

Electricity Networks  
Corporation  
(t/a Western Power)

Electricity Distribution  
Licence (EDL 1)

Performance Audit Report

January 2013

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## Acronym List

<b>Acronym / Reference</b>	<b>Description</b>
AMRS	AMRS Pty Ltd
AS/NZS 31000:2009	Australian/New Zealand Standard 31000-2009 Risk Management
Audit Guidelines	Authority's Audit Guidelines: Electricity, Gas and Water Licences (August 2010)
Authority	Economic Regulation Authority
B2B	Business to Business
Breach Register	Register of Compliance Contraventions
CBD	Central Business District
CFO	Connection Field Officers
CoC	Code of Conduct for the Supply of Electricity to Small Use Customers 2010 (WA)
Compliance Manual	Electricity Reporting Compliance Manual (May 2011)
CSR	Customer Service Representative
CT	Current Transformer
CTR	Customer Transfer Request

<b>Acronym / Reference</b>	<b>Description</b>
Compliance Register	Register of Licence Conditions Listing Reporting Type, Risk Rating and Internal Controls for Each Obligation
Customer Transfer Code	Electricity Industry Customer Transfer Code 2004 (WA)
DFIS	Distribution Field Information System
DFMS	Distribution Facilities Management System
DM	Western Power's document management system
ELIS	Electrical Licensing and Inspection System
ENMAC	Electrical Network Management and Control
EOPS	Extended Outage Payments Scheme
ERG	Emergency Response Generators
ETAC	Electricity Transfer Access Contract
HV	High Voltage
IMO	Independent Market Operator
LS	Life Support
MDV	Meter Data Verification
MBS	Metering Business System
Metering Code	Electricity Industry Metering Code 2005 (WA)
NetCIS	Customer Information System
NMI	National Metering Identifier
SCADA	Supervisory Control and Data Acquisition
SLA	Service Level Agreement

<b>Acronym / Reference</b>	<b>Description</b>
SPIDAWEB	Geographical Information System
SWIS	South West Interconnected System
TCS	Trouble Call System
TLS	Transmission Lines System
TPMS	Transmission Protection Equipment System
TRIS	Transmission Plant Management System
UMI	Unique Market Identifier
VT	Voltage Transformer
WAER	Western Australian Electrical Requirements
WADCM	Western Australian Distribution Connection Manual

# 1. Introduction

## **Western Power Corporation Background**

The Electricity Networks Corporation – t/a Western Power (“Western Power”) operates the electricity grid within the South West Interconnected System (SWIS) and delivers power to more than 1.5 million people every day.

Since March 2006, Western Power has held an electricity distribution licence (“EDL1”) granted by the Economic Regulation Authority (the “Authority”). EDL1 provides Western Power with the legal right to distribute electricity to customers.

## **Audit Background**

Western Power’s distribution licence is subject to a number of obligations contained within the licence itself, the Electricity Industry Act 2004 (the “Act”) and regulatory obligations.

Section 13 of the Act requires Western Power to provide the Authority with a performance audit conducted by an independent expert approved by the Authority not less than once every 24 months from the grant of the licence (unless a shorter or longer period is approved by the Authority). The Authority approved Grant Thornton to conduct the performance audit for the period 1 May 2011 to 30 June 2012.

An audit plan was developed and approved by the Authority using a risk based approach to focus on key risk areas in accordance with the risk evaluation model, Australian/New Zealand Standard (“AS/NZS”) 31000:2009. Grant Thornton has assessed the controls and performance against those standards through a combination of interviews/enquiries, examination of documents and detailed testing.

The audit plan upon which the audit was completed was developed in accordance with ASAE 3000 and the Authority’s “Audit Guidelines: Electricity, Gas and Water Licences (August 2010)” (“Audit Guidelines”). The performance audit plan outlined the approach for the nature, timing and extent of the evidence-gathering procedures to be performed and the reasons for selecting them.

The performance audit was conducted in a manner consistent with Standards on Assurance Engagements (ASAE) 3500 “Performance Engagements” and the Authority’s Audit Guidelines.

Preliminary analysis was performed on the licensing framework for the electricity distribution licence to ascertain the performance and compliance audit requirements of Western Power and to determine the nature and extent of audit activity.

### **Culture of Compliance**

Our 2011 audit identified numerous areas where there was a scope to strengthen the systems, controls and procedures employed by Western Power to manage its compliance obligations. Improvements could have been made through better documentation and communication of responsibilities to process owners. Western Power’s approach for process and system improvements surrounding the compliance obligations was seen to be largely reactive and the identification of breaches relied primarily on audits and reviews conducted by external parties.

In the execution of the current audit, we have engaged with senior management as well as operational staff responsible for managing compliance with the Corporation’s licence obligations. This consultation has revealed a continuously improving awareness among Western Power’s representatives of their compliance mandates.

Our testing confirmed that appropriate policies, systems and processes have been introduced to address the issues identified and were being actively communicated throughout the organisation. This has manifested in improved documentation and records management to demonstrate compliance requirements.

The Corporation was given a reduced audit cycle timeline and our 2011 Performance Audit Report was released during the testing period for 2012. As a result, many of the non-compliance issues noted in this report relate to matters that have subsequently been addressed in accordance with our audit recommendations in 2011.

Western Power has yet to address a number of our recommendations as set out in Section 11, Detailed Findings. It is important that the Corporation continues to build upon its improving compliance attitude and ensures that the remedial actions implemented are systemised within the organisation’s broader operating framework.

## 2. Objective

The audit objective was to evaluate the adequacy and effectiveness of controls implemented by Western Power to fulfil its obligations in complying with the performance and quality standards referred to in the licence.

The audit focused on the systems and processes used to ensure compliance with the standards, outputs and outcomes required by the licence.

### **Link to Risk Assessment**

Our approach to adopt the (AS/NZS) 31000:2009 risk assessment framework ensured a consistent approach to determining areas of higher risk. This allowed a greater focus and depth of testing to provide sufficient assurance of compliance and effective control.

As part of the risk evaluation methodology to assess Western Power's ability to manage its risks, Grant Thornton considered the following components:

- control environment (corporate governance, organisation structure, assignment of authority and responsibility, documentation of policies and procedures, human resource practice, records management and compliance attitude);
- Western Power's risk assessment process (as demonstrated through the Compliance Register and Breach Register);
- information systems (e.g. MBS, ELIS, ENMAC, DFIS & NetCIS);
- control activities (authorisation, segregation of duties, physical controls and security); and
- monitoring of controls (management review, internal audit, external audit).

During the conduct of the audit, as evidence was gathered on the effectiveness of the controls and where risks were determined to be high, extensive compliance and substantive testing was performed to provide adequate assurance that no major breaches of the relevant licence condition had occurred during the audit period.

## 3. Scope

The performance audit covered Western Power's Distribution Licence, EDL1, for the 14 month period 1 May 2011 to 30 June 2012 and examined a total of 264 obligations from the Compliance Manual.

The time period over which the performance audit was conducted was from June 2012 to August 2012 which included planning, fieldwork, reporting and the presentation of results to Western Power management and the Authority.

The performance audit also included:

- A review of all items under the Section 32 Notice issued by the Authority;
- A review of the status of remedial actions relating to breaches reported in the 2011 Compliance Report;
- The status of management actions pertaining to Western Power's 2011 EDL1 Performance Report; and
- A review and evaluation of the areas which have been highlighted by the Authority under the "Our Approach and Methodology" section.

The key legislation governing the licensing of distributors of electricity is the Electricity Industry Act 2004. Where applicable, other regulatory requirements that supported the EDL1 conditions were examined. Specifically, the relevant sections of the following codes and regulations were examined as part of this performance audit:

- Code of Conduct for the Supply of Electricity to Small Use Customers 2010 (WA);
- Electricity Industry (Obligation to Connect) Regulations 2005 (WA);
- Electricity Industry (Network Quality and Reliability of Supply) Code 2005 (WA);
- Electricity Industry Metering Code 2005 (WA);
- Electricity Industry Customer Transfer Code 2004 (WA); and

- Electricity Industry (Customer Contracts) Regulations 2005 (WA).

It is important to emphasise that not all obligations in the Compliance Manual were applicable to Western Power and accordingly the audit did not evaluate the performance of Western Power's compliance with those obligations.

## 4. Inherent Limitations

Because of the inherent limitations of any internal control system it is possible that fraud, error, or non-compliance with laws and regulations may occur and not be detected.

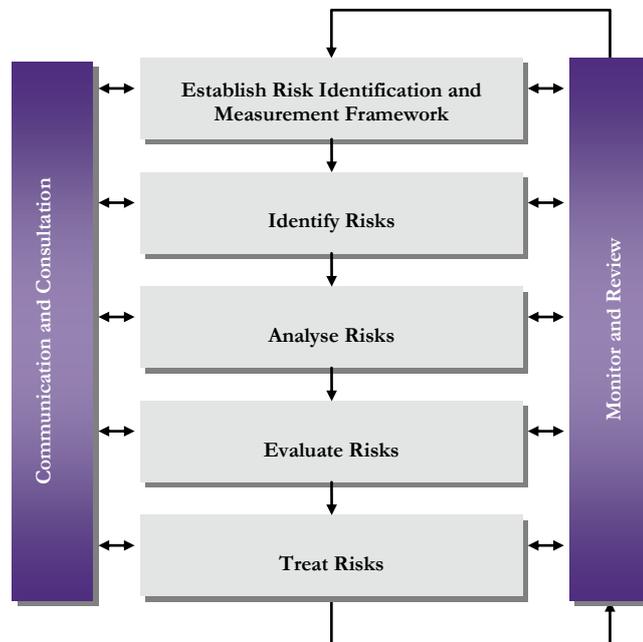
An audit is not designed to detect all weaknesses in control procedures as it is not performed continuously throughout the period and the tests performed are on a sample basis. Accordingly, readers of this report should not rely on this report to identify all potential instances of non-compliance which may occur.

Any projection of our evaluation of control procedures to future periods is subject to the risk that the procedures may become inadequate because of changes in conditions, or that the degree of compliance with them may deteriorate.

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

## 5. Our Approach and Methodology

In performing the performance audit of Western Power's electricity distribution licence, Grant Thornton adopted a risk based audit approach based on the AS/NZS 31000:2009 as illustrated in the diagram below.



### **Establishing the Context**

The Authority granted Western Power a distribution licence on 30 March 2006.

The key legislation that governs the licensing of distributors of electricity is the Electricity Industry Act 2004 and associated codes, regulations and licence obligations.

### **Risk Identification and Assessment**

Grant Thornton analysed each licence compliance element in terms of the inherent risk level, the rated controls and assigned the audit priorities based on the risk level and controls which management exercised over those risks.

Furthermore, we considered and adopted the Authority's Audit Guidelines in conducting the performance audit.

Our fieldwork involved extensive interviews and discussions with the process owner or delegated representative to obtain an understanding of the business environment and organisation structure. Through examination of documents, policies and procedures, we identified key controls. We have undertaken substantive testing to confirm the operational effectiveness of those controls.

The risk assessment was reviewed during the fieldwork of the audit and, where applicable, had been updated in accordance with the audit findings in the audit report.

The risk assessment rating for each compliance manual reference obligation was reviewed during the fieldwork of the audit and, where applicable, was updated in accordance with the audit findings in this report.

### **Risk Evaluation**

Risk evaluation for Western Power involved Grant Thornton assessing compliance with the requirements of the licence by examining:

- The design effectiveness of the controls through the evaluation of the:
  - control environment;
  - information system;
  - control procedures; and
  - compliance attitude of management.
  
- The operating effectiveness of controls throughout the period.
  - Tests of operating effectiveness were concerned with how the controls were applied at relevant times during the period under audit, the consistency with which they were applied and by whom or by what means they were applied. The focus was on

the systems and effectiveness of processes employed to ensure compliance with the standards, outputs and outcomes required by the licence obligation.

In accordance with the Authority's Audit Guidelines, the following compliance rating scale measuring the extent of Western Power's compliance with the applicable licence obligations was employed.

<b>Compliance Status</b>	<b>Rating</b>	<b>Description of Compliance</b>
<b>Compliant</b>	5	Compliant with no further action required to maintain compliance.
<b>Compliant</b>	4	Compliant apart from minor or immaterial recommendations to improve the strength of internal controls to maintain compliance.
<b>Compliant</b>	3	Compliant with major or material recommendations to improve the strength of internal controls to maintain compliance.
<b>Non-compliant</b>	2	Does not meet minimum requirements.
<b>Significantly Non-compliant</b>	1	Significant weaknesses and/or serious action required.
<b>Not Applicable</b>	N/A	Determined that the compliance obligation does not apply to the licensee's business operations.
<b>Not Rated</b>	N/R	No relevant activity took place during the audit period therefore, it is not possible to assess compliance.

### **Risk Treatment**

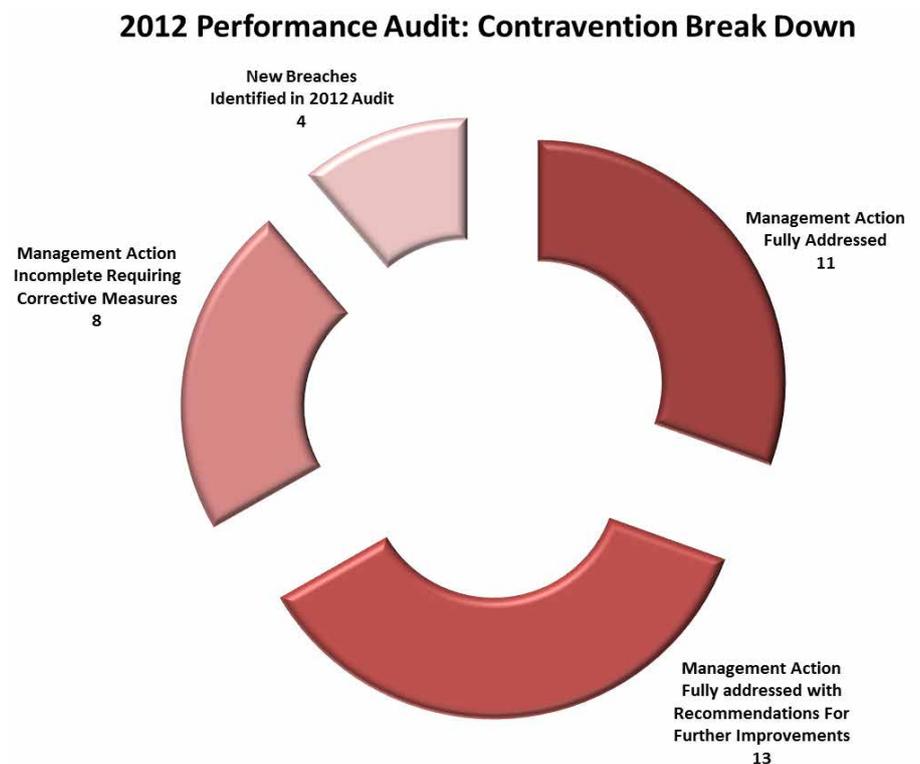
If a control risk is identified, which in the Auditor's professional judgement, left untreated, could cause Western Power to become non-compliant with its obligation under the licence, Grant Thornton has provided recommendations to mitigate the risk to an appropriately low level. The treatment of risks either involves reducing the likelihood of the risk materialising or mitigating the impact of the risk.

## 6. Audit Team members and Hours Utilised in the Execution of the Audit

<b>Team Members</b>	<b>Hours</b>
Cam Ansell, Engagement Partner	52
Rudi James, Manager	253
Henry Vu, Senior Consultant	90
Kundai Mtsambiwa, Consultant	160
Daniel Lee, Consultant	160
Michele Reis, Consultant	45
Simon Ainger, Consultant	45
<b>Total</b>	<b>805</b>

## 7. Summary of Non-Compliances

The following graph illustrates the breach profile of Western Power for those areas identified during the audit period which required corrective measures.



Western Power had begun implementing remedial actions to correct contraventions detailed in the 2011 Performance Audit Report. However, as the management actions timelines fell within the shortened audit period, not all of the 46 contraventions identified in the 2011 report were able to be fully addressed. Consequently, 32 of the 36 non-compliances detected during the 2012 audit were the same as those detailed in the 2011 report.

During the 2012 audit scope period Western Power was observed to have implemented a range of corrective measures that enabled the facilitation of compliance to its licence obligations. Further, details for those contraventions identified as requiring further

improvements or remedial actions can be referred to within the *Detailed Findings – Compliance Elements Which Require Corrective Measures* section of this report.

Table 1 represents the manual reference obligations that relate to the 4 categories of Western Power’s 2012 Performance Audit: Contravention Break Down summary.

**Key:**

<b>Font in black</b>	Refer to 2011 Electricity Compliance Reporting Manual
<b>Font in blue</b>	Refer to 2010 Electricity Compliance Reporting Manual

**Table 1– Contravention Summary Table**

Obligations	Manual Reference Obligation	Management Action Fully Addressed	Management Action Fully Addressed with Recommendations For Further Improvements	Management Action Incomplete Requiring Corrective Measures	New Breach Identified in 2012 Audit
Electricity Industry Customer Transfer Code clause 4.13	41 41				✓
Electricity Industry Customer Transfer Code Annex 4 clause A4.1	63 63				✓
Electricity Industry (Obligation to Connect) Regulations regulation 6	75 75	✓			
Electricity Industry (Obligation to Connect) Regulations regulation 8	77 77	✓			
Code of Conduct clause 7.6	235 221		✓		
Code of Conduct clause 7.7(2)	237 223		✓		
Code of Conduct clause 8.2	240 226		✓		
Code of Conduct clause 12.1(3)	297 284				✓
Code of Conduct clause 13.8(1)	309 296	✓			

Obligations	Manual Reference Obligation	Management Action Fully Addressed	Management Action Fully Addressed with Recommendations For Further Improvements	Management Action Incomplete Requiring Corrective Measures	New Breach Identified in 2012 Audit
Code of Conduct clause 13.8(2)	310 <a href="#">297</a>		✓		
Code of Conduct clause 13.10(1)	312 <a href="#">299</a>		✓		
Code of Conduct clause 13.14	317 <a href="#">304</a>		✓		
Code of Conduct clause 13.15(1)	318 <a href="#">305</a>		✓		
Code of Conduct clause 14.4(1)	326 <a href="#">313</a>		✓		
Electricity Industry Metering Code clause 3.5(6)	339 <a href="#">326</a>	✓			
Electricity Industry Metering Code clause 3.11(1)	347 <a href="#">334</a>		✓		
Electricity Industry Metering Code clause 3.16(3)	360 <a href="#">347</a>			✓	
Electricity Industry Metering Code clause 3.16(5)	361 <a href="#">348</a>			✓	
Electricity Industry Metering Code clause 3.16(6)	362 <a href="#">349</a>			✓	
Electricity Industry Metering Code clause 3.18(1)	363 <a href="#">350</a>		✓		
Electricity Industry Metering Code clause 3.21(1)	366 <a href="#">353</a>			✓	
Electricity Industry Metering Code clause 4.8(4)	386 <a href="#">373</a>	✓			

Obligations	Manual Reference Obligation	Management Action Fully Addressed	Management Action Fully Addressed with Recommendations For Further Improvements	Management Action Incomplete Requiring Corrective Measures	New Breach Identified in 2012 Audit
Electricity Industry Metering Code clause 4.8(5)	387 374	✓			
Electricity Industry Metering Code clause 5.3	391 378			✓	
Electricity Industry Metering Code clause 5.6(1)	396 383	✓			
Electricity Industry Metering Code clause 5.10	400 387				✓
Electricity Industry Metering Code clause 5.12(1)	402 389	✓			
Electricity Industry Metering Code clause 5.21(8)	422 409			✓	
Electricity Industry Metering Code clause 5.22(1)	426 413	✓			
Electricity Industry Metering Code clause 5.22(2)	427 414	✓			
Electricity Industry Metering Code clause 5.31(1)	442 429			✓	
Electricity Industry Metering Code clause 5.31(2)	443 430			✓	
Electricity Industry Metering Code clause 6.1(1)	445 432		✓		
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 13(2)	465 452		✓		
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 18	469 456	✓			

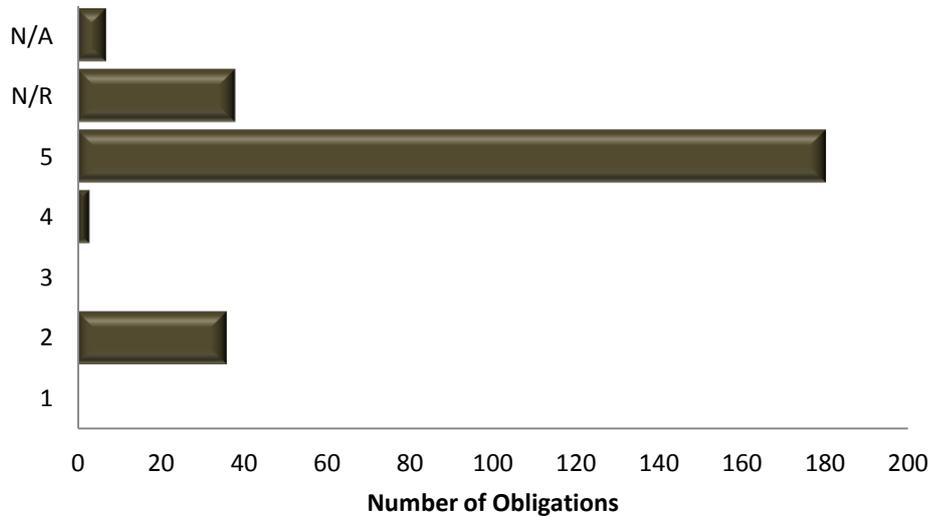
Obligations	Manual Reference Obligation	Management Action Fully Addressed	Management Action Fully Addressed with Recommendations For Further Improvements	Management Action Incomplete Requiring Corrective Measures	New Breach Identified in 2012 Audit
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 19	470 457		✓		

## 8. Overall Compliance Summary

The performance audit covers Western Power's EDL 1, for the 14 month period 1 May 2011 to 30 June 2012 and tested a total of 264 licence obligations.

The following illustrates the compliance profile of Western Power.

**Graph 1 – Western Power's Compliance Summary**



<b>Compliance Rating Scale</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>N/R</b>	<b>N/A</b>
<b>Number of Obligations</b>	0	36	0	3	180	38	7











Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Code clause 6.6													
Electricity Industry Customer Transfer Code clause 7.1(1)	55 55	Unlikely	Minor	Low	Strong								✓
Electricity Industry Customer Transfer Code clause 7.1(2)	56 56	Unlikely	Minor	Low	Strong								✓
Electricity Industry Customer Transfer Code clause 7.1(3)	57 57	Unlikely	Moderate	Medium	Strong								✓
Electricity Industry Customer Transfer Code clause 7.2(4)	58 58	Unlikely	Minor	Low	Strong								✓
Electricity Industry Customer Transfer Code clause 7.3(2)	59 59	Unlikely	Minor	Low	Strong								✓
Electricity Industry Customer Transfer Code Annex 1	60 60	Unlikely	Moderate	Medium	Strong							✓	
Electricity Industry Customer Transfer Code Annex 2	61 61	Unlikely	Moderate	Medium	Strong							✓	



Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
6 clause A6.2(a)													
Electricity Industry Customer Transfer Code Annex 6 clause A6.2(b)	69 69	Unlikely	Moderate	Medium	Strong								✓
Electricity Industry Customer Transfer Code Annex 6 clause A6.6	70 70	Unlikely	Minor	Low	Strong								✓
Electricity Industry Customer Transfer Code Annex 6 clause A6.7	71 71	Unlikely	Minor	Low	Strong								✓
Electricity Industry (Obligation to Connect) Regulations regulation 4	72 72	Likely	Moderate	High	Moderate								✓
Electricity Industry (Obligation to Connect) Regulations regulation 5(5)	73 73	Unlikely	Moderate	Medium	Strong								✓
Electricity Industry (Obligation to Connect) Regulations regulation 5(6)	74 74	Unlikely	Moderate	Medium	Strong								✓

Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Electricity Industry (Obligation to Connect) Regulations regulation 6	75 75	Likely	Moderate	High	Moderate		✓						
Electricity Industry (Obligation to Connect) Regulations regulation 7(1)	76 76	Likely	Moderate	High	Moderate						✓		
Electricity Industry (Obligation to Connect) Regulations regulation 8	77 77	Likely	Moderate	High	Moderate		✓						
Electricity Industry (Customer Contracts) Regulations 2005 regulation 36	99	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Act section 13(1)	101 81	Unlikely	Minor	Low	Strong						✓		
Electricity Industry Act section 14(1)(a)	102 82	Unlikely	Minor	Low	Strong						✓		
Electricity Industry Act section 14(1)(b)	103 83	Unlikely	Moderate	Medium	Strong							✓	
Electricity Industry Act section 14(1)(c)	104 84	Unlikely	Minor	Low	Strong						✓		



Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
n Licence condition 12.3 or 12.6													
Distribution Licence condition 12.1 Transmission Licence condition 12.1	119 105	Unlikely	Moderate	Medium	Strong								✓
Distribution Licence condition 13.4 Transmission Licence condition 13.4	120 106	Unlikely	Moderate	Medium	Strong								✓
Distribution Licence condition 14.2 Transmission Licence condition 14.2	121 107	Unlikely	Moderate	Medium	Strong								✓
Distribution Licence condition 20.5 Transmission Licence condition 20.5	122 108	Unlikely	Moderate	Medium	Strong								✓
Distribution Licence condition 15.1 Transmission Licence condition 15.1	123 109	Unlikely	Moderate	Medium	Strong								✓



Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable , C=Unlikely)	Consequence  (1=Minor, 2=Moderate, 3=Major)	Inherent Risk  (Low, Medium, High)	Adequacy of Existing Controls  (S=Strong, M=Moderate , W=Weak)	Compliance Rating								
						1	2	3	4	5	N / R	N / A		
Code of Conduct clause 8.3(1)	241 <a href="#">227</a>	Unlikely	Major	Medium	Strong								✓	
Code of Conduct clause 8.3(2)	242 <a href="#">228</a>	Unlikely	Major	Medium	Strong								✓	
Code of Conduct clause 9.2(2)	243 <a href="#">229</a>	Unlikely	Moderate	Medium	Strong							✓		
Code of Conduct clause 9.5(4)	249 <a href="#">235</a>	Unlikely	Moderate	Medium	Strong								✓	
Code of Conduct clause 9.6(3)	253 <a href="#">239</a>	Unlikely	Major	High	Strong								✓	
Code of Conduct clause 9.10(2)	258 <a href="#">244</a>	Unlikely	Moderate	Low	Strong								✓	
Code of Conduct clause 10.6	280 <a href="#">266</a>	Unlikely	Moderate	Low	Strong							✓		
Code of Conduct clause 10.7(1)	281 <a href="#">267</a>	Unlikely	Moderate	Medium	Strong							✓		
Code of Conduct clause 10.7(2)	282 <a href="#">268</a>	Unlikely	Moderate	Medium	Strong							✓		
Code of Conduct clause 10.7(3)	283 <a href="#">269</a>	Unlikely	Moderate	Medium	Strong							✓		















Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Code clause 3.16(2)													
Electricity Industry Metering Code clause 3.16(3)	360 347	Likely	Moderate	High	Moderate		✓						
Electricity Industry Metering Code clause 3.16(5)	361 348	Probable	Moderate	Medium	Strong		✓						
Electricity Industry Metering Code clause 3.16(6)	362 349	Probable	Moderate	Medium	Strong		✓						
Electricity Industry Metering Code clause 3.18(1)	363 350	Probable	Moderate	Medium	Strong		✓						
Electricity Industry Metering Code clause 3.20(1)	364 351	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Metering Code clause 3.20(3)	365 352	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Metering Code clause 3.21(1)	366 353	Probable	Moderate	Medium	Strong		✓						
Electricity Industry Metering Code clause 3.21(2)	367 354	Unlikely	Moderate	Medium	Strong						✓		





Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Electricity Industry Metering Code clause 4.8(4)	386 373	Unlikely	Moderate	Medium	Strong		✓						
Electricity Industry Metering Code clause 4.8(5)	387 374	Unlikely	Moderate	Medium	Strong		✓						
Electricity Industry Metering Code clause 4.9	388 375	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.1 (1)	389 376	Unlikely	Minor	Low	Strong					✓			
Electricity Industry Metering Code clause 5.1(2)	390 377	Unlikely	Minor	Low	Strong					✓			
Electricity Industry Metering Code clause 5.3	391 378	Probable	Moderate	Medium	Moderate		✓						
Electricity Industry Metering Code clause 5.4(1)	392 379	Unlikely	Minor	Low	Strong					✓			
Electricity Industry Metering Code clause 5.5(2)	394 381	Unlikely	Moderate	Medium	Strong					✓			

Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Electricity Industry Metering Code clause 5.6(1)	396 <a href="#">383</a>	Probable	Moderate	Medium	Moderate		✓						
Electricity Industry Metering Code clause 5.7	397 <a href="#">384</a>	Probable	Moderate	Medium	Moderate					✓			
Electricity Industry Metering Code clause 5.8	398 <a href="#">385</a>	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.9	399 <a href="#">386</a>	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.10	400 <a href="#">387</a>	Unlikely	Moderate	Medium	Strong		✓						
Electricity Industry Metering Code clause 5.11	401 <a href="#">388</a>	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.12(1)	402 <a href="#">389</a>	Probable	Moderate	Medium	Strong		✓						
Electricity Industry Metering Code clause 5.13	403 <a href="#">390</a>	Unlikely	Moderate	Medium	Strong					✓			



Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Code clause 5.21(8)													
Electricity Industry Metering Code clause 5.21(9)	423 410	Unlikely	Moderate	Medium	Strong							✓	
Electricity Industry Metering Code clause 5.21(11)	424 411	Unlikely	Moderate	Medium	Strong							✓	
Electricity Industry Metering Code clause 5.21(12)	425 412	Unlikely	Moderate	Medium	Strong								✓
Electricity Industry Metering Code clause 5.22(1)	426 413	Probable	Moderate	Medium	Moderate		✓						
Electricity Industry Metering Code clause 5.22(2)	427 414	Probable	Moderate	Medium	Strong		✓						
Electricity Industry Metering Code clause 5.22(3)	428 415	Unlikely	Moderate	Medium	Strong							✓	
Electricity Industry Metering Code clause 5.22(4)	429 416	Unlikely	Moderate	Medium	Strong							✓	
Electricity Industry Metering Code clause 5.22(5)	430 417	Unlikely	Moderate	Medium	Strong							✓	









Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Supply) Code 2005 clause 13(3)													
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 14(8)	467 454	Unlikely	Moderate	Medium	Strong								✓
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 15(2)	468 455	Unlikely	Moderate	Medium	Strong								✓
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 18	469 456	Probable	Moderate	Medium	Strong		✓						
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 19	470 457	Likely	Moderate	High	Moderate			✓					
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 21(1)	471 458	Unlikely	Moderate	Medium	Strong							✓	





Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Electricity Industry Act section 62, 64 and 65	488 90 & 91	Unlikely	Moderate	Low	Strong							✓	
Electricity Industry Act section 65	489 92	Unlikely	Moderate	Low	Strong							✓	
Electricity Industry Act section 11	490	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Act 11	491	Unlikely	Moderate	Medium	Strong							✓	

## 9. Review of Status of Management Actions for previous Audit Report

Western Power's last performance audit of compliance with its EDL1 was conducted in 2011. Our review revealed that there were previous audit findings from the 2011 audit which had not been addressed or had been found to be non-compliant within the current audit. These observations are further discussed in the Detailed Findings Section of the report.

Electricity Industry Customer Transfer Code - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
<b>Electricity Industry Customer Transfer Code clause 7.1(1)</b>	For a dispute in respect of a matter under or in connection with the Electricity Industry Customer Transfer Code, any disputing party must meet within five business days of a request from another disputing party and attempt to resolve the dispute by negotiations in good faith.	That Western Power develops a dispute resolution framework and ensures that it be communicated across the various Branches directly involved with all retailers.	Western Power will develop and implement a documented dispute resolution procedure.	The dispute procedure has been developed and agreed to by the Metering Account Managers, and published to major customers.  The recommendation and the management action have been addressed.
<b>Electricity Industry Customer Transfer Code clause 7.1(2)</b>	If the negotiations in 7.1(1) of the Electricity Industry Customer Transfer Code do not resolve the dispute within 10 days after the first meeting, the dispute must be referred to the senior executive officer of each disputing party who must attempt to resolve the dispute by negotiations in good faith.			

Electricity Industry Customer Transfer Code - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
Electricity Industry Customer Transfer Code clause 7.1(3)	If the dispute is resolved, the disputing parties must prepare a written and signed record of the resolution and adhere to the resolution.	That Western Power develops a dispute resolution framework and ensures that it be communicated across the various Branches directly involved with all retailers.	Western Power will develop and implement a documented dispute resolution procedure.	<p>The dispute procedure has been developed and agreed to by the Metering Account Managers, and published to major customers. Sampling and discussions revealed that during this audit period, there were no disputes relating to the Transfer Code.</p> <p>The recommendation and the management action have been addressed.</p>
Electricity Industry Customer Transfer Code clause 7.2(4)	A disputing party that refers a dispute to the Authority must give notice to the Authority of the nature of the dispute, including specified details.			
Electricity Industry Customer Transfer Code clause 7.3(2)	A disputing party must at all times conduct itself in a manner which is directed towards achieving the objectives in clause 7.3(1) of the Electricity Industry Customer Transfer Code.			

Electricity (Obligation to Connect) Regulations - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
<p><b>Electricity Industry (Obligation to Connect) Regulations, regulation 6</b></p>	<p>A distributor that is obliged to attach or connect premises to the distribution system under regulation 4 of the Electricity Industry (Obligation to Connect) Regulations must do so within a defined timeframe.</p>	<p>That Western Power establishes processes to effectively manage the attachment and connection of premises within the defined timeframes</p>	<p>This existing process has undergone a thorough analysis and identified an improvement opportunity. The revised process will be implemented on 01/09/2011.</p>	<p>Walkthrough of the revised processes revealed that the initial revised process suggested that a verbal recording of the agreement between the Corporation and the customer of a revised date sufficed as evidence. However, the Corporation reviewed this approach and made further changes to ensure that a written agreement from the customer is obtained. The customer is now sent a pro-forma with revised attach or connect dates. Once completed the customer is required to send it back to Western Power. The document is retained as documented evidence. If a written agreement is not received, the Corporation endeavours to undertake the work within the prescribed timeframe. If this is not achieved then the Corporation indicated that it will report its performance in accordance with the reporting requirements. This was implemented in April 2012.</p> <p>Whilst the recommendation and management actions were closed by the Corporation, the inability to</p>

				substantiation a written agreement contributed to the organisation not complying with this obligation. Refer to the Detailed Findings section 11.
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## Electricity (Obligation to Connect) Regulations - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
<b>Electricity Industry (Obligation to Connect) Regulations regulation 7(1)</b>  <b>Electricity Industry (Obligation to Connect) Regulations, regulation 8</b>	<p>A distributor must energise premises in certain prescribed circumstances.</p> <p>A distributor that is obliged to energise premises must do so within a defined timetable.</p>	<p>That Western Power review and revise their current timetable set up for energising a premises, specifically:</p> <ol style="list-style-type: none"> <li>Facilitate discussions with retailers on how to manage the application for energising a premises; and</li> <li>Reconfigure the system such that the timetable for energising a premise commences when a retailer sends an application.</li> </ol>	<ol style="list-style-type: none"> <li>Review the existing process to ensure accurate recording and reporting of energisations.</li> </ol>	<p>Review of the Regulations revealed that Western Power cannot energise a premise upon a retailer's request but may do so upon receipt of a notice of completion from a qualified electrician as per regulations 51 and 52 of the Electricity Licensing Regulations 1991.</p> <p>Sampling of energisations confirmed that Western Power energised a premise in accordance with Electricity Licensing Regulations 1991.</p> <p>The recommendation and management action have been addressed.</p>
			<ol style="list-style-type: none"> <li>Implement new process.</li> </ol>	<p>Revised processes for the management of urgent reconnections have been established to facilitate the recording and reporting of urgent reconnections</p> <p>The recommendation and management action have been addressed.</p>

## Code of Conduct - Type 1 Obligations

Source	Obligation	Recommendation	Management Action	Observation
<b>Code of Conduct, clause 7.6</b>	A retailer or distributor must not arrange for disconnections or disconnect a customer's supply address in the circumstances specified, subject to the exception specified.	1. That Western Power negotiates with AMRS to introduce a time limit provision on disconnection in the contract; and	1. Western Power has reinforced with all service providers and its own data entry staff the requirement to complete any disconnection work within the prescribed timeframes and to ensure completion times are entered correctly.	Our fieldwork determined that Western Power has implemented a revised process that limits disconnections for non-payment within the AMRS Contract.  Whilst this recommendation and management action have been addressed, sample based testing revealed instances where disconnections had occurred outside of the prescribed timeframes. Refer to Detailed Findings section 11.
		2. That Western Power request AMRS to accurately record the disconnection time. A regular cycle of internal review of disconnection times should be undertaken.	2. Further process improvements such as the introduction of field based technology will enable real time transfer of the disconnection completion time to the Metering Branch.	Review of communications between AMRS and Western Power confirmed the requirement imposed on AMRS to accurately record disconnection times.  Western Power was observed to implement a number of initiatives restricting disconnections activities. Field officers are required to obtain an authorisation code from the Metering Services Branch prior to proceeding with a disconnection for those disconnections that occur between the established internal guidelines.

				<p>Whilst the management action had been addressed, sample based testing and review of reports provided to the Authority identified instances where disconnections had occurred outside of the prescribed timeframes prior to the implementation of the revised process. Refer to Detailed Findings Section 11.</p> <p>Western Power has introduced field based technology within the metropolitan area, however due to technological constraints, the PDAs had not been rolled out into the regional areas.</p> <p>Walkthrough of Western Power's revised processes confirmed the implementation of the internal review process. Observation of reports substantiated that reviews had been conducted.</p>
Code of Conduct, clause 7.6	(Cont'd)	3. That Western Power reinforce the requirement to line crews for disconnecting a premises within the prescribed times; and	3. Six-monthly audits of disconnection works will be introduced. The first of these audits will be performed by the end of November 2011.	<p>Copies of the six monthly audit reports were sighted and copies obtained. The April 2012 audit cycle was observed to be delayed. Management provided that this was attributed to the planning of a Type 1 Compliance Framework audit. The review was postponed as a result of discussions between the Authority and Western Power and the scheduled review was concluded in</p>

				<p>May 2012.</p> <p>Western Power developed compliance related information and was observed to have communicated the material throughout the business, with a strong focus on type 1 obligations. The management action has been implemented.</p>
<p><b>Code of Conduct, clause 7.6</b></p>	<p>(Cont'd)</p>	<p>4. Western Power should develop and implement exception based reporting to detect the timing of the disconnections.</p>	<p>4. Performance agreements for staff responsible for managing disconnections and their direct manager will include key performance indicators specifically relating to compliance with this obligation.</p>	<p>A process has been implemented for the monitoring of disconnections. Performance agreements have also be established in relation to this obligation Observations of the performance agreements confirmed the inclusion of key performance indicators.</p> <p>The recommendation and management action have been addressed.</p>

## Code of Conduct - Type 1 Obligations

Source	Obligation	Recommendation	Management Action	Observation
Code of Conduct, clause 7.7(2)	A distributor must undertake the actions specified in circumstances where the distributor has been informed by a retailer or a relevant government agency that a person residing at a customer's supply address requires life support equipment.	That Western Power: <ol style="list-style-type: none"> <li>Undertake a daily reconciliation of the life support customers supplied by Synergy with the Sensitive Customer inbox to the TCS.</li> <li>Introduce to have a secondary authorisation prior to removing the Life Support flag from a life support customer's account.</li> </ol>	<ol style="list-style-type: none"> <li>The NWI-99 Processing Sensitive Customer Requests procedure is revised to change the mechanism recording Life Support Customers;</li> </ol>	<p>Review of the NWI-99 confirmed that the policy had been updated to capture the revised mechanism for recording life support customers.</p> <p>Western Power had implemented a daily reconciliation process between emails received (Sensitive Customer inbox) and those customers captured in TCS/ENMAC. Western Power also developed an automated functionality (with a minor reliance on manual intervention) whereby the file received from Synergy is transferred to TCS/ENMAC.</p> <p>We performed a reconciliation of the complete list of registered supply addresses with customers requiring life support equipment and supply addresses maintained within TCS/ENMAC. No exceptions were identified at the time of our interrogation.</p> <p>The recommendation and management action have been addressed.</p>

<b>Code of Conduct, clause 7.7(2)</b>	(Cont'd)	(Cont'd)	<p>2. Performance agreements for staff responsible for maintaining the life support equipment list and their direct manager will include key performance indicators specifically relating to compliance with this obligation; and</p>	<p>Performance agreements have been implemented with staff responsible for maintaining sensitive load customer lists. We obtained a copy of the performance reports and confirmed the inclusion of the KPIs.</p> <p>This management action has been addressed.</p>
<b>Code of Conduct, clause 7.7(2)</b>	(Cont'd)	(Cont'd)	<p>3. Six-monthly audits of the effectiveness of the life support procedures are conducted commencing at the end of September 2011. This will be coordinated by the Risk &amp; Compliance branch.</p>	<p>Copies of the six monthly audit reports have been obtained. The April 2012 audit cycle was delayed due to the planning of an audit of the Type 1 Compliance Framework. As a result of further discussion between the Authority and Western Power, this review was postponed and the scheduled effectiveness review was concluded in May 2012.</p> <p>Western Power was observed to have developed correspondence that has been communicated throughout its business of the type 1 obligations including when a disconnection for non-payments was not permitted. This management action has been implemented.</p>

Code of Conduct - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
<b>Code of Conduct clause 8.2</b>	A distributor must reconnect the customer's supply address upon the request of a retailer, within the timeframes specified.	<ol style="list-style-type: none"> <li>1. Establish processes for managing and recording urgent reconnections accurately;</li> <li>2. Revise the current reconnections reports such that it captures the time at which the field officer completes the job for the particular reporting period; and</li> <li>3. Coordinate and manage the reconnection requests workflow with the retailer.</li> </ol>	<ol style="list-style-type: none"> <li>1. Review the existing process to ensure accurate recording and reporting of re-connections; and</li> </ol>	<p>A revised process for the recording and reporting of urgent reconnections has been implemented to facilitate the accurate capturing and recording of urgent re-energisations.</p> <p>Recommendation 1 and management action has been addressed.</p> <p>Reconnection reports are compiled at the end of each month. Whilst the cut-off date is end of month, Western Power collates the reconnection data within the first week of each month. This facilitated the recording of the jobs processed within the correct period. As the Record Keeping Report is required to be provided to the Authority by September of each year, this approach was not observed to adversely impact the accuracy and completeness of this report.</p> <p>Recommendation 2 and management action has been addressed.</p>

Code of Conduct - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
			Implement the revised process.	<p>Sample based testing confirmed that the revised process has been implemented.</p> <p>Further, review of correspondence between Western Power and the retailer confirmed a review of the urgent re-energisation workflow to assist the urgent re-energisation process.</p> <p>Recommendation 3 and management action 2 have been addressed.</p>

## Code of Conduct - Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
Code of Conduct clause 13.8(1)	A distributor must keep a record of the total number of connections provided and connections not provided on or before the agreed date.	1. Retain a record of the written agreement against the request for a connection by the customer; and	1. Review the existing process to ensure accurate recording and reporting of energisations.	<p>In regards to recommendation 1, Western Power revised its process for monitoring the recording and reporting of connections. Management action 1 has been addressed.</p> <p>Western Power did not agree to recommendation 2 due to the requirements of regulations 50 and 51 of the Electricity Licencing Regulations.</p> <p>Further, where a customer agreed to a revised date, a record was observed to have been retained within the customer's account. However, the notice is used as a negative confirmation as opposed to a positive confirmation from the customer. In the instance that a notice has been provided, the customer is counted as a statistic for the purposes of total number of connections provide on or before an agreed date.</p>
		2. Reconfigure the system such that the timetable for energising a premise commences when a retailer sends an application for energising a premises.	2. Implement the revised process.	

## Code of Conduct - Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
<b>Code of Conduct clause 13.8(2)</b>	A distributor must keep a record of the total number of reconnections provided other than those specified and the total number of those reconnections not provided within the prescribed timeframe.	<ol style="list-style-type: none"> <li>1. Establish processes for managing and recording urgent reconnections accurately;</li> <li>2. Revise the current reconnections reports such that it captures the time at which the field officer completes the job for the particular reporting period; and</li> <li>3. Coordinate and manage the reconnection requests workflow with the retailer.</li> </ol>	1. Review the existing process to ensure accurate recording and reporting of re-energisations.	<p>Western Power established a revised process to facilitate the accurate capturing and recording urgent re-energisations. Sample based testing of communications between the retailer and Western Power's report did not reveal any exceptions.</p> <p>The recommendation and management action have been addressed.</p>
			2. Implement the revised process.	<p>Sample based testing of records pertaining to reconnections confirmed Western Power has separated the recording of urgent re-energisations.</p> <p>The recommendation and management action have been addressed.</p>

Code of Conduct - Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
				<p>Evidence has been obtained to substantiate that Western Power has engaged the retailer in the re-design of the work flow and communication of urgent re-energisations requirements.</p> <p>This recommendation has been addressed.</p>
<b>Code of Conduct clause 13.10(1)</b>	A distributor must keep a record of the customer complaint indicators specified.	That Western Power ensure those customer contacts relating to Extended Outage Payments are classified where appropriate and recorded accurately in accordance with the definition of a complaint as prescribed in the Code of Conduct.	No further action required.	<p>Whilst no further action was determined by Western Power, the Corporation revised its processes and our sample based testing confirmed that complaint indicators relating to EOPs are now in existence. Discussions with Customer Assist revealed that training and instructions had been provided to Western Power staff with respect of the complaints handling process and requirement to capture EOPs related complaints.</p> <p>The recommendation and management action have been addressed.</p>

Code of Conduct - Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
<b>Code of Conduct clause 13.10(2)</b>	A distributor must keep a copy of each customer complaint referred to in clause 13.10(1).	That Western Power ensures complaints relating to Extended Outage Payments are classified where appropriate and recorded accurately in accordance with the definition of a complaint as prescribed in the Code of Conduct.	1. Enhance its Complaints Handling Manual to reinforce the difference between a 'claim' contact and a complaint; and	Review of Western Power's training material confirmed that a complaint is to be recorded in accordance with the National Standards.  The recommendation and management action have been addressed.
			2. Provide additional training to staff to clearly distinguish between a complaint and a claim with regards to EOPs.	A copy of the training material provided to staff identifying a complaint versus a query was obtained. Discussions with staff charged with the responsibility for managing EOPs confirmed the delivery of training and the requirement to capture a complaint versus a query.

Code of Conduct - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
<b>Code of Conduct clause 13.11</b>	A distributor must keep a record of the total number of compensation payments made under clause 14.4.	Western Power undertakes validation checks for the accuracy of the total number of compensation payments under clause 14.4 of the Code of Conduct.	NetCIS reporting which will include the total number of compensation payments made under clause 14.4 of the Code of Conduct for the Supply of Electricity to Small Use Customers will become the single source of truth. This will eliminate the need for spread sheet reconciliation.	<p>Western Power was observed to have revised its management action and draws compensation payments related information from reports derived from its financial system (Ellipse).</p> <p>Validation checks were performed between the payment summary and the Ellipse report extract.</p> <p>The recommendation and management action have been addressed.</p>
<b>Code of Conduct clause 13.13</b>	A distributor must keep a record of the number of complaints relating to the installation and operation of a pre-payment meter at a pre-payment meter customer's supply address and the complaints information specified.	That Western Power establishes systems and processes for recording and monitoring the number of complaints relating to the installation and operation of pre-payment meters.	Western Power will ensure, for the purpose of annual reports, records of pre-payment meters are checked to capture any complaints made. As the number of pre-payment meter customers grows this process will be reviewed annually.	<p>A process has been established for the recording and monitoring of complaints relating to the installation of pre-payment meters.</p> <p>The recommendation and management action have been addressed.</p>

Code of Conduct - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
<b>Code of Conduct clause 13.14</b>	A distributor must keep a record of the total number of customers who are connected to its network.	That Western Power establishes processes for monitoring and reporting on the total number of customers who are connected to its network.	Western Power will implement a process for monitoring and reporting of the total number of customers connected to its network.	<p>Whilst Western Power has developed a checklist to monitor total number of customers connected to its network and the NMI as the statistic for capturing number of customers connected to its network, testing revealed that Western Power captured other distributors as their customers.</p> <p>As a result the 2010/2011 Record Keeping Report was determined to be inaccurate with respect to this matter.</p>
<b>Code of Conduct clause 13.15(1)</b>	A retailer and a distributor must prepare a report setting out the information required by Part 13 of the Code of Conduct, in respect of each year ending on 30 June. The report must be published no later than the following 1 October.	That Western Power undertakes a review of the reporting of the information required by Part 13 of the Code prior to publishing.	Western Power will create a checklist to ensure each requirement under Part 13 of the Code of Conduct for the Supply of Electricity to Small Use Customers is correctly reflected in its annual Record Keeping Report.	<p>We obtained a copy of the Checklist and our review of the document confirmed that the items required for annual reporting had been identified.</p> <p>The recommendation and management action have been addressed.</p>

Code of Conduct - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
<p><b>Code of Conduct clause 14.4(1)</b></p>	<p>A distributor must acknowledge and respond to a written query or complaint by a customer within the timeframes prescribed.</p>	<p>That Western Power consider implementing an automated system within the Customer Assist Branch to ensure that once a customer complaint has been recorded with the NetCIS system, the complaint is acknowledged and responded to within the prescribed timeframes.</p>	<p>From 1 March 2011 Western Power has updated its query &amp; complaints acknowledgement process to ensure that all written queries or complaints are acknowledged or responded to within the prescribed timeframes. No further remedial action required.</p> <p>Review of performance since implementation of the updated process indicates compliance performance levels in the high nineties with 100% compliance achieved in June 2011.</p>	<p>Sample based testing of complaint responsiveness revealed instances where written queries and complaints had not been acknowledged and responded to within the prescribed timeframe.</p> <p>Whilst Western Power had addressed the management action, the revised process implemented in June 2011 was determined to be ineffective.</p> <p>Western Power was observed to further revise its processes in April 2012 and since this date sample based testing did not reveal any exceptions.</p>

## Electricity Industry Metering Code - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
<b>Electricity Industry Metering Code clause 3.5(6)</b>	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.	<ol style="list-style-type: none"> <li>1. That Western Power review and update the current system set up of charges within MBS; and</li> <li>2. That a secondary review of the charges be undertaken by another Commercial Officer.</li> </ol>	<ol style="list-style-type: none"> <li>1. Western Power is in the process of negotiating a new SLA with Synergy which will include a cancellation fee provision based on the current in principle agreement.</li> </ol>	Discussions with Western Power revealed that the business is currently negotiating a revised SLA to capture the charges in accordance with the Metering Code. Review of MBS determined that the charges have not been amended. However, Synergy has provided Western Power an interim document detailing the acceptance of cancellation fees until further notice. The management action is partially complete as the negotiations were on-going post the provided completion date.
			<ol style="list-style-type: none"> <li>2. A secondary review of the charges will now be undertaken by another Commercial Officer before billing.</li> </ol>	A new workflow procedure has been developed and introduced that includes a secondary review prior to billing. However, sample based testing revealed that the Corporation could not substantiate that a secondary review had been undertaken. Western Power implemented a requirement for evidence of review to be maintained from April 2012 and since this date no exceptions had been noted. The recommendation and management action have been addressed.

## Electricity Industry Metering Code - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
<b>Electricity Industry Metering Code clause 3.11(1)</b>	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.	<ol style="list-style-type: none"> <li>Where feasible to program the MBS functionality to allow auto-substitution of interval data in accordance with the rules of the Metering Code; and</li> <li>Establish reports for monitoring the level of availability for instrument transformers and other components of the metering installation (99%) and metering installations that have communication links (95%).</li> </ol>	<ol style="list-style-type: none"> <li>Investigate the feasibility of MBS and MV90 functionality to allow auto substitution of interval data.</li> </ol>	<p>Western Power provided documentation to substantiate a feasibility study had been conducted and a business case approved for this scope of works.</p> <p>The recommendation and management action have been addressed.</p>
			<ol style="list-style-type: none"> <li>If feasible, implement the solution.</li> </ol>	<p>Whilst management identified that a solution was to be implemented by 31 March 2012. The functionality review was determined to be included in the MBS 6.5 upgrade scheduled to be implemented by June 2012. In this regard the management action had not been completed by the provided date.</p>
			<ol style="list-style-type: none"> <li>Enhance the current manual process to identify any missing data by establishing additional reporting from MBS.</li> </ol>	<p>Walkthrough of the process with the Metering Services staff revealed that the Corporation has developed monitoring reports. Review of the reports revealed that the availability of its metering installation was below the prescribed requirements.</p> <p>Refer to detail findings section 11.</p>

Electricity Industry Metering Code - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
Electricity Industry Metering Code clause 3.11(1)	(Cont'd)	(Cont'd)	4. Investigate the feasibility of establishing reports for monitoring the level of availability for instrument transformers and other components of the metering installation (99%) and metering installations that have communication links (95%); and	<p>A report has been identified for monitoring the availability for instrument transformers and other components of the metering installation (99%) and metering installation that do not have a communication link (95%).</p> <p>The report has been included in the Metering Regulatory Licence and Model SLA Compliance Reporting Project.</p> <p>The management action has been addressed.</p>
			5. If feasible, implement the solution.	<p>A monitoring report was established by the indicated date. However, sample based testing revealed that Western Power was unable to meet the minimum levels of availability of its metering installations on its network for the collection of data as prescribed within the Metering Code.</p>

## Electricity Industry Metering Code - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
<b>Electricity Industry Metering Code clause 3.16(3)</b>	<p>If a device is used as a data logger, the energy data for a metering point on the network must be collated in trading intervals within the metering installation unless it has been agreed between the network operator and the Code participant that energy data may be recorded in sub-multiples of a trading interval.</p>	<p>That Western Power establishes and formalises an agreement with Synergy such that energy data may be collected in 15 minute intervals.</p>	<p>Western Power met with Synergy on a number of occasions during the audit period to resolve the issue, but Synergy advised that it does not support Western Power collecting metering data in 15 minute intervals. Synergy are waiting for the Office of Energy to conclude its review of the Electricity Industry Metering Code with the understanding that this issue will be resolved on a regulatory level. Western Power presented the Office of Energy with a submission that would allow Western Power to record in sub intervals and publish in trading interval without retailer approval. Western Power received positive response to its submission.</p>	<p>Western Power's management action was to establish and formalise an agreement with the retailer. However as the trading interval sits within the Metering Code, Western Power has made a submission to the Public Utilities Office for consideration and decision.</p> <p>Review of the documentation submitted by Western Power to the Public Utilities Office (formerly the Office of Energy) confirmed an inclusion and request for revising the metering data intervals.</p> <p>At the conclusion of our fieldwork, a decision had not been handed down by the Public Utilities Office.</p> <p>In this regard management action has been addressed.</p>

## Electricity Industry Metering Code - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
<p><b>Electricity Industry Metering Code clause 3.16(5)</b></p>	<p>A network operator or a user may require the other to negotiate and enter into a written service level agreement in respect of the matters in the metrology procedure dealt with under clause 3.16(4) of the Code.</p>	<p>That Western Power incorporates the Notional Wholesale Meter value in the metrology procedure and establishes how it will be dealt with in the model SLA.</p>	<p>No further action required. Western Power is awaiting the outcome of as the Metering Code Review Recommendation Report which identified the removal of this requirement from the distributor.</p>	<p>National Wholesale Meter Value continues to be determined by the IMO and not the Corporation The Metering Code Review Recommendation Report has been sighted and it was noted that Western Power is awaiting a determination from the Public Utilities Office.</p> <p>Western Power did not assign a management action aside from seeking a determination from the Public Utilities Office, which it has done. In this regard the management action has been addressed.</p> <p>However, as the IMO continues to publish the Notional Wholesale Meter value further commentary has been provided within this report.</p> <p>Refer to Detailed Findings Section 11.</p>

## Electricity Industry Metering Code - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
<b>Electricity Industry Metering Code clause 3.16(6)</b>	A network operator may only impose a charge for the matters dealt with in the metrology procedure in accordance with the applicable service level agreement between it and the user.	Refer to Electricity Industry Metering Code clause 3.16(5)	Refer to Electricity Industry Metering Code clause 3.16(5)	Refer to Electricity Industry Metering Code clause 3.16(5).
<b>Electricity Industry Metering Code clause 3.18(1)</b>	If the Electricity Retail Corporation supplies electricity to a contestable customer at a connection point under a non-regulated contract, and in circumstances where immediately before entering into the contract, the electricity retail corporation supplied electricity to the contestable customer under a regulated contract, then the metering installation for the connection point must comply with the prescribed wholesale market metering installation requirements.	That Western Power incorporates those recommendations under compliance manual reference 347, 348 and 349 to ensure Western Power complies with the prescribed wholesale market metering installation requirements.	Western Power will document its current processes for the determination of meter installation types for each connection point. In addition, Western Power will develop reporting to enable annual review of correct determination of meter installation types.	Review of documentation relating to Western Power's processes for the determination of meter installation types for each connection point confirmed that Western Power had developed reporting tools and determined meter installation types for each connection point.  The management action has been addressed.

Electricity Industry Metering Code - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
<p><b>Electricity Industry Metering Code clause 3.21(1)</b></p>	<p>Meters containing an internal real time clock must maintain time accuracy as prescribed. Time drift must be measured over a period of 1 month.</p>	<ol style="list-style-type: none"> <li>1. Establish time drift monitoring mechanisms for all types of metering installations on a monthly basis; and</li> <li>2. Implement correct system parameters to ensure the time accuracy for its meters to reflect the requirements under the Electricity Industry Metering Code.</li> </ol>	<p>Western Power will develop and implement a documented process for monthly monitoring and correction of time drift in MV90, to meet the prescribed requirements.</p>	<p>Whilst Western Power had developed a monitoring mechanism for its metering installations, discussions with the Metering Services Division revealed that the mechanism had not been implemented until July 2012.</p> <p>Due to the implementation date and the date with which the 2012 audit scope period ended, we could not determine the effectiveness of the new monitoring mechanism. Therefore, this management action has been partially completed.</p>

## Electricity Industry Metering Code - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
Electricity Industry Metering Code clause 4.8(4)	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.	That Western Power considers restricting user access rights to the correct password level and removing the meter software from the Reading Management Team, who have full access to the energy data within the meters.	A formal matrix of authority levels for MV90 and EMPWin access will be developed and implemented to ensure appropriate access is provided to users.	Western Power has developed and implemented a password authority level matrix on metering installations. Western Power has also implemented a password authority level matrix on its metering database.  Whilst sample based testing identified further issues surrounding this obligation, the recommendation and management action have been addressed.
Electricity Industry Metering Code clause 4.8(5)	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.			Refer to Detailed Findings section 11.

## Electricity Industry Metering Code - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
<b>Electricity Industry Metering Code clause 5.3</b>	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.	Western Power should examine the feasibility of programming the MBS functionality to allow auto-substitution of interval data in accordance with the rules of the Metering Code.	1. Investigate the feasibility of MBS and MV90 functionality to allow auto substitution of interval data;	Feasibility study has been undertaken and a business case has been approved to include the increased functionality within MBS.  The recommendation and management action have been addressed.
			2. If feasible, implement the solution; and	Western Power has developed a system upgrade purported to address the gap identified. The automated process is to be implemented as a component of the MBS 6.5 upgrade.  However the implementations date of MBS 6.5 (June 2012) is outside of the initial date identified within the management actions. Western Power has developed a manual work around whereby substitution of interval data is undertaken.  This management action remained outstanding at the conclusion of our fieldwork.

Electricity Industry Metering Code - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
			3. Enhance the current manual process to identify any missing data by establishing additional reporting from MBS.	Walkthrough of the revised manual process confirmed the enhancement of the current manual process through the establishment of additional reports from MBS.  The recommendation and management action have been finalised.

## Electricity Industry Metering Code - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
<b>Electricity Industry Metering Code clause 5.6(1)</b>	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.	Western Power should examine the feasibility of programming the MBS functionality to allow auto-substitution of interval data in accordance with the rules of the Metering Code.	1. Recent upgrades of MBS (release 6.3) enabled manual data substitution. Western Power will investigate the feasibility of MBS and MV90 functionality to allow auto substitution of interval data.	Enquiries with the Meter Reading Services Manager and review of documentation revealed that a feasibility study has been undertaken and a business case has been approved to include the increased functionality within MBS.  The recommendation and management action have been addressed.
<b>Electricity Industry Metering Code clause 5.7</b>	A network operator must provide replacement energy data to the user for the metering point and the IMO within the timeframes prescribed.		2. Western Power's current manual process to identify any missing data will be enhanced by establishing additional reporting from MBS to monitor and remedy any non-compliance on a daily basis.	Enquiries with the Metering Branch and review of MV90, data within MBS and IDM Overdue Readings and IDE Gaps reports revealed that Western Power has enhanced its current manual process and has increased its diligence surrounding this topic.  This recommendation and management action have been addressed.

## Electricity Industry Metering Code - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
<b>Electricity Industry Metering Code clause 5.11</b>	If a transfer occurs at a connection point, a network operator must provide an incoming retailer with a copy of the standing data for each metering point associated with the connection point within the timeframes prescribed.	To implement the remediation tasks as identified in the Western Power Internal Notification Report.	No further action required.	The error that had occurred within MBS has since been rectified through the implementation of the remediation actions identified by Western Power. Sample based testing revealed that a copy of the standing data is provided to the incoming retailer.  This recommendation has been addressed.
<b>Electricity Industry Metering Code clause 5.12(1)</b>	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.	To implement the remediation tasks as identified in the Western Power Internal Notification Report.	No further action required.	The error that had occurred within MBS has since been rectified through the implementation of the remediation actions identified by Western Power. Sample based testing revealed that a copy of the standing data is provided to the incoming retailer.  This recommendation has been addressed.

## Electricity Industry Metering Code - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
<b>Electricity Industry Metering Code clause 5.21(8)</b>	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.	<ol style="list-style-type: none"> <li>1. Consider personnel within the Metering Infrastructure Team to complete the results of the meter test against the service order within MBS;</li> <li>2. Continue the review by the Commercial Officer for the accuracy of the records and charges related to meter tests; and</li> <li>3. Review and update the current system set up of charges within MBS.</li> </ol>	<ol style="list-style-type: none"> <li>1. Western Power will consider the possibility of personnel within the Metering Infrastructure Team to complete the results of the meter test against the service order within MBS.</li> </ol>	<p>Western Power has developed a meter test procedure to ensure correct and relevant checks are being performed to ensure billing integrity. Walkthrough of this process and sample based testing confirmed that flags for billing have been developed and implemented within MBS.</p> <p>This management action has been addressed.</p>
<b>Electricity Industry Metering Code clause 5.21(9)</b>	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.		<ol style="list-style-type: none"> <li>2. Process put in place for Commercial Officer review at time of service order closure and secondary review by Commercial Officer before billing.</li> </ol>	<p>Whilst Western Power implemented a review process, testing revealed that during the audit period, the person performing the review was not required to evidence a review being performed.</p> <p>Western Power has since implemented a record keeping process to enable substantiation of the review process. Due to the absence of audit evidence, we could not confirm that reviews had in fact been implemented by the action date.</p>

Electricity Industry Metering Code - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
			<p>3. Western Power will align the current system set up of charges within MBS against the applicable SLA.</p>	<p>Enquiries made with the Metering Services Division revealed that MBS updates had not been completed by the action date as Western Power is awaiting the determination of the model SLA prior to amending MBS charges.</p> <p>However, Western Power has since obtained an in principle agreement from Synergy, stating that the retailer will pay those costs associated with the cancellation of a request and does not charge for those instances where the test or audit reveals a non-compliance with the Code which results in energy data errors in the network operator's favour.</p>

## Electricity Industry Metering Code - Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
<b>Electricity Industry Metering Code clause 5.22(1)</b>	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.	That Western Power should program the MBS functionality to allow the validation of energy data using: <ul style="list-style-type: none"> <li>• The check meter to verify revenue meter data accuracy; and</li> <li>• A nominated maximum value for screening purposes.</li> </ul>	<ul style="list-style-type: none"> <li>• Western Power will investigate the feasibility of the MBS system change with possible inclusion in MBS 6.5 release; and</li> </ul>	We obtained documentation that substantiated that a feasibility study had been undertaken and the inclusion of the requirement within MBS 6.5.  This management action has been finalised.
			<ul style="list-style-type: none"> <li>• If feasible, Western Power will implement the MBS system change. If not feasible, Western Power will establish an alternative action.</li> </ul>	Review of documentation and discussions with the Metering Services Division confirmed that the business case deemed the improved functionality as feasible. MBS 6.5 IT projected was expected to be completed end of April 2012.  Western Power has implemented a manual work around through the IDM and IDE reports provided for the identification while the Corporation was developing its technical solution.  Implementation of MBS 6.5 occurred in June 2012 and whilst the actionable date was not met the manual work around addressed the observation.

## Electricity Industry Metering Code - Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
<b>Electricity Industry Metering Code clause 5.22(2)</b>	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.	That Western Power should program the MBS functionality to allow the validation of energy data against the check metering data.	<ol style="list-style-type: none"> <li>Western Power will investigate the feasibility of the MBS system change with possible inclusion in MBS 6.5 release; and</li> <li>If feasible, Western Power will implement the MBS system change. If not feasible, Western Power will establish an alternative action.</li> </ol>	We obtained documentation pertaining to a feasibility study of the MBS system change and inclusion of the requirement within MBS 6.5.  This management action has been finalised.
				Review of documentation and discussions with the Metering Services Division confirmed that the business case deemed the improved functionality as feasible. MBS 6.5 IT projected was expected to be completed end of April 2012.  Western Power has implemented a manual work around through the IDM and IDE reports provided for the identification while the Corporation was developing its technical solution.  Implementation of MBS 6.5 occurred in June 2012 and whilst the actionable date was not met the manual work around addressed the observation.

## Electricity Industry Metering Code - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
<b>Electricity Industry Metering Code clause 5.31(1)</b>	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.	That Western Power revises and updates the current SLA with Horizon to include the requirement that Western Power does not assess the compliance of Horizon's metering installations or upgrade a non-compliant metering installation.	Continue Western Power's participation in the Metering Code review process. The Office of Energy has advised that the final report will be published in August 2011, with the recommended changes being gazetted in December 2011.	<p>Emails to Horizon have been evidenced confirming the metering obligations have been transferred to Horizon.</p> <p>Western Power has participated in the metering code review process and are awaiting the outcome of the review by the Public Utilities Office.</p> <p>Whilst this recommendation remains outstanding at the conclusion of the fieldwork, it is noted that the Corporation is awaiting response from the Public Utilities Office. In the interim, Western Power and Horizon have been observed to be acting in good faith.</p>
<b>Electricity Industry Metering Code clause 5.31(2)</b>	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.			

Electricity Industry Metering Code - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
<b>Electricity Industry Metering Code clause 6.1(1)</b>	A network operator must, in relation to its network, comply with the agreements, rules, procedures, criteria and processes prescribed.	We recommend that Western Power seek to establish reporting capabilities for those items within the model SLA that are not reported.	<ol style="list-style-type: none"> <li>MBS system changes for enhanced reporting to be scoped and business case prepared.</li> <li>To be included in planned MBS system release 6.5.</li> </ol>	Western Power has examined the feasibility of enhancing its MBS, IT project has been developed and a business case has been approved.
				<p>There were 6 matters not previously monitored and reported on. Western Power has enhanced its reporting and has developed a suite of reports which now report on 4 of the 6 matters.</p> <p>The remaining 2 reports have been identified within the MBS 6.5 release scheduled for completion in June 2012. Due to the implementation of MBS 6.5 occurring late June 2012, we could not determine the effectiveness for this matter.</p> <p>As a result, this management action is partially addressed.</p>

Electricity Industry Metering Code - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
<b>Electricity Industry Metering Code clause 8.1(1)</b>	<p>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.</p>	<p>That Western Power develops a dispute resolution framework and ensures that it be communicated across the various Branches directly involved with all Code Participants.</p>	<p>Western Power will develop and implement a documented dispute resolution procedure.</p>	<p>A dispute resolution framework and procedure has been developed within the action date. The procedure has been provided to major customers and the process has been agreed to by the Metering Account Managers.</p> <p>During this audit period there were no disputes relating to The Transfer Code.</p> <p>The recommendation and management action has been addressed.</p>

## Electricity Industry Metering Code - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
<b>Electricity Industry Metering Code clause 8.1(2)</b>	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.	Refer to Electricity Industry Metering Code clause 8.1(1).	Refer to Electricity Industry Metering Code clause 8.1(1).	Refer to Electricity Industry Metering Code clause 8.1(1).
<b>Electricity Industry Metering Code clause 8.1(3)</b>	If the dispute is not resolved within 10 business days after the dispute is referred to senior management negotiations, the disputing parties must refer the dispute to the senior executive officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.			

Electricity Industry Metering Code - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
<b>Electricity Industry Metering Code clause 8.1(4)</b>	If the dispute is resolved by representative negotiations, senior management negotiations or CEO negotiations, the disputing parties must prepare a written and signed record of the resolution and adhere to the resolution.	Refer to Electricity Industry Metering Code clause 8.1(1).	Refer to Electricity Industry Metering Code clause 8.1(1).	Refer to Electricity Industry Metering Code clause 8.1(1).
<b>Electricity Industry Metering Code clause 8.3(2)</b>	The disputing parties must at all times conduct themselves in a manner which is directed towards achieving the objective of dispute resolution with as little formality and technicality and with as much expedition as the requirements of Part 8 of the Code and a proper hearing and determination of the dispute permit.			

## Network Quality and Reliability of Supply Code

Source	Obligation	Recommendation	Management Action	Observation
<b>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 18</b>	A distributor operating a relevant distribution system must, in specified circumstances, make a payment to a customer within a specific timeframe for a failure to give required notice of planned interruption.	<ol style="list-style-type: none"> <li>Review and rectify those instances where the compensation payments remain outstanding.</li> <li>Establish monitoring mechanisms for the timeliness of giving compensation payments to customers in the specified circumstances.</li> </ol>	Western Power will review its compensation payment process to ensure monitoring mechanisms for the timeliness of giving compensation payments to customers within the prescribed timeframes. This process will include monthly monitoring and reporting to the Risk and Compliance Branch.	Outstanding compensation payments were evidenced to have been made.  Recommendation 1 has been addressed.
				We noted that Western Power has implemented an automated flag system that has assisted with the management of the compensation payments.  However, sample based testing of service standard payments revealed that payments were not being made within the prescribed timeframe. This was due to: <ul style="list-style-type: none"> <li>The processing of applications taking a considerable amount of time which, in turn affected the approval and distribution of a payment; and</li> <li>Instances were also identified where payments were made outside the timeframe due to oversight and competing priorities.</li> </ul> Recommendation 2 had not been

Network Quality and Reliability of Supply Code

Source	Obligation	Recommendation	Management Action	Observation
				addressed. Refer to detailed finding in section 11 for further detail.

## Network Quality and Reliability of Supply Code

Source	Obligation	Recommendation	Management Action	Observation
<b>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 19</b>	A distributor operating a relevant distribution system must, in specified circumstances, make a payment to a customer within a specific timeframe if a supply interruption exceeds 12 hours.	<ol style="list-style-type: none"> <li>Undertake a review of those payments that were incorrectly declined through exception reports.</li> <li>Review and investigate the system parameters to enable the accurate measurement of supply interruptions.</li> </ol>	<ol style="list-style-type: none"> <li>Investigation is underway with IT to ascertain if claims were wrongly declined, how many and what the cause was.</li> </ol>	<p>The Corporation had identified System improvements have and were observed to have implemented them. A review was conducted and customers who were initially not approved due to the system error have since been corrected.</p> <p>The recommendation and management action have been completed.</p>
			<ol style="list-style-type: none"> <li>Customer management remedies will then be implemented along with root cause fixes within IT systems.</li> </ol>	<p>As above.</p> <p>Sampling confirmed Customers have been provided with a retrospective payment as a result of the reconciliation process.</p> <p>Review of IT coding confirmed that system work had been undertaken to address root cause issues.</p> <p>The recommendation and management action have been addressed.</p>

## Network Quality and Reliability of Supply Code

Source	Obligation	Recommendation	Management Action	Observation
<b>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 21(3)</b>	A distributor operating a relevant distribution system must provide written notice to eligible customers about payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005 not less than once in each financial year.	We recommend that Western Power implements an alternate means of issuing written notices in the event that Synergy cannot distribute the written notices within the prescribed timeframe.	Western Power has provided Synergy with the commentary for the 2011/2012 issues of the Synergy Life magazine	Western Power participates in the semi-annual utility flyer communicated by Synergy to its customers. Review of the publications confirmed the prescribed information is provided to customers in accordance with the Code requirements.  The recommendation and management have been addressed.

## Network Quality and Reliability of Supply Code

Source	Obligation	Recommendation	Management Action	Observation
<p><b>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 24(3)</b></p>	<p>A distributor or transmitter must complete a quality investigation requested by a customer in accordance with specified requirements.</p>	<p>In instances where a quality investigation requested by a customer cannot be completed within the 20 business day period specified in the Electricity Industry (Network Quality and Reliability of Supply) Code 2005, Western Power should:</p> <ol style="list-style-type: none"> <li>1. Contact the relevant customer and extend the due date for the completion of the investigation; and</li> <li>2. Retain corresponding records to confirm that the customer has acknowledged the due date extension.</li> </ol>	<ol style="list-style-type: none"> <li>1. Review the procedure/s associated with the measurement and investigation of power quality complaints to ensure clear articulation of activities and required timeframes for those complaints that are determined likely to exceed the 20 day period for investigation.</li> </ol>	<p>Review of the revised polices and processes confirmed a clear articulation of the activities and responsiveness timeframes. However, further review of the Code revealed that clause 24(2) requires the customer to forward a written request for an investigation.</p> <p>Our discussions with the responsible Branch revealed that Western Power proactively engaged a customer's request notwithstanding that the request had not been made in writing and performed an investigation.</p> <p>The recommendation tabled provided for a further opportunity to improve on those services provided outside of the Code requirements. Whilst it was determined that the implemented monitoring mechanism demonstrated investigations outstanding, the Corporation was determined to be proactive in using performance information to improve its service offerings.</p>

## Network Quality and Reliability of Supply Code

Source	Obligation	Recommendation	Management Action	Observation
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 24(3)	Cont'd	Cont'd	2. Review the application of the process in terms of resourcing and understanding of the requirements for investigation of power quality complaints	Review of the application of the process in terms of resourcing and understanding for investigations of power quality complaints was undertaken.  The management action has been completed.  However, review of the monitoring process revealed that there is further opportunity to strengthen its responsiveness related activities.
			3. Implement the revised procedure.	Discussions with responsible Branch revealed that the revised process has been implemented.  Refer to previous observations.
			4. Establish and maintain regular meetings with stakeholders relevant to the application of the procedure/s.	Observation of agenda and attendees confirmed this management action has been addressed.

## Network Quality and Reliability of Supply Code

Source	Obligation	Recommendation	Management Action	Observation
<b>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 24(4)</b>	A distributor or transmitter must report the results of an investigation to the customer concerned.	That Western Power retains records to confirm that a customer has been informed of the outcome of an investigation.	1. Review the procedure/s associated with the measurement and investigation of power quality complaints to ensure that the advice to the customer of the findings is recorded in terms of when, what was advised and what was discussed.	Review of the procedure and flow chart confirmed that Western Power has revised its process.  A network operator's responsiveness is linked to clause 24(2) of the Code, that is, a customer is to submit an investigation request in writing. Discussions with Western Power personnel and sampled based testing revealed written requests had not been received by the Corporation during the audit scope period. The investigations conducted by the Corporation have been a result of general enquiries. Therefore, the responsiveness is not required to be monitored.  This management action has been addressed.
			2. Implement the revised procedure.	Sampling of investigations confirmed investigation outcomes were retained against the customer's records.
			3. Establish and maintain regular meetings with stakeholders relevant to the application of the procedure/s.	Observation of agenda and attendees confirmed this management action has been addressed.

## 10. Special Areas of Interest

Initial discussions were held with the Authority and Western Power, and the Authority indicated a desire to place emphasis on the examination of special areas of interest. As such, a greater level of focus and commentary was assigned to these areas:

- The status of management actions for Western Power's 2011 EDL1 Performance Audit Report;
- The status of remedial actions relating to breaches reported in the 2011 Compliance Report;
- The status of all items under the section 32 Notice;
- Type 1 Effectiveness Compliance Framework;
- Type 1 Reporting Obligations;
- Disconnections;
- The Processes used by Western Power when extending their network;
- The internal processes used by Western Power to manage its corporate risks register;
- Monitoring of work performed by contractors;
- Western Power contractors involvement when performing works;
- Regional Site Visit – Northam;
- Planned interruptions; and
- Regulator Enquiries.

### **Section 32 Notice**

The Authority issued to Western Power, a Section 32 - Electricity Industry Act, Notice of failure to comply with the licence on Monday 17<sup>th</sup> October 2011. The Notice required the Corporation to rectify those contraventions detailed by the dates specified.

Based on our interviews, observations and sample based testing the following commentary is provided against each actionable item.

1. Contravention of Clause 5.1 of Electricity Distribution Licence EDL1 (“EDL1”):

*1.1. Clause 13.8(1) of the Code of Conduct, the Authority required by 31 December 2011:*

- *Implementation of a process to ensure that written agreement against the request for a connection by the customer is maintained.*
- *Implement a process to ensure the timetable for energising a premise commences when a retailer sends an application for energising a premise; and*
- *Take measures to ensure that the records above are only retained for customers who are subject to the Code of Conduct.*

Whilst Western Power was observed to have implemented a process for retaining evidence of a request for a connection by the prescribed date, this process was found not to have met the positive written confirmation requirement.

As a result, Western Power revised its processes to require customers to provide a positive confirmation, which was implemented in May 2012. Walkthrough of the new process revealed that Western Power records the conversation between itself and the customer, and retains evidence of a positive confirmation from the customer.

The positive confirmation was achieved through email communicated to the customer, which included a pro-forma notice advising of the agreed date. The customer is required to respond by acknowledging the email and sending back the confirmation. Where it is established that a customer does not have email access, a letter is sent stating the revised date, and the requirement for the customer to sign and return the document.

Whilst Western Power’s initial remedial action did not meet the Code’s requirement, its revised process was determined to have addressed those elements as detailed within the Code of Conduct.

In terms of the requirement to commence the timetable for energising a premise upon receipt of a retailer application, review of regulations 51 and 52 of the Electricity Licensing Regulations 1991 revealed that Western Power is unable to energise a premise prior to the receipt of an electrical certificate of completion. In this regard, the Corporation is unable to ensure that the timetable for energising a premise occurs upon receipt of a retailer's request.

Western Power has demonstrated that they are unable to action the initial recommendation due to the limitations established by other regulatory requirements. With respect to the Code of Conduct's requirement, Western Power is prevented from energising a premise without an electrical certificate of completion. There may be an opportunity to revisit the Code of Conduct's obligation to align with the Electricity Licensing Regulations 1991 in this regard.

Based on the Licensing Regulation Western Power is unable to implement the recommended remedial action.

A walkthrough of the revised process for recording customers who are subject to the Code of Conduct and a review of the methodology and approach confirmed that the Corporation is able to, and has correctly classified, small use customers. Western Power implemented a monitoring mechanism using the metering type as the primary filter along with historical consumption data as a basis to confirm classification. We obtained a copy of the report and confirmed classifications through sample based testing.

Discussions with the Metering Services Branch staff revealed that in those instances where a customer is new to the network and historical consumption data does not exist, the customer is initially classified as a small use customer. This is due to the new customer's meter installation having the capacity to deliver the supply of electricity that not only meets the definition of small use, but may exceed the small use threshold. Western Power monitors the consumption of the new meter installation and based on the historical data, reclassifies the customer where appropriate.

Western Power has implemented the required remedial actions for point 3 and has therefore addressed the requirements as detailed within this section 32 notice.

1.2. *Clause 13.8(2) of the Code of Conduct, the Authority required by 31 December 2011:*

- *A process for managing and recording urgent reconnections accurately; and*
- *Revise the current reconnection reports such that they capture the time at which the field officer completes the job for a particular reporting period.*

Walkthrough of the process for managing and recording urgent reconnections revealed that Western Power engaged the retailer during the stages of redesigning the workflow of managing urgent reconnections. Western Power's revised process requires its staff to log the receipt of a retailer's request. The service order has been redesigned to include a flag for urgent reconnections. Further, the retailer is now required to send an email confirming the verbal instructions as evidence of a request having been made. During the preparation of the records pertaining to urgent requests, the Commercial Officer reconciles the email request with those work orders flagged as urgent reconnections.

Further, review of the documentation revealed that field officers are required to record job completion times. Upon return of the completed work orders, the data is uploaded into MBS for monitoring and reporting purposes.

Based on our sample based testing, review of the revised processes and communications between Western Power and the retailer, we have confirmed that the Corporation had implemented the revised processes by the date specified.

- 1.3. *Clauses 13.10(1) and 13.10(2) of the Code of Conduct, the Authority required by 31 December 2011:*
- *Western Power to keep a record of the customer complaint indicators specified in clause 13.10(1) and also keep a copy of each customer complaint, specifically complaints received in regard to Extended Outage Payments and*
  - *The Corporation to retain a record of each complaint as required by clause 13.10(2) of the Code of Conduct.*

Discussions with Customer Service Centre staff and walkthrough of Western Power's revised complaint handling process revealed the inclusion of the requirement to capture and record Extended Outage Payment (EOP) complaints. Review of the Corporation's complaint indicators confirmed the inclusion of EOP as a complaint category and statistic.

Walkthrough of the revised complaint handling process revealed that Western Power had implemented the requirement to capture EOP records against the customer accounts. Review of documentation dates and enquiries made with the Manager Customer Assist confirmed that the Corporation had undertaken the required actions by the specified date.

Based on our sample testing and walkthrough of the revised EOPS complaint handling process, we have concluded that Western Power have addressed this action item.

- 1.4. *Clause 5.22(1) of the Electricity Industry Metering Code 2005 (the “Metering Code”) requires that the Corporation must validate the 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. The Authority required the Corporation to take the necessary measure to validate energy data using the check meter to verify revenue meter data accuracy and a nominated maximum value for screening purposes metering data by 30 April 2012.*

Review of the reporting tools implemented in January 2012 used to assist with the validation of revenue meter data accuracy using check meter data confirmed that the Corporation had taken a number of measures to verify meter data accuracy. However, enquiries and sample based testing revealed that the Corporation commenced validating energy data using nominated values from March 2012, and the process did not include all meters.

Enquiries with the Metering Services Branch staff and inspection of the maximum value missing report revealed that there were 142 meters that did not have a nominated maximum value to facilitate validation checks. This was due to the lack of information available from archived field data and safety restrictions imposed on CT chambers for the respective meters. These issues prevented the nominated maximum values being obtained.

Discussions with the Metering Services Branch staff revealed that the Corporation is continuing to investigate a suitable process to enable the calculation and establishment of a nominated maximum value for the meters concerned.

Based on our review, Western Power has partially addressed the remedial action. Further commentary can be located within compliance obligation 426 within the detailed findings section of this report.

- 1.5. *Clause 5.22(2) of the Metering Code, requires that the Corporation must use check metering data, where available, to validate energy data provided that the check metering data has been appropriately adjusted for difference in metering installation accuracy. The Authority required the Corporation to take the necessary measure to validate energy data using the check metering data by 30 April 2012.*

Western Power was determined to have established and implemented a process to validate revenue meter data accuracy against check metering data as of January 2012. A manual validation process entails comparing check meter data with revenue meter data that has failed the automated validation check.

Discussions with the Metering Services Branch staff revealed that the Corporation does not use partial check meters and therefore there is no requirement to appropriately adjust for difference in metering installation accuracy.

Further commentary can be located within compliance obligation 427 within the detailed findings section of this report.

### **Corporate Risk Framework**

The Authority requested a desktop review to be undertaken of Western Power's internal processes used to ensure that its corporate risk register is accurate, complete and that the information recorded within the register is current and aligned with the Corporation's strategic priorities.

Discussions and review of risk related documentation assisted towards gaining an understanding of the population and completeness of the Corporate Risk Register and its connection to Western Power's strategic objectives.

### **Risk Framework**

Western Power's Risk Framework is based on *AS/NZS ISO 31000:2009 Risk management – Principles and guidelines* and *ISO 31010 Risk Management – Risk Assessment Techniques*. The framework and policy defines what risk is for Western Power and how it is to be identified, rated, reported and monitored.

### **Risk Registers**

Each branch identifies risks and risk treatments related to their specific activities that are recorded on a risk register specific to that branch. Subsets of these individual branch risk registers are uploaded onto the risk database CURA as divisional risk registers.

Those divisional risks that are automatically identified by CURA as being significant to the organisation are duplicated on Western Power's Corporate Risk Register which is also managed by CURA. Other corporate risks are identified and reviewed through scheduled risk workshops held by Risk and Compliance Branch and the Executive Management Team. Corporate risks, divisional risks with rating of extreme and high, and emerging risks are reported to the Executive and Board as part of the quarterly reporting process.

### **Strategic Risks**

A linkage was confirmed to exist between the operational and corporate risks, however, it is understood that in February 2012, the Corporation has suspended its 2010-2013 Strategic Direction and replaced it with 7 Priorities in the short term.

Discussions with Risk and Compliance Branch revealed that the Corporation is in the process of revising its corporate strategic objectives and are planning to undertake a comprehensive risk exercise at that time.

### **Extension to the Network**

The Authority required a high level review to be conducted of the Corporation's process for extending the Corporation's network to determine whether the Corporation has carried out all the necessary procedures to extend its network. This includes a review of the processes, documentation and controls that Western Power has in place surrounding the network extension process.

Interviews with members of the Customer Solutions Branch and Data Service team were conducted to gain an understanding of the processes and systems used when considering and designing extensions to the network.

### **SPIDAWEB**

In January 2011 Western Power migrated away from DFIS to SPIDAWEB, whilst the underlying data behind both systems is the same, the functionality and the user interface system had improved.

SPIDAWEB is a geographical information system maintained by the Data Service team. The system contains a number of data "layers" which contain information about certain restrictions and protocols that relate to certain geographical areas, these include but are not limited to, the boundary of the network, fauna and flora protected areas and native title.

### **Designing Extensions to the Network**

The Customer Solutions Branch is responsible for designing any extensions to the network. Depending on the size of the customer request, different teams within the Branch are used for both smaller transmission based extensions and larger distribution based extensions. Whilst transmission and distribution extensions have separate policy and procedures, both share many of the same core processes and both use the SPIDAWEB system.

All planned extensions are modelled within the SPIDAWEB system to determine what restrictions may exist and what authorisations and approvals needed to be granted. The system will automatically inform users as to which areas need to be addressed and refers users to the relevant policy and procedure.

Through our discussions with Western Power staff and desktop review of policy, procedure and work examples, the Corporation has adequate systems and controls in place to ensure that the risk of an extension being non-compliant is mitigated sufficiently.

### **Type 1 Effectiveness Compliance Framework**

The Authority requested a desk top review of the Corporation's Type 1 Compliance Framework, focusing on the monitoring and improvement of controls and systems that surround Type 1 obligations and its implementation plan. Further, an assessment was required to determine whether robust controls have been put into place to support compliance with the Corporation's EDL1 Type 1 obligations.

Western Power's framework outlines the obligations themselves and identifies those persons which are responsible for the oversight of those obligations. The framework also identifies a list of core functions and assigns responsibilities and timeframes for these functions.

### **Core Components**

The core components of the framework are:

- identification of Type 1 compliance obligations and the controls that surround them;
- scheduled monitoring both internally and externally; and
- training and continuous improvements.

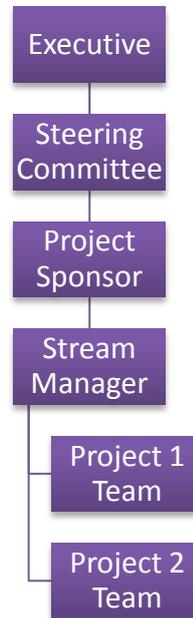
### **Project Streams**

Operationally, Western Power has implemented the Type 1 Compliance Framework by allocating all of the Type 1 compliance obligations into 4 broad categories or project streams:

- Planned Outages;
- Life Support List;
- Disconnections; and
- Compliance Framework (this stream supports the monitoring of the other three streams).

### **Framework Hierarchy**

Whilst minor differences may exist between streams due to the size, scope and number of projects being undertaken, the hierarchy of the streams are generally organised as follows:



### **Project Development and Implementation**

Each project had been designed and defined through a consultative approach that included key stakeholders for all business areas for which an obligation was identified.

Discussions with Stream Managers and Project Sponsors revealed projects were developed through consideration to previous audit recommendations, discussions with key stakeholders and consultation between branches. Once a project is conceptualised a project charter is developed which outlines those persons involved, their responsibilities in addition to scheduled implementation milestones.

Stream Managers are involved with the on-going monitoring and management of stream projects, and are responsible for ensuring that the implementation of the projects are aligned with the scheduled milestones outlined within the project charter.

Our desk top review of Western Power's approach determined that the Corporation has developed and implemented an adequate and effective framework.

**Disconnections**

Compliance Manual Reference	Type	Compliance Rating
235	1	2

- A retailer or a distributor must not arrange for disconnection or disconnect a customer's supply address in the circumstances specified, subject to the exception specified.

During the audit scope period, Western Power was observed to have performed a number of revisions to its disconnection process with the objective to mitigate the risk of disconnections occurring outside of the prescribed timeframes.

Sample based testing revealed instances where disconnections had occurred outside the specified timeframes. Review of communications between the Corporation and Authority confirmed the notification of 7 disconnections having been made. Our review of the disconnection report revealed a further disconnection occurring outside of the prescribed timeframe. Discussions with Metering Services Branch staff revealed that it had performed an investigation and concluded that the disconnection had in fact been conducted within the prescribed timeframe. Investigations made by the Corporation determined that whilst the disconnection was performed within the prescribed timeframe, the field officer had closed the work order on their PDA after 3.00pm.

The Corporation revised its disconnection procedure to a more conservative approach through their procedure and implementation of new controls. The revised internal policy does not allow disconnections to be performed on:

- Fridays, Saturday and Sunday;
- On public holidays and 2 days prior to a public holiday; and
- For those disconnections to be performed after 12pm and before 2pm Monday, Tuesday, Wednesday and Thursday the field officer is required to obtain an authorisation code.

The revised procedure and process were observed to have been communicated to all areas of the business including contract service providers. Western Power has attached a performance linked measure to its contractor as measure to incentivise the contractor and its employees to operate in accordance with the revised process.

Discussions with Northam depot staff revealed that they were cognisant of the revised internal policy, but the Depot implemented a more conservative approach where disconnections are not permitted after 12pm as opposed to 2pm. Observations of faxed work orders confirmed the inclusion of the internal policy times.

Whilst these improvements have provided for a more robust process in mitigating disconnections outside of the allowable timeframes, testing revealed 2 service orders were not

captured within the MBS extract or reports despite having occurred within the audit scope period to which the Meter Reading Manager could not identify the cause.

Our detailed observations can be viewed within section 11 *Detailed Findings – Compliance Elements Which Require Corrective Measures*.

### Planned Interruptions

Compliance Manual Reference	Type	Compliance Rating
237	1	2
469	2	2

- A distributor must undertake the actions specified in circumstances where the distributor has been informed by a retailer or a relevant government agency that a person residing at a customer's supply address requires life support equipment.
- A distributor operating a relevant distribution system must, in specified circumstances, make a payment to a customer within a specific timeframe for a failure to give required notice of planned interruption.

Sample based testing of service standard payments made to customers revealed instances of applications for a payment for the Corporation failing to provide 72 hour notice of a planned interrupt process having been approved.

Discussion with Western Power management and review of communications between the Corporation and the Authority revealed that Western Power had interrupted the supply of electricity to life support register customers without providing 3 days notice of the planned interruption to the customer. Our review of planned interruption activity revealed that the Corporation suspended all planned interruption activities to provide for an opportunity to revisit and strengthen its planned interrupt process.

Western Power's review of the planned interrupt process and the processes employed for identifying a customer residing at a supply address who requires life support revealed:

- Inaccuracies with the information contained within its asset systems with regards to location of switches and those that may be impacted as a result of a planned interrupt activity;
- The risk of non-uniform notification practice being applied across the business due to incorrect interpretation or lack of clarity surrounding the requirement of a planned interrupt notice; and
- Risk of oversight by Western Power employees, for example, leaving a single notice of a planned interrupt at the reception of building where there is more than one customer.

Further, discussions with Northam staff revealed that before the roll out of the revised procedure, they were unaware that there were supply addresses where customer's registered as having life support equipment resided within their district.

Discussions with the Risk and Compliance Branch, and Customer Services Division revealed that, Western Power had reviewed its planned interrupt process with the aim of developing and implementing a more robust approach to mitigate the risk of type 1 breaches.

Walkthrough of the revised procedure with the Risk and Compliance Branch revealed that a number of preventative and detective controls have been implemented prior to the authorisation of a planned interruption process proceeding. Review of training material and discussions with Team Leaders revealed that training focusing on the planned interrupt process has been rolled out and competency based assessments have also been included.

Instrumental to the planned interrupt process is that only those who have been deemed competent are able to prepare and complete planning documentation. Evidence of each step of the process is required to be reviewed, monitored and maintained to demonstrate compliance to the revised process.

In terms of the revised process for the notification to a customer on life support equipment, Western Power has amongst other controls, implemented:

- The use of registered mail or a courier service (regional) to communicate the planned interruption;
- Notifications to be provided at least 4 days prior to the planned interruption as opposed to the prescribed 3 days;
- Western Power team members to make phone calls to life support equipment customers who are directly affected and also alert those customers based on proximity testing;
- Evidence to be provided by the personnel facilitating the scheduled planned interruption and to be forwarded to the Evidence Retention Team;
- Western Power was observed to be preparing a business case for the mapping of the LV network, which amongst other matters, provides for better accuracy around areas affected by planned interrupts; and
- Training to staff of the revised process and the tools/systems available to assist with the identification of supply addresses registered as having life support equipment.

Western Power began rolling out the revised process and procedures post 30<sup>th</sup> June 2012, therefore, we could not test the effectiveness of these new processes and procedures. Our detailed observations can be viewed within section 11 *Detailed Findings – Compliance Elements Which Require Corrective Measures*.

### **Regional Site Visit**

The Authority required a level of assurance that Western Power's non-metropolitan sites were operating in accordance with the requirements as specified under EDL1 and ETL2. Western Power's Northam depot was selected by the Authority as part of the performance audit.

Discussions held with staff revealed a level of knowledge that was expectant for the roles of each interviewee. Enquiries also revealed that senior depot staff remained in contact with Western Power's head office which facilitated the flow of information and knowledge. Review of key processes such as disconnections, complaint handling, reconnections and obligations to connect confirmed the alignment of practice to corporate procedures.

Discussions with Team Leaders revealed that before the roll out of the revised procedures, they were unaware of the existence of supply addresses registered as having persons residing at the address and requiring life support equipment. Further, Team Leaders had not been exposed to GEOVIEW which is referenced at the Perth and Forrestfield offices. Whilst Team Leaders provided that they had historically notified residents of a planned interruption, the notification time and method varied.

With the recent review of the planned interrupt process by Western Power, training had been provided to the Team Leaders and their knowledge of the Corporation's obligations were reflective of the organisation's revised process. Further, Team Leaders demonstrated familiarity with GEOVIEW and a strong level of discipline around the planning of interruptions. The Metering Services Branch were identified to have recently provided training on the revised disconnection process, however, the Depot staff have decided not to perform any disconnections past 12pm on the appropriate days.

Sample based testing and review of documentation confirmed uniformity and consistency between documents and the protocols by which the regional site is required to operate. Information was observed to be uploaded into MBS in a timely manner through a manual process. There was a strong reliance on paper work instructions as communication connectivity was deemed to be a problem in remote areas.

### **Monitoring of Work Performed by Contractors**

The mechanism employed to facilitate the monitoring of Western Power's contractors included formal monthly meetings and review of performance reports against 19 KPIs. This is supported by weekly meetings between the contractor representatives and the Corporation's Metering Services Branch Managers.

Quality Audits are conducted on work carried out by the contractor such as the checking of metering installations under its field audit observation program. The Metering Services Branch also revealed that Western Power performs spot audit checks of its contractors, a sample of these documents have been sighted and obtained as evidence.

A matching process is also undertaken with regards to invoices received and work carried out by its contractors. This approach was provided as another tool by which the Corporation monitors the productivity of its contractors against agreed deliverables.

Discussions with Metering Services Branch personnel revealed that contractors as representatives of Western Power are required to comply with the standards, guidelines and requirements of the Corporation. This is facilitated through the provision of uniform work instructions to Western Power contractors.

### **Western Power Contractors Involvement When Performing Works**

Discussion with field officers confirmed both the awareness and understanding of their requirement to adhere to process controls. Enquiries revealed that field officers work

primarily under instruction from Team Leaders/Coordinators and if they encountered a matter to which they required clarification, it would be raised directly with their Supervisors.

Field officers interviewed demonstrated knowledge with respect to times they were not permitted to disconnect, however, field officers at Northam were unaware of the requirement to obtain an authorisation code for disconnections to be carried out after 12pm and before 2pm.

Northam field officers stated that they were under strict instruction not to perform any disconnections after 12pm on a Monday to Thursday and were not authorised to perform disconnections on a Friday, Saturday, Sunday, a public holiday or a day proceeding a public holiday.

### **Regulator Enquiries**

Enquiries with relevant regulators and review of their websites were made regarding any applicable orders, notices and compliance reports issued to Western Power. Those regulators contacted confirmed the existence of the range of applicable orders, notices and compliance reports having been issued to Western Power.

## 11. Audit Opinion

In our opinion, except for the matters identified in Section 11 – Compliance Obligation Elements which Require Corrective Measures and any effects thereof, we are satisfied that Western Power had policies, procedures and systems in place to support compliance with the licence conditions and associated regulations and codes, for the period 1 May 2011 to 30 June 2012.

**Grant Thornton Australia Ltd**

Campbell George Ansell

**Partner**

Perth

22 January 2013

## 12. Detailed Findings – Compliance Elements which Require Corrective Measures

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 4.13	
<b>Compliance Manual Reference</b>	41	41
<b>Obligation Description</b>	A network operator must within two business days after the transfer date give an electronic notice of the transfer and the transfer date to the incoming retailer, the previous retailer and, if applicable, the independent market operator.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>Sample based testing revealed instances where Western Power did not give electronic notice of the transfer and the transfer date to the incoming retailer and previous retailer within the prescribed timeframe.</p> <p>Our enquiries with Metering Services Branch staff revealed that these instances were related to:</p> <ul style="list-style-type: none"> <li>• A data loading issue between MVRS and MV90 which lead to a delay in providing notification within the timeframe. Although there was a delay in the notification process, data was obtained for the nominated transfer date. Enquiries with the Interval Data Coordinator found that Western Power could not determine the cause of this issue and had used a “process by elimination” effort to address it. While more active monitoring of customer transfers relating to Type 5 meters and IT improvements have been used to address the issue, further changes to MBS will occur based on a service call to MBS Functional Support. This is expected to be completed by 31 August 2012; and</li> <li>• A late request was dispatched to read a Type 5 meter by a Western Power user. As a consequence, the entire process was delayed and resulted in late notification to the incoming and previous retailer. Western Power identified this to be an isolated training related issue during the phase where the customer transfer process and duties were restructured from Interval Data Management to Reading Operations. Enquiries revealed that the user is no longer part of the process.</li> </ul>	

<b>Recommendation</b>	That Western Power continues to investigate the data loading issue between MVRS and MV90 and implements the necessary rectifications.
<b>Management Response</b>	Western Power acknowledges that there can be delays in data transfer from MVRS to MV90 in relation to Type 5 meters. This issue is due to the current inability to read Type 5 meters manually using MBS (which is the method of reading other types of meters).
<b>Management Actions</b>	Enable Type 5 meters to be manually read as part of MBS upgrade 6.6.
<b>Implementation Date</b>	31 October 2013.
<b>Responsible person</b>	Tony Shanahan – Branch Manager Metering.

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2) Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code Annex 4 clause A4.1	
	Electricity Industry Metering Code clause 5.10	
<b>Compliance Manual Reference</b>	63 & 400	<a href="#">63 &amp; 387</a>
<b>Obligation Description</b>		
	63	A network operator must provide certain information, if available, to a retailer who submits a request for standing data.
	400	A network operator must provide a subset of the standing data to a retailer in accordance with the provisions of Annex 4 of the Customer Transfer Code.
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>Our walkthrough of the standing data request process revealed that, upon a retailer submitting a request for standing data, Western Power did not provide information for the "last scheduled meter read date or day number" as required under Annex 4.1 (j) of the Customer Transfer Code.</p> <p>Although the last scheduled meter read date or day number was not provided upon the submission of a standing data request, we noted that the Metering Web Services Portal has the functionality to provide the retailer with meter read history separate from the request.</p>	
<b>Recommendation</b>	That Western Power reconfigures MBS to include the last scheduled meter read date or day number history in its response to a retailer who makes a standing data request.	

<b>Management Response</b>	<p>Western Power does include the “last scheduled meter read date” within the standing data however it is not included on the initial information that is provided to the retailer (the retailer has to go into another tab to get this data).</p>
<b>Management Actions</b>	<ol style="list-style-type: none"> <li>1. Investigate the feasibility of including the “last scheduled meter read date” onto the same page as information is provided during a standing data request.</li> <li>2. If feasible, implement the solution (via MBS 6.6 upgrade or another project depending on solution).</li> </ol>
<b>Implementation Date`</b>	<ol style="list-style-type: none"> <li>1. 31 December 2012.</li> <li>2. 31 October 2013.</li> </ol>
<b>Responsible person</b>	<p>Tony Shanahan – Branch Manager Metering.</p>

<b>Licence Condition</b>	Electricity Industry (Obligation to Connect) Regulations regulation 6	
<b>Obligations Under</b>	Electricity Industry (Obligation to Connect) Regulations regulation 6	
<b>Compliance Manual Reference</b>	75	75
<b>Obligation Description</b>	A distributor that is obliged to attach or connect premises to the distribution system under regulation 4 of the Electricity Industry (Obligation to Connect) Regulations must do so within a defined timeframe.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>Sample based testing revealed instances prior to May 2012 where customers had not been attached or connected within the 20 business day timeframe prescribed. Enquiries made with the Connections Team confirmed that written evidence from the customers, agreeing to be connected beyond the required timeframe had not been retained.</p> <p>Whilst Western Power established and implemented a new process in August 2011, enquiries revealed that for each of the identified instances from that period onwards, Western Power had contacted the customer by telephone and come to an agreement for the connection to be carried out at a later period. Although it was provided that the customers had agreed by telephone which was recorded and a letter was subsequently forwarded to the customer, positive written confirmation from the customer was not retained by Western Power.</p> <p>We noted that Western Power improved its process in May 2012 that required the Connections Team Senior Advisor to send customers electronic mail correspondences and advise customers to confirm their agreements for connections to be undertaken outside the 20 business days. In instances where customers do not respond to correspondences within 2 days, they are contacted and reminded of their requirement to confirm their revised date in writing and forward this to Western Power. Sample based testing did not reveal any exceptions post May 2012.</p>	

<b>2011 Compliance Report – Status of Remedial Action</b>	<p>Western Power had implemented the remedial actions in the timeframes specified.</p> <p>However, our testing revealed that the process implemented in August 2011 did not meet the requirements of the Regulations as positive confirmation letters from the customer were not retained by Western Power.</p>
<b>Recommendation</b>	None – requirement has been addressed.

<b>Licence Condition</b>	Electricity Industry (Obligation to Connect) Regulations regulation 8	
<b>Obligations Under</b>	Electricity Industry (Obligation to Connect) Regulations regulation 8	
<b>Compliance Manual Reference</b>	77	77
<b>Obligation Description</b>	A distributor that is obliged to energise premises must do so within a defined timetable.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<ol style="list-style-type: none"> <li>Western Power does not monitor retailer service order requests for energising a premise as written law prohibits Western Power from energising a premise unless completion advice from an electrical contractor or inspector exists.  Discussions with the Connections Team revealed that the time recorded for energising a premise did not commence when a retailer sends a request to energise a premise and that the team are not advised until after an energisation has already occurred. Regulation 51 and 52 of the Electricity Licensing Regulations 1991 does not permit the energisation of a premise until receipt of an electrical certificate of completion. Therefore, the time commences when the electrical contractor's or electrical inspector's completion advice is matched to the retailer's service order request. In most instances, where the electrical contractor (contractor connect scheme) has already energised the premises, submitted the completion notice and the Connections Team has matched the completion advice to the retailer's service order request, the time taken to energise a premise is calculated as 0 days.</li> <li>Western Power report internally on energisations that have not met the prescribed time frames.  Prior to 1 October 2011, Western Power's data records surrounding the obligation 77 captured only the total numbers of compliant and non-compliant energisations and could not be independently verified.</li> </ol>	

	Subsequent to 1 October 2011, Western Power improved its data capture and reporting surrounding the energising of new connections. We were able to verify the number of non-compliant energisations reported by Western Power for the months of October 2011, December 2011 and May 2012.
<b>2011 Compliance Report – Status of Remedial Action</b>	Western Power had implemented the remedial actions in the timeframes specified.
<b>Recommendation</b>	None – requirement has been addressed.

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 7.6	
<b>Compliance Manual Reference</b>	235	<a href="#">221</a>
<b>Obligation Description</b>	A retailer or a distributor must not arrange for disconnection or to disconnect a customer's supply address in the circumstances specified, subject to the exception specified.	
<b>Reporting Type</b>	1	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>1. Our testing of the disconnection records revealed that there were instances where the disconnection times were found to be outside of the allowances of the Code.</p> <p>Further investigation revealed that all of the disconnections identified through testing had been identified internally and 7 to which the ERA had been advised.</p> <p>Enquiries made with Risk and Compliance Branch, and Metering Services Branch revealed that, an investigation had been performed for a disconnection recorded as completed after the prescribed timeframe. Western Power investigation determined that the field officer was had performed the disconnection within the prescribed timeframe, however, the field officer did not close the work order at the time of completion but as they remembered to close the task on the PDA. The cause was attributed to a "PDA sync" issue, which is defined by the Corporation as the time disparity between the actual time the disconnection had taken place and the time at which it was recorded as complete by the field officer within the PDA device. However, the Risk and Compliance Branch had not been informed in a timely manner of the incident and investigation outcome.</p> <p>It was noted that Western Power had made significant changes to their procedures and controls to adopt a more conservative approach. Since the implementation of these new controls, there had been no identifiable non-compliances by both Western Power's internal reporting and our testing.</p>	

	<p>2. During the course of our testing, 2 service orders were identified that were not captured in prior MBS extracts or reports despite having occurred within the date period covered.</p> <p>Enquiries with Metering Services Branch staff could not identify the cause of 2 service orders not being captured in prior MBS extracts or reports.</p>
<b>2011 Compliance Report – Status of Remedial Action</b>	<p>Western Power had initiated all of the specified remedial actions in the timeframes specified and implemented an additional set of controls to strengthen compliance surrounding this obligation.</p>
<b>Recommendation</b>	<ol style="list-style-type: none"> <li>1. That Western Power provides a report of those disconnections investigated to its Risk and Compliance Branch.</li> <li>2. That Western Power investigates MBS to determine the cause of those services not having been captured and undertake remedial actions to prevent re-occurrence.</li> </ol>
<b>Management Response</b>	<p>Western Power investigates all disconnections that MBS records as outside of the prescribed times. Causes are noted in the notes tab of MBS and, if applicable, remedial actions to prevent re-occurrence are taken. As an expanded reporting mechanism, the notes that are captured in the MBS tab for disconnections recorded outside of the prescribed times will also be provided to the Risk &amp; Compliance Branch.</p> <p>Furthermore, Western Power has a Compliance Failure Reporting Policy which is being updated as part of its review of policies and procedures relating to Type 1 Obligations.</p> <p>The additional 2 service orders (which were both closed in MBS within 30 seconds of 15:00) were picked up in a rerun of an IT report. This has identified the need for a standard set of IT parameters with precise requirements for reporting against disconnection service orders which will be developed to ensure consistency of reporting.</p>
<b>Management Actions</b>	<ol style="list-style-type: none"> <li>1. Provide refresher training to the relevant staff on the requirements to immediately report any investigation of a recorded disconnection outside the prescribed times to the Risk and Compliance Branch.</li> <li>2. Develop standard reporting parameters with IT.</li> </ol>

<b>Implementation Date</b>	<ol style="list-style-type: none"><li>1. 31 October 2012.</li><li>2. 31 October 2012.</li></ol>
<b>Responsible Person</b>	Tony Shanahan – Branch Manager Metering.
<b>Status of Management Actions</b>	<ol style="list-style-type: none"><li>1. Closed.</li><li>2. Closed.</li></ol>

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 7.7(2)	
<b>Compliance Manual Reference</b>	237	<a href="#">223</a>
<b>Obligation Description</b>	A distributor must undertake the actions specified in circumstances where the distributor has been informed by a retailer or a relevant government agency that a person residing at a customer's supply address requires life support equipment.	
<b>Reporting Type</b>	1	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>1. Western Power was issued with a Contravention of Type 1 Licence Obligation notice as a result of the information provided by the Corporation to the Authority on 6 February 2012, with regard to Code of Conduct clause 7.7(2).</p> <p>Sample based testing and review of further notices provided to the Authority confirmed that Western Power in accordance with clause 7.7(2)(c) had failed to provide the required notice to the customer's supply address as registered as having a person residing at that address requiring life support equipment.</p> <p>Discussions with the Customer Services Division revealed that Western Power had ceased all planned interruption activities as it revised its approach and management of the planned interrupt process.</p> <p>Our reconciliation of the life support list and review internal and external audit reports revealed that a robust control framework exists to ensure that Western Power's life support list within ENMAC is reflective of their retailers.</p> <p>As required by the Authority, Western Power had implemented:</p> <ul style="list-style-type: none"> <li>• A daily reconciliation of all notifications sent by retailers against ENMAC;</li> <li>• 6 monthly external audit engagements of ENMAC life support data;</li> <li>• Internal scheduled reconciliations between the Synergy life</li> </ul>	

	<p>support list and the Western Power database. Any discrepancies determined by the reconciliation are investigated internally and discussed immediately with Synergy. To date all investigations and discussions with Synergy have verified that those exceptions identified by the reconciliation have been resolved as a matter of priority.</p> <p>2. Discussions with Metering Services Branch personnel indicated that Western Power had implemented a number of system based controls and procedures to ensure that registered life support customers would not be disconnected.</p> <p>MBS had been reconfigured to not allow service orders for disconnections to be raised for any existing supply address that was recorded on the life support register. Any additions to the life support register are matched against open service orders, if a match is determined, all relevant Branch Managers notified who contact the Scheduler or Field Officer via telephone and the job is cancelled immediately.</p> <p>Further, Western Power has revised its planned interrupt process with the objective of strengthening the controls and procedures surrounding the planning phase of the planned interruption. The revised process had begun to be rolled out as of July 2012.</p>
<b>Recommendation</b>	Western Power should test and continue to monitor the effectiveness of its revised planned interruption process and the outcomes of the reviews should be captured.
<b>Management Response</b>	Management acknowledges the auditors' observations and recommendation.
<b>Management Actions</b>	Commencing October 2012, as part of the Type 1 compliance framework, the effectiveness of the revised planned interruption process will be monitored. The outcome of each review will be captured.
<b>Implementation Date</b>	31 October 2012.
<b>Responsible Person</b>	Margaret Pyrchla – Branch Manager, Risk and Compliance.
<b>Status of Management Action</b>	Closed.

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 8.2	
<b>Compliance Manual Reference</b>	240	<a href="#">226</a>
<b>Obligation Description</b>	A distributor must reconnect the customer's supply address upon the request of a retailer, within the timeframes specified.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>1. Sample based testing revealed instances where Western Power did not reconnect customers supply addresses within the timeframes prescribed.</p> <p>Our enquiries made with Metering Services Branch personnel and sample based testing revealed that Western Power did not meet the required timeframes for reconnections due to multiple reasons, specifically:</p> <ul style="list-style-type: none"> <li>• Access restrictions to the customer's premises by field officers;</li> <li>• Additional re-energisation works required to poles when field officers visited customer's site to perform reconnections work; and</li> <li>• Availability of Field Officers to perform works.</li> </ul> <p>2. We also noted inaccuracies in the reporting of reconnections that were outside the required timeframe. Our testing and review of monthly exception reports revealed that:</p> <ul style="list-style-type: none"> <li>• Western Power identified 27 reconnections that were not performed within the prescribed timeframe for the period ending June 2011. However, our testing revealed an additional 8 non-compliant reconnections; and</li> <li>• Western Power identified 47 reconnections that were not performed within the prescribed timeframe for the period ending July 2011. However, our testing revealed an additional 10 non-compliant reconnections.</li> </ul>	

The Metering Services Branch indicated that for the additional non-compliances we identified, the “required by date” had been altered within MBS, resulting in Western Power not identifying the reconnections outside the required timeframe. There were 3 ways in which the “required by date” was altered within MBS. These were by:

- Western Power Officers not following the correct procedures and re-allocating the job to Field Officers;
  - AMRS Contractors, however, the cause could not be determined as the AMRS Contractors were no longer in the office; and
  - MBS, however, the cause could not be determined.
3. Our enquiries with Metering Services Branch staff and review of reports revealed that prior to December 2011, Western Power did not have a process in place for managing urgent reconnections with a retailer and recording urgent reconnections accurately.

However, post December 2011, Western Power established and implemented processes to facilitate urgent reconnection activities. This involved the retailer initially submitting a request for an urgent reconnection through the Web Metering Portal. Meter Reading Officers would then allocate the jobs to Field Officers through MBS, which has the functionality to change the field status from “standard” to “urgent” and for commentary to be inserted. In situations where a job has initially been requested by the retailer as a standard reconnection job and it changes to an urgent matter, the retailer will send an email to the Meter Reading mail inbox and also follow up on the matter via telephone to ensure that the job has been appropriately acted upon. Once the job has been completed by the Field Officer and the completion advice form has been forwarded to the Metering Branch, the job is closed off within MBS.

We obtained evidence to substantiate Western Power engaging the retailer in the re-design of the workflow and communication of urgent reconnections. Our review of monthly exception reports also confirmed that Western Power has separated the recording of urgent reconnections to ensure that they are accurately captured, including the time at which field officers complete the job for a particular reporting period.

<b>2011 Compliance Report – Status of Remedial Action</b>	<p>Western Power had not implemented the remedial actions in the timeframes specified within its 2011 Compliance Report.</p> <p>The revised process for the recording and reporting of urgent reconnections was only implemented in December 2011. Further, our testing revealed that the “required by date” for reconnections could be altered within MBS resulting in inaccuracies in the reporting of reconnections outside the required timeframe.</p>
<b>Recommendation</b>	<p>That Western Power should:</p> <ol style="list-style-type: none"> <li>1. Consider a review of the resource and scheduling to ensure that reconnections can be performed in accordance with the Code of Conduct.</li> <li>2. Review MBS functionality to ensure that it accurately calculates and records the reconnection “required by date” in accordance with the Code of Conduct.</li> <li>3. Re-configure MBS to ensure that the “required by date” is locked.</li> </ol>
<b>Management Response</b>	<p>Western Power currently achieves over 97% compliance with the Code of Conduct obligation for reconnections as reported in the Western Power’s Annual Compliance Report. Out of the 407 reconnections that did not occur within the prescribed timeframes the 180 of those were due to a second visit by line crew being required to reconnect the customer.</p> <p>Western Power accepts the improvement opportunity identified to ensure that fields in MBS are locked to ensure accurate data capture and reporting.</p>
<b>Management Actions</b>	<ol style="list-style-type: none"> <li>1. Review reconnection done by re-energisation (not re-attachment) to ensure resource allocation is optimised.</li> <li>2. Review MBS functionality to ensure that it accurately calculates and records the reconnection “required by date” in accordance with the Code of Conduct.</li> <li>3. Re-configure MBS to ensure that the required “by date” field is locked.</li> </ol>
<b>Implementation Date</b>	<ol style="list-style-type: none"> <li>1. 31 December 2012.</li> <li>2. 31 January 2013.</li> <li>3. 31 October 2013.</li> </ol>
<b>Responsible Person</b>	<p>Tony Shanahan – Branch Manager Metering.</p>

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 12.1(3)	
<b>Compliance Manual Reference</b>	297	284
<b>Obligation Description</b>	A retailer or distributor must at least provide the specified advice to a customer when handling a complaint.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>Discussions with Customer Services Centre personnel revealed that the Customer Contact Centre Staff do not provide the notification of their right to have their complaint escalated to those customers who had their complaint resolved at first contact.</p> <p>Western Power was unaware of the need to inform those customers who were deemed to have their complaint resolved at first contact of their rights in accordance with the Code of Conduct specifications.</p> <p>Review of those complaints escalated to the Customer Resolution Team revealed that during the first half of the audit period, Western Power was unable to provide evidence of the required notification.</p> <p>During March 2012 the Corporation has reviewed its processes for responding to complaints and have implemented an appropriate escalation notification process.</p> <p>However, customers whose complaints were resolved at first contact were not included as part of the process improvement.</p>	
<b>Recommendation</b>	<p>1. That Western Power:</p> <ol style="list-style-type: none"> <li>a) Examines the feasibility of including within its initial voice recognition (IVR) system a complaint filter. Upon selection by the customer of the “complaint” identifier, a pre-recorded message advising the customer of their rights be played prior to the call being answered; and</li> <li>b) If deemed feasible, implement the solution.</li> </ol>	

	<p>2. Alternatively, Western Power trains and instructs its Customer Contact Centre staff to provide advice with respect to the right of escalation when dealing with any complaints.</p>
<b>Management Response</b>	<p>Western Power has examined the option of including a complaints filter as part of its IVR however considers that this option would create too many IVR options for a caller and therefore be too confusing (the number of IVR options already exceeds the number which is recommended).</p> <p>To ensure compliance with this obligation Western Power's Contact Centre staff are currently being trained to automatically escalate a call which relates to any type of customer dissatisfaction to Western Power's designated complaints team. The designated complaints team are trained in the complaints handling process, in particular, the complaints handling notification requirement.</p>
<b>Management Actions</b>	<p>Review of complaints handling process to ensure that calls which relate to some sort of customer dissatisfaction are escalated to the designated complaints team and the necessary complaints handling notification is being provided.</p>
<b>Implementation Date</b>	<p>30 November 2012.</p>
<b>Responsible Person</b>	<p>Kerry Kennedy-Lennie – Branch Manager Customer Assist.</p>
<b>Status of Management Action</b>	<p>Closed.</p>

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 13.8(1)	
<b>Compliance Manual Reference</b>	309	296
<b>Obligation Description</b>	A distributor must keep a record of the total number of connections provided and connections not provided on or before the agreed date.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>1. Prior to May 2012, whilst Western Power had kept a record of the total number of connections provided and connections not provided on or before an agreed date, our testing revealed that the records were inaccurate.</p> <p>The obligation requires that where a connection is unable to be made within the prescribed timeframe, a positive written confirmation from the customer must be retained as evidence of agreement to be connected in a later period.</p> <p>Enquiries revealed that for each of the identified instances, Western Power had implemented a new process in August 2011, where the Corporation had contacted the customer by telephone and come to an agreement for the connection to be undertaken in a later period. Although it was indicated that the customers had agreed by telephone and a letter was subsequently forwarded to the customer, positive written confirmation from the customer was not retained by Western Power. Therefore, without written evidence, Western Power had incorrectly calculated the number of connections made within the 20 business days and connections made outside of or before an agreed date.</p> <p>However, subsequent to May 2012, we noted that Western Power improved its process that required a positive confirmation letter to be retained from the Customer, as outlined in compliance manual reference 75. Post May 2012, our testing did not reveal any exceptions.</p>	

	<p>2. Western Power report internally on connections that have not met the prescribed time frames.</p> <p>Prior to 1 October 2011, Western Power’s data records surrounding compliance manual obligation 77, captured total numbers of compliant and non-compliant energisations and the data could not be independently verified.</p> <p>Subsequent to 1 October 2011, Western Power improved its data capture and reporting surrounding the energising of new connections. We were able to verify the number of non-compliant energisations reported by Western Power for the months of October 2011, December 2011 and May 2012.</p>
<p><b>2011 Compliance Report – Status of Remedial Action</b></p>	<p>Western Power had implemented the remedial actions in the timeframes specified.</p> <p>However, our testing revealed inaccuracies in the reporting of the total number of connections provided and connections not provided on or before an agreed date, as the process implemented in August 2011 did not meet the requirements of the Code as discussed above.</p>
<p><b>Recommendation</b></p>	<p>None – requirement has been addressed.</p>

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 13.8(2)	
<b>Compliance Manual Reference</b>	310	297
<b>Obligation Description</b>	A distributor must keep a record of the total number of reconnections provided other than those specified and the total number of those reconnections not provided within the prescribed timeframe.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>1. Our review of monthly exception reports revealed inaccuracies in Western Power’s records for the total number of reconnections provided and the total number of reconnections not provided within the prescribed timeframe.</p> <p>Our review revealed that:</p> <ul style="list-style-type: none"> <li>• Western Power identified 27 reconnections that were outside the prescribed timeframe for the period ending June 2011. However, our testing revealed an additional 8 non-compliant reconnections; and</li> <li>• Western Power identified 47 reconnections that were outside the prescribed timeframe for the period ending July 2011. However, our testing revealed an additional 10 non-compliant reconnections.</li> </ul> <p>Metering Services staff indicated that for the additional non-compliances identified we identified, the “required by date” had been altered within MBS, resulting in Western Power not identifying the reconnections outside the required timeframe. There were 3 ways in which the “required by date” was altered within MBS. These were by:</p> <ul style="list-style-type: none"> <li>• Western Power Officers not following the correct procedures and re-allocating the job to Field Officers;</li> <li>• AMRS Contractors, however, the cause could not be determined as the AMRS Contractors were no longer in the office; and</li> </ul>	

	<ul style="list-style-type: none"> <li>• MBS, however, the cause could not be determined.</li> </ul> <p>2. Our enquiries with Metering Services staff and review of reports revealed that prior to December 2011, Western Power did not have a process in place for managing urgent reconnections with a retailer and recording urgent reconnections accurately.</p> <p>However, post December 2011, Western Power established and implemented processes to facilitate urgent reconnection activities. This involved the retailer initially submitting a request for an urgent reconnection through the Web Metering Portal. Meter Reading Officers would then allocate the jobs to Field Officers through MBS, which has the functionality to change the field status from “standard” to “urgent” and for commentary to be inserted. In situations where a job has initially been requested by the retailer as a standard reconnection job and it changes to an urgent matter, the retailer will send an email to the Meter Reading mail inbox and also follow up on the matter via telephone to ensure that the job has been appropriately acted upon. Once the job has been completed by the Field Officer and the completion advice form has been forwarded to the Metering Branch, the job is closed off within MBS.</p> <p>We obtained evidence to substantiate Western Power engaging the retailer in the re-design of the workflow and communication of urgent reconnections. Our review of monthly exception reports also confirmed that Western Power has separated the recording of urgent reconnections to ensure that they are accurately captured, including the time at which field officers complete the job for a particular reporting period.</p>
<b>2011 Compliance Report – Status of Remedial Action</b>	<p>Western Power had not implemented the remedial actions in the timeframes specified.</p> <p>The revised process for the recording and reporting of urgent reconnections was only implemented in December 2011. Further, our testing revealed that the “required by date” for reconnections could be altered within MBS resulting in inaccuracies in the reporting of reconnections outside the required timeframe.</p>
<b>Recommendation</b>	<p>That Western Power should:</p> <ol style="list-style-type: none"> <li>1. Review MBS functionality to ensure that it accurately calculates and records the reconnection “required by date” in accordance with the Code of Conduct.</li> </ol>

	<ol style="list-style-type: none"> <li>2. Re-configure MBS to ensure that the “required by date” is locked.</li> </ol>
<b>Management Response</b>	<p>Western Power currently achieves over 97% compliance with the obligations under the Code of Conduct for reconnections as reported in the Western Power’s Annual Compliance Report. Western Power notes that out of 407 reconnections which did not occur within the required timeframe 180 of those were as a result of a second visit being required to reconnect the customer.</p> <p>Western Power acknowledges and accepts the improvement opportunity identified to ensure that fields in MBS are locked to ensure accurate data capture and reporting.</p>
<b>Management Actions</b>	<ol style="list-style-type: none"> <li>1. Review MBS functionality (as part of MBS upgrade 6.6) to ensure that it accurately calculates and records the reconnection “required by date” in accordance with the Code of Conduct.</li> <li>2. Re-configure MBS (as part of MBS upgrade 6.6) to ensure that the “required by date” field is locked.</li> </ol>
<b>Implementation Date</b>	<ol style="list-style-type: none"> <li>1. 31 January 2013.</li> <li>2. 31 October 2013.</li> </ol>
<b>Responsible Person</b>	Tony Shanahan – Branch Manager Metering.

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 13.10(1)	
<b>Compliance Manual Reference</b>	312	299
<b>Obligation Description</b>	A distributor must keep a record of the customer complaint indicators specified.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>Enquiries made with Customer Service Centre and Customer Assist Branch staff revealed that Western Power does not record those complaints resolved on first contact.</p> <p>The complaint indicators maintained by the Corporation is for those complaints that have been escalated to its Customer Resolution Team.</p> <p>Discussions revealed that Customer Contact Centre staff do receive complaints and have resolved a number of complaints during the first phone call, however, these complaint contacts were not recorded.</p> <p>As a result, the record keeping report provided to the Authority is inaccurate and incomplete.</p>	
<b>Recommendation</b>	<ol style="list-style-type: none"> <li>1. That Western Power requires its Customer Contact Centre staff to record those complaints resolved during first contact within NetCIS, including the nature of the complaint and the resolution.</li> <li>2. That the Record Keeping Report processes be reviewed for integrity to ensure that the information required to be captured and reported to the Authority is accurate and complete.</li> </ol>	
<b>Management Response</b>	Western Power records all calls. Notwithstanding this, Western Power will review its guidance, training and processes to ensure complete clarity for customer service agents on when to classify contacts as a “complaint”.	
<b>Management Actions</b>	<ol style="list-style-type: none"> <li>1. Review of complaints handling process to provide clarity as to whether a call that is resolved on the first call should be classified as a complaint.</li> </ol>	

	2. Review of complaints record keeping procedures to ensure that necessary information is captured and reported.
<b>Implementation Date</b>	<ol style="list-style-type: none"> <li>30 November 2012.</li> <li>31 December 2012.</li> </ol>
<b>Responsible Person</b>	Kerry Kennedy-Lennie – Branch Manager Customer Assist.
<b>Status of Management Actions</b>	<ol style="list-style-type: none"> <li>Closed.</li> <li>Status of management action not determined.</li> </ol>

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 13.14	
<b>Compliance Manual Reference</b>	317	304
<b>Obligation Description</b>	A distributor must keep a record of the total number of customers who are connected to its network.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>Enquiries made with the Metering Services Branch and Customer Services Branch revealed that Western Power had included within the total number of connections to its network, those connections who were not its customers.</p> <p>This was attributed to the failure of the Corporation to appropriately filter those connections who were customers of another network service provider.</p> <p>As a result of the inaccurate recording and reporting process Western Power implemented a revised its process for reporting on the total number of customers connected report in February 2012. The Corporation re-ran the number of connections report and our review of the output did not reveal any further exceptions in this regard.</p> <p>Review of the 2010/2011 record keeping report provided to the Authority and discussion with the Corporation revealed that he records relating to the number of connections within this report was inaccurate.</p>	
<b>2011 Compliance Report – Status of Remedial Action</b>	Western Power was identified to have developed a check list that would facilitate the preparation of the Record Keeping Report. This remedial action has been completed.	
<b>Recommendation</b>	Western Power should regularly prepare a report detailing the total number of customers who are connected to its network. The report should be reviewed quarterly for integrity.	

<b>Management Response</b>	<p>Management acknowledges the auditors' observations and recommendation and has now implemented a fully revised data capture and documentation process to accurately identify the number of customers who are connected to the network (which was used to create the 2011/12 report).</p>
<b>Management Actions</b>	<p>Review the fully revised data capture and documentation process on a quarterly basis for integrity.</p>
<b>Implementation Date</b>	<p>31 December 2012.</p>
<b>Responsible Person</b>	<p>Gino Giudice – Group Manager Customer Service.</p>

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 13.15(1)	
<b>Compliance Manual Reference</b>	318	305
<b>Obligation Description</b>	A retailer and a distributor must prepare a report setting out the information required by Part 13 of the Code of Conduct, in respect of each year ending on 30 June. The report must be published no later than the following 1 October.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<ol style="list-style-type: none"> <li>1. Although a checklist was developed and implemented during the preparation of the 2010/2011 Record Keeping Report, the report was found to be inaccurate and incomplete due to non-compliances identified for compliance manual references 309, 310, 312, 313 and 317.</li> <li>2. Enquiries with the Customer Assistance Branch revealed that on 5 June 2012, Western Power had enhanced its controls in compiling data for the 2011/2012 Record Keeping Report. This requires the relevant data owner to: <ul style="list-style-type: none"> <li>• Specify items that are to be included and excluded in calculating the required information;</li> <li>• State the source data and method of calculation; and</li> <li>• Sign off on the validity of the required information.</li> </ul> <p>Whilst Western Power had implemented these controls, we were not able to determine their effectiveness as the 2011/2012 Record Keeping Report was not yet published.</p> </li> <li>3. Our review of web log records verified that the 2010/2011 Record Keeping Report was published on 30 September 2011.</li> </ol>	
<b>2011 Compliance Report – Status of Remedial Action</b>	Western Power has created a checklist to ensure that each requirement under Part 13 of the Code of Conduct is included in its annual report. However, the accuracy and completeness of the report information remains to be an issue.	

<b>Recommendation</b>	That Western Power considers conducting a review of the implemented controls to determine their adequacy and effectiveness during the preparation of its Record Keeping Report to ensure integrity of information provided to the Authority.
<b>Management Response</b>	Management acknowledges the auditors' observations and recommendation and has now implemented a fully revised data capture and documentation process to accurately identify the number of customers who are connected to the network.
<b>Management Actions</b>	Review the fully revised data capture and documentation process on a quarterly basis for integrity.
<b>Implementation Date</b>	31 December 2012.
<b>Responsible Person</b>	Gino Giudice – Group Manager Customer Service.

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 14.4(1)	
<b>Compliance Manual Reference</b>	326	313
<b>Obligation Description</b>	A distributor must acknowledge and respond to a written query or complaint by a customer within the timeframes prescribed.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>1. Sample based testing revealed 6 instances where Western Power had not acknowledged or responded to written complaints within the prescribed timeframes.</p> <p>Management indicated that the cause for the instances for failing to acknowledge or respond to a written query or complaint within the prescribed timeframe was due to resource constraint issues and oversight during the monitoring process from the Team Leader.</p> <p>2. Further, walkthrough of the process for responding to written queries revealed that NetCIS did not have the functionality to separate a written query from a complaint. Enquiries with Customer Service Centre staff revealed that written queries would be recorded within the complaint indicator in NetCIS due to the same response timeframe. However, this approach will result in the Corporation over reporting on its complaint indicators.</p> <p>In terms of the absence of functionality with NetCIS to adequately capture a written query, Western Power personnel revealed that the original coding did not provide for this.</p> <p>During the audit period, Western Power performed a review of its monitoring and response process involving the production of a daily report detailing the Corporation's activities with respect to responsiveness. A manual review identifies those matters requiring immediate attention and is acted upon as a priority. Sample based testing post April 2012 did not reveal any exceptions.</p>	

<b>2011 Compliance Report – Status of Remedial Action</b>	<p>Western Power was observed to have developed a checklist which details each requirement under Part 13 of the Code of Conduct.</p>
<b>Recommendation</b>	<ol style="list-style-type: none"> <li>1. The Corporation examines the feasibility of developing auto-escalation functionality into its NetCIS system that alerts the business of the requirement to respond to a written query or complaint and if deemed feasible, implement the solution.</li> <li>2. During the determination of the feasibility for the above recommendations, continue with the manual monitoring strategy, focusing on ensuring that a number of staff are across the process and are actively engaged to manage the Corporation’s compliance with this obligation.</li> </ol>
<b>Management Response</b>	<p>Western Power’s web site features an auto-acknowledgement confirming to a customer that correspondence has been received, however, up until recently if the customer sent an ordinary email (not via the web site) the auto-acknowledgement did not occur. Western Power has reviewed the systems by which a customer submits an ordinary email to <a href="mailto:enquiry@westernpower.com.au">enquiry@westernpower.com.au</a> to ensure acknowledgement to the customer occurs as per clause 14.4 (1) of the Code of Conduct. This will eliminate the chance that Western Power does not acknowledge a written complaint which is provided via email to <a href="mailto:enquiry@westernpower.com.au">enquiry@westernpower.com.au</a>.</p>
<b>Management Actions</b>	<p>Examine the feasibility of developing auto-escalation functionality in NetCIS that alerts the business of the requirement to respond to a written query or complaint and if deemed feasible, implement the solution.</p>
<b>Implementation Date</b>	<p>31 December 2012.</p>
<b>Responsible Person</b>	<p>Kerry Kennedy-Lennie – Branch Manager Customer Assist.</p>

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.5(6)	
<b>Compliance Manual Reference</b>	339	<a href="#">326</a>
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>Sample based testing revealed that there were instances where Synergy were not charged in accordance with the charges as specified within the model SLA.</p> <p>Western Power had charged Synergy cancellation fees for meter replacements which were not established within the charges of the model SLA.</p> <p>We noted that on 8 March 2012, Synergy had acknowledged and agreed to incur cancellation fees to by way of email correspondence and continue to pay the associated charges as invoiced.</p> <p>Further, we noted that Western Power is in negotiations to revise the model SLA. The inclusion of cancellation fees relating to metering installation tests have been raised during these negotiations.</p>	
<b>2011 Compliance Report – Status of Remedial Action</b>	Western Power had implemented the remedial actions stated within the 2011 Compliance Report.	
<b>Recommendation</b>	None – requirement has been addressed.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.11(1)	
<b>Compliance Manual Reference</b>	347	334
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>1 Discussion with Metering Branch staff and sample based testing revealed that Western Power was unable to meet the minimum levels of availability of its metering installations on its network for the collection of data as prescribed within the Metering Code.</p> <p>The difficulty experienced by Western Power to meet the minimum availability was contributed to a number of factors including:</p> <ul style="list-style-type: none"> <li>• Remote locations of a number of its metering installations;</li> <li>• Weather; and</li> <li>• Availability of communication facilities from the respective TELCO where the communication link uses a SIM card.</li> </ul> <p>2 Further, Western Power did not have a monitoring mechanism to enable the Corporation to have visibility over its performance during the audit period. A COGNOS report was developed in December 2011 / January 2012. Prior to this period, Western Power could not substantiate its performance against the prescribed criteria.</p>	
<b>2011 Compliance Report – Status of Remedial Action</b>	<p>Western Power investigated the feasibility of allowing auto substitution of interval data prone to human error however implementation did not occur by the action date.</p> <p>Reports for monitoring level of availability were observed to have been developed by the action date.</p>	

<b>Recommendation</b>	<ol style="list-style-type: none"> <li>1. Review the new COGNOS report to determine and ensure the integrity of the report.</li> <li>2. For those instances where metering installations are identified to have an availability issue and the matter is within Western Power's control, the Corporation continues to investigate and perform the necessary rectification actions in a timely manner.</li> </ol>
<b>Management Response</b>	<p>Currently, Western Power does not have a monitoring mechanism to have visibility over all interval meters' availability to be read and a project is currently underway to develop a report to monitor visibility over all interval meters' availability.</p> <p>Western Power acknowledges the recommendation to continue investigating availability issues concerning metering installations and perform any necessary rectification actions in a timely manner and agrees to continue doing this.</p>
<b>Management Actions</b>	<p>Finalise current COGNOS reporting project to deliver on-going monitoring of all meters.</p>
<b>Implementation Date</b>	<p>30 November 2012.</p>
<b>Responsible Person</b>	<p>Tony Shanahan – Branch Manager Metering.</p>
<b>Status of Management Action</b>	<p>Closed.</p>

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.16(3)	
<b>Compliance Manual Reference</b>	360	347
<b>Obligation Description</b>	If a device is used as a data logger, the energy data for a metering point on the network must be collated in trading intervals within the metering installation unless it has been agreed between the network operator and the Code participant that energy data may be recorded in sub- multiples of a trading interval.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>Discussions with Metering Branch staff revealed that 98% of Western Power’s data loggers collected energy data in 15 minute intervals as opposed to the stipulated trading interval (30 minutes) in the Metering Code.</p> <p>Enquiries revealed that no agreements to log energy data in 15 minute intervals existed with retailers. However, review of correspondences revealed that Western Power had met with Synergy to resolve the issue on multiple occasions but the retailer advised that it does not support Western Power collecting energy data in 15 minute intervals.</p> <p>Further, we noted that Western Power had submitted an application to the Office of Energy in July 2010 requesting that clause 3.16(3) of the Metering Code be amended to:</p> <ul style="list-style-type: none"> <li>• remove the requirement for the retailer and Western Power to agree for interval data to be recorded in sub-multiples of the trading interval; and</li> <li>• to allow for interval energy data to be recorded in a trading interval or sub-multiples of a trading interval.</li> </ul> <p>As at 30 June 2012, Western Power was awaiting the outcome of these amendments to be finalised by the Public Utilities Office (formerly the Office of Energy). We obtained and reviewed the following supporting documentation to confirm that the review process was currently being undertaken:</p>	

	<ul style="list-style-type: none"> <li>the “Amendments to Electricity Industry Metering Code 2005, Final Recommendation Report, August 2011”, which details the Office of Energy’s final recommended Metering Code amendments to be forwarded to the Minister of Energy for endorsement; and</li> <li>the draft copy of the “Proposed Amended Electricity Industry Metering Code, July 2012”.</li> </ul>
<b>2011 Compliance Report – Status of Remedial Action</b>	No further action was required as Western Power was awaiting the outcome of the Metering Code amendments to be finalised.
<b>Recommendation</b>	Western Power should investigate the feasibility of employing the functionality within its data loggers to record energy data at intervals prescribed by the Metering Code, in the event the Minister of Energy does not approve the Corporation’s proposed amendments to the Metering Code.
<b>Management Response</b>	<p>As identified in the audit observations revisions to the Metering Code that apply to clause 3.16(3) are likely to be implemented. The implementation of the proposed revision would result in Western Power being compliant with this obligation.</p> <p>The effort, resources and expenditure in resolving these breaches, before the implementation of the new Code, is not considered prudent or efficient.</p>
<b>Management Actions</b>	No further action unless the revised Metering Code is not gazetted by 31 March 2013 in which case Western Power will investigate how to ensure compliance with the obligation.
<b>Implementation Date</b>	If revised Metering Code is not gazetted by 31 March 2013, investigate necessary compliance processes by 30 June 2013.
<b>Responsible Person</b>	Tony Shanahan – Branch Manager Metering.

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.16(5) Electricity Industry Metering Code clause 3.16(6)	
<b>Compliance Manual Reference</b>	361 & 362	<a href="#">348 &amp; 349</a>
<b>Obligation Description</b>		
	361	A network operator or a user may require the other to negotiate and enter into a written service level agreement in respect of the matters in the metrology procedure dealt with under clause 3.16(4) of the Code.
	362	A network operator may only impose a charge for the matters dealt with in the metrology procedure in accordance with the applicable service level agreement between it and the user.
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch and review of documents revealed that both the metrology procedure and the model SLA do not address the requirements under clause 3.16(4) of the Metering Code.</p> <p>Clause 3.16(4) of the Metering Code requires that the metrology procedure must specify how the network operator (Western Power) is to produce the “Notional Wholesale Meter” value for the purposes of, and as defined in, the market rules.</p> <p>Our enquiries with Metering Services staff revealed that the Notional Wholesale Meter value is determined by the Independent Market Operator (the “IMO”) and not Western Power.</p> <p>We noted that Western Power had submitted to the Office of Energy in July 2010 an application requesting that:</p> <ul style="list-style-type: none"> <li>• clause 3.16(4) be removed from the Metering Code; and</li> <li>• the Authority considers a consequential amendment to the Metrology Procedure to remove the requirement for the</li> </ul>	

	<p>network operator (Western Power) to produce the Notional Wholesale Meter value.</p> <p>As at 30 June 2012, Western Power was awaiting the outcome of these amendments to be finalised by the Public Utilities Office (formerly the Office of Energy). We obtained and reviewed the following supporting documentation to confirm that the review process was currently being undertaken:</p> <ul style="list-style-type: none"> <li>the “Amendments to Electricity Industry Metering Code 2005, Final Recommendation Report, August 2011”, which details the Office of Energy’s final recommended Metering Code amendments to be forwarded to the Minister of Energy for endorsement; and</li> <li>the draft copy of the “Proposed Amended Electricity Industry Metering Code, July 2012”.</li> </ul>
<b>2011 Compliance Report – Status of Remedial Action</b>	No further action was required as Western Power was awaiting the outcome of the Metering Code amendments to be finalised.
<b>Recommendation</b>	In the absence of a ruling from the Minister, Western Power consider stating the required terms in the metrology procedure and establishes how it will be dealt with in the model SLA.
<b>Management Response</b>	<p>As identified in the audit observations revisions to the Metering Code that apply to clause 3.16(5) and (6) are likely to be implemented. The implementation of the proposed revision would result in Western Power being compliant with these obligations.</p> <p>The effort, resources and expenditure in resolving these breaches, before the implementation of the new Code, is not considered prudent or efficient.</p>
<b>Management Actions</b>	No further action unless the revised Metering Code is not gazetted by 31 March 2013 in which case Western Power will investigate how to ensure compliance with the obligation.
<b>Implementation Date</b>	If revised Metering Code is not gazetted by 31 March 2013 investigate necessary compliance processes to ensure compliance by 30 June 2013.
<b>Responsible Person</b>	Tony Shanahan – Branch Manager Metering.

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.18(1)	
<b>Compliance Manual Reference</b>	363	350
<b>Obligation Description</b>	If the Electricity Retail Corporation supplies electricity to a contestable customer at a connection point under a non-regulated contract, and in circumstances where immediately before entering into the contract, the electricity retail corporation supplied electricity to the contestable customer under a regulated contract, then the metering installation for the connection point must comply with the prescribed wholesale market metering installation requirements.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<ol style="list-style-type: none"> <li>As a result of Western Power not complying with the wholesale market metering requirements under clause 3.16(3), 3.16(5) and 3.16(6) of the Metering Code, Western Power does not comply with the requirements under this obligation. Refer to compliance manual references 360, 361 and 362 for further clarification.</li> <li><u>Type 4 – 5 meters</u> In addition to not complying with the above compliance manual references, our enquiries revealed that prior to August 2011, Western Power did not have a documented process in place surrounding the Corporation’s adopted methodology for determining the metering installation type for each connection point for Type 4 and 5 meters.  However, subsequent to August 2011, we noted that Western Power documented its process for the determination of meter installation for Types 4 and 5 meters for each connection point.  Type 4 and 5 meter installations were determined by the Interval Data Team by utilising a formula developed by the Complex Metering and Lab Team. We performed a walkthrough of this new process and sample based testing did not reveal any exceptions.</li> </ol>	

	<p>3. <u>Type 1 – 3 meters</u></p> <p>We noted that Type 1 – 3 meter installations were determined through the high voltage metering project document that had been developed using the meter tender document, meter revenue specification and Western Power L and G meter data storage document to ascertain market metering requirements. Sample based testing did not reveal any exceptions.</p> <p>4. Prior to December 2011, Western Power did not have a formalised reporting process to enable the annual review of correct determination of meter installation types.</p> <p>However, subsequent to December 2011, we noted that Western Power established a “Meter Installation Type Exception Report” process to facilitate the annual review of correct determination of meter installation types.</p> <p>The Meter and Asset Distribution team would run Meter Installation Type Exception reports which would be reviewed against the meter installation type requirements as per Appendix 1 of the Metering Code. Where a meter installation type requires altering, this is updated by the Meter and Asset Distribution team and notes would be added against the NMI for that meter within MBS. Where a meter installation type also requires the meter to be changed, a service order is raised within MBS and the job is allocated to a Field Officer who would replace the meter and forward the completed advice form to the Meter and Asset Distribution team. The meter installation type would subsequently be updated and the service order would be closed with notes added against the NMI for that meter within MBS.</p> <p>We performed a walkthrough of this new process with a representative of the Meter and Asset Distribution team.</p>
<b>2011 Compliance Report – Status of Remedial Action</b>	<p>Western Power had implemented the remedial actions in the timeframes specified.</p>
<b>Recommendation</b>	<p>That Western Power incorporates those recommendations under compliance manual reference 360, 361 and 362 to ensure Western Power complies with the prescribed wholesale market metering installation requirements.</p>

<b>Management Response</b>	<p>As identified in the audit observations revisions to the Metering Code that apply to clause 3.18(1) are likely to be implemented. The implementation of the proposed revision would result in Western Power being compliant with these obligations.</p> <p>The effort, resources and expenditure in resolving these breaches, before the implementation of the new Code, is not considered prudent or efficient.</p>
<b>Management Actions</b>	<p>No further action unless the revised Metering Code is not gazetted by 31 March 2013 in which case Western Power will investigate how to ensure compliance with the obligation.</p>
<b>Implementation Date</b>	<p>If revised Metering Code is not gazetted by 31 March 2013 then investigate necessary compliance processes to ensure compliance by 30 June 2013.</p>
<b>Responsible Person</b>	<p>Tony Shanahan – Branch Manager Metering.</p>

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.21(1)	
<b>Compliance Manual Reference</b>	366	353
<b>Obligation Description</b>	Meters containing an internal real time clock must maintain time accuracy as prescribed. Time drift must be measured over a period of 1 month.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>1. Our review and discussions with staff from the Metering Services Branch revealed that prior to July 2012, time drift was not monitored on a monthly basis for all meter types containing an internal real time clock.</p> <p>Our enquiries confirmed that subsequent to July 2012, a formalised monitoring process was developed, documented and implemented for all meter types. We noted that Western Power monitor time drift on its meters by running monthly compliance reports. We obtained and reviewed the methodology and work procedures surrounding these reports.</p> <p>2. As data was only provided for May 2012 and June 2012, sample based testing for these months revealed instances where time accuracy was not maintained as prescribed within the Metering Code for Type 5 meters.</p> <p>Our enquiries made with the Metering Branch revealed that time accuracy was not maintained for the identified instances due to power outages and weak/deteriorating back-up batteries within the meters.</p> <p>We noted that for Type 5 meters, time accuracy data is manually read by Western Power Officers at the customer's premise using portable hand held devices (FC200). Once the data is downloaded and read, it is transferred onto the MV90 system at the Metering Branch offices.</p>	

	<p>3. Our enquiries revealed that prior to December 2011, time drift parameter settings within MV90 had been incorrectly set up.</p> <p>We noted that for Type 1 – 4 meters with communication links, the MV90 system automatically flags and adjusts metering installations that are not within time accuracy.</p> <p>Our review revealed that a 10 second time drift parameter had been set up within MV90. Therefore, time drift for Type 1 and 2 metering installations would never be adjusted, as the Metering Code only allows for clock errors of 5 seconds and 7 seconds per month for Type 1 and 2 metering installations.</p> <p>However, subsequent to December 2011, the MV90 system parameters for meters containing an internal real time clock were adjusted (to 4 seconds) to ensure the tolerance level for clock errors fulfils the Metering Code requirements. We reviewed the system parameters within MV90 and confirmed that the adjustments were made.</p>
<b>2011 Compliance Report – Status of Remedial Action</b>	<p>Western Power had not implemented the remedial actions in the timeframes specified.</p> <p>The monthly monitoring and correction of time drift process was only developed, documented and implemented in July 2012. Therefore, the effectiveness of the new monitoring process could not be determined.</p>
<b>Recommendation</b>	<p>That Western Power:</p> <ol style="list-style-type: none"> <li>1. Review the time accuracy maintained for all Type 5 meters, and correct the time drift where inaccuracies are identified; and</li> <li>2. Consider establishing and implementing a monitoring mechanism to prevent time accuracy errors outside the prescribed timeframes in circumstances where a power outage occurs or the back-up battery within the meters is weak/has deteriorated.</li> </ol>
<b>Management Response</b>	<p>As noted in the audit observations, Western Power has implemented the required actions to monitor time drift for all Type 5 interval meters. It is acknowledged that Western Power now needs to investigate the implementation of a monitoring mechanism to prevent time accuracy errors due to a power outage or a deteriorated battery.</p>

<b>Management Actions</b>	<ol style="list-style-type: none"> <li>1. Implement time drift monitoring policy for all Type 5 interval meters including policy for the correction of time drift inaccuracies which are identified.</li> <li>2. Investigate the method of monitoring to prevent future time accuracy errors due to a power outage or a deteriorated battery.</li> </ol>
<b>Implementation Date</b>	<ol style="list-style-type: none"> <li>1. Completed (August 2012).</li> <li>2. 31 March 2013.</li> </ol>
<b>Responsible Person</b>	Tony Shanahan – Branch Manager Metering.
<b>Status of Management Actions</b>	<ol style="list-style-type: none"> <li>1. Closed.</li> <li>2. Status of management action not determined.</li> </ol>

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 4.8(4) Electricity Industry Metering Code clause 4.8(5)	
<b>Compliance Manual Reference</b>	386 & 387	<a href="#">373 &amp; 374</a>
<b>Obligation Description</b>		
	386	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.
	387	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.
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>1. Prior to September 2011, whilst Western Power did have certain processes in place to ensure its metering installation and metering database were secured from unauthorized local or remote access, the Corporation did not have a formal meter access authority matrix in place for both the metering installation and metering database.</p> <p>However, post September 2011, it was noted that Western Power developed and implemented “passwords authority level matrices” on both its metering installations and metering database. Our enquiries and review of the “passwords authority level matrices” revealed that access levels to the metering installation and metering database varied depending on the Officer’s position and division. We also noted that:</p> <ul style="list-style-type: none"> <li>• application requests for access to the metering database required approval from the Officer’s Team Leader/Manager and an MBS Service Support personnel;</li> </ul>	

	<ul style="list-style-type: none"> <li>• application requests for access to the metering installation required approval from the Metering Services Branch personnel;</li> <li>• MBS passwords are required to be changed every 30 days; and</li> <li>• MBS user accounts are locked if a password is attempted wrongly after 3 times.</li> </ul> <p>Through our testing, we confirmed that Western Power has restricted user access rights to the appropriate personnel.</p> <p>2. Prior to September 2011, our enquiries revealed that the Readings Management Team, who primarily validated energy data, had full access rights to the metering installation as the metering software (EMPWin) was installed on their computers. Therefore, personnel within the Team had the capability to reprogram the meters and delete the interval energy data.</p> <p>However, subsequent to September 2011, it was noted that Western Power removed the metering software from the Readings Management Team’s computers to ensure appropriate access was only provided to users of the software. Our testing confirmed that the metering software had been removed from the computers.</p>
<b>2011 Compliance Report – Status of Remedial Action</b>	<p>Western Power had implemented the remedial actions in the timeframes specified.</p>
<b>Recommendation</b>	<p>None – requirement has been addressed.</p>

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.3	
<b>Compliance Manual Reference</b>	391	378
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>Sample based testing and review of cycle reports revealed instances where basic data had not been obtained and transferred within the prescribed timeframe.</p> <p>Enquiries with staff from the Metering Services Branch revealed that these instances were the result of:</p> <ul style="list-style-type: none"> <li>• Access restrictions to customer’s premise, preventing a field officer from obtaining energy data;</li> <li>• Delays in meter reading rounds caused by adverse weather conditions; and</li> <li>• Logistical issues encountered for Type 5 meters that require a special probe to obtain readings.</li> </ul> <p>We noted that Western Power has investigated the feasibility of enabling data to be recorded on handheld devices for Type 5 meters and are currently considering the implementation of this within MBS release 6.6.</p> <p>Further, our review revealed where there were a number of late meter reading rounds for basic data, the appropriate penalties were imposed on AMRS in accordance with the contract agreement.</p>	
<b>2011 Compliance Report – Status of Remedial Action</b>	<p>Western Power investigated the feasibility of allowing auto substitution of interval data prone to human error however implementation did not occur by the action date.</p> <p>Western Power did not achieve compliance with this obligation by the stated timeframe due to the audit observations outlined.</p>	

<b>Recommendation</b>	That Western Power re-examines the process for obtaining and transferring data and if feasible, implement any potential efficiencies that can be gained to ensure compliance with this licence obligation.
<b>Management Response</b>	<p>26,084 of 6,891,308 (0.04%) meter reads collected in the audit period were not completed within the prescribed timeframes mainly due to late meter reading rounds caused by a number of field technology failures and short term field resourcing issues.</p> <p>Western Power accepts that the implementation of technology to allow Type 5 manual reads to be more reliably probed and data uploaded is valid. Western Power agrees there is merit in re-examination of meter reading resourcing to increase the level of compliance.</p>
<b>Management Actions</b>	<ol style="list-style-type: none"> <li>1. Replacement of current meter reading handheld data units to improve field technology reliability.</li> <li>2. Enable Type 5 meters to be manually read via MVRS routes through the implementation of MBS version 6.6 to improve reliability of data transfer.</li> <li>3. Review meter reading field resourcing and if feasible implement any efficiencies to increase the level of compliance.</li> </ol>
<b>Implementation Date</b>	<ol style="list-style-type: none"> <li>1. 30 April 2013.</li> <li>2. 31 October 2013.</li> <li>3. 31 March 2013.</li> </ol>
<b>Responsible person</b>	Tony Shanahan – Branch Manager Metering.

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.6(1)	
<b>Compliance Manual Reference</b>	396	383
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>Sample based testing revealed instances where Western Power did not provide substituted or estimated interval data for a metering point to the current user and the IMO within the prescribed timeframe.</p> <p>Enquiries with staff from the Metering Branch explained that for those identified instances, delays were primarily caused by the interval data substitution process being manual. Specifically, these delays were a result of Western Power personnel:</p> <ul style="list-style-type: none"> <li>• Not detecting a metering point that required substitute data within the prescribed timeframe;</li> <li>• Waiting for a meter to be reprogrammed before substituted data was provided;</li> <li>• Deciding not to provide substituted data due to the meter belonging to a decommissioned site; and</li> <li>• Requiring a confirmation that a site was offline before the manual substitution took place.</li> </ul> <p>We noted that Western Power programmed MBS with the functionality to auto-substitute interval data during the period in two phases. In February 2012, auto substitution functionality was implemented for revenue meters and in June 2012, check meters were able to substitute interval data.</p> <p>Subsequent to the implementation of auto substitution functionality for revenue meters, sample based testing did not reveal any exceptions.</p>	

<b>2011 Compliance Report – Status of Remedial Action</b>	Western Power investigated the feasibility of allowing auto substitution of interval data prone to human error however implementation did not occur by the action date.
<b>Recommendation</b>	None- requirement has been addressed.

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.12(1)	
<b>Compliance Manual Reference</b>	402	389
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>Sample based testing revealed an instance where Western Power was given a request for energy data and did not provide the energy data within the prescribed timeframe.</p> <p>Staff from the Metering Services Branch explained that whilst the service order had been completed within the prescribed timeframe, an unidentified issue within MBS delayed the provision of data to the retailer. At the time enquiries were made, the cause of the delay for requested data had not been determined.</p>	
<b>2011 Compliance Report – Status of Remedial Action</b>	Western Power upgraded MBS (release 6.3) by June 2011 however further issues were noted with this manual reference obligation. Please refer to the above audit observation.	
<b>Recommendation</b>	Western Power investigates MBS to determine the cause of the delay in order to ascertain whether the issue is systemic and rectify the issue.	
<b>Management Response</b>	Although during the audit one transaction for a “Provide Meter Data History” request was completed within the required timeframe it is acknowledged that the data was provided late to the retailer. Western Power receives approximately 500 “Provide Meter Data History” each month.	

<b>Management Actions</b>	<ol style="list-style-type: none"> <li>1. Investigate the cause of the event identified in the audit observation within MBS.</li> <li>2. If the cause is found to be systemic or system failure rather than an isolated event, then implement the appropriate remedial actions.</li> </ol>
<b>Implementation Date</b>	<ol style="list-style-type: none"> <li>1. 31 October 2012.</li> <li>2. If MBS update is required include in version 6.6 (proposed 31 October 2013).</li> </ol>
<b>Responsible Person</b>	<p>Tony Shanahan – Branch Manager Metering.</p>
<b>Status of Management Actions</b>	<ol style="list-style-type: none"> <li>1. Closed.</li> <li>2. Status of management action not determined.</li> </ol>

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.21(8)	
<b>Compliance Manual Reference</b>	422	409
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>1. Sample based testing revealed instances where Western Power imposed charges to Synergy for the cancellation of the metering installation tests, which is not outlined in the Model SLA.</p> <p>Enquiries with the Metering Branch revealed that prior to 8 March 2012, Western Power did not have a written agreement with Synergy to impose charges for the cancellation of metering installation tests.</p> <p>Through a review of email correspondence it was revealed that on 8 March 2012, Synergy agreed to incur cancellation fees related to the testing of metering installations.</p> <p>We noted that Western Power is in negotiations to revise the model SLA. The inclusion of cancellation fees relating to metering installation tests have been raised during these negotiations.</p> <p>2. Discussions with Metering Branch staff indicated that Western Power conducts a secondary review for the preparation of invoices according to a documented procedure. However, no evidence could be provided to substantiate that this process was being undertaken.</p>	

<b>2011 Compliance Report – Status of Remedial Action</b>	<p>Western Power considered the possibility of personnel within the Metering Infrastructure Team to complete the results of the meter tests against the service order within MBS but determined that it should not be implemented.</p> <p>Western Power did not implement the remedial action to align the current system set up of charges within MBS against the applicable SLA by the action date as it was able to obtain a MOU from the retailer stating that they (the retailer) are prepared to incur the relevant fee, but hold the right to reconsider at a later date. Sample based testing confirmed that the retailer continues to pay the charges as invoiced.</p>
<b>Recommendation</b>	<p>That Western Power retains evidence of review to substantiate secondary review had been undertaken.</p>
<b>Management Response</b>	<p>Western Power acknowledges the auditor’s findings and recommendation.</p>
<b>Management Actions</b>	<p>Adjust the secondary review process to ensure a way of retaining evidence of the review when no adjustment has occurred.</p>
<b>Implementation Date</b>	<p>30 November 2013.</p>
<b>Responsible Person</b>	<p>Tony Shanahan – Branch Manager Metering.</p>

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.22(1)	
<b>Compliance Manual Reference</b>	426	413
<b>Obligation Description</b>	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 minimum, the prescribed rules and procedures.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch, walkthrough of the process and review of documentation found that Western Power did not have all necessary processes in place to ensure compliance with this manual reference obligation over the entire audit period.</p> <ol style="list-style-type: none"> <li>1. Enquiries and walkthrough of the validation process revealed that prior to January 2012, Western Power did not validate energy data by conducting a comparison of revenue and check metering data. In January 2012, Western Power established and implemented a process to validate revenue data against check metering data. A walkthrough of the process and review of reports confirmed that revenue meter energy data that had failed automated MBS validation checks were populated on a report and manually validated against check meter data on a daily basis.</li> <li>2. Prior to March 2012, Western Power did not validate energy data through a check against a nominated maximum value for all its meters. Metering Branch staff advised that nominated maximum validations were not conducted earlier as the maximum values had to be established and calculated based on extracting archived field work data.</li> </ol> <p>Following March 2012, Western Power began validating energy data through a check against a nominated maximum value using MV90. However, there are still 142 meters outstanding that are not validated through this process.</p>	

	<p>Discussions revealed that maximum values had not been attained for the outstanding meters due to:</p> <ul style="list-style-type: none"> <li>• A lack of information from archived field work data to establish and calculate a maximum value; and</li> <li>• Safety regulations restricting field officers accessing CT chambers to obtain details for the maximum value.</li> </ul> <p>We noted that Western Power is currently investigating a suitable process to obtain the nominated maximum values for the remaining meters.</p>
<b>2011 Compliance Report – Status of Remedial Action</b>	Western Power investigated the feasibility of the MBS system change and decided not to include it within MBS 6.5. An alternative action has been established as outlined in the above audit observation.
<b>Recommendation</b>	<p>That Western Power:</p> <ul style="list-style-type: none"> <li>• Investigates and establishes nominated maximum values for the remaining meters; and</li> <li>• Validates the energy data for the remaining meters against the nominated maximum values.</li> </ul>
<b>Management Response</b>	Investigations are on-going on how to collect maximum values from the 142 meters that remain non-compliant with this obligation.
<b>Management Actions</b>	<ol style="list-style-type: none"> <li>1. Continue with investigations on how to obtain maximum values for the remaining 142 meters.</li> <li>2. If feasible, implement the findings of this investigation.</li> </ol>
<b>Implementation Date</b>	<ol style="list-style-type: none"> <li>1. 30 November 2012.</li> <li>2. 30 June 2013.</li> </ol>
<b>Responsible Person</b>	Tony Shanahan – Branch Manager Metering.
<b>Status of Management Actions</b>	<ol style="list-style-type: none"> <li>1. Closed.</li> <li>2. Status of management action not determined.</li> </ol>

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.22(2)	
<b>Compliance Manual Reference</b>	427	414
<b>Obligation Description</b>	A 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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>Discussions with the Metering Branch, walkthrough of the process and review of documentation found that Western Power did not have all necessary processes in place to ensure compliance with this manual reference obligation over the entire audit period.</p> <p>Enquiries and walkthrough of the validation process revealed that prior to January 2012, check metering data was available but did not use it to validate energy data.</p> <p>In January 2012, Western Power established and implemented a process to validate revenue data against check metering data. A walkthrough of the process and review of reports confirmed that revenue meter energy data that had failed automated MBS validation checks were populated on a report and manually validated against check meter data on a daily basis.</p> <p>Discussions revealed that Western Power does not need to adjust for differences in metering installation accuracy as partial check meters are not installed.</p>	
<b>2011 Compliance Report – Status of Remedial Action</b>	Western Power investigated the feasibility of the MBS system change and decided not to include it within MBS 6.5 An alternative action has been established as outlined in the aforementioned audit observation.	
<b>Recommendation</b>	None – requirement has been addressed.	

<b>Licence Condition</b>	Distribution Licence e condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.31(1) Electricity Industry Metering Code clause 5.31(2)	
<b>Compliance Manual Reference</b>	442 & 443	<a href="#">429 &amp; 430</a>
<b>Obligation Description</b>		
	442	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.
	443	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.
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>Discussions with staff from the Metering Services Branch revealed that Western Power and Horizon Power metering personnel agreed verbally in May 2009 that Western Power as the metering data agent will no longer:</p> <ul style="list-style-type: none"> <li>• assess the compliance of each metering installation in the Horizon network as required under 5.31(1) of the Metering Code; and</li> <li>• upgrade non-compliant meters as required under 5.31(2) of the Code.</li> </ul> <p>Although our review of the service level contract for metering services could not identify this agreement, our enquiries revealed that in December 2011 the agreement had been put in writing to</p>	

	<p>terminate the service level metering services between Western Power and Horizon Power. We obtained and reviewed this correspondence.</p> <p>Further, it was noted that Western Power had submitted to the Office of Energy in July 2010 a request that the Metering Code be amended to restrict the application of Division 5.4 limiting this provision so that the electricity networks corporation (Western Power) is only obligated to be a metering data agent for another network operator if the network operator's network is located within the licence boundaries of the South West Interconnected System (i.e. Western Power's licence area).</p> <p>As at 30 June 2012, Western Power was awaiting the outcome of these amendments to be finalised by the Public Utilities Office. We obtained and reviewed the following supporting documentation to confirm that the review process was currently being undertaken:</p> <ul style="list-style-type: none"> <li>the "Amendments to Electricity Industry Metering Code 2005, Final Recommendation Report, August 2011", which details the Office of Energy's final recommended Metering Code amendments to be forwarded to the Minister of Energy for endorsement; and</li> <li>the draft copy of the "Proposed Amended Electricity Industry Metering Code, July 2012".</li> </ul>
<b>2011 Compliance Report – Status of Remedial Action</b>	<p>No further action was required as Western Power was awaiting the outcome of the Metering Code amendments to be finalised.</p>
<b>Recommendation</b>	<p>None – requirement has been addressed.</p>

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 6.1(1)	
<b>Compliance Manual Reference</b>	445	432
<b>Obligation Description</b>	A network operator must, in relation to its network, comply with the agreements, rules, procedures, criteria and processes prescribed.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>Western Power is required to report on certain service elements on a quarterly basis while others may be agreed upon with the retailer. Our review revealed that Western Power does not comply with certain requirements outlined within the model SLA. Specifically:</p> <ul style="list-style-type: none"> <li>• Western Power does not have reporting capabilities across all elements of the model SLA. Enquiries with Metering Branch staff and review of compliance reports found that as of June 2012 Western Power was still in the process of developing reporting capabilities for remotely collected energy interval data (monthly) and standing data provision;</li> <li>• Due to inaccuracies in recordings for energising a premises or reconnecting after disconnection, the reporting of these SLA requirements were not accurate; (refer to compliance manual references 240 &amp; 310); and</li> <li>• Although Western Power reports on the model SLA to Synergy and has commenced reporting to Alinta as of March 2012 on a monthly basis, it was noted that Western Power does not provide any reports to the remaining retailers.</li> </ul> <p>Through our enquiries with the Metering Branch it was advised that Western Power had not provided reports to the remaining retailers as they were not requested.</p> <p>Further, through our enquiries and review of documentation, we noted that Western Power has mechanisms in place to facilitate compliance with the Communication Rules, metrology procedure, mandatory link criteria and registration process. Metering Branch</p>	

	<p>staff indicated that Western Power does not have a registration process relevant to this obligation.</p> <p>Enquiries made with the Metering Service Division with respect to the meeting of performance levels as prescribed within the SLA revealed that there were instances where performance levels had not been achieved.</p> <p>Specifically, Western Power was observed not to have met the 95% meter change service level during the audit scope period. The cause was determined to be an unforeseen take up of the installation of photovoltaic systems by customers.</p> <p>The strong take-up of the renewable energy scheme outside of the forecasted take up by customers had meant that Western Power did not meet the performance level associated with meter changes as detailed within the SLA.</p> <p>Further, the Metering Code Clause 5.1(1)(a) provides for a network operator to use all reasonable endeavours to facilitate a Code participant obtaining a metering service. Our enquiries revealed Western Power implemented a number of strategies in an effort to address not only the forecasted increase in the demand for services, but also the unforeseen increase in customer participation with the Scheme. Western Power activities included up-skilling of staff, recruitment and increased availability of field crews and equipment.</p>
<p><b>2011 Compliance Report – Status of Remedial Action</b></p>	<p>Western Power has investigated system changes for enhanced reporting however has not included them in MBS system release 6.5.</p> <p>Reporting capabilities across all elements of the model SLA have not been implemented by the action date.</p>
<p><b>Recommendation</b></p>	<p>That Western Power:</p> <ol style="list-style-type: none"> <li>1. Implement reporting capabilities for the outstanding SLA line elements, remotely collected energy interval data and standing data provision.</li> <li>2. Provide performance indicator reports to the remaining retailers for the SLA line elements that require reporting.</li> <li>3. Formally enter into discussions with the remaining retailers whether reporting is required for SLA line elements that can be agreed upon.</li> <li>4. In the event where Western Power is unable to meet its performance under the SLA, engage with affected Code</li> </ol>

	participants and inform them of the actions undertaken, including the proposed strategies to improve performance.
<b>Management Response</b>	Due to the recent enhancement in processes for remotely collected energy interval data and standing data provision, and their complexity, reports are still in development to support the provision of these data elements. Relevant retailers have been approached previously and it has been agreed with them that Service Level Agreement reporting was not required (by their request) however it is acknowledged that this was not formally recorded.
<b>Management Actions</b>	<ol style="list-style-type: none"> <li>1. Implement reporting capabilities for the outstanding SLA line elements, remotely collected energy interval data and standing data provision.</li> <li>2. Obtain formal confirmation from retailers of their requirements in terms of SLA reporting.</li> <li>3. Provide performance indicator reports to the remaining retailers for the SLA line elements that require reporting.</li> <li>4. Where Western Power is unable to meet the performance outlined in the SLA, Western Power will engage with the affected Code participants to inform them of actions taken/to be taken to meet the agreed performance standards.</li> </ol>
<b>Implementation Date</b>	<ol style="list-style-type: none"> <li>1. 30 November 2012.</li> <li>2. 31 December 2012.</li> <li>3. 31 January 2013.</li> <li>4. As required.</li> </ol>
<b>Responsible person</b>	Tony Shanahan – Branch Manager Metering.
<b>Status of Management Actions</b>	<ol style="list-style-type: none"> <li>1. Closed.</li> <li>2. Status of management action not determined.</li> <li>3. Status of management action not determined.</li> <li>4. Status of management action not determined.</li> </ol>

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 13(2)	
<b>Compliance Manual Reference</b>	465	452
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>1. Our review of summary reports revealed that the average total lengths of interruptions of supply exceeded the Electricity Industry (Network Quality and Reliability of Supply) Code 2005 requirements across all three following areas:</p> <ul style="list-style-type: none"> <li>• Perth CBD;</li> <li>• Urban areas other than the Perth CBD; and</li> <li>• Any other area of the State.</li> </ul> <p>Network Performance Branch staff indicated that the average total length of outages exceeded the Code requirements mainly due to:</p> <ul style="list-style-type: none"> <li>• Weather conditions outside of Western Power's control; and</li> <li>• Planning and works surrounding the asset management system upgrade that did not facilitate for the average length of outages to be met.</li> </ul> <p>2. Our review of Western Power's Network Performance KPI report revealed that Western Power did not meet the service standard benchmark for SAIDI (system average interruption duration index) which is a measure of the average total lengths of interruption within the rural long area for the year ending June 2011.</p>	

	<p>Network Performance Branch personnel indicated that Western Power’s rural long average SAIDI did not meet the service standards due to unseasonal environmental impacts.</p> <p>We noted that the service standard benchmarks for SAIDI were outlined within the Access Arrangement (2009 – 2012) approved by the Authority in January 2010. These service standard benchmarks have exclusions outside of Western Power’s control and allow for average total lengths of interruptions greater than the Electricity Industry (Network Quality and Reliability of Supply) Code 2005 requirements for the following areas:</p> <ul style="list-style-type: none"> <li>• CBD areas;</li> <li>• Urban areas;</li> <li>• Rural Short areas; and</li> <li>• Rural Long areas.</li> </ul> <p>We also noted that the service standard benchmarks for each area differ on a yearly basis.</p> <p>3. We noted that Western Power submitted an application to the Authority on 30 September 2011 for the revision of the Access Arrangement (2012 – 2017), to allow for appropriate average total lengths of interruption times to be different to the current Access Agreement times.</p> <p>We obtained and reviewed the proposal, and as at 30 June 2012, Western Power was awaiting the outcome of the proposal.</p>
<p><b>Recommendation</b></p>	<p>That Western Power engage the Public Utilities Office to consider revising clause 13(2) of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005 to align with the service standard benchmark definitions for SAIDI in the approved Access Arrangement.</p> <p>The number of minutes specified under clause 13(2) of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005 should not be better than any applicable service standard benchmarks approved by the Authority in the approved Access Arrangement.</p>
<p><b>Management Response</b></p>	<p>Management understands the need to approach the Public Utilities Office to have the revision of clause 13(2) of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005 considered.</p>

<b>Management Actions</b>	<p>Changes to the Electricity Industry (Network Quality and Reliability of Supply) Code 2005 are outside of Western Power's control. Notwithstanding this, Western Power will engage with the Public Utilities Office and raise the need to review and revise clause 13(2) of the Code to ensure that the average total lengths of interruptions of supply are aligned with the service standard benchmark definitions for SAIDI in the approved Access Arrangement.</p>
<b>Implementation Date</b>	<p>31 March 2013.</p>
<b>Responsible Person</b>	<p>Margaret Pyrchla – Branch Manager, Risk and Compliance.</p>

<b>Licence Condition</b>	Distribution Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 18	
<b>Compliance Manual Reference</b>	469	456
<b>Obligation Description</b>	A distributor operating a relevant distribution system must, in specified circumstances, make a payment to a customer within a specific timeframe for a failure to give required notice of planned interruption.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>Sample based testing revealed instances where Western Power failed to make payments to customers within the specified timeframe for failure to give notice of a planned interruption.</p> <p>Failure to make payments within the timeframe were primarily caused by time inefficiencies related to:</p> <ul style="list-style-type: none"> <li>• The separation of the compensation payment process across two teams; and</li> <li>• The compensation payment process requiring further investigations being undertaken to determine whether notice of a planned interruption was provided.</li> </ul> <p>We noted that in March 2012, Western Power consolidated the compensation payment process into one branch and enhanced the evidence retention team to reduce the amount of time taken to process applications. Further, each approved payment has now been given an identification number to improve the reconciliation process. Subsequent to March 2012, sample based testing did not reveal any exceptions where payments were not made within the prescribed timeframe.</p>	
<b>2011 Compliance Report – Status of Remedial Action</b>	Western Power has developed a checklist to ensure that all system defaults are reset following any future IT systems and has enhanced the team to ensure a dedicated resource is in place to process planned outage payments. However, compliance was not achieved by the action date.	
<b>Recommendation</b>	None – requirement has been addressed.	

<b>Licence Condition</b>	Distribution Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 19	
<b>Compliance Manual Reference</b>	470	457
<b>Obligation Description</b>	A distributor operating a relevant distribution system must, in specified circumstances, make a payment to a customer within a specific timeframe if a supply interruption exceeds 12 hours.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	2	
<b>Audit Observations</b>	<p>Sample based testing of payments made to customers where a supply interruption exceeded 12 hours revealed that payments were made outside of the prescribed timeframe.</p> <p>Analysis of late payments found that this trend was more prevalent in the early months of the scope period and found to improve towards the end of the audit scope period.</p> <p>Sample based testing also revealed customers had requested a review of their declined applications two months after receipt of the notice.</p> <p>This was contributed to a number of factors including:</p> <ul style="list-style-type: none"> <li>• sharing of the extended outage payment (EOP) role across two branches;</li> <li>• a gap in knowledge around Western Power's record retention process;</li> <li>• dependency on a manual review process; and</li> <li>• untimely process for determining validity of a claim where the claim had been rejected by the EOP system.</li> </ul> <p>Further review of the Network Quality and Reliability of Supply Code revealed that the Code was silent with regard to the timeframe by which a network operator is required to respond in the event the initial application was rejected. An application may be rejected for a number of reasons including the customer identifying an incorrect date, time or the field officer has not provided complete records of work undertaken and the impact of an interruption.</p>	

	<p>During the audit period, Western Power centralised the management of extended outage payments and built system intelligence into the extended outage payment process. The new functionality enables the Customer Contact Centre team to review those applications that have been rejected and investigate whether the claim was valid.</p> <p>Review of the June 2012 storm event found approximately 55,000 claims had been received of which a majority had been processed and approved for payment prior to the end of the month.</p> <p>The revised manual assessment processes were observed to be included in a daily workflow and this manual intervention found a large number of those applications previously declined were being subsequently approved.</p> <p>The communication of payment requirement has been converted into an automated process and Western Power's Finance system now performs the payment transaction via an interface.</p>
<b>2011 Compliance Report – Status of Remedial Action</b>	<p>The temporary IT fix was implemented and the data was found to be re-run. However, sample based testing revealed that compliance had not been achieved by the identified date.</p>
<b>Recommendation</b>	<ol style="list-style-type: none"> <li>1. That training of other EOP team members to include interrogative techniques to enable timely and accurate decisions to be made against EOP applications.</li> <li>2. That the Corporation engages with the relevant Regulator to clarify whether the prescribed timeframe applies to those applications which have been rejected and require further investigation. Based on the outcome of the discussion develop and implement a process that manages the Corporation's compliance with this obligation.</li> </ol>
<b>Management Response</b>	<p>As highlighted within the audit observations, the process around EOPs has been centralised and reviewed in order to ensure compliance with obligations regarding the time taken to provide a payment to a customer.</p>
<b>Management Actions</b>	<ol style="list-style-type: none"> <li>1. Provide EOP team members with interrogative techniques in relation to dealing with EOP applications.</li> <li>2. Treat any EOP's that are rejected, which the customer then raises a query about the rejection, under its complaints management obligations. Therefore Western Power will adhere to the timelines prescribed for addressing a complaint.</li> </ol>

<b>Implementation Date</b>	<ol style="list-style-type: none"><li>1. 31 January 2013.</li><li>2. 31 January 2013.</li></ol>
<b>Responsible Person</b>	Kerry Kennedy-Lennie – Branch Manager Customer Assist.

## 13. Detailed Findings – Compliance Elements which Require Minor Improvements

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 7.5	
<b>Compliance Manual Reference</b>	234	220
<b>Obligation Description</b>	A distributor who disconnects a customer's supply address for emergency reasons must provide a 24 hour emergency line and use its best endeavours to restore supply as soon as possible.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	4	
<b>Audit Observations</b>	<p>Discussions with Customer Service centre personnel and a BT representative revealed that the Corporation provides a 24 hour emergency line. However the Corporation's systems did not have the immediate functionality to identify if a customer was calling its emergency number.</p> <p>Further, it was established that Western Power did not have control over the all costs and therefore could not confirm whether a customer was being charged a cost of a local call.</p> <p>Although our audit procedures found that Western Power had technically contravened this manual reference obligation, the Authority was of the view that a contravention by the Corporation had not occurred and provided substantiation for its compliance.</p> <p>Based on this decision, Grant Thornton has given this manual reference obligation a compliance rating of 4.</p>	
<b>Recommendation</b>	<p>That Western Power investigates offering an alternative number that would ensure that mobile phone callers are being charged the cost of a local call.</p> <p>Otherwise provide a notice to call made to 13 numbers from mobile phone will incur additional charges.</p>	
<b>Management Response</b>	Western Power has conducted investigations with several telecommunication companies in relation to providing a phone number that charges mobile phone callers a local call fee only. Western Power are advised that there is currently no such product available.	

<b>Management Actions</b>	Provide notice of additional charges which will be incurred by a mobile phone caller on all of Western Power's electronic communications (i.e. website, emails) and future printed communication which include the 13 number.
<b>Implementation Date</b>	31 December 2012.
<b>Responsible Person</b>	Gino Giudice – Group Manager Customer Service.

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 13.10(2)	
<b>Compliance Manual Reference</b>	313	300
<b>Obligation Description</b>	A distributor must keep a copy of each customer complaint referred to in clause 13.10(1).	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	4	
<b>Audit Observations</b>	<p>Enquiries made with the Customer Assist Branch revealed that all phone calls that come into the Customer Contact Centre is recorded and retained. Further, written complaints are stored within the Corporation’s document management system.</p> <p>Western Power’s voice recording system employed within the Customer Contact Centre facilitated the capturing of those complaints received through the Customer Contact Centre.</p> <p>Written complaints were retained within the Corporation’s document management system and allocated a unique identifier.</p> <p>Based on our enquiries made and sample based testing, we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation</p>	
<b>Recommendation</b>	Whilst there is no requirement to record the details relating to a complaint received during a phone conversation against the customer’s account, the Corporation should consider implementing this requirement.	
<b>Management Response</b>	<p>Western Power’s experience shows that a complaint about a product or service provided by Western Power where a customer is seeking an action or response by Western Power is not able to be “completed” at time of call. These issues require investigation, remedy, considered explanation etc. which is beyond what is able to occur with the customer, on the phone, at time of call.</p> <p>Western Power records all calls. Notwithstanding this, Western Power will review its guidance, training and processes to ensure complete clarity for customer service agents on when to classify contacts as a “complaint”.</p>	

<b>Management Actions</b>	<ol style="list-style-type: none"> <li>1. Review of complaints handling process to provide clarity as to whether a call that is resolved on the first call should be classified as a complaint.</li> <li>2. Review of complaints record keeping procedures to ensure that necessary information is captured and reported.</li> </ol>
<b>Implementation Date</b>	<ol style="list-style-type: none"> <li>1. 30 November 2012.</li> <li>2. 31 December 2012.</li> </ol>
<b>Responsible Person</b>	Kerry Kennedy-Lennie – Branch Manager Customer Assist.
<b>Status of Management Actions</b>	<ol style="list-style-type: none"> <li>1. Closed.</li> <li>2. Status of management action not determined.</li> </ol>

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 27(1)	
<b>Compliance Manual Reference</b>	481	468
<b>Obligation Description</b>	A distributor or transmitter must prepare and publish a report about its performance in accordance with specified requirements.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	4	
<b>Audit Observations</b>	<p>Through our review of the Annual Reliability and Power Quality Report – 1 July 2010 – 30 June 2011 and web log records, we confirmed that the report required under Section 26 of Electricity Industry (Network Quality and Reliability of Supply) Code was published on 30 September 2011.</p> <p>We performed a reconciliation of the information contained in the report against the criteria prescribed in Schedule 1 of the Electricity Industry (Network Quality and Reliability of Supply) Code and confirmed that Western Power addressed all the relevant information.</p> <p>Enquiries with the Network Performance Branch revealed that although Western Power had a process in place to compile the report, the process was not documented.</p>	
<b>Recommendation</b>	We recommend that Western Power creates a checklist and documents its process for preparing the Annual Reliability and Power Quality report in order to facilitate the compilation of the report in the event key personnel are absent.	
<b>Management Response</b>	Western Power has an assigned functional area that is responsible for delivering the Annual Reliability and Power Quality report. Western Power acknowledges the recommendation for a checklist and to document the process in place to prepare the Annual Reliability report in the event that key personnel are absent.	
<b>Management Actions</b>	Network Performance branch to create a checklist that documents its processes for preparing the Annual Reliability and Power Quality report.	

<b>Implementation Date</b>	31 January 2013.
<b>Responsible person</b>	David Fyfe – Branch Manager Network Performance.

## 14. Detailed Findings – Compliance Elements which Do Not Require Further Action

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 2.2(1)(a)	
<b>Compliance Manual Reference</b>	1	1
<b>Obligation Description</b>	A network operator must treat all retailers which are its associates on an arms-length basis.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	N/A	
<b>Audit Observations</b>	Review of Western Power's operating structure, communication provided by the Legal and Governance Branch and search on ASIC's website confirmed that the Corporation does not have a retailer that is its associate.	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 2.2(1)(b)	
<b>Compliance Manual Reference</b>	2	2
<b>Obligation Description</b>	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-5 length application of the Electricity Industry Customer Transfer Code or the benefit is made available to all other retailers.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	N/A	
<b>Audit Observations</b>	Review of Western Power's operating structure, communication provided by the Legal and Governance Branch and search on ASIC's website confirmed that the Corporation does not have a retailer that is its associate.	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 3.1(1)(a)	
<b>Compliance Manual Reference</b>	3	3
<b>Obligation Description</b>	A network operator must publish a request for standing data form which must comply with Annex 1 of the Electricity Industry Customer Transfer Code.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>A review of the Metering Service Portal found that Western Power had published a request for standing data which complied with Annex 1 of the Electricity Industry Transfer Code.</p> <p>Based on our inspection we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 3.1(1)(b)	
<b>Compliance Manual Reference</b>	4	4
<b>Obligation Description</b>	A network operator must publish a request for historical data form which must comply with Annex 2 of the Electricity Industry Customer Transfer Code.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Our review of Western Power's request for historical data form which was published on the Corporation's Metering Service Web Portal confirmed that the form complies with Annex 2 of the Electricity Industry Transfer Code.</p> <p>Based on our review we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 3.1(2)	
<b>Compliance Manual Reference</b>	5	5
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch revealed that Western Power did not amend its data request form during the audit period.</p> <p>Walkthrough of the process confirmed that if the Corporation was to publish an amended data request form, the Corporation's Metering Services Branch were conversant with the requirements as detailed within Annex 1 or Annex 2 of the Electricity Industry Transfer Code.</p> <p>Observation of the data request form and comparison performance of historical data request form confirmed no amendments had been made during the scope period.</p> <p>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 3.7(1)	
<b>Compliance Manual Reference</b>	10	10
<b>Obligation Description</b>	A network operator must, subject to clause 3.7(3) of the Electricity Industry Customer Transfer Code, electronically notify a retailer if its data request is not valid.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Enquiries with Metering Services Branch, review of MBS and Web Service Centre Metering Portal functional specifications revealed that Western Power has configured its system to automatically reject a data request that is not valid.</p> <p>A walkthrough of the Metering Service Centre Web Portal and MBS confirmed that upon the rejection of an invalid data request, the Metering Service Centre Web Portal automatically notifies the retailer.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 3.7(2)	
<b>Compliance Manual Reference</b>	11	11
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Sample based testing of standing data requests confirmed that Western Power provided data to the requesting retailer within the timeframe prescribed.</p> <p>The provision of standing data request was observed to be an automated functionality within MBS. Discussion with the Metering Branch staff revealed that the communication of the standing data and provision of the information is a result of a valid electronic “handshake.” Western Power was observed to facilitate requests that exceeded the limit as prescribed within the Transfer Code.</p> <p>Western Power has a monitoring mechanism in place to assist with the identification of any instances where standing data is not provided within the prescribed timeframe. There were no exceptions identified where the Corporation had not provided the standing data request within the prescribed period.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 3.8(1)	
<b>Compliance Manual Reference</b>	12	12
<b>Obligation Description</b>	A network operator must use all reasonable endeavours to provide to the retailer the requested data under a valid data request.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Review of extracts of standing data provided to the retailer as a result of receipt of a valid data request confirmed the provision of data by Western Power. Discussions with the Metering Services Branch personnel revealed that MBS is designed to provide a timely response to a valid request. The provision of data in response to the receipt of a valid data request is an automated function communicated through an electronic portal.</p> <p>Our enquiries made with Metering Services staff confirmed that Western Power has undertaken reasonable endeavours to provide a retailer the requested data upon receipt of a valid data request. This was also demonstrated through the explanations of the development of the MBS functionality.</p> <p>Through our audit procedures, we have concluded that Western Power has adequate and effective controls in place to support compliance with this obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 3.8(2)(a)	
<b>Compliance Manual Reference</b>	13	13
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Metering Services Branch is responsible for ensuring that the format of a data request is in accordance with the Communication Rules. A copy of the approved Communication Rules had been obtained and further explanation was provided by the Metering Services staff with respect to the design of the electronic data request format.</p> <p>Metering Services staff extracted a sample of electronic data requests that had been previously utilised by a retailer. The format was compared with the requirements of the Communication Rules and found to be in accordance with the prescribed format.</p> <p>Through our discussions and review of the electronic data request format, we have concluded that Western Power has adequate and effective controls in place to support compliance with this obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 3.8(2)(b)	
<b>Compliance Manual Reference</b>	14	14
<b>Obligation Description</b>	A network operator must provide the requested data under a valid data request in accordance with a specified timetable.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Sample based testing, description of MBS functionality and walkthrough of the automated valid data request process with the Metering Services Branch confirmed that Western Power provides requested data under a valid data request within the prescribed timeframes.</p> <p>Discussions with Metering Services Branch staff revealed that MBS has been designed to include system controls and process to facilitate a timely response. Samples obtained demonstrated Western Power's response in a large number of instances exceeded the prescribed timeframes.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliant with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 3.8(3)	
<b>Compliance Manual Reference</b>	15	15
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with staff from the Metering Services Branch revealed that MBS business rules have been established to address this licence obligation.</p> <p>Sample based testing of NMI (UMI) identification requests and responses provided, confirmed the provision of up to a maximum of 10 exit points to the retailer. Business rules within MBS drives an automated response in accordance with the response required from the electronic request submitted.</p> <p>Based on our sample testing, discussions with Metering Services Branch personnel with regards to the MBS system functionality, walkthrough of the procedures for the provision of up to 10 exit points upon receipt of a request, we have concluded that Western Power has adequate and effective controls in place to support compliant with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 3.10(1)	
<b>Compliance Manual Reference</b>	20	20
<b>Obligation Description</b>	A network operator must not charge for the provision of standing data.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Enquiries with staff from the Metering Services Branch and inspection of charges confirmed that Western Power did not have a set of business rules built to initiate a charge from a request for standing data.</p> <p>Review of MBS functional specification and a walkthrough request for standing data process found that MBS is configured to provide standing data automatically through the Metering Service Centre Web Portal at no charge.</p> <p>Testing of the system confirmed that standing data for a metering point was provided automatically at no charge.</p> <p>Based on our discussions, review of documentation and a walkthrough we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 3.10(2)	
<b>Compliance Manual Reference</b>	21	21
<b>Obligation Description</b>	A network operator must not charge more for historical consumption data than the defined amounts.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Enquiries with Meter Services Branch and review of the model SLA revealed that Western Power charges the retailer for the provision of historical consumption data if the request made, is for 13-24 months of data.</p> <p>Discussions with Metering Services staff, review of the MBS functional specifications and a walkthrough of the Metering Service Centre Web Portal found that MBS is configured to provide historical consumption data through the Metering Service Centre Web Portal.</p> <p>Sample based testing and review of retailer invoices against historical consumption data requests confirmed that charges were in accordance to the model SLA.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 4.1	
<b>Compliance Manual Reference</b>	22	<a href="#">22</a>
<b>Obligation Description</b>	A network operator must publish a customer transfer request form which must comply with Annex 3 of the Electricity Industry Customer Transfer Code.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Our review of the customer transfer request available on Western Power's Metering Services Branch Web Portal, confirmed that the form complied with Annex 3 of the Electricity Industry Transfer Code.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 4.9(1)	
<b>Compliance Manual Reference</b>	31	31
<b>Obligation Description</b>	A network operator must object to a customer transfer request in certain circumstances as set out in clause 4.9(1) of the Electricity Industry Transfer Code.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch and review of the MBS functional specifications revealed that MBS had business rules configured to object a customer transfer request according to the circumstances set out in clause 4.9(1) of the Electricity Industry Transfer Code.</p> <p>Sample based testing of customer transfer requests that failed validation confirmed that MBS objected those requests in accordance with the circumstances prescribed in clause 4.9(1) of the Electricity Industry Transfer Code.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 4.9(2)	
<b>Compliance Manual Reference</b>	32	32
<b>Obligation Description</b>	A network operator must not object to a customer transfer request otherwise than in accordance with clause 4.9(1) of the Electricity Industry Customer Transfer Code.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with Metering Services staff and review of the MBS functional specifications revealed that MBS was designed and is configured to object a customer transfer request in accordance with circumstances set out in clause 4.9(1) of the Electricity Industry Transfer Code.</p> <p>Sample based testing of objected customer transfer request confirmed that MBS objected requests in accordance with circumstances prescribed in the Electricity Industry Transfer Code.</p> <p>Based on our discussions, sample based testing and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 4.9(3)	
<b>Compliance Manual Reference</b>	33	33
<b>Obligation Description</b>	A network operator that objects to a customer transfer request must give an electronic notice detailing specified information to a retailer within the timeframe prescribed.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch staff, walkthrough of the Metering Service Branch Web Portal and review of the MBS functionality found that notification detailing the reason the customer transfer request has been rejected is automatically provided through MBS and the Metering Service Branch Web Portal.</p> <p>Sample based testing of rejected customer transfer requests confirmed that Western Power provides electronic notification detailing the reason for the rejected transfer within the timeframe prescribed.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 4.9(6)	
<b>Compliance Manual Reference</b>	34	34
<b>Obligation Description</b>	A network operator and retailer must agree to a revised nominated transfer date in certain circumstances.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Enquiries made with the Metering Services Branch staff revealed that Western Power has processes in place to revise a nominated transfer date in certain circumstances. Further, we noted that the Metering Analyst and Account Managers would communicate by email with the retailer to determine and agree upon a revised transfer date.</p> <p>Walkthrough of the process, sample based testing and a review of email correspondence confirmed that Western Power and the retailer had agreed to a revised transfer date.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 4.10(1)	
<b>Compliance Manual Reference</b>	35	35
<b>Obligation Description</b>	A network operator must take certain action in accordance with a defined timetable following the receipt of a valid customer transfer request, subject to clauses 4.10(2) and 4.10(3) of the Electricity Industry Customer Transfer Code and using all reasonable endeavours to affect the transfer.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Our discussions with the Metering Services Branch, sample based testing and walkthrough of the customer transfer request process revealed that Western Power electronically notifies the current retailer through the Web Services Metering Portal and MBS of the nominated transfer date within the prescribed timeframes upon the submission of a valid customer transfer request.</p> <p>Walkthrough of the process found that a secondary manual validation check is also conducted to ensure the system has correctly inputted the nominated transfer date to determine whether a special read is required to be created. Further, it was found that Type 1 – 4 meters can be remotely read and commence on the midnight before the nominated transfer date. Types 5 meters require a service order to be raised and dispatched as they only can be manually read.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 4.10(2)	
<b>Compliance Manual Reference</b>	36	36
<b>Obligation Description</b>	A network operator must take certain action if it considers that it is unlikely to be able to meet its obligations under clause 4.10(1) of the Electricity Industry Customer Transfer Code within the defined timetable.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Enquiries with the Metering Services Branch, sample based testing and review of Western Power’s transfer calendar confirmed that electronic notifications were provided to the retailer in instances where Western Power was unable to meet the proposed timetable for the transfer and the new nominated date in the prescribed timeframe.</p> <p>Walkthrough of the customer transfer request process and revealed that Type 1 – 4 meters are remotely read commencing on the midnight before the nominated date. Type 5 meters requires to be manually probed to obtain the meter readings which are conducted the day after the nominated transfer date.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 4.10(3)	
<b>Compliance Manual Reference</b>	37	37
<b>Obligation Description</b>	In certain circumstances a network operator must electronically notify the retailer of the most likely exit points to which a customer transfer request relates, up to a maximum of 10, if the network operator has not allocated the exit point a UMI and it is unable to determine a single exit point to which the customer transfer request relates, within the specified timeframe.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch staff found that all exit points are allocated with a UMI/NMI through an automated function within MBS.</p> <p>Sample based testing confirmed that each exit point was allocated a UMI/NMI and that there were no identifiable instances for customer transfer requests where the exit point was not allocated a UMI/NMI.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 4.11(1)	
<b>Compliance Manual Reference</b>	38	38
<b>Obligation Description</b>	A transfer may only occur on a day the contestable customer's meter is actually read.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel revealed that Western Power has systems processes in place to ensure that a transfer may only occur on a day the contestable customer's meter is read.</p> <p>A walkthrough of the CTR process revealed that upon receiving a valid CTR, the request would be entered into Western Power's Transfer Calendar which will trigger MBS to schedule the meter to be read on the day of the transfer. Through our enquiries we noted that the Interval Data Team would be responsible for monitoring the meter reading on the nominated transfer date.</p> <p>Sample based testing and review of the electronic notification confirmed that customer transfers only occurred on the day that the meter is read.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 4.11(3)	
<b>Compliance Manual Reference</b>	39	39
<b>Obligation Description</b>	A network operator and the retailer must take certain action if the contestable customer's meter is not read on the nominated transfer date.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Enquiries with the Metering Services Branch staff and walkthrough of the CTR process revealed that where a meter could not be read on the nominated transfer date, then Western Power would contact the incoming retailer and schedule a new nominated transfer date. Further, MBS had the functionality to automatically notify the current retailer that the meter was not read and the new nominated transfer date.</p> <p>Through sample based testing we confirmed that electronic notifications were provided within the prescribed timeframe.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 4.12(3)	
<b>Compliance Manual Reference</b>	40	40
<b>Obligation Description</b>	The parties to an access contract must negotiate in good faith any necessary amendments to the access contract arising from certain circumstances.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Through discussions with the Customer Solutions Branch and walkthrough of the process to amend the access contract where required, Western Power has demonstrated the action it would take to facilitate the amendment of the contract and was determined to be considered as their best endeavours.</p> <p>In the event that an access contract requires amending and disputes arise, Western Power have a process in place to ensure the dispute is handled appropriately. Our enquiries revealed there were no complaints relating to amendments of access contracts during the audit period.</p> <p>Based on discussions and walkthrough of the processes in place and testing we have concluded that there are adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 4.14	
<b>Compliance Manual Reference</b>	42	42
<b>Obligation Description</b>	A network operator must, following a transfer, do all that is necessary to ensure that charges up to the transfer time are paid by or charged to the previous retailer and charges from the transfer time are paid by or charged to the incoming retailer.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch staff revealed that Western Power has systems and processes in place to ensure compliance with this manual reference obligation.</p> <p>A walkthrough of the customer transfer process found that meter reading data obtained on the nominated transfer date was automatically separated by MBS according to the previous and incoming retailer based on the time of the transfer. Through this process, relevant charges are able to be allocated to the previous retailer up to the transfer time and to the incoming retailer from the transfer time.</p> <p>Sample based testing confirmed that meter reading and billing information was separated to the incoming and previous retailer at the time of the transfer.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 4.15	
<b>Compliance Manual Reference</b>	43	43
<b>Obligation Description</b>	In the case of a transfer to reverse an erroneous transfer, a network operator and all affected retailers (and the independent market operator if applicable) must act in good faith to ensure that the rights and obligations of the affected contestable customer are as they would have been had the erroneous transfer not occurred.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel revealed that in the event of a transfer to reverse an erroneous transfer, Western Power has controls and processes to ensure the rights and obligations of the affected customer are as they would have been had the erroneous transfer not occurred.</p> <p>A walkthrough of the customer transfer process revealed that if a retailer notifies Western Power of an erroneous transfer, a CTR Change Response notification will be issued to the retailer. Subsequent to this, the status of the transfer is changed within MBS and the Metering Analyst and System Support staff make the necessary adjustments to MV90 and metering routes.</p> <p>Through a review of MBS records and correspondence, we confirmed that that records and details were reverted to the original state prior to the customer transfer, ensuring rights and obligations of the affected customer are unaffected.</p> <p>Based on our discussions, walkthrough of the process and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 5.1(1)	
<b>Compliance Manual Reference</b>	46	46
<b>Obligation Description</b>	A network operator must submit communication rules to the Authority within six months after the commencement of the Electricity Industry Customer Transfer Code.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch staff revealed that the activity relating to this manual reference obligation occurred outside the scope period. However, we confirmed that Western Power had developed and submitted the Communication Rules in 2005 in accordance with Part 6 of the Electricity Industry Metering Code 2005 and Part 5 of the Electricity Industry Customer Transfer Code 2004.</p> <p>Review of the Communication Rules found that Western Power had published the document on Western Power's website and was approved by the Authority on the 16 December 2005 under the Electricity Industry Customer Transfer Code. Further, no changes have been made to the communication rules during the audit period.</p> <p>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 5.1(3)	
<b>Compliance Manual Reference</b>	47	47
<b>Obligation Description</b>	A network operator must take certain action before submitting the communication rules to the Authority.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch revealed that there have not been any activities relating to this manual reference obligation during the audit scope period. However, enquiries with the Metering Services Branch management and review of the approval notice from the Authority dated 14 February 2006 confirmed that Western Power had undertaken the required actions before submitting the Communication Rules to the Authority. Further, Western Power's Communication Rules have not been amended since they were approved by the Authority.</p> <p>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 5.1(4)	
<b>Compliance Manual Reference</b>	48	48
<b>Obligation Description</b>	A network operator and a retailer must comply with approved communication rules.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch staff along with mapping of the Communication Rules to a number of MBS processes demonstrated that the approved Communication Rules were instrumental in the design of a number of MBS key functional specifications and processes that were discussed.</p> <p>Review of the Build Pack which defines the procedures and processes used to communicate data between Western Power and retailers and the approved Communication Rules did not identify any exceptions.</p> <p>Based on our enquiries and walkthrough of the approved Communication Rules and its application within Western Power, we have concluded that the Corporation has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 6.2	
<b>Compliance Manual Reference</b>	49	49
<b>Obligation Description</b>	A licensee's notice in relation to a data request or a customer transfer must identify the exit point to which it relates.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Through our discussions with the Metering Services Branch personnel, we found that every exit point relating to a data request of a customer transfer is allocated a UMI/NMI.</p> <p>Sample based testing confirmed that notices relating a data request and customer transfers under Part 3 or Part 4 identified the exit point through its UMI/NMI. No meters with unallocated exit points were found.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 6.3(1)	
<b>Compliance Manual Reference</b>	50	50
<b>Obligation Description</b>	A network operator must use its reasonable endeavours to ensure that a retailer can give it notice by post, facsimile or electronic communication and notify the retailer of a telephone number for voice communication.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch, inspection of Western Power's website and an Electricity Transfer Access Contract revealed that Western Power has processes and systems in place to ensure a retailer can give it notice by post, facsimile or electronic communication.</p> <p>A walkthrough of the communication process confirmed that Western Power notifies the retailer of a telephone number for voice communication through its website.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 6.3(2)	
<b>Compliance Manual Reference</b>	51	51
<b>Obligation Description</b>	A network operator must notify each retailer of its initial contact details, and any amended contact details at least three business days before the change takes effect.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	<p>Walkthrough of the change notification process with the Branch Manager and the Metering Services Branch management confirmed that Western Power would facilitate the timely notification of change of its contact details prior to the change taking effect.</p> <p>Review of the change notification process also revealed that Western Power does have the ability to electronically notify each retailer of the revised contact details.</p> <p>Enquiries also revealed that Western Power did not have any of its contact details changed during the audit period.</p> <p>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 6.6	
<b>Compliance Manual Reference</b>	54	54
<b>Obligation Description</b>	A network operator or a retailer must send required electronic communications to the applicable electronic communication address, in accordance with Annex 6.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch and review of electronic communication revealed that Western Power's communication process and controls are based against the Communication Rules which are in accordance with the Customer Transfer Code.</p> <p>Sample based testing of electronic communication confirmed that electronic communication sent by Western Power was in a consistent data format that contained information in accordance with Annex 6.</p> <p>Based on our audit procedures we have concluded that there were adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code clause 7.1(1)	
	Electricity Industry Customer Transfer Code clause 7.1(2)	
	Electricity Industry Customer Transfer Code clause 7.1(3)	
	Electricity Industry Customer Transfer Code clause 7.2(4)	
	Electricity Industry Customer Transfer Code clause 7.3(2)	
<b>Compliance Manual Reference</b>	55, 56, 57, 58 & 59	<a href="#">55, 56, 57, 58 &amp; 59</a>
<b>Obligation Description</b>		
55	For a dispute in respect of a matter under or in connection with the Electricity Industry Customer Transfer Code, any disputing party must meet within five business days of a request from another disputing party and attempt to resolve the dispute by negotiations in good faith.	
56	If the negotiations in 7.1(1) of the Electricity Industry Customer Transfer Code do not resolve the dispute within 10 days after the first meeting, the dispute must be referred to the senior executive officer of each disputing party who must attempt to resolve the dispute by negotiations in good faith.	
57	If the dispute is resolved, the disputing parties must prepare a written and signed record of the resolution and adhere to the resolution	
58	A disputing party that refers a dispute to the Authority must give notice to the Authority of the nature of the dispute, including specified details.	
59	A disputing party must at all times conduct itself in a manner which is directed towards achieving the objectives in clause 7.3(1) of the Electricity Industry Customer Transfer Code.	
<b>Reporting Type</b>	NR, NR, 2, NR and NR	

<b>Compliance Rating</b>	N/R
<b>Audit Observations</b>	<p>Through our enquiries it was revealed that prior to September 2011, Western Power did not have a dispute resolution framework that provided a methodology for identifying, classifying, recording, resolving and communicating a dispute.</p> <p>In September 2011, Western Power developed and implemented a dispute resolution procedure in accordance with requirements prescribed within the Transfer Code. The dispute procedure has been developed and published to major customers and agreed to by the Metering Account Managers.</p> <p>Further, discussions with Metering Services Branch staff revealed that Western Power has an escalation framework in place to address an issue before it may escalate into a dispute. This is achieved through communication with their Metering Account Managers from the Customer Solutions Branch or, if agreed upon, via B2B Steering Committee meetings.</p> <p>Enquiries revealed that during this audit period there were no disputes relating to the Transfer Code.</p> <p>In the absence of activity with regard to these obligations, we have determined that we could not rate these compliance manual reference obligations.</p>
<b>Recommendation</b>	Nil.

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code Annex 1	
<b>Compliance Manual Reference</b>	60	60
<b>Obligation Description</b>	A network operator's request for stranding data must require a retailer to provide certain information.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Through our discussions with the Metering Services Branch staff, we found that Western Power's standing data form is published on the Metering Service Centre Web Portal and was designed to meet the requirements prescribed within Electricity Industry Customer Transfer Code Annex 1.</p> <p>A walkthrough of the stranding data request process revealed that the standing data form requires the retailer to provide information prescribed within the Electricity Industry Customer Transfer Code Annex 1.</p> <p>Based on our audit procedures, we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code Annex 2	
<b>Compliance Manual Reference</b>	61	61
<b>Obligation Description</b>	A network operator's request for historical consumption data must require a retailer to provide certain information.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel revealed that Western Power's historical consumption data form is published on the Metering Service Branch Web Portal and was designed in accordance with Electricity Industry Customer Transfer Code Annex 2.</p> <p>A walkthrough of the historical data request process revealed that the historical data form requires the retailer to provide information prescribed within the Electricity Industry Customer Transfer Code Annex 2.</p> <p>Based on audit procedures, we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code Annex 3	
<b>Compliance Manual Reference</b>	62	62
<b>Obligation Description</b>	A network operator's customer transfer request form must require a retailer to provide certain information.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel revealed that that Western Power's CTR form was designed to request information prescribed under Annex 3 of the Electricity Industry Customer Transfer Code.</p> <p>Our inspection of the CTR request form published on the Metering Service Centre Web Portal confirmed that a retailer is required to provide information prescribed within the Electricity Industry Customer Transfer Code Annex 3.</p> <p>Based on our audit procedures, we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code Annex 4 clause A4.2	
<b>Compliance Manual Reference</b>	64	64
<b>Obligation Description</b>	A network operator must provide certain metering data, if available in a prescribed manner to a retailer who submits a request for historical consumption data.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch staff and walkthrough of the request for historical consumption data process through the Metering Services Centre Web Portal revealed that Western Power provides the required information in accordance with Electricity Industry Transfer Code Annex 4 clause A4.2.</p> <p>Sample based testing confirmed that Western Power provided the requested historical consumption data in the format prescribed under Electricity Industry Metering code Annex 4 clause A4.2.</p> <p>Based on our audit procedures, we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code Annex 5 clause A(2)	
<b>Compliance Manual Reference</b>	65	65
<b>Obligation Description</b>	A network operator must respond to a request from a retailer for a UMI and checksum for an exit point within one business day of receiving a retailer's request.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel and walkthrough of the request process revealed that a retailer is able to use the Metering Services Centre Web Portal to submit a request for a UMI and checksum which will be automatically provided by MBS.</p> <p>Through sample based testing we confirmed that the UMI and checksum were automatically provided to the retailer within the one business day timeframe.</p> <p>Based on audit procedures, we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code Annex 5 clause A5(6)	
<b>Compliance Manual Reference</b>	66	66
<b>Obligation Description</b>	A network operator must provide the most likely matches to the retailer, up to a maximum of 99, if a request does not return a single UMI and checksum.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Enquiries made with Metering Services Branch personnel and sample based testing of retailer requests confirmed that Western Power has processes and systems in place to ensure compliance with this obligation.</p> <p>Walkthrough of the UMI/NMI discovery process revealed that this process is an inbuilt functionality within Western Power's MBS. Upon receipt of a retailer's request for a UMI/NMI identifier, MBS automatically provides the most likely matches to the retailer up to a maximum of 99.</p> <p>Based on our discussion, review of the Corporation's policies and procedures, and sample based testing, we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code Annex 5 clause A5(7)	
<b>Compliance Manual Reference</b>	67	67
<b>Obligation Description</b>	A network operator must, unless otherwise advised by the retailer, provide the UMI and checksum for the relevant exit point if a request returns a single UMI and checksum.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel and walkthrough of the request process revealed that a retailer is able to make a request for a UMI and checksum for an exit point through the Metering Services Branch Web Portal. Upon a request, the details will be provided automatically through MBS.</p> <p>Through sample based testing we confirmed that a UMI and checksum for the relevant exit point was provided where a request returned a single UMI and checksum.</p> <p>Based on our audit procedures, we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code Annex 6 clause A6.2(a)	
<b>Compliance Manual Reference</b>	68	68
<b>Obligation Description</b>	A network operator and a retailer must use reasonable endeavours to ensure that its information system on which electronic communications are made is operational 24 hours a day and 7 days a week.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch staff revealed that there were no instances where the information system was unavailable during the audit period. Further enquiries indicated that the system is monitored and regularly maintained to facilitate its operation 24 hours a day, 7 days a week.</p> <p>In the event of a disaster, Western Power has system backups and MBS Disaster Recovery Plans to ensure that electronic communications are made operational in accordance with Electricity Industry Customer Transfer Code Annex 6 clause A6.2(a).</p> <p>Based on audit procedures, we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code Annex 6 clause A6.2(b)	
<b>Compliance Manual Reference</b>	69	69
<b>Obligation Description</b>	A network operator and a retailer must establish a mechanism to generate an automated response message for each electronic communication (other than an automated response message) received at the electronic communication address.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch staff revealed that MBS has the functionality to generate an automated response for each electronic communication received at the electronic communication address.</p> <p>Walkthrough of the process and testing of the system confirmed that upon receipt of an electronically communicated message, an automated acknowledgement message is provided to the sender of the original email.</p> <p>Based on audit procedures, we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code Annex 6 clause A6.6	
<b>Compliance Manual Reference</b>	70	70
<b>Obligation Description</b>	The originator of an electronic communication must identify itself in the communication.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel and review of email correspondence revealed that electronic communication sent by Western Power staff includes their name, position, email and contact details in their email signature.</p> <p>We noted that Western Power's IT services established the information contained within staff's email signature in order to facilitate the identification of the originator of the communication.</p> <p>Based on our audit procedures, we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
<b>Obligations Under</b>	Electricity Industry Customer Transfer Code Annex 6 clause A6.7	
<b>Compliance Manual Reference</b>	71	71
<b>Obligation Description</b>	The originator of an electronic communication must use reasonable endeavours to adopt a consistent data format for information over time, to facilitate any automated processing of the information by the addressee.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel and review of email correspondence between metering analysts and retailers revealed that efforts have been made to follow a consistent format over time to facilitate any automated processing of information. Further, Western Power has established communication guidelines and protocols to ensure a consistent data format for information sent to the addressee.</p> <p>Based on our audit procedures, we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Obligation to Connect) Regulations regulation 3	
<b>Obligations Under</b>	Electricity Industry (Obligation to Connect) Regulations regulation 4	
<b>Compliance Manual Reference</b>	72	72
<b>Obligation Description</b>	A distributor must attach or connect premises to a distribution system if a retailer or customer takes certain action and the circumstances in regulation 5(1) of the Electricity Industry (Obligation to Connect) Regulations exist.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Connections Team Senior Advisor revealed that Western Power has systems and processes in place to ensure that premises are attached or connected to a distribution system in accordance with the Regulation 5(1).</p> <p>Our enquiries and walkthrough of the Obligation to Connect process revealed that customers submit applications by e-mail, fax or through the Western Power website. The Connections Team Senior Advisor then determines whether customers fulfil the connections requirements (using DFIS and SPIDER Web Systems) under regulation 5(1) and ensures that application forms have been completed appropriately. Customers are then sent an acknowledgement letter and if customers are eligible for an attachment or connection, they are contacted by telephone and a date is arranged for the connection job to be undertaken.</p> <p>Sample based testing confirmed that Western Power had attached or connected customer premises to its distribution system in instances where customers were deemed to be compliant and had completed application forms correctly.</p> <p>Based on our enquiries, walkthrough of processes and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Obligation to Connect) Regulations regulation 3	
<b>Obligations Under</b>	Electricity Industry (Obligation to Connect) Regulations regulation 5(5)	
<b>Compliance Manual Reference</b>	73	73
<b>Obligation Description</b>	A distributor that is obliged to attach or connect premises to the distribution system under regulation 4 of the Electricity Industry (Obligation to Connect) Regulations must extend the distribution system to a suitable connection point.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Connections Team Senior Advisor revealed that Western Power has systems and processes in place to ensure that the distribution system is extended to a suitable connection point where required and premises are attached or connected in accordance with regulation 5(5).</p> <p>Our enquiries and walkthrough of the Obligation to Connect process revealed that customers submit applications by e-mail, fax or through the Western Power website. The Connections Team Senior Advisor then determines whether customers fulfil connections requirements (using DFIS and SPIDER Web Systems) under the regulations and whether an extension to the distribution system to a suitable connection point is required. Customers are contacted by telephone and a date is arranged for the connection to be undertaken. Western Power's Design Team then carries out the extension of the distribution system to a suitable connection point.</p> <p>Sample based testing confirmed that Western Power had attached or connected customer premises to its distribution system in instances where customers were compliant with regulation 5(5).</p> <p>Based on our enquiries, walkthrough of processes and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Obligation to Connect) Regulations regulation 3	
<b>Obligations Under</b>	Electricity Industry (Obligation to Connect) Regulations regulation 5(6)	
<b>Compliance Manual Reference</b>	74	74
<b>Obligation Description</b>	The capacity and standard of an extension must be adequate for the supply required and in accordance with accepted good industry practice as it would be applied by a prudent distributor.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Connections Team Senior Advisor revealed that the extension of the distribution system to facilitate a connection or an attachment of a premise to the distribution network is undertaken by qualified and trained personnel.</p> <p>We performed a walkthrough of Western Power’s process for extending the distribution system and found that the distributor takes into consideration those aspects deemed to be good industry practice as it would be applied by a prudent distributor. Enquiries made with the Connections Team Senior Advisor revealed that Western Power considers good industry practice to be the relevant Australian Standards.</p> <p>Sample based testing revealed that Western Power had extended its distribution system to a suitable connection point to enable a premise to be attached or connected. Connection and extension data was viewed within DFIS and the information pertaining to the work undertaken was retained against the connection point.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry (Obligation to Connect) Regulations regulation 3	
<b>Obligations Under</b>	Electricity Industry (Obligation to Connect) Regulations regulation 7(1)	
<b>Compliance Manual Reference</b>	76	76
<b>Obligation Description</b>	A distributor must energise premises in certain prescribed circumstances.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Western Power does not monitor retailer service order requests for energising a premise as written law prohibits Western Power from energising a premise unless completion advice from an electrical contractor or inspector exists.</p> <p>Discussions with a Synergy representative indicate that in order for an electrical contractor or inspector to issue a completion advice, an authorisation number is required to be sought from Synergy. Western Power identifies the receipt of the completion advice as the time at which an obligation to energise a premise exists and will energise the premise accordingly.</p>	
<b>Status of 2011 Remedial Actions</b>	Western Power was observed to have completed the remedial actions in the timeframes specified and implemented additional set of controls surrounding this obligation.	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 22.1	
<b>Obligations Under</b>	Electricity Industry (Customer Contracts) Regulations 2005 regulation 36	
<b>Compliance Manual Reference</b>	99	(No old reference as it is new)
<b>Obligation Description</b>	The licensee must determine, from time to time, the default supplier for each connection point that connects to a distribution system operated by the licensee.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Meter Reading Manager and observation of MBS set-up revealed that Western Power by default records the default supplier for each exit point.</p> <p>As part of business as usual, Western Power maintains default supplier information for each NMI that connects to its distribution system. As a result the Corporation has the ability to identify the default supplier upon request.</p> <p>Sample based testing confirmed the default supplier details had been recorded against the respective exit points.</p> <p>Based on our enquiries and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 14.1 Transmission Licence condition 14.1	
<b>Obligations Under</b>	Electricity Industry Act section 13(1)	
<b>Compliance Manual Reference</b>	101	81
<b>Obligation Description</b>	A licensee must, not less than once every 24 months, provide the Authority with a performance audit conducted by an independent expert acceptable to the Authority.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Branch Manager Risk and Compliance, Compliance Advisor and walkthrough of the monitoring and scheduling processes for the performance audit confirmed that Western Power has mechanisms in place to enable the provision of a performance audit report to the Authority within the prescribed timeframe. Review of the Branch Manager and Compliance Advisor's PADP confirmed individual's performance ensuring the Corporation's obligations to the Authority are monitored and met.</p> <p>Further, the Corporation provided documentation demonstrating the approval of an independent expert from the Authority for the 2011 and 2012 performance audits.</p> <p>We also obtained documentation confirming the provision of the performance audit report to the Authority within the prescribed timeframe.</p> <p>Based on our enquiries and review of documentation, we have concluded that Western Power has adequate and effective controls on place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 20.1 Transmission Licence condition 20.1	
<b>Obligations Under</b>	Electricity Industry Act section 14(1)(a)	
<b>Compliance Manual Reference</b>	102	82
<b>Obligation Description</b>	A licensee must provide for an asset management system.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Our review and discussions with the Network Performance Process and Audit Team Leader revealed that Western Power maintains and manages an asset management system.</p> <p>Our review noted that Western Power has an Asset Management Policy, Network Management Plan, Asset Management Process and performs an independent review of the effectiveness of its asset management system to monitor and manage its asset management system.</p> <p>Based on the discussions, walkthrough of the processes in place and review of documents we have concluded that there are adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 20.2 and 20.3 Transmission Licence condition 20.2 and 20.3	
<b>Obligations Under</b>	Electricity Industry Act section 14(1)(b)	
<b>Compliance Manual Reference</b>	103	83
<b>Obligation Description</b>	A licensee must notify details of the asset management system and any substantial changes to it to the Authority.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	<p>Discussions with the Network Performance Process and Audit Team Leader revealed that there have not been any substantial changes to the asset management system.</p> <p>Our review confirmed that if there were any changes to the asset management system, Western Power had processes in place to inform the Authority.</p> <p>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 20.4 Transmission Licence condition 20.4	
<b>Obligations Under</b>	Electricity Industry Act 14(1)(c)	
<b>Compliance Manual Reference</b>	104	84
<b>Obligation Description</b>	A licensee must provide the Authority with a report by an independent expert as to the effectiveness of its asset management system every 24 months, or such longer period as determined by the Authority.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Branch Manager, Risk and Compliance, Compliance Advisor, and walkthrough of the monitoring and scheduling process for the Asset Management System Effectiveness Review confirmed that Western Power has mechanisms in place to enable the provision of an Asset Management System Effectiveness Review report to the Authority within the prescribed timeframe. Review of the Branch Manager and Compliance Advisor's PADPs confirmed monitoring of individual's performance ensuring that the Corporation's obligations to the Authority are met.</p> <p>Further, the Corporation provided documentation demonstrating the approval of an independent expert from the Authority for the 2011 and 2012 Asset Management System Effectiveness Review.</p> <p>We also obtained documentation confirming the provision of the Asset Management System Effectiveness Review report to the Authority within the prescribed timeframe.</p> <p>Based on our enquiries and review of documentation, we have concluded that Western power has adequate and effective controls on place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 4.1 Transmission Licence condition 4.1	
<b>Obligations Under</b>	Electricity Industry Act section 17(1)	
<b>Compliance Manual Reference</b>	105	85
<b>Obligation Description</b>	A licensee must pay to the Authority the prescribed licence fee within one month after the day of grant or renewal of the licence and within one month after each anniversary of that day during the term of the licence.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Branch Manager, Risk Management and Compliance, and the Compliance Advisor revealed that the Corporation monitors the renewal date of the Corporation's licence.</p> <p>Upon receipt of the invoice from the Authority, the Branch Manager, Risk and Compliance review the invoice and where appropriate, authorises the payment of the invoice. The invoice is then forwarded to the Finance Branch for payment.</p> <p>The Compliance Advisor was able to provide the proof of payment and review of the payment date confirmed that the invoice was paid within the prescribed timeframe.</p> <p>Based on our enquiries and review of documentation, we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Act section 31(3)	
<b>Compliance Manual Reference</b>	106	86
<b>Obligation Description</b>	A licensee must take reasonable steps to minimise the extent or duration of any interruption, suspension or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Through our discussions with Network Operations Branch personnel, we found that Western Power has the ability to provide alternative supply of electricity to areas that have been affected by an interruption and in certain circumstances, deploy emergency response generators to minimise the extent or duration of any interruption.</p> <p>A walkthrough of Western Power's Fault process revealed that the organisation has plans in place 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.</p> <p>Sample based testing of interruptions confirmed that Western Power had deployed ERGs and rerouted the supply of electricity to minimise the extent or duration of interruptions to customers within the affected area.</p> <p>Based on our audit procedures, we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Act section 41(6)	
<b>Compliance Manual Reference</b>	107	87
<b>Obligation Description</b>	A licensee must pay the costs of taking an interest in land or an easement over land.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	<p>Enquiries with the Environment, Community Engagement and Approvals Branch revealed that Western Power had not taken an interest or easement in land during the audit period.</p> <p>The Environment, Community Engagement and Approvals Branch are responsible for managing and processing the payment of costs and expenses incurred in the taking of an interest or easement of land.</p> <p>Western Power has a dedicated team of resources that investigate and determine the compensation to be paid in accordance with the assessment made by Valuer General's Office. Western Power is also revising its processes to take into consideration compensation based on imposition of the asset with respect to the impact on visual amenity.</p> <p>Discussions revealed that the Corporation is able to secure easement or interest in land for those power lines that operate 200kV and above as determined by the energy Operations (Power) Act 1979. Historically, Western Power has secured easements for power lines that operate more than 132kV.</p> <p>Review of Western Power's processes, we determined that the Corporation does have mechanisms in place for the payment of costs whether it be determined by the Valuer General's Office or a Court of competent jurisdiction.</p> <p>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 21.1	
<b>Obligations Under</b>	Electricity Industry Act section 101	
<b>Compliance Manual Reference</b>	111	94
<b>Obligation Description</b>	A retail, distribution or integrated regional licensee must not supply electricity to small use customers unless the licensee is a member of an approved scheme and is bound by and compliant with any decision or direction of the electricity ombudsman under the approved scheme.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussion with the Risk and Compliance Branch, observation of the Corporation's membership and review of scheme members as listed within the Energy Ombudsman Report 2010 – 2011 confirmed that Western Power was a member of an approved scheme during the audit period.</p> <p>Western Power utilises GEOVIEW and SPIDAWEB along with other SCADA tools to determine whether the proposed supply of electricity to a potential customer is within its approved boundary. The information systems are designed such that a number of validation checks are performed prior to the approval of the supply of electricity to a customer.</p> <p>Enquiries made with Western Power personnel confirmed a sound understanding of this obligation and the requirement to comply with a decision or direction provided by the Electricity Ombudsman.</p> <p>Based on our enquiries and review of the mechanisms in place for monitoring compliance we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Act section 115(1)	
<b>Compliance Manual Reference</b>	112	95
<b>Obligation Description</b>	A licensee that is a network service provider or an associate of a network service provider, in relation to network infrastructure covered by the Code, must not engage in conduct for the purpose of hindering or prohibiting access by any person to services in accordance with the Code, the making of access agreements or any particular agreement in respect of those facilities, or the access to which a person is entitled under an access agreement or a determination made by way of arbitration.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Our review and discussions with the Team Leader Networks Division and Access Solutions Manager, Customer Solutions Branch revealed that Western Power has not engaged in conduct for the purpose of hindering or prohibiting access arrangements.</p> <p>Our review identified that Western Power has monitoring mechanisms in place to ensure that the organisation does not engage in conduct for the purpose of hindering or prohibiting access arrangements.</p> <p>Our enquiries revealed that Western Power did not receive any complaints during the audit scope period in relation to conduct prohibiting or hindering access arrangements.</p> <p>Based on the discussions, walkthrough of the processes in place and review of documents we have concluded that there are adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Act section 115(2)	
<b>Compliance Manual Reference</b>	113	96
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	N/A	
<b>Audit Observations</b>	<p>Discussions with the Networks Division, Queue Manager and Customer Solutions Branch, Access Solutions Manager revealed that Western Power is a network service provider, and not a person/associate of a person that has access to services under an access agreement.</p> <p>Based on our enquiries, we have concluded that this manual reference obligation is not applicable.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 11	
<b>Obligations Under</b>	Distribution Licence condition 12.2	
<b>Compliance Manual Reference</b>	(No new reference as it has been removed from May 2011 Compliance Manual)	102
<b>Obligation Description</b>	A licensee must, unless otherwise notified in writing by the Authority, review the customer service charter within the timeframe specified, and submit to the Authority the results of that review within 5 days after it is completed.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	N/A	
<b>Audit Observations</b>	Western Power is no longer required to address the specified information in the Customer Service Charter due to the removal of the obligation in the May 2011 Compliance Reporting Manual and June 2010 Code of Conduct.	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 11	
<b>Obligations Under</b>	Distribution Licence condition 15.2 or <a href="#">15.5</a> Transmission Licence condition 12.2 or <a href="#">12.5</a> Distribution Licence condition 15.3 or <a href="#">15.6</a> Transmission Licence condition 12.3 or <a href="#">12.6</a>	
<b>Compliance Manual Reference</b>	No new reference as the obligations have been removed from May 2011 manual	<a href="#">103 &amp; 104</a>
<b>Obligation Description</b>		
	103	A licensee must amend the asset management system before an expansion or reduction in generating works, distribution systems and transmission systems and notify the Authority in the manner prescribed, if the expansion or reduction is not provided for in the asset management system.
	104	A licensee must not expand the generating works, distribution systems or transmission systems outside the licence area.
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Enquiries with the Risk and Compliance Branch revealed that no expansion or reduction in generating works had occurred during the 10 day period for which the previous Manual was relevant.</p> <p>Discussions with the Standards, Policy &amp; Data Quality Branch and review of the Data Management Information Pack document revealed that Western Power has processes in place for updating the asset management system due to an expansion or reduction of Western Power’s distribution and transmission network.</p> <p>The Data Service team is responsible for the input and maintenance of computer data in SPIDAWEB (formally DFIS/DFMS and TPMS/TLS/TRIS) for projects or work covering design, installation, commission, construction, operation and maintenance of Western Power or customer facilities.</p> <p>Amongst other things, SPIDAWEB is used by the Customer Solutions Branch to determine whether proposed works fall within or will otherwise affect the licence boundary. SPIDAWEB reports</p>	

	<p>will notify the Customer Solutions Branch if the proposed works fall outside the licence boundary and will prompt the Customer Solutions Branch to inform the Risk and Compliance Branch.</p> <p>Once the Risk and Compliance Branch is informed of the proposed change to the distribution and transmission systems, notification will be sent to the Authority in accordance to the requirement of the Act.</p> <p>Once a formal response has been issued by the Authority, the Risk and Compliance Branch will notify the Data Service team to update the information in the SPIDAWEB system to reflect those changes to the network.</p> <p>Based on the discussions, walkthrough of the processes in place and review of documents we have concluded that there are adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>
<p><b>Recommendation</b></p>	<p>Nil.</p>

<b>Licence Condition</b>	Electricity Industry Act section 11	
<b>Obligations Under</b>	Distribution Licence condition 12.1 Transmission Licence condition 12.1	
<b>Compliance Manual Reference</b>	119	105
<b>Obligation Description</b>	A licensee and any related body corporate must maintain accounting records that comply with the Australian Accounting Standards Board Standards or equivalent International Accounting Standards.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Review of the management letter provided by the Office of Auditor General, review of the financial statements for year ending June 2011 and discussions with the Corporate Accounting and Taxation Branch, revealed that Western Power maintains its accounting records in accordance with the Australian Accounting Standards Board Standards.</p> <p>Further, Western Power maintains a financial management manual which details the policies and procedures to support and guide how transactions are to be conducted. Enquiries of the management within the Corporate Accounting and Taxation Branch revealed that a large proportion of its finance staff are Chartered Accountants or Certified Practising Accounts. Staff are required to maintain currency in knowledge which is facilitated through the provision of on site or off site training.</p> <p>Based on our enquiries and review of documentation, we have concluded that western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 11	
<b>Obligations Under</b>	Distribution Licence condition 13.4 Transmission Licence condition 13.4	
<b>Compliance Manual Reference</b>	120	106
<b>Obligation Description</b>	A licensee must comply with any individual performance standards prescribed by the Authority.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	<p>Enquiries made with the Risk and Compliance Branch revealed that the Authority did not prescribe any individual performance standards on the Corporation during the audit scope period.</p> <p>Walkthrough of the organisation's process for the management of individual performance standards revealed that the Corporation has a mechanism in place to address such a requirement if it were to be imposed.</p> <p>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 11	
<b>Obligations Under</b>	Distribution Licence condition 14.2 Transmission Licence condition 14.2	
<b>Compliance Manual Reference</b>	121	107
<b>Obligation Description</b>	A licensee must comply, and require its auditor to comply, with the Authority's standard audit guidelines dealing with the performance audit.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Review of the performance audit tender documentation confirmed the requirement for the auditor to comply with the Authority's standard audit guidelines dealing with the performance audit.</p> <p>Further, Western Power's Risk and Compliance Branch provided a copy of the approval provided by the Authority of the audit plans as tabled by the appointed auditor.</p> <p>The Compliance Advisor revealed that the evaluation process also incorporates the review of respondents understanding of the Authority's audit guidelines and this element provides as an element during the evaluation process.</p> <p>Our review of the previous performance audit reports confirmed the existence of the nexus between the 2011 performance report and the audit guidelines through the explanatory notes of methodology, approach and ratings.</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 11	
<b>Obligations Under</b>	Distribution Licence condition 20.5 Transmission Licence condition 20.5	
<b>Compliance Manual Reference</b>	122	108
<b>Obligation Description</b>	A licensee must comply, and must require the licensee's expert to comply, with the relevant aspects of the Authority's standard guidelines dealing with the asset management system.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>The requirement to comply with the Authority's standard guidelines is explicitly stated in the "Request For Tender" for which the expert is contractually bound after becoming the successful tender applicant.</p> <p>Comprehensive audit plans are provided to the Authority for approval. The asset management review cannot be commenced without audit plan approval from the Authority.</p> <p>Based on the discussions and review of documents we have concluded that there are adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 11	
<b>Obligations Under</b>	Distribution Licence condition 15.1 Transmission Licence condition 15.1	
<b>Compliance Manual Reference</b>	123	109
<b>Obligation Description</b>	A licensee must report to the Authority, in the manner prescribed, if a licensee is under external administration or there is a significant change in the circumstances upon which the licence was granted which may affect a licensee's ability to meet its obligations.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	<p>Enquiries with the Risk and Compliance Branch, review of the financial statements and the auditor's management letter did not reveal a going concern issue with Western Power.</p> <p>As a Government Trading Enterprise, it is unlikely that the Government of Western Australia would place Western Power in such a position.</p> <p>Discussions with the Risk and Compliance Branch revealed that Western Power has a process in place to advise the Authority of any significant change in its status.</p> <p>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 11	
<b>Obligations Under</b>	Distribution Licence condition 16.1 Transmission Licence condition 16.1	
	Distribution Licence condition 17.1 and 17.2 Transmission Licence condition 17.1 and 17.2	
	Distribution Licence condition 18.1 Transmission Licence condition 18.1	
<b>Compliance Manual Reference</b>	124, 125 & 126	<a href="#">110, 111 &amp; 112</a>
<b>Obligation Description</b>		
	124	A licensee must provide the Authority, in the manner prescribed, any information the Authority requires in connection with its functions under the Electricity Industry Act.
	125	A licensee must publish any information it is directed by the Authority to publish, within the timeframes specified.
	126	Unless otherwise specified, all notices must be in writing.
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Enquiries made with the Branch Manager Risk Management and Compliance, and the Compliance Advisor revealed that Western Power has mechanisms in place to ensure that information as requested by the Authority is provided within the timeframe requested. The Corporation maintains a register of all correspondences exchanged between itself and the Authority.</p> <p>Sample based testing of notifications issued by the Authority confirmed that the Corporation provided the requested information within the timeframe and the manner prescribed. All formal communication was provided in writing.</p>	

	Based on our enquiries and sample based testing we have concluded that western Power has adequate and effective controls in place to support compliance with this manual reference obligation.
<b>Recommendation</b>	Nil.

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Code of Conduct clause 8.3(1)	
<b>Compliance Manual Reference</b>	241	<a href="#">227</a>
<b>Obligation Description</b>	A distributor must create and maintain a Priority Restoration Register <a href="#">in accordance with the criteria established by the Minister.</a>	
<b>Reporting Type</b>	1	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	<p>Discussions with the Network Operations Branch found that Western Power has not created or maintained a Priority Restoration Register in accordance with Code of Conduct for the Supply of Electricity to Small Use Customers as the criteria for the Priority Restoration Register has not been established by the Minister.</p> <p>Our inspection of Western Power’s guidance instructions revealed that the organisation has adopted a philosophy and methodology of how it will prioritise the restoration of electricity in the event of an unplanned interruption. In order to facilitate the order of restoration, Western Power assigns codes and prioritises sensitive customers which are recorded in ENMAC and TCS.</p> <p>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1	
<b>Obligations Under</b>	Code of Conduct clause 8.3(2)	
<b>Compliance Manual Reference</b>	242	<a href="#">228</a>
<b>Obligation Description</b>	The Priority Restoration Register must comply with any criteria determined by the Minister.	
<b>Reporting Type</b>	1	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	<p>Discussions with the Network Operations Branch revealed that Western Power has not created or maintained a Priority Restoration Register in accordance with Code of Conduct for the Supply of Electricity to Small Use Customers as criteria for the Priority Restoration Register has not been established by the Minister.</p> <p>In the absence of a criteria from the Minister with regard this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 9.2(2)	
<b>Compliance Manual Reference</b>	243	<a href="#">229</a>
<b>Obligation Description</b>	A distributor may only operate a pre-payment meter at a residential customer's supply address and a retailer may only offer a pre-payment meter service in an area that has been declared by the Minister by notice in the Government Gazette.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch revealed that Western Power only operates pre-payment meters in the Ninga Mia community area. Our review of the June 2010 Government Gazette extract revealed that the Ninga Mia community was an area declared by the Minister where the Corporation could operate pre-payment meters.</p> <p>Our enquiries revealed that Western Power currently has 17 pre-payment meter customers, which are all recorded on Western Power's pre-payment meter register. Further, the Metering Services Branch personnel also indicated that there were no pre-payment meters installed during the audit period.</p> <p>Based on our discussions and review of documentation, we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 9.5(4)	
<b>Compliance Manual Reference</b>	249	235
<b>Obligation Description</b>	If a retailer requests a distributor to revert a pre-payment meter, the distributor must revert the pre-payment meter within the time frames specified.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	<p>Our review of documents and discussions with the Metering Services Branch personnel revealed that Western Power has processes in place to ensure that pre-payment meters are reverted within the timeframes prescribed upon request.</p> <p>We performed a walkthrough of the reversion process which involves the retailer submitting a request (specifying timeframes) for the reversion through the metering web portal or MBS. MBS would then generate an automated e-mail response which would be forwarded to the Metering Branch Manager and Metering Installation Team Leader for monitoring purposes. The Metering Field Installation Team would then allocate the job to an AMRS or Connections Field Officer, and once the meter has been replaced this is communicated to the Metering Branch who close off the service order within MBS.</p> <p>AMRS and Connections Field Officers are provided with work instructions for meter replacement and installation jobs, and the timeframes required to complete these jobs are stipulated within these instructions, which align to the Metering Code requirements.</p> <p>Our enquiries revealed that there were no requests from pre-payment meter customers to revert a pre-payment meter during the audit period.</p> <p>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 9.6(3)	
<b>Compliance Manual Reference</b>	253	<a href="#">239</a>
<b>Obligation Description</b>	If a retailer requests a distributor to revert a pre-payment meter, the distributor must revert the pre-payment meter within the time frames specified.	
<b>Reporting Type</b>	1	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	<p>Our review of documents and discussions with the Metering Services Branch that Western Power has processes in place to ensure that a pre-payment meter at the supply address of a residential customer on life support equipment is reverted within the timeframes prescribed upon request.</p> <p>We performed a walkthrough of the reversion process which involves the retailer submitting a request (specifying timeframes) for the reversion through the metering web portal or MBS. MBS would then generate an automated e-mail response which would be forwarded to the Metering Branch Manager and Metering Installation Team Leader for monitoring purposes. The Metering Field Installation team would then allocate the job to an AMRS or Connections Field Officer, and once the meter has been replaced this is communicated to the Metering Branch who close off the service order within MBS.</p> <p>AMRS and Connections Field Officers are provided with work instructions for meter replacement and installation jobs, and the timeframes required to complete these jobs are stipulated within these instructions, which align to the Metering Code requirements. Our enquiries revealed that there were no requests from pre-payment meter customers to revert a pre-payment meter during the audit period.</p> <p>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 9.10(2)	
<b>Compliance Manual Reference</b>	258	<a href="#">244</a>
<b>Obligation Description</b>	If requested by a retailer, a distributor must check or test a pre-payment meter at a customer's supply address.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	<p>Through our enquiries with the Metering Services and Customer Assist Branches, we noted that there were no requests for a check or a test for pre-payment meters during the audit scope.</p> <p>Discussions and walkthrough of the process revealed that Western Power has a process in place to undertake the testing of a pre-payment meter if requested by a retailer. Once a test is completed, the report is forwarded to a Metering Services Branch staff for review and then submitted to the retailer.</p> <p>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 10.6	
<b>Compliance Manual Reference</b>	280	266
<b>Obligation Description</b>	A distributor must give a customer on request, at no charge, the specified information that is particular to a distributor.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Customer Assist Branch, review of Western Power's website, walkthrough performed of procedures revealed that customers are able to obtain the information specified under clause 10.6 of the Code of Conduct at no charge.</p> <p>Review of Western Powers website provided that Western Power makes available the distribution standards, metering arrangement information, Code of Conduct and the Customer Service Charter to its customers and the public at no charge.</p> <p>In the instance where a customer contacts the call centre, Western Power staff are able to provide the caller with information direct the customer to its website to source the information requested.</p> <p>Based on the discussion, walkthrough of the processes in place and testing we have concluded that there are adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 10.7(1)	
<b>Compliance Manual Reference</b>	281	267
<b>Obligation Description</b>	A distributor must, on request, give a customer its consumption data.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions and sample based testing confirmed that Western Power has a process in place to ensure that a customer is provided with consumption data upon request. The provision of historical consumption data process is a shared responsibility between Customer Assist and Metering Services Branches.</p> <p>A customer is able to communicate a request to Western Power through its Customer Assist Branch who then forwards and the request as a work order through NetCIS to the Metering Services Branch. Upon receipt of the electronic request the Metering Services Branch extracts the historical consumption data and communicates it back to the customer through means of a formal letter.</p> <p>Based on our enquiries and sample based testing we have concluded that western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 10.7(2)	
<b>Compliance Manual Reference</b>	282	268
<b>Obligation Description</b>	A distributor must give a customer the requested consumption data at no charge in the circumstances specified.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with Western Power’s Customer Assist and Metering Services Branch management revealed that the Corporation did not receive a large number of enquiries for historical consumption data.</p> <p>We obtained the report detailing requests for historical consumption data for the audit period and observed approximately 250 requests had been made to the Corporation.</p> <p>Whilst Western Power has the ability to charge for the provision of historical consumption data for those requests that do not meet the detailed criteria, the Corporation had not been observed to charge for the provision of historical consumption data to small use customers.</p> <p>Based on our enquiries and sample based testing we have concluded that western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 10.7(3)	
<b>Compliance Manual Reference</b>	283	269
<b>Obligation Description</b>	A distributor must give a customer the requested consumption data within 10 business days of the receipt of the request or, if payment is required (and requested by the distributor within 2 business days of the request), within 10 business days of receipt of payment of the distributor's reasonable charge for providing the consumption data.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Walkthrough of the processes for the provision of consumption data on request and the monitoring mechanism employed demonstrated that the Corporation provided customers with consumption data within the prescribed timeframe.</p> <p>The workflow process for the request of consumption data identified that the Customer Contact Centre (Customer Assist Branch) received the customer's request. The request was then forwarded to the Metering Services Branch to act upon. The Metering Services Branch personnel monitor the timeliness of the provision of the consumption data. Sample based testing did not reveal any exceptions in this regard.</p> <p>Based on our enquiries and sample based testing we have concluded that western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 10.7(4)	
<b>Compliance Manual Reference</b>	284	270
<b>Obligation Description</b>	A distributor must keep a customer's consumption data for seven years.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Through our discussions with the Information Knowledge Management (IKM) team and review of data retained within MBS and NetCIS, we were able to extract historical data for a minimum period of 7 years.</p> <p>Metering Services Branch personnel provided that MBS has maintained customer consumption data since the inception of the system.</p> <p>Discussion with IKM personnel revealed that data would not be removed from a system without receipt of authorisation from the data owner and there have been no instances where such a request has been made for a customer's consumption data.</p> <p>Based on our enquiries and sample based testing we have concluded that western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 10.8(1)	
<b>Compliance Manual Reference</b>	285	271
<b>Obligation Description</b>	A distributor must, on request, tell a customer how the customer can obtain information on distribution standards and metering arrangements that are relevant to the customer.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Customer Assist Branch personnel revealed that the staff were conversant with informing the customer how they can obtain information on distribution standards and metering arrangements upon request.</p> <p>Our enquiries revealed that a customer can contact and request information through the Call Centre (13 10 87). Call Centre staff would then direct the customer to the Western Power website where information pertaining to the distribution standards and metering arrangements could be located. We performed a walkthrough of the process undertaken by the Call Centre staff as to how they could provide the customer the requested information.</p> <p>Based on our enquiries, testing and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 10.8(2)	
<b>Compliance Manual Reference</b>	286	272
<b>Obligation Description</b>	A distributor must publish information on distribution standards and metering arrangements on the distributor's website.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel revealed that Western Power publishes information regarding distribution standards and metering arrangements on its website.</p> <p>Our enquiries revealed that the distribution standards and metering arrangements was contained within the Western Australian Distribution Connections Manual ("WADCM"), which is located on the Western Power website.</p> <p>Discussions also revealed that Western Power has processes in place to ensure that the WADCM is reviewed for currency and is updated. When the document is reviewed and updated, the Branch Manager, Standards, Policy and Data Quality who is responsible for publishing the document on the Corporation's website is notified advising of the need to place the revised document on the website.</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 10.9	
<b>Compliance Manual Reference</b>	287	273
<b>Obligation Description</b>	A retailer and distributor must, to the extent practicable, ensure that any written information that must be given to a customer by the retailer or distributor or its electricity marketing agent under the Code of Conduct is expressed in clear, simple, and concise language and is in a format that makes it easy to understand.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Customer Assist Branch revealed that Western Power has processes in place to ensure that written information given to customers is expressed as specified within the Code of Conduct.</p> <p>Enquiries with the Customer Service Centre Branch Manager revealed that the Corporate Affairs Branch is responsible for ensuring that the material meets the prescribed requirements, which is achieved by performing a review of the written information required to be provided to customers.</p> <p>Sampling of information given to customers by Western Power under the Code of Conduct confirmed that the written information given is expressed in clear, simple, and concise language and is in a format that makes it easy to understand.</p> <p>Based on the discussions, walkthrough of the processes in place and testing we have concluded that there are adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 10.10(1)	
<b>Compliance Manual Reference</b>	288	<a href="#">274</a>
<b>Obligation Description</b>	A retailer and distributor must tell a customer on request how the customer can obtain a copy of the Code of Conduct.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Customer Service Centre Manager revealed that Western Power has policies and procedures in place to ensure that a customer is advised on request, how to obtain a copy of the Code of Conduct.</p> <p>Through enquiries with the Customer Service Centre Branch and front reception, we confirmed that staff were aware of where a customer could obtain a copy of the Code of Conduct.</p> <p>Based on the discussions, walkthrough of the processes in place and testing we have concluded that there are adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 10.10(2)	
<b>Compliance Manual Reference</b>	289	275
<b>Obligation Description</b>	A retailer and distributor must make electronic copies of the Code of Conduct available, at no charge, on their web sites.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Examination of Western Power website determined that a copy of the Code of Conduct was available and accessible.</p> <p>We were able to download a copy of the Code at no charge. This was facilitated through a hyperlink to the State Law Publisher's website listed on the Corporation's web page:</p> <p><a href="http://www.westernpower.com.au/aboutus/How_we_are_regulated.html">http://www.westernpower.com.au/aboutus/How we are regulated.html</a></p> <p>Walkthrough of the Corporation's process for providing a copy of the Code of Conduct to a customer upon request confirmed that Western Power has the ability to email a copy to a customer's nominated email address at no charge.</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 10.10(3)	
<b>Compliance Manual Reference</b>	290	276
<b>Obligation Description</b>	A retailer and distributor must make a copy of the Code of Conduct available for inspection, at no charge, at their offices.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Enquiries made with the Metering Services Branch, Head Office and Northam Depot confirmed that Western Power had copies of the Code of Conduct available at no charge.</p> <p>Staff were able to produce a copy of the Code of Conduct upon our request and we were able to inspect the Code at no charge. Western Power staff also enquired as to whether we would like a copy of the Code to which they were able to provide without charge.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 10.11(1)	
<b>Compliance Manual Reference</b>	291	277
<b>Obligation Description</b>	A retailer and distributor must make available to a residential customer on request, at no charge, services that assist the residential customer in interpreting information provided by the retailer or distributor.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Walkthrough of the Corporation's process for the provision of interpretation services, review of documentation and information provided on its website confirmed that interpretation services have been made available to its customers.</p> <p>Discussions with the Customer Contact Centre staff revealed that they were conversant with the interpretation services offered to its customers. Western Power also provides a direct phone number to which its customers may use to access the interpreter services.</p> <p>Western Power was determined to have an account with its preferred interpreter suppliers. Western Power staff provides the Corporation's account number to the services provider to which the services are to be charged. This process ensures that the interpreters services are provided free of charge to the customer.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 10.11(2)	
<b>Compliance Manual Reference</b>	292	278
<b>Obligation Description</b>	A retailer and, where appropriate a distributor, must include in relation to residential customers, the telephone number for their TTY services and for independent multi-lingual services and the National Interpreter Symbol with the words “Interpreter Services”, on the documents specified.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Our review of the Corporation’s documentation requiring inclusion of the National Interpreter Symbol and the words “Interpreter Services” revealed that during the audit period, the required information had been included on the relevant documents.</p> <p>The Corporation established a register and identified a process for those documents requiring special needs information. Western Power developed a customisation within the respective printing program to include the customers who require special information needs.</p> <p>Sample based testing of Western Power’s bills and bill related information confirmed the inclusion of the information specified within clause 10.11(2) of the Code of Conduct.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>2011 Compliance Report – Status of Remedial Action</b>	The remedial action proposed by Western Power has been completed.	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 10.12(1)	
<b>Compliance Manual Reference</b>	293	279
<b>Obligation Description</b>	A distributor must advise a customer, at no charge, of the availability of different types of meters.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel and Contact Call Centre staff revealed that Western Power does not charge for providing a customer with the information on the availability of different types of meters.</p> <p>Our enquiries and walkthrough of processes with the Metering Services Branch personnel revealed that customers were able to obtain information on the different type of meters on Western Power's website, the Customer Charter, by telephone or email upon request.</p> <p>Based on our enquiries, walkthrough of processes and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 12.1(1)	
<b>Compliance Manual Reference</b>	295	282
<b>Obligation Description</b>	A retailer and distributor must develop, maintain and implement an internal process for handling complaints and resolving disputes.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Team Leader Complaints and Small Claims revealed that Western Power maintains a complaints handling process for resolving disputes.</p> <p>The complaint handling process is available on the Corporation's intranet as part of the organisation's knowledgebase. The complaint handling process and its process map (which is maintained by the Team Leader) was reviewed in 2011.</p> <p>Enquiries with Customer Assist management revealed that Western Power has training programs in place for handling complaints and dispute resolution. Review of training material and attendances revealed that staff had been provided training on an ongoing basis.</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 12.1(2)	
<b>Compliance Manual Reference</b>	296	283
<b>Obligation Description</b>	A retailer and distributor must develop, maintain and implement a complaints handling process that meets the specified requirements.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Review of the complaints handling process and enquiries made with Manager Customer Assist revealed that the Corporation's complaints handling process was developed against the AS/ISO 10002:2006.</p> <p>Comparison of the key elements of the complaints handling process and the AS/ISO 10002:2006 confirmed alignment of the process with the Standard.</p> <p>The Corporation's complaints handling procedure details how a complaint can be lodged, the rights of the customers with respect to escalation and the information to be provided to the customer. Further, the process outlined the Corporation's responsiveness and method response.</p> <p>A copy of the complaints handling process was able to be obtained at no cost as it has been included within the Corporation's Customer Service Charter and available on the internet.</p> <p>Based on our audit procedures we have concluded that western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 12.2	
<b>Compliance Manual Reference</b>	298	<a href="#">285</a>
<b>Obligation Description</b>	A retailer must comply with any guideline developed by the Authority relating to distinguishing customer queries from customer complaints.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	N/A	
<b>Audit Observations</b>	<p>This licence obligation refers a retailer and therefore is not applicable to Western Power.</p> <p>Based on our review, we have concluded that this manual reference obligation is not applicable.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 12.3	
<b>Compliance Manual Reference</b>	299	286
<b>Obligation Description</b>	A retailer, distributor and electricity marketing agent must give a customer on request, at no charge, information that will assist the customer in utilising the respective complaints handling processes.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Customer Assist Branch staff and walkthrough of the process for the provision of information to customers, we determined that Western Power has processes in place for the provision of information to assist customers with utilising the complaints handling process.</p> <p>Review of the complaints process flow chart demonstrated the workflow by which the Corporation could also leverage when explaining to a customer the complaints handling process.</p> <p>Further, review of the Corporation's website noted the explanatory notes were also made available to customers.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 12.4	
<b>Compliance Manual Reference</b>	300	<a href="#">287</a>
<b>Obligation Description</b>	A retailer, distributor or electricity marketing agent who receives a complaint that does not relate to its functions, must refer the complaint to the appropriate entity and inform the customer of the referral.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Walkthrough of Western Power’s complaint referral process and discussions with the Customer Assist Branch staff revealed that the Corporation has mechanisms in place to facilitate the re-direction of a customer’s complaint that does not relate to its functions.</p> <p>The Corporation identifies a complaint received from a customer, ascertains as to whether the complaint is related to its functions. If enquiry finds that the complaint is to be referred to another entity, the customer is advised of the action and contact is made by Western Power on behalf of the customer. The action is then handed over to the responsible entity.</p> <p>The complaint process Visio map was observed and discussions held with Customer Contact Centre staff confirmed their understanding of the process and the steps required to be undertaken when referring a customer to another entity.</p> <p>Based on our enquiries and sample based testing we have concluded that western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 13.1	
<b>Compliance Manual Reference</b>	301	<a href="#">288</a>
<b>Obligation Description</b>	A retailer, distributor or electricity marketing agent must keep a record or other information as required to be kept by the Code of Conduct for at least two years from the last date on which the information was recorded, unless expressly provided otherwise.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Customer Assist Branch and Metering Branch revealed that records are kept in NetCIS and MBS in accordance with the requirements of the Code of Conduct clause 13.1.</p> <p>Sample based testing of MBS confirmed that records were kept for at least two years from the last date on which the information was recorded.</p> <p>Based on our enquiries, walkthrough of processes and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 13.9	
<b>Compliance Manual Reference</b>	311	298
<b>Obligation Description</b>	A distributor must keep a record of the total number of street lights and the street light faults and repair indicators specified.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Our enquiries with the Streetlight Service Team revealed that Western Power maintains a record of the prescribed information required under clause 13.9 of the Code of Conduct.</p> <p>Discussions and walkthrough of the record keeping process found that Western Power records reported streetlight fault information utilising systems that include MBS, TCS and DFIS. Further, data is also obtained through customers and field officers providing information on faulty street lights.</p> <p>Sample based re-performance of monthly calculations, tracing of work orders and review of the street light records did not reveal any exceptions.</p> <p>Based on audit procedures, we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 13.11	
<b>Compliance Manual Reference</b>	314	301
<b>Obligation Description</b>	A distributor must keep a record of the total number of compensation payments made under clause 14.4.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Walkthrough of the process for maintaining records of the total number of compensation payments made with Customer Assist Branch personnel revealed that Western Power does maintain the required records.</p> <p>The Complaints and Small Claims team monitors service standard applications and payments made through an Ellipse extract as confirmation of the payment having been made under clause 14.4. Western Power has built in a unique identifier to facilitate the extraction of this information from its financial system.</p> <p>Our re-performance of compensation payments recorded and reported by the Corporation to the Authority did not reveal any exceptions within the Record Keeping Report for 2010/2011.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 13.12	
<b>Compliance Manual Reference</b>	315	302
<b>Obligation Description</b>	A distributor must keep a record of call centre performance indicators specified.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Customer Service Centre Manager and review of performance reports found that Western Power maintains a record of call centre performance indicators specified under clause 13.12 of the Code of Conduct.</p> <p>Enquiries with the BT Onsite Operations Manager revealed that Western Power utilises Aspect software that monitors, records and calculates performance indicators required under this manual reference obligation. We noted that the Aspect software was maintained and independently monitored by an externally contracted support staff member.</p> <p>Review of management reports and re-performance conducted of sampled daily reports were found to reconcile with the management reports.</p> <p>Further, our review of the ASPECT demonstrated that the software had been configured to record the number of telephone calls to centre responded to within 30 seconds.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 13.13	
<b>Compliance Manual Reference</b>	316	303
<b>Obligation Description</b>	A distributor must keep a record of the number of complaints relating to the installation and operation of a pre-payment meter at a pre-payment meter customer's supply address and the complaints information specified.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	<p>Walkthrough of the revised complaints handling process with the Customer Assist Branch confirmed that Western Power does monitor its pre-payment meter customer interaction on a monthly basis.</p> <p>Due to the limited number of pre-payment meters on the network, the Complaints and Small Claims team perform individual reviews to determine if any interaction has occurred with any of its pre-payment meter customers through the account records maintained within NetCIS. The outcome of the review is then retained with screen prints to confirm review activity capturing date of review.</p> <p>Monitoring of pre-payment meter customers is facilitated through a register of pre-payment NMIs, where this list is deemed to be the source of truth and maintained by the Complaints and Small Claims team. The team members were able to demonstrate familiarity of the process used to interrogate pre-payment meter customer accounts to determine if any of the notes recorded were related to a complaint.</p> <p>Our review of the reports retained by the Corporation and sample based testing of pre-payment meter customer accounts during the audit period confirmed that Western Power did not receive any complaints relating to the installation and operation of a prepayment meter at a pre-payment meter customer's supply address.</p> <p>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 13.15(3)	
<b>Compliance Manual Reference</b>	319	306
<b>Obligation Description</b>	A copy of each report must be given to the Minister and the Authority not less than 7 days before it is published.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Our review of notices from the Authority and web log records confirmed that a copy of the 2010/2011 Record Keeping Report was provided to the Minister and the Authority not less than 7 days before it was published.</p> <p>We noted that the report was received by the Minister and the Authority on 23 September 2011 and published on 30 September 2011.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 14.1(2)	
<b>Compliance Manual Reference</b>	321	308
<b>Obligation Description</b>	Subject to clause 14.5, a distributor must compensate a retailer for the payment if a retailer is liable to and makes a payment due to an act or omission of the distributor.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Complaints and Small Claims Team and walkthrough of the Corporation's procedures revealed that Western Power has a process in place for compensating a retailer for the payment if the retailer made a payment for an act or omission of the distributor.</p> <p>Where a retailer seeks compensation, the Corporation requires the submission of a claim form to enable investigation and substantiation of the entitlement. Upon receipt of this form, Western Power would investigate the claim and where it has been determined to be appropriate, provide the compensation to the retailer.</p> <p>Sample based testing revealed instances where Western Power had made reconnections outside of the prescribed timeframes. The Corporation had received applications for compensation and as a result of the matter being tabled by Western Power, applications have been received. Review of the applications, investigations and subsequent payments made confirmed that Western Power had processes in place to facilitate payment of compensation made to a retailer.</p> <p>Based on our enquiries and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 14.2(2)	
<b>Compliance Manual Reference</b>	323	310
<b>Obligation Description</b>	Subject to clause 14.5, a distributor must compensate a retailer for the payment if a retailer is liable to and makes a payment due to an act or omission of the distributor.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Complaints and Small Claims Team and walkthrough of the Corporation's procedures revealed that Western Power has a process in place for compensating a retailer for the payment if the retailer made a payment for an act or omission of the distributor.</p> <p>Where compensation is sought from the retailer, the Corporation requires the submission of a claim form to enable investigation and substantiation of the entitlement for compensation. Upon receipt of this form, Western Power would investigate the claim and where it has been determined to be appropriate, provide the compensation to the retailer.</p> <p>Sample based testing revealed instances of where Western Power field officers had incorrectly performed a disconnection. Whilst the customer was reconnected an application for compensation was made in accordance with the Code. The Corporation was observed to make compensation to the retailer in accordance with this obligation.</p> <p>Based on our enquiries and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 14.4(2)	
<b>Compliance Manual Reference</b>	327	314
<b>Obligation Description</b>	Subject to clause 14.5, a distributor must pay the stated compensation to a customer where the retailer has failed to acknowledge or respond to a query or complaint within the timeframes prescribed (and an exception to payment does not apply).	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Sample based testing of instances where Western Power had failed to acknowledge or respond to a written query or complaint within the prescribed timeframe revealed that the Corporation had paid the stated compensation amount within the prescribed timeframe.</p> <p>Walkthrough of the compensation payment process with the Complaints and Small Claims Team revealed that, upon receipt of a submission from a customer, the Corporation determines the validity of the claim. Once the entitlement has been identified, the payment requirements are communicated to Finance for disbursement. Review of an Ellipse extract confirmed that payments had been made to customers who were entitled to the service standard payment.</p> <p>Based on our enquiries and sample based testing we have concluded that western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Electricity Industry Act section 82	
<b>Obligations Under</b>	Code of Conduct clause 14.6(2)	
<b>Compliance Manual Reference</b>	329	316
<b>Obligation Description</b>	A distributor who is required to make a compensation payment for failing to satisfy a service standard, must do so in the manner specified.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Complaints and Small Claims Team and review of the payment methods facilitated by Western Power revealed that the Corporation has mechanisms in place to make compensation payments in the manner prescribed.</p> <p>Whilst sample based testing demonstrated payments were made directly to customers and this was the preferred method as articulated by customers, enquiries revealed that Western Power is receptive to customer's preferred payment method and would comply with the instructions as provided.</p> <p>Based on our audit procedures we have concluded that western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 2.2(1)(a)	
<b>Compliance Manual Reference</b>	330	317
<b>Obligation Description</b>	A network operator must treat all Code participants that are its associates on an arms-length basis.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	<p>Enquiries made with the Risk and Compliance Branch, review of documents provided by the Legal Branch and observation made of the Corporation's structure as recorded on the ASIC website revealed that Western Power does own a number of business names.</p> <p>However, discussions with Risk and Compliance Branch revealed that the Corporation does not have an associate that is a Code participant. The Corporation and its Legal and Commercial Branch are confident that principles of probity, transparency and accountability would continue to be applied to facilitate arms-length basis.</p> <p>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 2.2(1)(b)	
<b>Compliance Manual Reference</b>	331	318
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	<p>Enquiries made with the Risk and Compliance Branch, review of documents provided by the Legal Branch and observation made of the Corporation's structure as recorded on the ASIC website revealed that Western Power does own a number of business names.</p> <p>However, discussions with Risk and Compliance Branch revealed that the Corporation does not have an associate that is a Code participant. The Corporation and its Legal and Commercial Branch are confident that principles of probity, transparency and accountability would continue to be applied to facilitate arms-length basis.</p> <p>The procurement policy of the Corporation requires guidelines to be met for purchases exceeding predetermined thresholds. In these instances, the proposed contracts are required to be communicated to the Legal and Commercial Branch for review and ratification.</p> <p>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.1	
<b>Compliance Manual Reference</b>	332	319
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Our review of policies and procedures, and discussions with the Metering Services Branch personnel revealed that Western Power has a process in place to ensure that its meters meet the requirements specified in the metrology procedure and also comply with relevant standards.</p> <p>Enquiries made with the Metering Services Branch personnel and walkthrough of the process revealed that meters are initially tested during the “Tender Evaluation” phase with a supplier to ensure that they meet the mandatory technical requirements under clause 3.1 of the Metering Code. Western Power utilise the Meter Tender Specifications document and Revenue Meters Technical Specifications document during this phase which align with the metrology procedure, Metering Code and Australian Standards for meters. Discussions revealed that Tender Evaluation Reports are then completed and retained for each tested meter and any meters that do not meet the mandatory technical requirements are not purchased by Western Power.</p> <p>Once the meters are purchased, Western Power performs another test of the meters prior to the meters being installed. Further, the meters are tested a third time in accordance with the Metering Management Plan, and where they do not the metrology procedure and Australian Standards, they are replaced with new meters.</p>	

	<p>As at 30 June 2012, Western Power were currently in the process of testing all 0.5 meters in accordance with Metering Management Plan and these were scheduled to be completed by 2013.</p> <p>Based on our discussions and review of documentation, we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>
<b>Recommendation</b>	Nil.

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.2(1)	
<b>Compliance Manual Reference</b>	333	320
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Our review of policies, procedures and work instructions, and discussions with the Metering Services Branch personnel revealed that Western Power have mechanisms in place to ensure its accumulation meters conform to the requirements specified in the metrology procedure.</p> <p>Enquiries made with the Metering Services Branch personnel revealed that meters are initially tested during the “Tender Evaluation” phase with a supplier to ensure that they meet the requirements under clause 3.2(1) of the Metering Code. Western Power utilise the Western Australia Electricity Market Metrology Procedure for Metering Installations as the metrology standard, the Meter Tender Specifications document and Revenue Meters Technical Specifications document during this tender evaluation phase.</p> <p>We reviewed meters within Western Power’s testing laboratory and confirmed that the meters display, or permit access to a display of, the accumulated electricity production or consumption at the metering point through dials, a cyclometer, an illuminated display or some other visual means.</p> <p>Based on our review and testing, we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.3(1)	
<b>Compliance Manual Reference</b>	334	321
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel and walkthrough of downloading procedures confirmed that Western Power’s interval meters (Type 1 – 5 meters) have an interface to allow the interval energy data to be downloaded using an interface compatible with the applicable metrology procedure requirements.</p> <p>Enquiries and review of meters within the Metering laboratory revealed that Western Power interval meters have an “infra-red” interface to allow interval energy data to be downloaded to a portable hand held device or laptop computers. Our enquiries revealed that all interval meters are tested during the “Tender Evaluation” phase with the supplier (Landis and Grys) to ensure that they have an interface compatible with the Metering Code requirements, the Australian Standards and applicable metrology procedure.</p> <p>We also noted that for Type 1 – 4 interval meters with communication links, the interval energy data is downloaded through MV90. However, Type 5 meters are manually read and have ports that allow probing devices to download interval energy data on to a laptop.</p> <p>Based on our enquiries and testing, we have concluded that Western Power has adequate controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.3(3)	
<b>Compliance Manual Reference</b>	335	322
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel and walkthrough of downloading procedures revealed that Western Power’s metering installations that require inclusion of a communications link (Type 1 – 4 meters), included a modem and isolation device to allow for interval energy data to be downloaded in the manner prescribed under the Metering Code.</p> <p>Our enquiries revealed that the current meter supplier sources the modems from a third party provider. A Certificate of Conformance has been issued to the supplier advising the communication link complies with the telecommunications regulations and Australian Standards. All meters purchased are tested for compliance during the “Tender Evaluation” phase, and all meters come with an isolation device which ensures that the meters are protected in the event the modem becomes faulty.</p> <p>Our testing of metering installations with a communication link confirmed that MBS records the telephone line number to allow the interval energy data to be downloaded in the manner prescribed.</p> <p>Based on our enquiries and testing, we have concluded that Western Power has adequate controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.5(1) and (2)	
<b>Compliance Manual Reference</b>	336	323
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Our review of documents provided and discussions with the Metering Services Branch personnel revealed that Western Power has policies and procedures in place to ensure that there is a metering installation at every connection point for meters that are not Type 7, and that the installation meets the functionality requirements specified.</p> <p>Our enquiries revealed that initial tests are undertaken during the “Tender Evaluation” phase with the supplier to ensure that all meters have the functionality requirements as per clause 3.5(2) of the Metering Code.</p> <p>Once a metering installation has been completed at a customer’s premises by the Electrical Contractor and it is communicated to the Metering Branch, a NMI has been assigned for every metering installation within MBS. Through our testing, we confirmed that Western Power’s metering installations provided for a NMI for each connection point.</p> <p>Based on our enquiries and testing, we have concluded that Western Power has adequate controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.5(3)	
<b>Compliance Manual Reference</b>	337	324
<b>Obligation Description</b>	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).	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Our review of policies, procedures, guidelines and work instructions, and discussions with the Metering Services Branch personnel revealed that Western Power has policies and procedures in place to ensure that each metering installation on its network meets the requirements under clause 3.5(3) of the Metering Code.</p> <p>Our enquiries revealed that Western Power replace all faulty meters that do not meet the Metering Code, applicable metrology procedure, good electricity industry practice and the model SLA in respect of the metering installation on its network.</p> <p>Faulty/non-compliant meters are identified either through customer complaints or when the meters are tested by Western Power in accordance with the Metering Management Plan. We noted that the replacement of faulty meters is undertaken by Australian Metering Reading Services (“AMRS”) Contractors or Western Power Connection Field Officers (“CFO”).</p> <p>Further, we noted that in December 2011, Western Power began conducting field audits on the work performed by AMRS and CFOs for the installation and replacement of meters to ensure the meters fulfilled the relevant Australian Standards and Western Australian Electrical Wiring Standards.</p> <p>We also noted that post December 2011, Western Power’s Operational Technical Excellence (“OTX”) team incorporated scheduled and regular audits within their metering field assessments plans to ensure that qualified personnel are carrying</p>	

	<p>out the metering installations and replacements, ensuring that the Corporation complies with the Metering Code and Energy Safety requirements.</p> <p>As at 30 June 2012, Western Power were currently in the process of testing all 0.5 meters in accordance with Metering Management Plan and these were scheduled to be completed by 2013.</p> <p>Based on our enquiries and testing, we have concluded that Western Power has adequate controls in place to support compliance with this compliance manual reference obligation.</p>
<b>Recommendation</b>	Nil.

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.5(4)	
<b>Compliance Manual Reference</b>	338	325
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Our review and discussions with the Metering Services Branch personnel revealed that Western Power has processes in place to ensure that the metering point for a revenue metering installation is located as practicable to the connection point as required under clause 3.5(4) of the Metering Code.</p> <p>Our review revealed that Western Power’s internal documents are in line with the Wiring Rules, WA Electrical Requirements, which correspond to the Australian Standards. We also noted that Western Power utilise the High Voltage Metering Design Report which is issued to Project Managers, which captures and outlines each step involved when installing meters, including the location of metering equipment. The Project Manager oversee and verify that approved electricians have completed metering installations appropriately, ensuring that the metering point for the revenue metering installation is located as close as practicable to the connection point.</p> <p>The Metering Services Branch personnel also advised that Western Power undertakes inspections on a sample basis to ensure that meter installations are in accordance with Wiring Rules and WA Electrical Requirements.</p> <p>Based on our enquiries, testing and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.5(9)	
<b>Compliance Manual Reference</b>	340	327
<b>Obligation Description</b>	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 non-compliance and arrange for the non-compliance to be corrected as soon as practicable.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Our review and discussions with the Metering Services Branch personnel revealed that Western Power has processes and procedures in place to ensure that where a metering installation does not comply with the Code, the affected parties are notified and the non-compliance is rectified.</p> <p>Our enquiries revealed that non-compliant meter installations are identified through customer complaints or inspections carried out by electrical technicians at a customer's premises. The Metering Management Plan also manages compliance testing of meters which are to be reported to the Authority.</p> <p>Western Power utilise the "Notification of Affected Parties" document which identifies the process surrounding communication of non-compliant meters. The affected parties that need to be advised for non-compliant metering equipment are retailers, Generators (if non-complaint equipment is installed on the generator's premises), customers (if non-compliant is installed on Customer's premises), the Authority and Energy Safety.</p> <p>As at 30 June 2012, Western Power were currently in the process of testing all 0.5 meters in accordance with Metering Management Plan and these were scheduled to be completed by 2013.</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power has adequate controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.7	
<b>Compliance Manual Reference</b>	341	328
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Walkthrough of configuration of compatible devices and discussions with the Metering Services Branch personnel revealed that all Western Power communication devices are compatible with the telecommunications network (Telstra) and comply with all applicable State and Commonwealth enactments.</p> <p>We noted that all type 1 – 4 meters supplied to Western Power by its service provider include an “A-tick” mark, which means that the modems within the meters are compliant with the mandatory technical standards and can legally be connected to a communications network.</p> <p>Maxon who supply the modems have provided a Certificate of Conformance with both the Australian Standards and State and Commonwealth enactments.</p> <p>We also noted that the modems are tested for compatibility with telecommunications network during the Tender Evaluation phase prior to purchasing.</p> <p>Based on our enquiries, testing and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.8	
<b>Compliance Manual Reference</b>	342	329
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Our observation of meters within the Metering Services Branch Laboratory and discussions with the Metering Services Branch personnel revealed that all Western Power meters are fitted with an approved seal for security purposes as part of the original manufacture design. The seal is surrounded by a panel, to prevent any interference or tampering.</p> <p>Our enquiries revealed that the Western Australian Electricity Wiring Requirements and Contractor Connect Scheme require that all meters are to be fitted with an approved seal for security purposes.</p> <p>We also noted that Western Power CT and VT metering installations are retained within locked boxes, whereby only Western Power personnel and the residential customer have access keys to the box.</p> <p>Western Power also has procedures in place in the event that a meter has been tampered with (i.e. if the seal is broken). We noted that tampered meters are usually identified and reported by members of public, electrical inspectors, Western Power field officers, retailers or AMRS. Once the meters are tested by the Laboratory team and results confirm that the meters have intentionally been tampered with, the Energy Ombudsman is notified and involved, and remedial action is sought. The Customer Inspection Revenue Protection team is responsible for undertaking and coordinating the investigation of tampered meters.</p>	

	Based on our enquiries, testing and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.
<b>Recommendation</b>	Nil.

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.9(3)	
<b>Compliance Manual Reference</b>	343	330
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel revealed that initial tests are undertaken during the “Tender evaluation” phase with the supplier to ensure that they meet the requirements for the type of metering installation specified in Table 3 of Appendix 1 of the Metering Code. Where they do not meet the requirements, the meters are flagged as non-compliant and are immediately replaced.</p> <p>We also noted that in accordance with the Metering Management Plan, meters are tested again when the time is due to ensure compliance with clause 3.9(3) of the Metering Code.</p> <p>Western Power also utilise the approved Western Australian Distribution Connections Manual, which makes reference to the Australian Standards to ensure that each metering installation complies with Table 3 in Appendix 1 of the Code.</p> <p>Our enquiries revealed that as at 30 June 2012, Western Power were currently testing all 0.5 meters in accordance with the Metering Management Plan, and these tests were scheduled to be completed by 2013.</p> <p>Based on our enquiries, testing and review of documentation, we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.9(7)	
<b>Compliance Manual Reference</b>	344	331
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Walkthrough of accuracy testing procedures and discussions with the Metering Services Branch personnel revealed that Western Power has mechanisms in place to ensure it installs, as a minimum, the accuracy requirements of Type 3 metering installation for CT/VT meters.</p> <p>Our enquiries revealed that all meters supplied by the supplier are tested during the “Tender Evaluation” phase to ensure the meters conform to the requirements specified under the Metering Code and applicable metrology procedure.</p> <p>Western Power also undertakes a test of all metering installations in accordance with the Metering Management Plan, to ensure the metering installation meets the relevant accuracy requirements of Type 3 metering installation for active energy only.</p> <p>We noted that where the metering installation accuracy requirement is to be treated as a Type 3 metering installation, this is communicated to the Meter Asset and Distribution team, who would be responsible for ensuring that the metering installation is inputted within MBS as a Type 3 meter.</p> <p>Our enquiries revealed that as at 30 June 2012, Western Power were currently testing all 0.5 meters in accordance with the Metering Management Plan, and these tests were scheduled to be completed by 2013.</p>	

	Based on our enquiries, testing and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.
<b>Recommendation</b>	Nil.

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.9(9)	
<b>Compliance Manual Reference</b>	345	<a href="#">332</a>
<b>Obligation Description</b>	If compensation is carried out within the meter then the resultant metering system error must be as close as practicable to zero.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	<p>Our enquiries with the Metering Services Branch personnel revealed that Western Power does not carry out any compensation on its meters.</p> <p>We noted that in instances where Western Power identifies meter system errors, either during the “Tender Evaluation” phase prior to purchase or through tests carried out in accordance with the Metering Management Plan, the meters are immediately replaced as they are classified as non-compliant.</p> <p>Based on our discussions, review of documentation and the absence of activity with regard to this obligation, we have determined that we cannot rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.10	
<b>Compliance Manual Reference</b>	346	333
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Walkthrough of meter installations, data loggers and peripheral devices functionality and enquiries with the Metering Services Branch personnel revealed that the programmable settings apply to the display of whole numbers on the meters, and all Western Power meters have the capability of being reprogrammed as required.</p> <p>Our enquiries revealed that all meters supplied are pattern approved in accordance with National Measurement Institute section M6 and Australian Standards. The metering installations, data loggers or peripheral devices are tested during the “tender evaluation” phase to determine their conformance to the requirements specified under the Metering Code and applicable metrology procedure.</p> <p>We also noted that in accordance with the Metering Management Plan, meters are tested again when the time is due to ensure compliance with clause 3.10 of the Metering Code.</p> <p>Based on our enquiries and testing, we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.11(2)	
	Electricity Industry Metering Code clause 3.11(3)	
<b>Compliance Manual Reference</b>	348 & 349	<a href="#">335 &amp; 336</a>
<b>Obligation Description</b>		
	348	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.
	349	A Code participant who becomes aware of an outage or malfunction of a metering installation must advise the network operator as soon as practicable.
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel revealed that Western Power only replaces and does not repair metering installations if an outage or malfunction occurs to a metering installation.</p> <p>Enquiries found that customers are required to contact their retailer in order to notify Western Power of an outage or malfunction of a metering installation whilst a Code participant can request for a meter replacements through the market gateway or Metering Service Centre Web Portal. Once the request has been validated a service order will be raised within MBS and replacement will be assigned to a CFO, Metering Officers or AMRS dependent on the type of meter.</p> <p>Sampled based testing confirmed that Western Power replaced meter installations that were affected by an outage or malfunction.</p> <p>Based on our audit procedures, we have determined that we cannot rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.12(1)	
<b>Compliance Manual Reference</b>	350	<a href="#">337</a>
<b>Obligation Description</b>	A network operator must ensure that each metering installation complies with at least, the prescribed design requirements.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Enquiries with the Metering Services Branch staff revealed that Western Power has policies, procedures and processes in place to monitor each metering installation's compliance to the design requirements under clause 3.12(1) of the Metering Code.</p> <p>We noted that the design requirements were only applicable to CT (low voltage) and HV (high voltage) metering installations. Our enquiries revealed that Metering Services Branch officers are provided with work instructions and guidelines, which make reference to the Australian Standards, to ensure that metering installations are carried out in accordance with the prescribed design requirements. These work instructions are also made available on the Western Power website if Metering Services Branch officers need to refer to them.</p> <p>Further, Western Power undertakes sample audits on metering installations to ensure that the Metering Services Branch officers perform the connections appropriately.</p> <p>Based on our enquiries and review of documentation, we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.12(2)	
<b>Compliance Manual Reference</b>	351	338
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch staff revealed that Western Power have policies, procedures and processes in place to monitor instrument transformers (CT or VT) in its metering installations for compliance with the applicable metrology procedure and the Australian Standards.</p> <p>Our enquiries revealed that Western Power utilise the WADCM, WAER and the High Voltage Transmission and Generation Metering guidelines to ensure that instrument transformers installed comply with the relevant requirements.</p> <p>Through sample based testing, we reviewed Metering Services Branch officers' completion advice forms of metering installations against the information recorded within MBS for the metering installations, and confirmed that metering installations complied with the applicable metrology procedure.</p> <p>Based on our enquiries, testing and review of documentation, we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.12(3)	
<b>Compliance Manual Reference</b>	352	339
<b>Obligation Description</b>	A network operator must provide isolation facilities, to the standard of good electricity industry practice, to facilitate testing and calibration of the metering installation.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch staff revealed that Western Power provides for isolation facilities for all its metering installations.</p> <p>Our enquiries revealed that isolation facilities are part of every metering installation design. The design practice is in accordance with the Western Australian Electrical Requirement guide which is aligned to the Australian Standards.</p> <p>Western Power utilise the WADCM, Western Australian Electrical Requirements guide, Inspection Systems Plan and the High Voltage Transmission and Generation Metering guidelines in their design consideration to ensure that isolation facilities are provided for all metering installations.</p> <p>We reviewed meters within the Metering Branch Laboratory, and confirmed that isolation facilities were installed within meters to ensure that tests can be performed on meters (tests on either check or revenue meters) without interrupting power supply.</p> <p>Based on our enquiries, testing and review of documentation, we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.12(4)	
<b>Compliance Manual Reference</b>	353	340
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch staff and review of documentation provided revealed that Western Power maintains drawings and supporting information detailing the metering installation for maintenance and auditing purpose within its Corporate Filing System (DM).</p> <p>Our review revealed that drawings are maintained for current transformers, voltage transformers and direct connect metering installations within the Western Australian Distributions Connection manual and High Voltage Transmission and Generation Metering guidelines. Further, Western Power's internal Technical Information Management System (TIMSWeb) database maintains drawings and supporting information for metering installations, which was made available to Western Power Metering Services Branch officers.</p> <p>We obtained and reviewed copies of the drawings for metering installations specified above.</p> <p>Based on our enquiries and review of documentation, we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.13(1)	
<b>Compliance Manual Reference</b>	354	341
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Service Branch staff revealed that Western Power only install full check meters for high voltage metering projects (Type 1 - 2 meters).</p> <p>Our enquiries revealed that Western Power utilise the High Voltage Transmission and Generation Metering guidelines when installing full check meters to ensure the installation complies with the applicable metrology procedure and Australian Standards.</p> <p>We also noted that Western Power has a high voltage metering project process in place to ensure that Project Managers oversee metering installations performed by their officers.</p> <p>Testing of metering installations confirmed that Western Power installed full check meters in accordance with the prescribed requirements. We obtained and reviewed Metering Services Branch officers completed advice forms and records within MBS for the full check metering installations.</p> <p>Based on our enquiries and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.13 (c)	
<b>Compliance Manual Reference</b>	355	<a href="#">342</a>
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch staff revealed that Western Power only install full check meters for high voltage metering projects (Type 1 - 2 meters).</p> <p>Our enquiries revealed that in the event that Western Power is required to install partial check meters, the High Voltage Transmission and Generation Metering guidelines may be used when installing the partial check meter, to ensure that it is physically arranged as required and complies with the applicable metrology procedure and Australian Standards.</p> <p>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.13(4)	
<b>Compliance Manual Reference</b>	356	343
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Service Branch personnel revealed that Western Power only install and use full check and revenue meters. The specifications of the full check meter and the revenue meter installation are exactly the same. The meters measure the same load and there is no room for errors.</p> <p>Our enquiries revealed that Western Power utilise the Metering Technical Requirements document which is provided to Project Managers, as guidance to ensure that metering installations for revenue and check meters have the same load condition.</p> <p>Review of a sample of metering installation test results confirmed that Western Power had installed revenue and check meters in accordance with the prescribed requirements. We obtained and reviewed Metering Services Branch officers completed advice forms and records within MBS for the metering installations.</p> <p>Based on our enquiries, review of documentation and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.14(3)	
<b>Compliance Manual Reference</b>	357	344
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel revealed that Western Power do not install meters for the metering class CTs and VTs if they do not comply with the prescribed requirements.</p> <p>Sample based testing did not reveal any instances where meters with a higher class accuracy or apply accuracy calibration factors had been installed.</p> <p>Our enquiries revealed that Western Power replaces all meters that do not comply with clause 3.14(3) of the Metering Code. Non-compliant meters are identified through tests undertaken in accordance with the Metering Management Plan.</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.16(1)	
<b>Compliance Manual Reference</b>	358	345
<b>Obligation Description</b>	A network operator must ensure that a Type 1 metering installation to Type 5 metering installation on the network has the facilities and functionality prescribed.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel and sample based testing confirmed that Western Power’s Type 1 – 5 meters have the facilities and functionality prescribed.</p> <p>Our enquiries revealed that Type 1 – 5 meters are tested during the “Tender Evaluation” phase with the supplier to ensure that the meters:</p> <ul style="list-style-type: none"> <li>• have electronic data recording facilities that are able to measure and record internal energy data;</li> <li>• are capable of separately registering and recording flows in each direction if bi-directional electricity flows occur; and</li> <li>• store interval energy data for a period of at least 35 days from and including the day that data is first recorded.</li> </ul> <p>Meters are tested a second time in accordance with the Metering Management Plan to ensure that they conform to the prescribed requirements.</p> <p>Based on our enquiries, review of documentation and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.16(2)	
<b>Compliance Manual Reference</b>	359	346
<b>Obligation Description</b>	A network operator must ensure that a Type 1 metering installation to Type 4 metering installation on the network includes a communications link.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel and sample based testing confirmed that Western Power’s Type 1 – 4 metering installations on the network include a communications link.</p> <p>Our enquiries revealed that all Type 1 – 4 meters supplied by Landis and Gyrs include a communication link. The meters are all tested prior to purchase during the “Tender Evaluation” phase.</p> <p>Our enquiries also revealed that once the metering installation has been completed by Western Power at the customer’s premise, the completion advice forms are forwarded to the Metering Branch and recorded within MBS against the type of installation and a “Remote Phone Number” is allocated for that modem &amp; sim card.</p> <p>Sample based testing confirmed that an advice form was completed for metering installations that included a communications link, and the line number was recorded against the metering installation within MBS.</p> <p>Based on our enquiries, review of documentation and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.20(1)	
<b>Compliance Manual Reference</b>	364	351
<b>Obligation Description</b>	A network operator must, if reasonably requested by a Code participant, provide enhanced technology features in a metering installation.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel and sample based testing confirmed that Western Power provide enhanced technology features in a metering installation if requested by a Code participant.</p> <p>Our enquiries and walkthrough of the process revealed that the customer requests for enhanced technology features through the retailer who raises a service order through the metering web portal. MBS automatically generates a service order and forwards an email to the Metering Services Branch officers surrounding the job. Once the task is completed on the metering installation, the Metering Officer forwards the completed advice form for the task to the Metering Data Centre team, who input the information within MBS and close off the service order.</p> <p>Our testing confirmed that Western Power provided enhanced technology features in a metering installation when requested by the Code participant.</p> <p>Based on our enquiries, review of documentation and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.20(3)	
<b>Compliance Manual Reference</b>	365	<a href="#">352</a>
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel and review of documentation revealed that Code participants are not charged for the provision of metering installations with enhanced technology features, which is in accordance with the model SLA.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.21(2)	
<b>Compliance Manual Reference</b>	367	354
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel and testing confirmed that Western Power meters had facilities for storing interval energy data to meet the required periods of at least 35 days (Type 1 – 4 meters with communication links), and at least 200 days (Type 5 meters without communication links).</p> <p>Our enquiries revealed that meters supplied to Western Power by Landis and Gyrs had a minimum requirement of ensuring facilities have minimum storage capacity of 220 days for interval data. These meters go through a technical evaluation which incorporates the testing of storing the interval energy data for the periods prescribed.</p> <p>Based on our enquiries, testing and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.22	
<b>Compliance Manual Reference</b>	368	355
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel revealed that Western Power has a licence agreement with its supplier for the use and accessing the metering software applicable.</p> <p>Our enquiries and walkthrough of the process with the Metering Services Branch personnel revealed that the Complex Metering and Lab Team are responsible for programming and setting the parameters for all devices, including “read only” and “write” passwords. The Metering Services Branch personnel are responsible for authorising the different access levels to the EMPWin software. We also noted that the EMPWin software has an automated flagging control in the instance that an unauthorised Metering Officer attempts to install metering software using a device and attempts to program and set the parameters for the device.</p> <p>Based on our enquiries, review of documentation and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.23(a)	
<b>Compliance Manual Reference</b>	369	356
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel revealed that all Western Power meters were installed with electronic buffers or relays.</p> <p>Our enquiries revealed that all Western Power meters supplied by Landis and Gyr had undergone a technical evaluation which ensures that the meters have relays or electronic buffers. We reviewed meters within the Metering Branch Laboratory and confirmed that the meters were installed with electronic buffers or relays.</p> <p>We also obtained and reviewed relevant documentation surrounding the mandatory technical requirements for all Western Power meters to have electronic buffers or relays.</p> <p>Based on our enquiries, review of meters and documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.23(b)	
<b>Compliance Manual Reference</b>	370	357
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel and testing confirmed that Western Power provides signal specification information to customers to ensure compliance with clause 3.23(c) of the Metering Code.</p> <p>Our enquiries revealed that customers submit requests through the retailer for enabling a signal. Once a service order is raised by the retailer, jobs are then allocated to Western Power field officers who visit the customers' premises and perform works on meters to enable a signal. The information detailing the signal specification is contained within a pamphlet which is provided to customers at their premises.</p> <p>Based on our enquiries, testing and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.25	
<b>Compliance Manual Reference</b>	371	358
<b>Obligation Description</b>	A network operator that operates and maintains a pre-payment 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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel revealed that Western Power operate and maintain pre-payment meters in the same manner as other metering installations.</p> <p>Our enquiries revealed that all pre-payment meters would be subject to a replacement if a retailer has submitted a request for a change due to a malfunction or outage. Further, the pre-payment meters would be subject to testing in accordance with the Metering Management Plan.</p> <p>Our enquiries also revealed that Western Power currently operate and maintain 17 pre-payment meters in the Ninga Mia Community, and the Corporation has not had to replace any of these meters since their installation.</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 3.29	
<b>Compliance Manual Reference</b>	373	360
<b>Obligation Description</b>	A network operator must publish a list of registered metering installation providers, including the prescribed details, and at least annually, update the list.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Meter Installation Team found that Western Power publishes a list of registered metering installation providers, including details on the type of work each registered metering installation provider is authorised to carry out on Western Power’s website.</p> <p>We noted that registered metering installation providers are only registered on ELIS once certain requirements have been met which includes validation from Energy Safety’s database of licensed electrical contractors. Western Power’s website and MBS is interfaced with ELIS, which details any changes to registered metering installation providers and updates the website on a daily basis.</p> <p>Our inspection of Western Power’s website confirmed the organisation’s list of registered metering installation providers was available.</p> <p>Based on our enquiries and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Code of Conduct clause 4.1(1)	
<b>Compliance Manual Reference</b>	374	361
<b>Obligation Description</b>	A network operator must establish, maintain and administer a metering database containing standing data and energy data for each metering point on its network.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch management and review of the MBS functional specifications found that Western Power had established a metering data base containing standing and energy data for each metering point on its network.</p> <p>Our enquiries with Information System Analysts and review of performance reports indicated that Western Power had processes for maintaining and administering the database.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 4.1(2)	
<b>Compliance Manual Reference</b>	375	362
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel and Metering Service Support personnel revealed that Western Power do have processes in place to restrict access to approved users to its metering database and associated links, circuits, information storage and processing systems.</p> <p>Our enquiries revealed that access levels to the metering database varied depending on the Officer's position and division. Application requests for access to the metering database require the Officer to complete an "MBS Application Form" and obtain approval from their Team Leader/Manager and MBS Service Support personnel.</p> <p>We also noted that:</p> <ul style="list-style-type: none"> <li>• Western Power developed and implemented a "<i>password authority level matrix</i>" on its metering database;</li> <li>• Western Power developed and implemented a signature authority list for MBS to ensure approval to the metering database is given by appropriate personnel;</li> <li>• MBS passwords are required to be changed every 30 days; and</li> <li>• MBS user accounts are locked if a password is attempted wrongly after 3 times.</li> </ul> <p>We obtained and reviewed the IT security policy and MBS Functional Specification Manual for security.</p>	

	Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.
<b>Recommendation</b>	Nil.

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 4.1(3)	
<b>Compliance Manual Reference</b>	376	363
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Enquiries made with the IT Branch and Metering Services Branch personnel and review of documents provided by the IT Branch confirmed that Western Power has systems and processes in place to facilitate the rebuilding of MBS in the event of a disaster.</p> <p>Western Power maintains a replica of MBS and the data is purported to be updated on a daily basis as a minimum. Western Power has also identified off-site recovery options that would permit the timely provision of energy data to Code participants. Disaster recovery capability and capacity were identified during the discussion and the IT Branch personnel provided that a recent disaster recovery test did not reveal any exceptions. Systems and processes were examined for integrity, and whilst the testing did not require a “go live” exercise, the IT team were confident that if required, they could “go live” without experiencing any major issues.</p> <p>Review of the Disaster Recovery Report confirmed that Western Power is able to replicate MBS database and ensure the Corporation is able to provide energy data within 2 business days after the day of any disaster.</p> <p>The disaster recovery plan had taken into consideration maximum outage times and identified MBS data as a topic of priority.</p> <p>Based on our audit procedures we have concluded that western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 4.2(1)	
<b>Compliance Manual Reference</b>	377	364
<b>Obligation Description</b>	A network operator must ensure that its registry complies with the Code and the prescribed clause of the market rules.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch staff, review of the Metering Code and prescribed clause of the Market Rules, we determined that MBS (registry) functional specifications have been configured accordingly.</p> <p>We performed a walkthrough of the MBS and identified that adequate processes existed for data recording, consumption data and historical data are recorded and maintained within the system.</p> <p>Based on our audit procedures we have concluded that western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 4.3(1)	
<b>Compliance Manual Reference</b>	378	365
<b>Obligation Description</b>	The standing data for a metering point must comprise at least the items specified.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Review of MBS functionality revealed that the system has been configured in accordance with the specifications, validation checks and specific data fields as required by the Metering Code.</p> <p>Examination of the standing data for a single metering point confirmed that MBS records the minimum amount of information as specified by the Metering Code.</p> <p>Discussions with the Metering Services Branch management regarding the Build Pack provided further insight with respect to the business rules by which MBS had been designed.</p> <p>Based on audit procedures we have concluded that western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 4.4(1)	
<b>Compliance Manual Reference</b>	379	366
<b>Obligation Description</b>	A network operator and affected Code participants must liaise together to determine the most appropriate way to resolve a discrepancy between energy data held in a metering installation and data held in the metering database.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Service Branch personnel and walkthrough of the MDV process determined that Western Power has a process in place to facilitate the determination of the most appropriate way to resolve a discrepancy.</p> <p>In the event a discrepancy is raised by a Code participant through the B2B process the Reading Management Group will investigate the discrepancy through system interrogation or field enquiries. Metering Services Branch personnel have the ability to liaise directly with the Code participant who raised the discrepancy to resolve the issue.</p> <p>Walkthrough of the resolution process where Code participants had raised an issue observed that the each issue was resolved through positive engagement.</p> <p>Based on our audit procedures we have concluded that western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 4.5(1)	
<b>Compliance Manual Reference</b>	380	367
<b>Obligation Description</b>	A Code participant must not knowingly permit the registry to be materially inaccurate.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Our discussions with the Metering Services Branch personnel revealed that Western Power has systems and processes in place to ensure that it does not knowingly permit the registry to be materially inaccurate.</p> <p>Our enquiries and walkthrough of processes revealed that Western Power run registry exception and health check reports on a daily basis and where anomalies are identified, they are investigated and resolved by the Basic Data team. Further, review of the MBS and Web Portal functional specifications revealed that there are security access restrictions in place to ensure unauthorised users do not have access to the registries. We also noted that MBS has an audit trail functionality to allow for any previous amendments to the registry to be tracked.</p> <p>Based on our enquiries, walkthrough of processes and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 4.6(1)	
<b>Compliance Manual Reference</b>	382	369
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch staff revealed that Western Power has systems and processes in place to ensure that it updates the registry, when notified by a Code participant of a change to or inaccuracy in an item of standing data.</p> <p>Our enquiries and walkthrough of the process revealed that service orders were raised by the retailer on behalf of the customer to update an item of standing data. The Business to Business (“B2B”) transaction request would then be validated and automatically updated by MBS, and the retailer would also be automatically notified of the update thereafter.</p> <p>Sample based testing of valid notices received for a change to or inaccuracy in the standing data registry confirmed that Western Power updated the registry in accordance with the Metering Code clause 4.6(1).</p> <p>Based on our enquiries, walkthrough of processes and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 4.6(2)	
<b>Compliance Manual Reference</b>	383	370
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Our discussions with the Metering Services Branch staff revealed that Western Power has systems and processes in place to ensure that it undertakes appropriate investigations to determine whether the registry should be updated, and update the registry as required, when notified by a Code participant of a change to or inaccuracy in an item of standing data.</p> <p>Our enquiries and walkthrough of the process revealed that service orders were raised by the retailer on behalf of the customer of a change to or inaccuracy in standing data. The B2B transaction request would then be validated and where data issues exist, the Basic Data Team would investigate the data and determine whether the registry should be updated or not. We noted that there may be instances where a Metering Officer may be required to visit the customer's premise to undertake the investigation. Upon completion of the investigation at the customer's premise, the outcome would be communicated to the Basic Data Team who would determine whether the registry should be updated, and subsequently act on the service order and ensure the update is carried out by MBS if required.</p> <p>Sample based testing of valid notices received for a change to or inaccuracy in the standing data registry confirmed that Western Power conducted an investigation to determine whether the</p>	

	<p>registry should be updated where applicable, and subsequently updated the registry as required.</p> <p>Based on our enquiries, walkthrough of processes and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>
<b>Recommendation</b>	Nil.

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 4.7	
<b>Compliance Manual Reference</b>	384	371
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Our discussions with the Metering Services Branch personnel revealed that Western Power has systems and processes in place to ensure that it notifies the affected user for a metering point of the updated standing data within 2 business days.</p> <p>Our enquiries and walkthrough of the process revealed that affected users are notified upon closure of the service order once the registry is automatically updated through MBS. The MBS functionality allows a notification to be sent once the service order has been completed.</p> <p>Sample based testing of notifications made to users in regard to the updates performed of registry confirmed that the dates of the notifications were in accordance with the Metering Code requirements.</p> <p>Based on our enquiries, walkthrough of processes and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 4.8(3)	
<b>Compliance Manual Reference</b>	385	372
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel revealed that Western Power have systems and processes in place to permit "read only" passwords for accessing the energy data at the metering points for users who supply, purchase or generate electricity.</p> <p>Our enquiries and walkthrough of the process revealed that the Customer Solutions Branch Account Managers obtains a request from a user for a "read only" password. The Account Managers submit the request to the Reading Management Team through the metering web portal, who would issue a service order to the Meter Infrastructure Team for creating and providing the "read only" password for the user. We also noted that the Metering Services Branch personnel would seek clarification with the Accounts Manager if the user holds an access contract.</p> <p>Sample based testing confirmed that Western Power provide "read only" passwords to appropriate users for accessing the energy data at the metering points.</p> <p>Based on our enquiries, review of documentation and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 4.9	
<b>Compliance Manual Reference</b>	388	<a href="#">375</a>
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Our discussions with the Metering Services Branch personnel revealed that Western Power’s MBS has been configured to retain energy data for 24 months from the date it was obtained, and archive energy data for 7 years.</p> <p>We reviewed the MBS functional specifications and sample based testing of metering points confirmed that the energy data had been retained within MBS for the period and in the format prescribed in accordance with this Metering Code obligation.</p> <p>Based on our enquiries, review of documentation and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Metering code 5.1(1)	
<b>Compliance Manual Reference</b>	389	376
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Enquiries with the Metering Services Branch personnel found that Western Power engages in regular meetings with relevant Code participants to discuss metering service and requirements in connection with the negotiation of a SLA.</p> <p>Further, Western Power provides opportunities to raise issues relating to SLA negotiations through contact with their Metering Account Mangers from the Customer Solutions Branch and B2B Steering Committee meetings.</p> <p>Our enquiries revealed that during the audit period, Western Power has been in communication with Synergy to develop a separate SLA. Inspection of the draft SLA and minutes of monthly meetings held with key Synergy personnel confirmed that Western Power has facilitated discussions with Synergy in order negotiate metering service and requirements within the proposed SLA.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Metering code 5.1(2)	
<b>Compliance Manual Reference</b>	390	<a href="#">377</a>
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Through our enquiries with the Metering Services Branch personnel, we were informed that Western Power has the ability to provide services to a Code participant by entering into a formal agreement with the Code participant. Western Power will negotiate with the Code participant the services to be provided in the agreed SLA to ensure that it is in accordance with the Metering Code.</p> <p>Discussions and review of the proposed Synergy SLA revealed that Western Power had been actively involved in negotiations with Synergy to develop a separate SLA throughout the audit period. Our inspection of minutes recorded at monthly meetings demonstrated that Western Power negotiated its terms in good faith.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Metering Code clause 5.4(1)	
<b>Compliance Manual Reference</b>	392	379
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Through our enquiries with Metering Services Branch personnel we noted that Western Power has processes in place to undertake a meter reading that provides an actual value at least once in any 12 month period.</p> <p>Discussions and review of reports found that Western Power has contracted AMRS to undertake meter readings to fulfil this manual licence reference obligation. Further, AMRS provides reports on the status and forecast of meter readings undertaken to Western Power on a monthly basis.</p> <p>Based on our audit procedures we have concluded that Western Power have taken reasonable endeavours, and has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Metering Code clause 5.5(2)	
<b>Compliance Manual Reference</b>	394	381
<b>Obligation Description</b>	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 from doing so.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Through our discussions with the Metering Services Branch personnel and review of billing invoices, we found that Western Power only imposed a charge for the provision of data under the Electricity Metering Code in accordance with the model SLA.</p> <p>Sample based testing did not reveal any exceptions where a charge was imposed for the provision of data that was not in accordance with the model SLA.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.7	
<b>Compliance Manual Reference</b>	397	384
<b>Obligation Description</b>	A network operator must provide replacement energy data to the user for the metering point and the IMO within the timeframes prescribed.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Enquiries with the Metering Services Branch personnel revealed that Western Power has systems and processes in place to ensure that replacement energy data to the user for the metering point and the IMO is provided within the prescribed timeframes.</p> <p>Our walkthrough of the replacement data process revealed that once data was replaced within MBS, it would be published to the market on the same day.</p> <p>Sample based testing did not reveal any exceptions where replacement data was provided outside of the prescribed timeframes.</p> <p>Discussions with the Information Services Analyst and review of MBS release notes found that the unforeseen errors arising from the system upgrade resolved by May 2011.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>2011 Compliance Report – Status of Remedial Action</b>	Western Power investigated the feasibility of allowing auto substitution of interval data prone to human error however implementation did not occur by the action date.	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.8	
<b>Compliance Manual Reference</b>	398	385
<b>Obligation Description</b>	A network operator must provide a user with whatever information the network operator has that is necessary to enable the user to comply with its obligations under the Code of Conduct, within the time necessary for the user to comply with the obligations.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel revealed that Western Power has both system and manual processes in place to provide necessary information for the user to comply with obligations under the Code of Conduct.</p> <p>We performed a walkthrough of the process and identified that information can be provided through the following ways:</p> <ul style="list-style-type: none"> <li>• B2B transactions;</li> <li>• Metering Services web Portal;</li> <li>• Western Power Contact Call Centre communications; and</li> <li>• Direct response to customer enquiries by email or telephone.</li> </ul> <p>Further, we noted that Western Power undertake regular B2B meetings with the retailer to discuss potential areas of concern that need to be addressed regarding data being provided to users to facilitate the Corporation in complying with the Metering Code.</p> <p>Based on our enquiries, walkthrough of processes and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.9	
<b>Compliance Manual Reference</b>	399	386
<b>Obligation Description</b>	A network operator must provide standing data, provided to or obtained by it under this Code, to users where required to do so under any enactment.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel revealed that Western Power have processes in place to provide to or obtain standing data in accordance with the Metering Code.</p> <p>A walkthrough of the process revealed the provision of standing data information is an automated process configured through MBS functionality.</p> <p>Sample based testing confirmed that where standing data was requested for, Western Power provided the relevant standing data.</p> <p>Based on our enquiries, walkthrough of processes and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.11	
<b>Compliance Manual Reference</b>	401	388
<b>Obligation Description</b>	If a transfer occurs at a connection point, a network operator must provide an incoming retailer with a copy of the standing data for each metering point associated with the connection point within the timeframes prescribed.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Meter Installation Team Leader revealed that Western Power has systems and process to provide an incoming retailer with a copy of standing data for each connection point associated with the connection point within the prescribed timeframe.</p> <p>A walkthrough of the customer transfer process and review of documentation observed that a full standing data update is provided to the incoming retailer through MBS in accordance with the Western Australian Electricity Industry Build Pack and Standing Data Procedure.</p> <p>Sample based testing of full standing data updates provided after a transfer occurred did not reveal any exceptions outside the prescribed timeframes.</p> <p>Discussions with the Information Services Analyst and review of MBS release notes found that the unforeseen errors arising from the system upgrade resolved by May 2011.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>2011 Compliance Report – Status of Remedial Action</b>	Western Power has completed the remedial action.	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.13	
<b>Compliance Manual Reference</b>	403	390
<b>Obligation Description</b>	A network operator must provide a current user with a complete current set of standing data for the 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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Meter Installation Team, review of Western Power's Communication Rules and sample based testing revealed that Western Power provides current users with a current set of standing data through MBS and advised whether there was a communication link for the metering point in accordance with the Communication Rules.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.14(3)	
<b>Compliance Manual Reference</b>	404	391
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Enquiries with the Metering Services Branch personnel and a review of the standing data procedure revealed that Western Power has processes in place to 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.</p> <p>A walkthrough of the standing data request process found that upon submission of a valid standing data request, Western Power will validate each request in accordance with the business rules established in the Build Pack. Notification of a valid standing request will be provided through MBS and the web portal. Sample based testing did not reveal any exceptions.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.15	
<b>Compliance Manual Reference</b>	405	<a href="#">392</a>
<b>Obligation Description</b>	A network operator that provides energy data to a user or the IMO must also provide the date of the meter reading.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussion with Metering Services Branch personnel and inspection of MBS functional specifications revealed that Western Power has processes in place to provide the date of the meter reading with energy data to a user or to the IMO.</p> <p>Sample based review of NEM12 and NEM 13 energy data files provided to users and the IMO confirmed that MBS will automatically input the date of the meter reading.</p> <p>Based on audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.19(5)	
<b>Compliance Manual Reference</b>	413	400
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Our review and discussions with the Metering Services Branch staff revealed that Western Power have processes in place to:</p> <ul style="list-style-type: none"> <li>• Ensure a user is given notice;</li> <li>• Acknowledging receipt of a customer; and</li> <li>• Site or address attributes from the user within the timeframes prescribed.</li> </ul> <p>Our enquiries, walkthrough of the process and sample based testing confirmed that Western Power gave notice to a user acknowledging receipt of customer attributes or site attributes within 1 business day after receiving the information and address attributes from the user within 15 business days after receiving the information. Further, we noted that notifications were provided automatically through MBS.</p> <p>Based on our enquiries, walkthrough of processes and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.20(1)	
<b>Compliance Manual Reference</b>	415	<a href="#">402</a>
<b>Obligation Description</b>	A network operator must, within 6 months from the date this Code applies to the network operator, develop, in accordance with the communication rules, an energy data verification request form	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussion with the Metering Services Branch personnel revealed that Western Power developed an energy data verification request form in accordance with the Metering Code and Communication Rules. Western Power's energy data verification request form was developed in 2005 which was within 6 months of the Metering code applying to Western Power.</p> <p>Enquiries and inspection of the form found that there have not been any changes to the energy data verification request form or the Metering Code during the audit period.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.20(2)	
<b>Compliance Manual Reference</b>	416	403
<b>Obligation Description</b>	An Energy Data Verification Request Form must require a Code participant to provide the information prescribed.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel revealed that Western Power’s Energy Data Verification Request form has been designed to meet the requirements of clause 5.20(2) of the Metering Code.</p> <p>Review of the electronic Energy Data Verification form confirmed that the form required a Code participant to provide the following information:</p> <ul style="list-style-type: none"> <li>• Metering point’s NMI and checksum;</li> <li>• The reason for the request;</li> <li>• Information related to interval and accumulation meters such as period in which the request relates; and</li> <li>• Where practicable information as the Code participant is reasonably able to provide to assist Western Power to comply with verification request.</li> </ul> <p>In the absence of the above information the Energy Data Verification form would be rejected.</p> <p>Based on our enquiries, validation and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.20(4)	
<b>Compliance Manual Reference</b>	417	404
<b>Obligation Description</b>	If a Code participant requests verification of energy data, a network operator must, in accordance with the metrology procedure, use reasonable endeavours to verify energy data and inform the requesting Code participant of the result of the verification and provide the verified energy data within the timeframes prescribed.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Enquiries with the Metering Services Branch personnel and walkthrough of the meter data verification process confirmed that Western Power has processes and controls to support compliance with clause 5.20(4) of the Electricity Metering Code.</p> <p>A walkthrough of the process revealed that Code participants are able to submit a MDV request through the B2B gateway or Metering Service Centre Web Portal. A service order request for a MDV will be manually checked through the system and if necessary a fielder officer will be requested to perform a manual reading for the meter.</p> <p>Sample based testing did not reveal any exceptions where MDV requests were responded to outside the prescribed timeframe.</p> <p>Based on audit procedures we have concluded that Western Power has used reasonable endeavours, and has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.21(2)	
<b>Compliance Manual Reference</b>	418	405
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel revealed that Western Power have processes in place to ensure a test or an audit surrounding the accuracy of a metering installation or its associated data is undertaken upon request.</p> <p>Our enquiries and walkthrough of the process revealed that Code participants would make a request through the retailer for a test or an audit of the accuracy of the metering installation. The retailer would raise a service order request through the metering web portal for the test or audit to be undertaken. Once a Metering Technician has been dispatched to the job and the test has been completed within the Metering Branch Laboratory, the test result is reported on a “Test Request” form (electronic). A report is provided to the retailer detailing the outcome of the test or audit through MBS by the Metering Branch.</p> <p>Sample based testing confirmed that Western Power carried out tests or audits on the accuracy of metering installations or the energy or standing data of metering installations upon request by a Code participant.</p> <p>Based on our enquiries, review of documentation and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.21(4)	
<b>Compliance Manual Reference</b>	419	406
<b>Obligation Description</b>	A test or audit is to be conducted in accordance with the metrology procedure and the applicable service level agreement.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel revealed that a test or audit of a metering installation is a service standard that Western Power must fulfil to the Code participant as required by the model SLA and metrology procedure.</p> <p>Our enquiries and walkthrough of the process revealed that Code participants would make a request through the retailer for a test or an audit of the accuracy of the metering installation. The retailer would raise a service order request through the metering web portal for the test or audit to be undertaken. Once a Metering Technician has been dispatched to the job and the test has been completed within the Metering Branch Laboratory, the test result is reported on a “Test Request” form (electronic) to a Commercial Officer within the Meter Asset and Distribution team. A report is provided to the retailer detailing the outcome of the test or audit through MBS by the Commercial Officer.</p> <p>Sample based testing confirmed that Western Power carried out tests or audits on metering installations in accordance with the metrology procedure, which refers to the applicable Australian Standards.</p> <p>Based on our enquiries, walkthrough of processes and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	
<b>Licence Condition</b>	Distribution Licence condition 5.1	

	Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.21(9)	
<b>Compliance Manual Reference</b>	423	410
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Through discussions, walkthrough and review of the model SLA, we confirmed that Western Power includes a provision that no charge is to be imposed if the test or audit reveals a non-compliance with the Electricity Industry Metering Code.</p> <p>Enquiries revealed that upon completion of a meter test the outcome of the meter test would be stated as a pass or fail. Based on this information the Metering Services Branch officers will impose the relevant charges.</p> <p>Sample based testing did not reveal any instances where a charge had been imposed for a failed meter tests.</p> <p>Based on our discussions and walkthrough we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>2011 Compliance Report – Status of Remedial Action</b>	Western Power has not implemented the remedial action to align the current system set up of charges within MBS against the applicable SLA by the action date. However, Western Power has since obtained an in principle agreement from the retailer, stating that the retailer will pay those costs associated with the cancellation of a request. Further, review of charges imposed on the retailer in accordance with this clause revealed that it does not charge for those instances where the test or audit reveals a non-compliance with the Code which results in energy data errors in the network operator's favour.	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.21(11)	
<b>Compliance Manual Reference</b>	424	411
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Our discussions with the Metering Services Branch staff revealed that Western Power advises affected parties as soon as practicable of errors detected under a test or audit and the possible duration of the errors. If errors are discovered within the meter installation, the meter will be replaced rather than repaired in accordance with the model SLA.</p> <p>Our enquiries revealed that once a test or audit on the metering installation has been completed by the Metering Service Branch Technician, the test result is reported on a “Test Request” form (electronic) and this provided to a Commercial Officer within the Meter Asset and Distribution team. A report is then compiled and provided to the retailer detailing the outcome of the test or audit through MBS by the Commercial Officer.</p> <p>We also noted that the “Notification of Affected Parties” document outlines the communication process.</p> <p>Sample based testing confirmed that Western Power notified affected parties upon completion of a test or audit and service order requests, and MBS records were reviewed surrounding the replacement of erroneous meters.</p> <p>Based on our enquiries, walkthrough of processes and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.21(12)	
<b>Compliance Manual Reference</b>	425	412
<b>Obligation Description</b>	The original stored error correction data in a meter must not be altered except during accuracy testing and calibration of a metering installation.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	<p>Our discussions with the Metering Services Branch personnel revealed that Western Power do not alter original stored error correction data in a meter.</p> <p>Our enquiries revealed that all Western Power meters do not have stored error correction data capabilities. Meters supplied to Western Power by Landis and Gyr undergo a technical evaluation to ensure that the original stored error correction data cannot be altered.</p> <p>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Metering code 5.22(3)	
<b>Compliance Manual Reference</b>	428	415
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel and walkthrough of the estimation process revealed that Western Power has adequate processes in place to substitute values in accordance with clause 5.22(3) the Metering Code.</p> <p>A review of MBS and sample based testing confirmed that where check meter energy data was not available or when the energy data cannot be recovered from the metering installation within the time required under this Code, Western Power provided substituted values which have been prepared utilising the method contained in Appendix 3 of the Electricity Industry Metering Code.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Metering Code clause 5.22(4)	
<b>Compliance Manual Reference</b>	429	416
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch management revealed that Western Power has systems and controls in place to notify each affected Code participant of a loss of energy data or incorrect energy data from a metering installation is detected.</p> <p>We performed a walkthrough of the notification process and found that MBS is designed to automatically match data against historical energy usage. In instances where any unusual spikes in data readings are observed, MBS has the functionality to create an exception and notify the affected Code participant of the loss of energy state or incorrect energy data in accordance with the Metering Code.</p> <p>Sample based testing confirmed that notifications to the affected Code participant for the loss or error of energy data were provided within 24 hours after detection.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Metering Code clause 5.22(5)	
<b>Compliance Manual Reference</b>	430	417
<b>Obligation Description</b>	Substitution or estimation of energy data is to be required when energy data is missing, unavailable or corrupted, including in the circumstances described.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Enquiries with the Metering Services Branch personnel and review of MBS confirmed that Western Power has a process in place to substitute energy data in relation to circumstances outlined under clause 5.22(5) of the Electricity Industry Metering Code.</p> <p>A walkthrough of the process revealed that MBS has the functionality to automatically generate a substitute value for basic energy data. Prior to February 2012, substituted energy data for interval data was required to be entered manually where data was found to be missing or unavailable data. Subsequent to this date, auto substitution functionality was implemented for revenue meters and in June 2012, check meters were able to substitute interval data.</p> <p>Western Power has established an exception report for energy data that is missing or unavailable or corrupted. We obtained and reviewed the information contained in the exception report to confirm the identification of a substitution requirement.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Metering Code clause 5.22(6)	
<b>Compliance Manual Reference</b>	431	418
<b>Obligation Description</b>	A network operator must review all validation failures before undertaking any substitution.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Through our discussion with the Metering Services Branch personnel, we found that Western Power has processes and systems in place to review all validation failures before undertaking any substitution.</p> <p>A walkthrough of the review process revealed that energy data proceeds through an automatic validation process from batch to system. If energy data fails the automatic validation checks, MBS will raise the energy data reading into exception status. Each exception will then be reviewed and revised prior to permitting the system to allocate the substituted value.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.23(1)	
<b>Compliance Manual Reference</b>	432	<a href="#">419</a>
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussion with the Metering Services Branch management revealed that Western Power has a process in place to designate an estimated or substituted value for the metering point to be deemed actual under the circumstance of this manual reference obligation.</p> <p>Sample based review of instances where meters with communications had failed to deliver energy data, faulty meters or loss of meter data, confirmed that a final substitute read was provided in circumstances where a meter was removed or when an exception reporting identified an error with the actual energy data.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.23(3)	
<b>Compliance Manual Reference</b>	433	420
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Our discussions with the Metering Service Branch staff revealed that Western Power only replaced meters or one or more components of the metering equipment when a designated deemed actual value is provided.</p> <p>Our enquiries and inspection of data records confirmed that meters were replaced based on meter inspection results. We observed that meter inspections were raised through MBS, as a result of exceptions being identified in meter reads undertaken by the Metering Services Branch teams. Further, we noted that exception reports were run on a daily basis.</p> <p>Sample based testing confirmed that Western Power replaced meters when a designated deemed actual value was provided and a service order was raised.</p> <p>Based on our enquiries, walkthrough of processes and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.24(1)	
<b>Compliance Manual Reference</b>	434	421
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel revealed that Western Power has a process in place to replace the first value with the second value where applicable under the requirement of clause 5.24(1) of the Metering Code.</p> <p>Our enquiries and walkthrough of the value replacement process revealed that MBS automatically generates exception reports which identify erroneous actual value readings. Erroneous actual value readings are then investigated and if second actual value readings or deemed actual value readings are available and of a better quality, they are used to replace actual value readings in accordance with the Metering Code.</p> <p>Sample based testing confirmed that Western Power replaced the first actual value with a better quality actual or deemed actual value in accordance with the Metering Code requirements.</p> <p>Based on our enquiries, walkthrough of processes and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.24(2)	
<b>Compliance Manual Reference</b>	435	<a href="#">422</a>
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch staff revealed that Western Power has a process in place to replace the deemed actual value with a better quality deemed actual value where applicable under the requirement of clause 5.24(2) of the Metering Code.</p> <p>Our enquiries and walkthrough of the value replacement process revealed that MBS automatically generates exception reports which identify erroneous deemed actual value readings. Erroneous deemed actual value readings are then investigated and if second deemed actual value readings are available and of a better quality, they are used to replace the first deemed actual value readings in accordance with the Metering Code.</p> <p>Sample based testing confirmed that Western Power replaced the first deemed actual value with a better quality deemed actual value in accordance with the Metering Code requirements.</p> <p>Based on our enquiries, walkthrough of processes and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.24(3)	
<b>Compliance Manual Reference</b>	436	423
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch personnel revealed that Western Power has a process in place to replace the estimated or substituted value with a better quality actual, deemed, estimated or substituted value where applicable under the requirement of clause 5.24(3) of the Metering Code.</p> <p>Our enquiries and walkthrough of the value replacement process revealed that MBS automatically generates exception reports which identify erroneous estimated or substituted value readings. Erroneous estimated or substituted value readings are then investigated and if second actual, deemed, estimated or substituted value readings are available and of a better quality, they are used to replace the first value readings in accordance with the Metering Code.</p> <p>Sample based testing confirmed that Western Power replaced the first estimated or substituted value readings with a better quality actual, deemed, estimated or substituted value readings in accordance with the Metering Code requirements.</p> <p>Based on our enquiries, walkthrough of processes and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.24(4)	
<b>Compliance Manual Reference</b>	437	424
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Metering Services Branch staff revealed that Western Power has a process in place to replace the estimated or substituted value upon reasonable request from a Code Participant.</p> <p>Our enquiries revealed that requests for the replacement of estimated or substituted value readings are submitted by the retailer through email. Estimated or substituted value readings are then investigated by the Metering Data team through the review of historical consumption records. The decision is then made thereafter to replace the estimated or substituted value readings if required.</p> <p>Our enquiries and review of minutes also revealed that Western Power participate in regular B2B meetings with the retailer (Synergy) regarding any areas of concern. Discussions may include the replacement of estimated or substituted value readings.</p> <p>Sample based testing confirmed that Western Power replaced estimated or substituted value readings where requested by a Code participant.</p> <p>Based on our enquiries, walkthrough of processes and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.25	
<b>Compliance Manual Reference</b>	438	425
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussion with Metering Services Branch personnel revealed that Western Power has systems and processes in place to ensure the accuracy of estimated energy data in accordance with the methods prescribed in the Metrology Procedure.</p> <p>Walkthrough of the estimation process and review of the Australian Energy Market Operator Metrology Procedures and MBS functional specifications determined that Western Power performed MBS validation and exception reporting checks on a daily basis to ensure accuracy of the estimated energy data and transformation or processing data in accordance with the quality requirements of the metrology procedure.</p> <p>Based on audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.29	
<b>Compliance Manual Reference</b>	440	<a href="#">427</a>
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	<p>Enquiries with Metering Services Branch management revealed that Western Power had not entered into a metering data agency agreement within the audit period.</p> <p>On 1 October 2009, Western Power entered into a metering data agreement with Horizon Power which terminated on 31 December 2011.</p> <p>Discussion and review of the Service Level Contract found that Western Power did not undertake any of the activities prescribed under clause 5.29 of the Metering Code were undertaken as the metering data agency agreement was established outside the audit period.</p> <p>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.30(1)	
<b>Compliance Manual Reference</b>	441	<a href="#">428</a>
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Enquiries with the Metering Services Branch management revealed that Western Power had not entered into a metering data agency agreement within the audit period.</p> <p>On 1 October 2009, Western Power entered into a metering data agreement with Horizon Power which terminated on 31 December 2011.</p> <p>A review of the Service Level Contract found that it did not include some of the matter prescribed under clause 5.30(1) of the Electricity Industry Metering Code as the services within the Service Level Contract have ceased from 30 September 2009.</p> <p>Based on our discussions, review of documentation and the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 5.34(2)	
<b>Compliance Manual Reference</b>	444	431
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with Metering Services Branch personnel and review of email correspondence revealed that on 1 October 2011 Western Power entered into a metering data agreement with Horizon Power which terminated on 31 December 2011.</p> <p>Sample based testing of Horizon Power billing invoices, confirmed that confirmed that costs were imposed in accordance with the Service Level Contract between Western Power and Horizon.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 6.20(4)	
<b>Compliance Manual Reference</b>	447	<a href="#">434</a>
<b>Obligation Description</b>	A network operator must amend any document in accordance with the Authority's final findings.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	<p>Our enquiries with the Metering Services Branch management and review of the Authority's web site indicated that Western Power did not receive any advice from the Authority to amend any listed documents under the Electricity Industry Metering Code.</p> <p>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 7.2(1)	
<b>Compliance Manual Reference</b>	448	<a href="#">435</a>
<b>Obligation Description</b>	Code participants must use reasonable endeavours to ensure that they can send and receive a notice by post, facsimile and electronic communication and must notify the network operator of a telephone number for voice communication in connection with the Code.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Enquiries with the Metering Services Branch personnel revealed that Western Power makes contract information available through the Corporation's website and within Electricity Transfer Access Contracts. Further, Code participants are able to electronically contact Western Power through the Metering Service Centre Web Portal and B2B gateway.</p> <p>Walkthrough of Western Power's website and Metering Service Centre Web Portal and review of an Electricity Transfer Access Contract, we confirmed that Western Power's post, email and facsimile are made available to a Code participant.</p> <p>A walkthrough of the communication process confirmed that Western Power notifies the retailer of a telephone number for voice communication through its website.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry Metering Code clause 7.2(2)	
<b>Compliance Manual Reference</b>	449	436
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	<p>Discussions with Metering Services Branch personnel revealed that Western Power did not change its contact details during the audit period.</p> <p>However, in the event that Western Power does change its contact details, the Corporation has a process in place that would ensure that each Code participant is notified of the changes in a timely manner.</p> <p>Walkthrough of the notification process revealed that Western Power would automatically notify the retailer electronically through MBS of its new contact details. We also noted that Western Power's Account Managers in Customer Solutions Branch had the responsibility for notifying Code Participants of any revised changes.</p> <p>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>		
	Electricity Industry Metering Code clause 8.1(1)	
	Electricity Industry Metering Code clause 8.1(2)	
	Electricity Industry Metering Code clause 8.1(3)	
	Electricity Industry Metering Code clause 8.1(4)	
	Electricity Industry Metering Code clause 8.3(2)	
<b>Compliance Manual Reference</b>	454, 455, 456, 457 & 458	<a href="#">441, 442, 443, 444 &amp; 445</a>
<b>Obligation Description</b>		
454	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.	
455	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.	
456	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.	
457	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.	

458	<p>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.</p>
<b>Reporting Type</b>	NR, NR, NR, 2, NR
<b>Compliance Rating</b>	N/R
<b>Audit Observations</b>	<p>Through our enquiries we found that prior to September 2011, Western Power did not have a dispute resolution framework that provided a methodology for identifying, classifying, recording, resolving and communicating a dispute.</p> <p>In September 2011, Western Power developed and implemented a dispute resolution procedure in accordance with requirements prescribed within the Metering Code. The dispute procedure has been developed and published to major customers and agreed to by the Metering Account Managers.</p> <p>Further, discussions with Metering Services Branch staff revealed that Western Power has an escalation framework in place to address an issue before it may escalate into a dispute. This is achieved through communication with their Metering Account Managers from the Customer Solutions Branch or, if agreed upon, via B2B Steering Committee meetings.</p> <p>Enquiries revealed that during this audit period there were no disputes relating to the Metering Code.</p> <p>In the absence of activity with regard to these obligations, we have determined that we could not rate these compliance manual reference obligations.</p>
<b>Recommendation</b>	Nil.

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 5(1)	
<b>Compliance Manual Reference</b>	459	446
<b>Obligation Description</b>	A distributor or transmitter must, as far as reasonably practicable, ensure that electricity supply to a customer's electrical installations complies with prescribed standards.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Network Operations Branch revealed that Western Power has processes in place to ensure that electricity supplied to a customer's electrical installations, does not fluctuate outside of the compatibility levels for harmonic voltages.</p> <p>Enquiries revealed that Western Power utilise the Flicker and Harmonic Allocation Models to test voltage fluctuations or load issues that may arise from electricity supplied to a customer's new connection.</p> <p>A walkthrough of the process found that the network was designed to minimise harmonic distortion in line with Australian Standards and testing for harmonics was conducted on a sample based method by Western Power.</p> <p>Sample based testing of customer complaints relating to voltage fluctuations or harmonic voltage distortions revealed that Western Power had undertaken the necessary investigations to complete the work programs required and comply with the prescribed standards under clause 6(2) and 7 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 8	
<b>Compliance Manual Reference</b>	460	447
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Through our enquiries with the Network Operations Branch, review and walkthrough of systems, investigations and emergency management processes and procedures, we found that Western Power has the capability to disconnect the supply of electricity to installations or property in specified circumstances.</p> <p>Sample based testing of customer complaints confirmed that Western Power undertook investigations to monitor and determine the quality and reliability of supply. In instances where investigations revealed that ‘flicker’ and ‘harmonic voltage’ levels fluctuated outside the prescribed levels, Western Power would communicate with customers and provide them with the option to disconnect the supply of electricity to their installation or property.</p> <p>Further discussions revealed that in the event of an emergency where property or life may be threatened, Western Power has the capability to disconnect supply and has done so in such situations.</p> <p>Based on our enquiries, review of documentation and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 9	
<b>Compliance Manual Reference</b>	461	448
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Through enquiries with the Network Operations Manager, review of documentation and walkthrough of the restoration process revealed that Western Power used a number of systems including ENMAC and SCADA to monitor and identify interruptions.</p> <p>A review of Western Power's Emergency Management Plans and Fault Processing revealed that the organisation had actions plans that could be implemented to address planned and unplanned interruptions. Further, we noted that Western Power is able to source alternative means of generating and supplying electricity to its customers, primarily through back-feeding electricity using nearby networks.</p> <p>Based on our enquiries and walkthrough we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 10(1)	
<b>Compliance Manual Reference</b>	462	449
<b>Obligation Description</b>	A distributor or transmitter must, so far as reasonably practicable, reduce the effect of any interruption on a customer.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Enquiries with the Network Operations management and review of documentation confirmed that Western Power has systems and controls in place to reduce the effect of an interruption on a customer.</p> <p>Through our discussions and walkthrough of the full restoration process, we found that in the event of an interruption, Western Power was able to re-route electricity and in certain circumstances, deploy Emergency Response Generators to reduce the effect of an interruption to the affected area and customers.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 10(2)	
<b>Compliance Manual Reference</b>	463	450
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Network Operations management and review of documentation confirmed that Western Power had systems and processes to supply electricity by alternative means to a customer who will be affected by a proposed interruption in the circumstances outlined in clause 10(2) of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.</p> <p>Sample based testing and walkthrough of the restoration process confirmed that Western Power has the ability to supply electricity by alternative means to a customer who will be affected by a planned interruption. This includes back-feeding electricity using adjacent networks or the deployment of Emergency Response Generators.</p> <p>Further, Western Power was found to review TCS to identify sensitive customers during the planning of an interruption and investigate whether the effect of the interruption on the customer's business would be substantial.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 12(3)	
<b>Compliance Manual Reference</b>	464	451
<b>Obligation Description</b>	A distributor must take prescribed action in the event of a significant interruption to a small use customer.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Enquiries with the Network Operations management and review of documentation revealed that Western Power has systems and processes in place to meet the conditions specified under clause 12(3) of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.</p> <p>Walkthrough of the fault management process found that Western Power's System Management Network Operation team was responsible for emergency management processes, assisting in remedial action or entering into an alternative arrangement for a significant interruption. Through our discussions we noted that Western Power has the ability to deploy ERGs in certain circumstances to reduce the time of a significant or frequent interruption.</p> <p>Sample based testing revealed that Western Power put into effect action plans to address and remedy significant interruptions for small use customers.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 13(3)	
<b>Compliance Manual Reference</b>	466	453
<b>Obligation Description</b>	The average total length of interruptions of supply is to be calculated using the specified method.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Through discussions with the Network Operations Branch, review of the data and methodology used, we found that Western Power calculated the average total length of interruptions of supply in accordance with the method prescribed under clause 13(3) of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.</p> <p>Enquiries revealed that business rules have been designed against the Electricity Industry (Network Quality and Reliability of Supply) Code 2005 to calculate the total average length of interruptions within TCS.</p> <p>Walkthrough of the system and sample based re-performance utilising report data extracted from TCS confirmed the accuracy of the calculations.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 14(8)	
<b>Compliance Manual Reference</b>	467	454
<b>Obligation Description</b>	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 (Network Quality and Reliability of Supply) Code 2005.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	<p>Discussions with the Network Operations management revealed that Western Power did not apply for an exemption or replacement of a provision under clause 14(3) of the Electricity Industry (Quality and Reliability of Supply) Code 2005 during the audit period. Consequently, there has not been an instrument issued by the Minister and of any notice given under section 14(7) of the Electricity (Network Quality and Reliability of Supply) Code.</p> <p>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 15(2)	
<b>Compliance Manual Reference</b>	468	455
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	<p>Discussions with the Network Operations management revealed that Western did not enter into any agreements that required an exclusion or modification of certain provisions with a customer relating to Part 2 Electricity Industry (Network Quality and Reliability of Supply) Code 2005 during the audit period.</p> <p>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 21(1)	
<b>Compliance Manual Reference</b>	471	458
<b>Obligation Description</b>	A distributor operating a relevant distribution system must provide eligible customers with information about applying for payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Our discussions with the Customer Assist Branch revealed that Western Power does provide its customers with the information as required about applying for service standard payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.</p> <p>Review of the complaints policy, Western Power's website, Contact Centre knowledge and information made available through its contact number confirmed that Western Power provides information to its customers as to the information required from the customer and how to lodge the application forms. The application forms detailed claim assessments and payment options.</p> <p>Sample based testing of Service Standard Payment Claims forms revealed that customers have completed and submitted the claim documentation.</p> <p>Based on our enquiries, review of documentation and sample based testing provided we have concluded that, Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 21(2).	
<b>Compliance Manual Reference</b>	472	459
<b>Obligation Description</b>	A distributor operating a relevant distribution system must provide written notice to customers about payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	N/A	
<b>Audit Observations</b>	<p>Our discussions with the Customer Assist Branch revealed that as of July 2010 Western Power is no longer required to provide written notice to customers about service standard payments for failure to meet those requirements detailed within sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.</p> <p>We reviewed section 10.3A of the Code of Conduct which stipulated that it was the retailer's responsibility to provide written notice to customers about service standard payments.</p> <p>Based on our enquiries and review of documents, we have concluded that this manual reference obligation is not applicable.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 21(3).	
<b>Compliance Manual Reference</b>	473	460
<b>Obligation Description</b>	A distributor operating a relevant distribution system must provide written notice to eligible customers about payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005 not less than once in each financial year.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	N/A	
<b>Audit Observations</b>	<p>Our discussions with the Customer Assist Branch revealed that as of July 2010 Western Power is no longer required to provide written notice to customers about service standard payments for failure to meet those requirements detailed within sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.</p> <p>We reviewed section 10.3A of the Code of Conduct which stipulated that it was the retailer's responsibility to provide written notice to customers about service standard payments.</p> <p>Based on our enquiries and review of documents, we have concluded that this manual reference obligation is not applicable.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 23(1)	
<b>Compliance Manual Reference</b>	474	461
<b>Obligation Description</b>	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.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Enquiries with the Network Performance Monitoring and Benchmarking Team revealed that Western Power has processes in place to monitor the operation of its network to ensure compliance with the provisions of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.</p> <p>Through discussions with the Networks Branch we found that Western Power measures voltage fluctuations in response to customer complaints and through its investigation process when operating the network.</p> <p>Further, Western Power utilises a pilot program to pro-actively measure and monitor network quality, reliability and performance. Data from these measurements are stored on Western Power's database, PI Historian and are gathered on a quarterly basis for analysis.</p> <p>A walkthrough of the process demonstrated that Western Power uses this data to produce their Annual Reliability and Quality Report, which monitors the organisation's compliance with the reporting requirements under section 27 of the Electricity Industry Code. Review of the Annual Reliability and Power Quality Report 2010/2011 confirmed that the data was in regards to compliance and non-compliance to the Electricity Industry Code.</p> <p>Based on our enquiries and sample based testing, we have concluded that there were adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 23(2)	
<b>Compliance Manual Reference</b>	475	462
<b>Obligation Description</b>	A distributor or transmitter must keep records of information regarding its compliance with specific requirements for the period specified.	
<b>Reporting Type</b>	NR	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Enquiries with the Network Operations Branch revealed that Western Power has systems and processes in place to retain records of information regarding its compliance for at least 5 years.</p> <p>Discussions revealed that Western Power retains records for proactive data on its corporate database (PI Historian) for periods up to 5 years. All reactive data on customers is retained on Western Power's electronic Document Management System which is managed by the Information Knowledge Management team.</p> <p>Sample based testing confirmed that records of information regarding its compliance are retained for at least 5 years.</p> <p>Based on our enquiries and sample based testing, we have concluded that there were adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 24(3) Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 24(4)	
<b>Compliance Manual Reference</b>	476 & 477	463 & 464
<b>Obligation Description</b>		
	476	A distributor or transmitter must complete a quality investigation requested by a customer in accordance with specified requirements
	477	A distributor or transmitter must report the results of investigation to the customer concerned.
<b>Reporting Type</b>	2, 2	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	<p>In accordance with clause 24(2) of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005, a customer may in writing request Western Power to investigate whether the supply of electricity complies with provisions outlined within the mandate.</p> <p>Enquiries with the Network Performance Branch and sample based testing revealed that Western Power had not received a written request to investigate the supply of electricity against provisions prescribed in the Electricity Industry Code within the audit scope period.</p> <p>Through our review of Western Power's 2011 compliance report we noted that the organisation had reported a breach relating to these manual reference obligations. However, further discussions and sample based testing found that the Western Power had over reported this breach. This was due to the KPI report for monitoring investigation timeframes being driven by both telephone and written requests.</p>	

	<p>Discussions revealed that Western Power has employed a customer facing response and this approach remains to be encouraged.</p> <p>In the absence of activity with regard to these obligations, we have determined that we could not rate these compliance manual reference obligations.</p>
<b>2011 Compliance Report – Status of Remedial Action</b>	<p>The remedial actions have been completed.</p>
<b>Recommendation</b>	<p>Nil.</p>

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 25(2)	
<b>Compliance Manual Reference</b>	478	465
<b>Obligation Description</b>	A distributor or transmitter must make available, at no cost, a copy of a document setting out its complaint handling processes to a small customer who makes a complaint to the distributor or transmitter or who asks to be given such information.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Complaints and Small Claims Team and review of Western Power's complaint resolution process confirmed that the organisation does make available its complaints handling process at no cost.</p> <p>Our walkthrough of the complaints handling process revealed that Western Power Customer Service Centre representatives are able to mail a copy of the complaints handling process at no charge or direct the customer to Western Power's website. Further, discussions found that Customer Service Centre representatives have been trained to inform the customer of the complaints process during the call to the call centre.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 25(3)	
<b>Compliance Manual Reference</b>	479	466
<b>Obligation Description</b>	A document setting out a distributor's or transmitter's complaint handling process must contain the specified information.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Enquiries with the Complaints and Small Claims Team and inspection of Western Power's complaints resolution process confirmed that the organisation has included the specified information prescribed in clause 25(3) of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.</p> <p>Review of Western Power's website and complaints handling process document revealed that Western Power informs a small use customer of their right to refer to the electricity ombudsman under Act Part 7 of the Electricity Industry Code if a complaint is not resolved to their satisfaction. The contact details of the Energy Ombudsman are also provided.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 26	
<b>Compliance Manual Reference</b>	480	467
<b>Obligation Description</b>	A distributor or transmitter must arrange for an independent audit and report on its systems for monitoring, and its compliance with specific requirements. This is to be carried out in respect of the operation of such systems during each year ending on 30 June.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Through enquiries with Network Performance Branch and review of documentation we confirmed that Western Power has arranged for an independent audit to be undertaken and report on the operation of the systems Western Power has in place for monitoring its compliance with issues specified under clause 26 of the Electricity Industry (Network and Reliability of Supply) Code 2005.</p> <p>Review of the contract order request and quote revealed that Western Power had engaged Deloitte to undertake the 2012 review.</p> <p>Discussions revealed that Deloitte had completed the fieldwork for the 2012 review in accordance with the project plan.</p> <p>Inspection of the quote from Deloitte confirmed that the auditor did not have any independence issues with Western Power.</p> <p>Based on our enquiries and review of documentation, we have concluded that there were adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
<b>Obligations Under</b>	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 27(3)	
<b>Compliance Manual Reference</b>	482	469
<b>Obligation Description</b>	A distributor or transmitter must give a copy of its report about its performance to the Minister and the Authority within the specified period.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Enquiries with the Network Operations Branch and review of correspondence between Western Power, the Minister and the Authority revealed that Corporation provided a copy of its Annual Reliability and Power Quality Report to the Minister and the Authority on 23 September 2011. We noted that this was 7 days before it was published on the website (30 October 2011).</p> <p>Based on our audit procedures we have concluded that there were adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Western Power Transmission Licence Schedule 2 condition 2.1 Western Power Distribution Licence Schedule 2 condition 2.1	
<b>Obligations Under</b>	Electricity Industry Act section 61	
	Electricity Industry Act 65	
<b>Compliance Manual Reference</b>	487	(No old reference as it is new)
<b>Obligation Description</b>	The licensee must submit to the Coordinator a draft extension and expansion policy within the specified timeframe.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	<p>Discussions that the Regulation, Pricing and Access Development management revealed Western Power submitted a draft extension and expansion policy on 26 February 2007 in response to a request from the Coordinator for Energy dated 8 December 2006.</p> <p>Our enquiries found that subsequent to this submission, on 23 August 2007, the Coordinator notified Western Power that the organisation that their requirement for an extension and expansion policy had been repealed. The Coordinator had not requested for a draft extension and expansion policy during the audit period.</p> <p>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Western Power Transmission Licence Schedule 2 condition 2.2 & 2.3	
	Western Power Distribution Licence Schedule 2 condition 2.2 & 2.3	
<b>Obligations Under</b>	Electricity Industry Act section 62(1)(b)	
	Electricity Industry Act section 64(2)	
	Electricity Industry Act 65(d)	
<b>Compliance Manual Reference</b>	488 & 489	<a href="#">90,91 &amp; 92</a>
	<b>Obligation Description</b>	
	488	The licensee must comply with a direction given by the Coordinator in relation to a draft extension and expansion policy or an amendment to an extension and expansion policy.
	489	Electricity Networks Corporation and Regional Power Corporation must implement arrangements set out in an approved extension and expansion policy.
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	Discussions with the Regulation, Pricing and Access Development management revealed that on 23 August 2007 the Coordinator notified Western Power that the organisation's extension and expansion policy had been repealed. Further, the Coordinator has not requested Western Power to produce a replacement draft extension and expansion policy during the audit period.	
	In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Western Power Transmission Licence Schedule 2 condition 3.1 Western Power Distribution Licence Schedule 2 condition 3.1	
<b>Obligations Under</b>	Electricity Industry Act 11	
<b>Compliance Manual Reference</b>	490	(No old reference as it is new)
<b>Obligation Description</b>	The licensee will operate and maintain a trouble call fault management system.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	5	
<b>Audit Observations</b>	<p>Discussions with the Network Operations Branch confirmed that the Western Power implemented a trouble call fault management system on 23 March 2009.</p> <p>Enquiries and walkthrough of Trouble Call System (TCS) revealed that the system is responsible for the transfer of fault and emergency calls and maintaining the network fault database. Further, TCS was managed by an in-house team within the Network Operations Branch and was supported by five servers to ensure it was operational at all times.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

<b>Licence Condition</b>	Western Power Transmission Licence Schedule 2 condition 3.2 Western Power Distribution Licence Schedule 2 condition 3.2	
<b>Obligations Under</b>	Electricity Industry Act 11	
<b>Compliance Manual Reference</b>	491	(No old reference as it is new)
<b>Obligation Description</b>	The licensee must provide prior notification to the Authority if it intends to outsource its trouble call fault management system.	
<b>Reporting Type</b>	2	
<b>Compliance Rating</b>	N/R	
<b>Audit Observations</b>	<p>Through our discussions with the Network Operations Branch, we confirmed that Western Power has not outsourced or intended to outsource its trouble call fault management system during the audit period. The organisation had implemented a trouble call fault management system on 23 March 2009.</p> <p>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>	
<b>Recommendation</b>	Nil.	

# Appendix 1 – Audit Evidence – Documents Examined

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
1	DM#9511402 DM#8996513
2	DM#9511402 DM#8996513 E-mail containing correspondence between account managers and retailers DM # 9088853
3	Metering Service Centre User Task Manual Build Pack Web Portal Functional Specification DM#2231181
4	Metering Service Centre User Task Manual Build Pack <a href="http://www.westernpower.com.au/retailersgenerators/Metering_portal.html">http://www.westernpower.com.au/retailersgenerators/Metering_portal.html</a>
5	Metering Service Centre User Task Manual MBS functional specification DM#2415207

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	Web Portal Functional Specification DM#2231181 <a href="http://www.westernpower.com.au/retailersgenerators/Metering_portal.html">http://www.westernpower.com.au/retailersgenerators/Metering_portal.html</a>
10	MBS functionality specification DM#2415207 Customer Transfer Request Process DM#8929963 Metering Service Centre User Task Manual Web Portal Functional Specification DM#2231181
11	MBS functionality specification DM#2415207 Customer Transfer Request Process DM#8929963 Metering Service Centre User Task Manual Web Portal Functional Specification DM#2231181 Standing Data Process Build Pack
12	MBS functionality specification DM#2415207 Customer Transfer Request Process DM#8929963 Metering Service Centre User Task Manual Web Portal Functional Specification DM#2231181 Standing Data Process Build Pack
13	DM#9116196 Standing Data Process Build Pack EM12/13 Specification - AEMO NEM12/NEM13 Specification Transaction time frames DM#9145869
14	Meter Data Process Build Pack EM12/13 Specification AEMO NEM12/NEM13 Specification Transaction time frames DM#9145869
15	Notification example DM#9084888 Standing Data Process Build Pack EM12/13 Specification - AEMO NEM12/NEM13 Specification

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	Transaction time frames DM#9145869 Evidence of max 10 returns
20	Metering Service Centre User Task Manual MBS functionality specification document DM#2415207 Web Portal Functional Specification DM#2231181 Metering Portal Guide
21	Metering Service Centre User Task Manual MBS functionality specification document DM#2415207 Web Portal Functional Specification DM#2231181 Metering Portal Guide Model SLA
22	Metering Service Centre User Task Manual – CTR Process Web Portal Functional Specification DM#2231181 Metering Portal
31	MBS functionality specification document DM#2415207 Customer Transfer Request Process DM#8929963 Work instructions DM#8216512
32	MBS functionality specification document DM#2415207 Customer Transfer Request Process DM#8929963 Process Flowchart for CTR Management DM#6801675
33	MBS functionality specification document DM#2415207 Metering Service Centre User Task Manual CTR- Negotiate new CTR Date With Retailer DM#8508746 CTR Access issues or Contact details DM#8509176 Web Portal Functional Specification DM#2231181
34	MBS Functional Specification DM#2415207

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	CTR Management DM#6801675 Customer Transfer Request Process DM#8929963 CTR- Negotiate new CTR Date With Retailer DM#8508746
35	MBS functional specification DM#2415207 Customer Transfer Request Process DM#8929963 Work Instructions DM#8216512 CTR- Request Received Alert Emails & DM#8508448 Dispatching Special Reads to IDM & DM#8508746 CTR- Negotiate New CTR Date with Retailer
36	MBS functional specification DM#2415207 Customer Transfer Request Process DM#8929963 Work Instructions DM#8216512 CTR- Request Received Alert Emails & DM#8508448 Dispatching Special Reads to IDM & DM#8508746 CTR- Negotiate New CTR Date with Retailer
37	MBS functional specification document – Exception and Negative Acknowledgement DM#2415207 Customer Transfer Request Process DM#8929963 Work Instructions DM#8216512 CTR- Request Received Alert Emails & DM#8508448 Dispatching Special Reads to IDM & DM#8508746 CTR- Negotiate New CTR Date with Retailer Evidence of Max 10 Returns
38	MBS Functional Specification Document DM#2415207 Customer Transfer Request Process DM#8929963 CTR Management DM#6801675 CTR- Request Received Alert Emails & DM#8508448

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	Dispatching Special Reads to IDM & DM#8508746 CTR- Negotiate New CTR Date with Retailer
39	MBS Functional Specification Document DM#2415207 Customer Transfer Request Process DM#8929963 CTR Management DM#6801675 CTR- Request Received Alert Emails & DM#8508448 Dispatching Special Reads to IDM & DM#8508746 CTR- Negotiate New CTR Date with Retailer
40	Dispute Resolution process MBS functional specifications DM#2415207
41	MBS functionality specification DM#2415207 Customer Transfer Request Process DM#8929963 Metering Service Centre User Task Manual CTR management DM#6801675 Web Portal Functional Specification DM#2231181
42	MBS functional specifications DM#2415207 Metering Service Centre Web Portal functional specifications DM#2231181 CTR Process flowchart Customer Transfer Extracts CTR Work Instructions – Negotiate New CTR date with Retailer CTR Work Instructions CTR – Dispatching Special Reads to IDM Customer Transfer Request Process
43	MBS functionality specification DM#2415207 Customer Transfer Request Process DM#8929963 Metering Service Centre User Task Manual CTR Erroneous Transfer DM#8506238

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
46	Communication Rules
47	Communication Rules
48	Communication Rules MBS functional specification DM#2415207 Metering Service Centre User Task Manual Web Portal Functional Specification DM#2231181 CTR Document DM#9006859 Work Instructions DM# 8216512v1; DM#8506238v1; DM#8507044v1; DM#8522199v1; DM8509176v1 &DM#8508746v1
49	MBS functional specification DM#2415207 Customer Transfer Request Process DM#8929963
50	MBS functional specification DM#2415207 Web Portal Functional Specification DM#2231181 Retailer Contacting and Sending Information to Western Power - <a href="http://www.westernpower.com.au/retailersgenerators/index.html">http://www.westernpower.com.au/retailersgenerators/index.html</a>
51	MBS functional specification DM#2415207 Metering Service Centre User Task Manual Electricity Transfer Access Contract (ETAC) - DM#8800835 & DM#9019103 Customer Charter
54	MBS functional specification DM#2415207 Metering Service Centre User Task Manual Web Portal Functional Specification DM#2231181
55	Process DM#8651492
56	Process DM#8651492
57	Process DM#8651492

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
58	Process DM#8651492
59	Process DM#8651492
60	MBS Functional Specification DM#2415207 Metering Service Centre User Task Manual
61	MBS Functional Specification DM#2415207 Metering Service Centre User Task Manual
62	MBS functional specification DM#2415207 Metering Service Centre User Task Manual Web Portal Functional Specification DM#2231181 Western Power Guide to the Metering Portal
63	MBS functional specification DM#2415207 Web Portal Functional Specification DM#2231181 Customer Transfer Request Process DM#892996 Metering Service Centre User Task Manual Western Power Guide to the Metering Portal
64	Meter Data Process Build Pack MBS functional specification DM#2415207 Customer Transfer Request Process DM#892996 Metering Service Centre User Task Manual Western Power Guide to the Metering Portal
65	MBS functional specification DM#2415207 Metering Service Centre User Task Manual Web Portal Functional Specification DM#2231181 Western Power Guide to the Metering Portal NMI Discovery Transactions

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	Meter Data Process Build Pack
66	MBS functional specification DM#2415207 Metering Service Centre User Task Manual Web Portal Functional Specification DM#2231181 Western Power Guide to the Metering Portal Metering Portal for Evidence of Max 99 Returns
67	MBS functional specification DM#2415207 Metering Service Centre User Task Manual
68	MBS functional specification DM#2415207 Metering Service Centre User Task Manual
69	MBS functional specification DM#2415207 Metering Service Centre User Task Manual Web Portal Functional Specification DM#2231181
70	MBS functional specification DM#2415207 Metering Service Centre User Task Manual
71	MBS functional specification DM#2415207 Metering Service Centre User Task Manual Web Portal Functional Specification DM#2231181
72	O2C Standard Operating Procedure DM#8550558 O2C Admin process DM#8550285
73	O2C Standard Operating Procedure DM#8550558 O2C Admin process DM#8550285
74	O2C Standard Operating Procedure DM#8550558 O2C Administration process DM#8550285
75	O2C Standard Operating Procedure DM#8550558

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	O2C Administration process DM#8550285
76	IT business case endorsement for WR 3755 and 3756 DM#9170923 IT Update DM#8858927 DM#8912349
77	IT business case endorsement for WR 3755 and 3756 DM#9170923 IT Update DM#8858927 DM#8912349
99	MBS functional specification DM# 2415207
101	Compliance Task Register DM#6589937 Auditor Tender Package Branch Manager PADP
102	Asset Management Policy DM#9487355 Network Management Plan Asset Management Process DM#7733751
103	Asset Management Policy DM#9487355 Network Management Plan Asset Management Process DM#7733751
104	Branch Manager and Compliance Advisor PADP
105	Reminders Extract set up in Lotus Notes
106	Work Instructions – Emergency Response Generators Work Instructions – Prioritizing Network Restoration Guidance Instructions Guideline to Emergency Levels Customer Impact Chart Extract
107	Energy Operators (Powers) Act 1979

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
111	Electricity Distribution Licence 1 from ERA DM#7870641
112	AQP policy and procedures Bypass Request document
113	AQP policy and procedures Bypass Request document
102	N/A
103	Data Management Information Pack SPIDAWEB functional specifications Asset Management Plan
104	Data Management Information Pack SPIDAWEB functional specifications Asset Management Plan
119	Financial Accountabilities Manual DM#6396563 CAAT policies, procedures and guidelines
120	N/A
121	Compliance Tasks Register DM#6589937 Audit Tender package
122	Request for quote document for independent expert
123	Auditor's Management Letter
124	Correspondence Register for communications between Western Power and ERA
125	Correspondence Register for communications between Western Power and ERA
126	Correspondence Register for communications between Western Power and ERA
234	Faults & Emergencies line 131351 open 24/7

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	<p><a href="http://www.westernpower.com.au/customerservice/contactus/index.html">http://www.westernpower.com.au/customerservice/contactus/index.html</a></p> <p>FaultCast URL showing ETR in first instance</p> <p><a href="http://faultcast.westernpower.com.au/">http://faultcast.westernpower.com.au/</a></p> <p>acma charges for calls to 13 numbers</p> <p><a href="http://www.acma.gov.au/webwr/_assets/main/lib310037/charges%20for%20calls%20to%2013%201300%20numbers%20-%20fs15.pdf">http://www.acma.gov.au/webwr/_assets/main/lib310037/charges%20for%20calls%20to%2013%201300%20numbers%20-%20fs15.pdf</a></p> <p>Prioritising Network Restoration guidance instructions - DM#8482502</p>
235	<p>PDA enhancements to code disconnections IT project WR#3788, DM#8650306</p> <p>Metering IT Program Update DM 8858927</p> <p>Email communication to AMRS DM#8968358</p> <p>Response from AMRS regarding actions to be taken DM#8968351</p> <p>Status/Evidence of actions taken by AMRS - DM#9134870, DM#9134811, DM#9134798, DM#9134831, DM#9134294</p> <p>Hotline to obtain authorisation for disconnections - DM#8970907.</p> <p>Alert email to Metering Branch DM#9297520</p> <p>Pop up message on PDA - IT enhancement</p> <p>Update service order for country crews - IT change in mid March</p> <p>De-en protocol control procedure</p> <p>Type 1 Control Framework DM#9139124</p> <p>Email from Metering Branch regarding IT control for disconnects which will automate email send to Group/Branch/Section heads 3 days before a public holiday as a reminder.</p>
237	<p>DM#9505602</p> <p>Processing of sensitive customer requests DM#2442151</p> <p>Program writers sensitive customer check DM#3340542</p> <p>MBS functional specifications - New Life Support with outstanding De-En 6019 &amp; DM#8650306.</p> <p>Life support registration process NOCC</p> <p>Network Operations Protocol DM#5383606.</p>

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	<p>Auto email sent when Life Support is updated in MBS DM# 9364955</p> <p>Field work instruction hotline DM#9024423.</p> <p>Type 1 Control Framework DM#9171139</p> <p>Risk and Control Matrix Type 1 Obligation DM#9149350</p> <p>Type 1 Breach Commitment Matrix DM#9150670</p>
240	<p>MBS functional specifications for reconnections DM#8650306</p> <p>Metering services standard procedures for operations division and Future Grid Resources DM#6531739</p> <p>Re-energisations working protocol DM#6315351</p> <p>Identification of urgent reconnections DM#8938001</p>
241	<p>Guidance instructions for prioritizing network restoration</p> <p>Email Correspondence relating to the 2011 Conduct for the Supply of Electricity to Small Use Customers</p> <p>Draft code of Conduct for the Supply of Electricity to Small Use Customers</p>
242	N/A
243	<p>Government Gazette, 2010, extract on page 3</p> <p><a href="http://www.slp.wa.gov.au/gazette/GAZETTE.NSF/searchgazette/06DABD6E38F444194825775000145BDD/\$file/gg116.pdf">http://www.slp.wa.gov.au/gazette/GAZETTE.NSF/searchgazette/06DABD6E38F444194825775000145BDD/\$file/gg116.pdf</a></p> <p>Ninga Mia Prepayment Meters DM#8855631</p> <p>Synergy Media Statement on Ninga Mia Prepayment Meters DM#8855635</p> <p>Pre-payment Meter Register DM#8928148</p>
249	<p>Work Instructions for registering new pre-payment meters within MBS DM#8704732</p> <p>Meter replacement non-removal of services procedure DM# 8760541</p> <p>Removal of asbestos meter panels procedure DM#8157143</p> <p>Meter Panel Replacements (non-asbestos) procedure DM#8204359</p> <p>IT system changes to generate alert flags and evidence DM#8962271, DM#9220861, DM#9220918</p>

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	<p>Email correspondence to Kalgoorlie Branch re-enforcing obligation requirements DM#8993063</p> <p>Email sent to retailer requesting implementation of additional controls to notify Branch Manager and Installation Manager when a request to revert a pre-payment meter has been received by the retailer DM#8903149</p> <p>Work instructions for registering new pre-payment meters DM#8704732</p> <p>NOCC's process for registering new life support customers DM#8952406</p> <p>Confirmation of Synergy process DM#9027632 &amp; DM#9141907</p>
253	<p>Work Instructions for registering new pre-payment meters within MBS DM#8704732</p> <p>Meter replacement non-removal of services procedure DM# 8760541</p> <p>Removal of asbestos meter panels procedure DM#8157143</p> <p>Meter Panel Replacements (non-asbestos) procedure DM#8204359</p> <p>IT system changes to generate alert flags and evidence DM#8962271, DM#9220861, DM#9220918</p> <p>Email correspondence to Kalgoorlie Branch re-enforcing obligation requirements DM#8993063</p> <p>Email sent to retailer requesting implementation of additional controls to notify Branch Manager and Installation Manager when a request to revert a pre-payment meter has been received by the retailer DM#8903149</p> <p>Work instructions for registering new pre-payment meters DM#8704732</p> <p>NOCC's process for registering new life support customers DM#8952406</p> <p>Confirmation of Synergy process DM#9027632 &amp; DM#9141907</p>
258	<p>Workflow procedure for meter test DM#8575903</p> <p>MBS Functional Specifications</p> <p>Model SLA</p>
280	<p>Call Centre Operators line 131087</p> <p><a href="http://www.westernpower.com.au/customerservice/contactus/index.html">http://www.westernpower.com.au/customerservice/contactus/index.html</a></p> <p>Customer Service Officer Training Plan to achieve first call resolution DM#8667870</p>

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	New connections: information available for customer on web: <a href="http://www.westernpower.com.au/residents/connections/newconnections.html">http://www.westernpower.com.au/residents/connections/newconnections.html</a> (a)
281	131087 Emergency Response line 131351 Operator Line Web indicating number <a href="http://www.westernpower.com.au/customerservice/contactus/index.html">http://www.westernpower.com.au/customerservice/contactus/index.html</a> Instructions for creating a NetCIS case DM#8073588 Instructions for responding to electronic requests DM#6458221 Information for call takers Metering Handout DM#3839072 Readings Management Supply of Historical Consumption Data DM#9118354
282	131351 Operators Scheduling NetCIS Case DM#8073588 Instructions for Responding to Electronic Requests DM#6458221 Information for Call Takers DM#3839072 Readings Management Supply of Historical Consumption Data DM#9118354
283	131351 Operators Scheduling NetCIS Case DM#8073588 Instructions for Responding to Electronic Requests DM#6458221 Information for Call Takers DM#3839072 Readings Management Supply of Historical Consumption Data DM#9118354
284	Evidence from MBS DM#9084993
285	131351 Operators Scheduling NetCIS work instructions for sending cases to Metering DM#8073588 Electronic Enquiry work instructions DM 6458221 WA Distribution Connections Manual 2011 Distribution Standards

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	Guidelines and Manual on Website <a href="http://www.westernpower.com.au/ldd/guidelinesmanuals.html">http://www.westernpower.com.au/ldd/guidelinesmanuals.html</a> A Electrical Requirements <a href="http://www.commerce.wa.gov.au/energysafety/PDF/Publications/WA_Electrical_Requirements.pdf">http://www.commerce.wa.gov.au/energysafety/PDF/Publications/WA_Electrical_Requirements.pdf</a>
286	<a href="http://www.westernpower.com.au/documents/WA_Distribution_Connections_Manual.pdf">http://www.westernpower.com.au/documents/WA_Distribution_Connections_Manual.pdf</a>
287	Corporate Style Guide and Process for Approval of Communications DAIP 2010-2015 DM#8369835 Better Letters Course - DM#9134942 & DM#9134962
288	131351 Operators Scheduling Induction Presentation - Slide 6 & 7 DM#5476251
289	<a href="http://www.westernpower.com.au/aboutus/How_we_are_regulated.html">http://www.westernpower.com.au/aboutus/How_we_are_regulated.html</a> DM 9083834 Legislation and Policy Documentation at Front Reception
290	Copies printed and available for customers at Reception Legislation and Policy Documentation at Front Reception
291	Accessible information fact sheet DM#8622646 Using Telephone Interpreter Services DM#6174164 Session outline DM#5191886 Quiz & Learning Check DM#5193477 Process in Handling Retailer Calls DM#8007724
292	<a href="http://www.westernpower.com.au/residents/meters/YourMeter.html">http://www.westernpower.com.au/residents/meters/YourMeter.html</a>
295	Complaints Process DM#7840035 NetCIS Case Management DM#8498897
296	AS ISO 10002-2006

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	<p>Telephone Etiquette DM#5515809 &amp; Customer Charter</p> <p>Senior Employee DM#7670827</p> <p>Daily SLA Reports</p>
297	<p>Senior Employee DM#7670827</p> <p>Complaints and Resolution Process DM#9145532 (9 March 2012)</p> <p>Full Letter of Complaint Response DM#9224450</p> <p>Letter Template for Call Made to Customer DM#9345613</p> <p>Email Template – see stationery in Issues Management inbox</p>
298	N/A
299	<p>Complaints and Resolution Process DM#9145532 (9 March 2012)</p> <p>Complaints &amp; Small Claims Process and Procedures DM#8498897</p> <p>URL WP Website - Complaints and Dispute Resolution Process</p> <p><a href="http://www.westernpower.com.au/customerservice/claims/customercomplaints.html">http://www.westernpower.com.au/customerservice/claims/customercomplaints.html</a></p> <p>Telephone Etiquette Hand-out DM#5515809</p>
300	Visio for Overall Complaints Process DM#7840035
301	<p>NetCI and Cusrems DM#9132545</p> <p>Netcis2 Business Case- DM#6392768</p> <p>Archived Cusrems</p> <p>MBS Service Order history, Conversion/Reversion to Prepayment Meters</p>
309	<p>Reporting Changes Request DM#8473997</p> <p>Metering IT Program Update DM#8858927</p>
310	<p>Synergy-WP B2B Urgent &amp; Emergency Re-en Protocol DM#7693549</p> <p>Copy of E-mail Directive DM#8933021</p> <p>Urgent Re-Energisation DM#8938001</p>

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
311	DM#8337456
312	10/11 Record Keeping Report DM#8648494 10/11 Data Sheet DM#8528805 10/11 Data Recon Tab to ERA DM#6748099 Complaints by case type (year per type tab) DM#8886279 EOPS training manual page 2 DM#3838170 -
313	NetCIS Case Management DM#8498897 Archived Cusrems Customer Service Centre S Drive
314	Payment Spreadsheet for 2011/12 DM#8389579 Process for NetCIS Contacts to be added DM#9144794 SSP - Monthly Report(draft) DM#9144828 C&R Process for SSP Payments DM#9392201 SSP Approval Letter DM#9397749 SSP Decline Letter DM#9397824 Current & Future Process DM#9311654 Ellipse Source Data Reconciliation DM#9346700
315	ERA reporting 2010/2011 DM#7396887
316	Old Reporting Process DM#7728587 Old Reporting Data DM#6748099 New Reporting Process & Data DM#8886279 Pre-Payment Meter as Case Issue DM#8564903 Pre-Payment Meters NetCIS Cases Oct 2011 - Apr 2012 DM#9216002 Pre-Payment Meters NetCIS Cases Jul - Aug 2011 DM#8565232 Pre-Payment Meters NetCIS Cases Sep 2011 DM#8614374
317	2011 Record Keeping Report DM#8648494 No Read Report DM#9313739

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	Meter Counts report DM#9278260
318	Record Keeping Report Datasheet DM#8528805 WP Record Keeping 2010/2011 - <a href="http://www.westernpower.com.au/documents/reportspublications/8648494_2011_record_keeping_report.pdf">http://www.westernpower.com.au/documents/reportspublications/8648494_2011_record_keeping_report.pdf</a> Front Reception Procedure Manual DM#9143485 Record Keeping Report checklist DM#8638483
319	Record Keeping Report datasheet DM#8528805 Record Keeping Report 2010/2011 - <a href="http://www.westernpower.com.au/documents/Reports%20publications/8648494_2011_record_keeping_report.pdf">http://www.westernpower.com.au/documents/Reports publications/8648494_2011_record_keeping_report.pdf</a> Record Keeping Report Checklist DM#8583830
321	Western Power website <a href="http://www.westernpower.com.au/documents/applicationforms/Retailer_reimbursement_form_18May2011.pdf">http://www.westernpower.com.au/documents/applicationforms/Retailer_reimbursement_form_18May2011.pdf</a> Process Map DM#8862374 Synergy Process DM9145078 Retailer Reimbursement Spreadsheet DM#7001191 Synergy Email confirmation DM#9144969
323	New Visio Process DM#8862374 Synergy Process DM#9145078 Spread sheet DM#7001191 Synergy Email confirmation DM#9144969
326	Evidence of Correspondence Future Date Complaints Visio Process DM#7840035 NetCIS Case Management DM#8498897 NetCIS Acknowledgement Mandatory Characteristic DM#9145150 NetCIS Acknowledgement Characteristic Creation request DM#9145195 Email to CSC DM#9145241

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	Email to Complaints Team DM#9145267 Work Instructions DM#8234933[v2] CSC Written Query Process DM#9332841
327	Payment Spread sheet DM#8389579 Process for NetCIS Contacts to be added DM#9144794 SSP - Monthly Report(draft) DM#9144828
329	Payment Spread sheet DM#8389579 Process for NetCIS Contacts to be added DM#9144794 SSP - Monthly Report(draft) DM#9144828
330	DM#9511402 DM#8996513
331	DM#9511402 DM#8996513
332	Tender Document Part E DM#3958468 Revenue Meters Technical Specifications DM#8117564
333	Tender Document Part E: DM#3958468 Revenue Meters Technical Specifications DM#8117564
334	Tender Document Part E: DM#3958468 Revenue Meters Technical Specifications DM#8117564
335	Tender Document Part E DM#3958468 Revenue Meters Technical Specifications DM#8117564 Certification from Supplier of Remote Communication Modules DM#8842444
336	Ticket lodgement process (ETIC - Electronic Ticketing System) - <a href="http://www.westernpower.com.au/electricalcontractors/ETIC.html">http://www.westernpower.com.au/electricalcontractors/ETIC.html</a> Inspection System Plan DM#1271273

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	Revenue Protection Policy DM#1298586 Contractor Connect & Service Connect Schemes <a href="http://www.westernpower.com.au/electricalcontractors/Connection_schemes.html">http://www.westernpower.com.au/electricalcontractors/Connection_schemes.html</a>
337	WP Operational Technical Excellence (OTX) Field Assessment DM#8757206 Business Case Approved DM#8827277 Internal Field Audit of Metering Installation Officers DM#8852512
338	WADCM - <a href="http://www.westernpower.com.au/documents/WA_Distribution_Connections_Manual.pdf">http://www.westernpower.com.au/documents/WA_Distribution_Connections_Manual.pdf</a> Metering Technical Requirements – High Voltage Transmission & Generation Metering DM#7560244 Technical Rules - <a href="http://www.westernpower.com.au/documents/aboutus/Access_arrangement/2007/Technical%20Rules/TECHNICALRULES.pdf">http://www.westernpower.com.au/documents/aboutus/Access_arrangement/2007/Technical%20Rules/TECHNICALRULES.pdf</a>
339	Model SLA <a href="http://www.era.wa.gov.au/electricity/library/Approved%20Model%20Service%20Level%20Agreement.pdf">http://www.era.wa.gov.au/electricity/library/Approved%20Model%20Service%20Level%20Agreement.pdf</a> Draft SLA Synergy Document DM#7478158 Escalated Issues letter from Synergy DM#9060853 B2B WP-Synergy meeting minutes of 15 Feb DM#9075596 Confirmation from Synergy Regarding Cancellation Fees DM#9323462 Updated DM#8883030
340	Metering Management Plan Notification of Affected Parties Annual Report to Authority/Energy Safety E-mail regarding Referral of meter replacement and metering management plan
341	Tender Document Part E DM#3958468 Revenue Meters Technical Specifications DM#8117564 Certification from Supplier of Remote Communication Modules DM#8842444

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
342	<p>WAER (wiring requirements) –  <a href="http://www.commerce.wa.gov.au/EnergySafety/PDF/Publications/WA_Electrical_Requirements.pdf">http://www.commerce.wa.gov.au/EnergySafety/PDF/Publications/WA_Electrical_Requirements.pdf</a></p> <p>Inspections processes DM#6664951, DM#6698606 &amp; DM#6647627</p> <p>Revenue Protection processes DM#6718579, DM#7209350 &amp; DM#6685744</p> <p>Contractor Connect Scheme requirements –  <a href="http://www.westernpower.com.au/documents/networkcontractors/contractor_connect_scheme.pdf">http://www.westernpower.com.au/documents/networkcontractors/contractor_connect_scheme.pdf</a></p> <p>Passwords Authority Level Matrix on Metering Installations DM#8572290</p> <p>Passwords Authority Level Matrix on Metering Database DM#8600731</p>
343	<p>WADCM - <a href="http://www.westernpower.com.au/documents/WA_Distribution_Connections_Manual.pdf">http://www.westernpower.com.au/documents/WA_Distribution_Connections_Manual.pdf</a></p> <p>Metering Technical Requirements – High Voltage Transmission &amp; Generation Metering DM#7560244</p>
344	<p>Metering Technical Requirements – High Voltage Transmission &amp; Generation Metering – DM#7560244</p> <p>Technical Rules <a href="http://www.westernpower.com.au/documents/aboutus/Access_arrangement/2007/Technical%20Rules/TECHNICALRULES.pdf">http://www.westernpower.com.au/documents/aboutus/Access_arrangement/2007/Technical%20Rules/TECHNICALRULES.pdf</a></p> <p>MBS Functionality Determination of the Type of Installation.</p> <p>MBS Metering Installation information &amp; Functionality</p>
345	<p>Tender Document Part E DM#3958468</p> <p>Revenue Meters Technical Specifications DM#8117564</p> <p>L &amp; G EM5300 Meter (Code 0214 &amp; 0215) Technical Specification DM#8990788</p>
346	<p>Meter Tender Document Part E DM#3958468</p> <p>Revenue Meters Technical Specifications DM#8117564</p>
347	<p>Metering IT Program Update DM#8858927</p> <p>Updated IT requirements document DM#8473997</p>

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	IDM Overdue Reading report DM#9038836 Enhancement of Current Manual Process IDE Gaps Report DM#9038855
348	Exception report procedure documents process DM#8908261 Example of daily report DM#8903225 Model SLA Meter Installation Repair, Model SLA - <a href="http://www.era.wa.gov.au/electricity/library/Approved%20Model%20Service%20Level%20Agreement.pdf">http://www.era.wa.gov.au/electricity/library/Approved%20Model%20Service%20Level%20Agreement.pdf</a>
349	Western Power Fault Contact Number 131351 Information Available on Website Home Page <a href="http://www.westernpower.com.au/">http://www.westernpower.com.au/</a> <a href="http://www.westernpower.com.au/customerservice/reportaproblem/index.html">http://www.westernpower.com.au/customerservice/reportaproblem/index.html</a> Model SLA
350	WADCM - <a href="http://www.westernpower.com.au/documents/W_A_Distribution_Connections_Manual.pdf">http://www.westernpower.com.au/documents/W_A_Distribution_Connections_Manual.pdf</a> Metering Technical Requirements – High Voltage Transmission & Generation Metering DM#7560244 Technical Rules - <a href="http://www.westernpower.com.au/documents/aboutus/Access_arrangement/2007/Technical%20Rules/TECHNICALRULES.pdf">http://www.westernpower.com.au/documents/aboutus/Access arrangement/2007/Technical%20Rules/TECHNICALRULES.pdf</a>
351	WADCM - <a href="http://www.westernpower.com.au/documents/W_A_Distribution_Connections_Manual.pdf">http://www.westernpower.com.au/documents/W_A_Distribution_Connections_Manual.pdf</a> Metering Technical Requirements – High Voltage Transmission & Generation Metering DM#7560244 Technical Rules - <a href="http://www.westernpower.com.au/documents/aboutus/Access_arrangement/2007/Technical%20Rules/TECHNICALRULES.pdf">http://www.westernpower.com.au/documents/aboutus/Access arrangement/2007/Technical%20Rules/TECHNICALRULES.pdf</a>
352	WAER (wiring requirements) – <a href="http://www.commerce.wa.gov.au/energysafety/PDF/Publications/WA_Electrical_Requirements.pdf">http://www.commerce.wa.gov.au/energysafety/PDF/Publications/WA_Electrical_Requirements.pdf</a>

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	Inspections System Plan – DM#3097251 WADCM - <a href="http://www.westernpower.com.au/documents/WA_Distribution_Connections_Manual.pdf">http://www.westernpower.com.au/documents/WA_Distribution_Connections_Manual.pdf</a> Metering Technical Requirements – High Voltage Transmission & Generation Metering DM#7560244
353	Corporate Filing System in place (DM). CT Connected design drawings on web, Direct Connect in WAER, WA Distributions Connections Manual - <a href="http://www.westernpower.com.au/electricalcontractors/connectionsandmetering.html#connectionsmanuals.xml#connectionsmanual">http://www.westernpower.com.au/electricalcontractors/connectionsandmetering.html#connectionsmanuals.xml#connectionsmanual</a> Corporate Drawings Database - TIMSWeb
354	User's Access Contract (Arrangement) with Western Power Metering Technical Requirements – High Voltage Transmission & Generation Metering DM#7560244
355	Metering Technical Requirements – High Voltage Transmission & Generation Metering DM#7560244
356	Metering Technical Requirements – High Voltage Transmission & Generation Metering DM#7560244
357	MBS Functionality – Meter Model selection Metering Technical Requirements – High Voltage Transmission & Generation Metering – DM#7560244 Revenue Meters Technical Specifications – DM#8117564 Letter from Office of Energy RE: Grandfather Clause DM#8947273 Email Correspondence DM#8947278
358	Tender Document Part E – DM#3958468 Revenue Meters Technical Specifications DM#8117564 WP L_G Meters Data Storage Capacities DM#8904575
359	MBS Functionality – Installation Type selection

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	<p>Metering Technical Requirements – High Voltage Transmission &amp; Generation Metering DM#7560244</p> <p>Revenue Meters Technical Specifications DM#8117564</p> <p>Meter Completion Advice Form DM#8118447</p>
360	<p>Tender Document Part E – DM#3958468</p> <p>Revenue Meters Technical Specifications DM#8117564</p> <p>Final Recommendation Report (Amendments to the Metering Code) - <a href="http://www.finance.wa.gov.au/cms/uploadedFiles/Public_Utility_Office/Energy_Initiatives/final-recommendations-report-august-2011.pdf">http://www.finance.wa.gov.au/cms/uploadedFiles/Public_Utility_Office/Energy_Initiatives/final-recommendations-report-august-2011.pdf</a> (2.3.13 recommendation 16.2, page 12)</p> <p>DM#8911051</p>
361	<p>Final Recommendation Report (Amendments to the Metering Code) - <a href="http://www.finance.wa.gov.au/cms/uploadedFiles/Public_Utility_Office/Energy_Initiatives/final-recommendations-report-august-2011.pdf">http://www.finance.wa.gov.au/cms/uploadedFiles/Public_Utility_Office/Energy_Initiatives/final-recommendations-report-august-2011.pdf</a> (2.3.13 recommendation 16.3, page 12)</p> <p>The Notional Wholesale Meter Calculation <a href="http://www.finance.wa.gov.au/cms/uploadedFiles/Public_Utility_Office/Energy_Initiatives/recommendations-report-april-2011.pdf">http://www.finance.wa.gov.au/cms/uploadedFiles/Public_Utility_Office/Energy_Initiatives/recommendations-report-april-2011.pdf</a> - 2.3.12 recommendation</p>
362	<p>Final Recommendation Report (Amendments to the Metering Code) - <a href="http://www.finance.wa.gov.au/cms/uploadedFiles/Public_Utility_Office/Energy_Initiatives/final-recommendations-report-august-2011.pdf">http://www.finance.wa.gov.au/cms/uploadedFiles/Public_Utility_Office/Energy_Initiatives/final-recommendations-report-august-2011.pdf</a> (2.3.13 recommendation 16.3, page 12)</p> <p>The Notional Wholesale Meter Calculation <a href="http://www.finance.wa.gov.au/cms/uploadedFiles/Public_Utility_Office/Energy_Initiatives/recommendations-report-april-2011.pdf">http://www.finance.wa.gov.au/cms/uploadedFiles/Public_Utility_Office/Energy_Initiatives/recommendations-report-april-2011.pdf</a> - 2.3.12 recommendation</p>
363	<p>Tender Document Part E DM#3958468</p> <p>Revenue Meters Technical Specifications DM#8117564</p>

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	WP L_G Meters Data Storage Capacities DM#8904575 Report DM#8935005 Process of Annual Review of Meter Installation Types - refer DM#8928722
364	Model SLA
365	Model SLA
366	Interval Data Management Maintaining Meter Real Time Clock Accuracy DM#8772212
367	Tender Document Part E DM#3958468 Revenue Meters Technical Specifications DM#8117564 WP L & G Meters Data Storage Capacities DM#8904575
368	License Agreement with Meter Supplier DM#8842805. Tender Document Part E DM#3958468
369	Tender Document Part E DM#3958468 Revenue Meters Technical Specifications DM#8117564 Meters Technical Information – DM#3187423, DM#3241602, DM#6515699, DM#3825365 & DM#3825337
370	Output Signal Installation & Maintenance Procedure – DM#6512907 Meters Technical Information – DM#3187423, DM#3241602, DM#6515699, DM#3825365 & DM#3825337
371	Tender Document Part E DM#3958468 Revenue Meters Technical Specifications DM#8117564
373	Registered Meter Installation Provider List
374	MBS Functional Spec Index DM#2151519
375	Passwords Authority Level Matrix on Metering Installations DM#8572290 Passwords Authority Level Matrix on Metering Database DM#8600731

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	IT Access to MBS DM#5073668
376	ASG Disaster Recovery Test Master Plan December 2011 TT Disaster Recovery Validation Schedule June 2012
377	MBS Functional Spec Index DM#2151519 NEM12 file. XML Transaction Timeframes XML File Format Guide
378	Implementation MBS Functional Spec Index DM#2151519 XML Format Guide Build Pack XML Formal Guide Participant Build pack DM#908488
379	Metering Technical Investigation Process DM#8426956 Sample Technical Investigation Report DM#8908245 Crossed Meter Investigation Procedure DM#7209350 Data Validation Processes (MV90 & MVRS) DM#9165726 (MV90XI) Data Validation process Interval DM#9146616 Data Estimation & Substitution Processes (MV90 & MVRS) DM#22449451 DM#9163623 e.g. MDV
380	MBS - System B2B transactions, Events & History MBS functional specification DM#2415207 The Metering Service Centre User Task Manual; Web Portal Functional Specification DM#2231181
382	MBS - System B2B Transactions, System Auditing MBS functional specification DM#2415207 The Metering Service Centre User Task Manual documents evidence to satisfy this obligation

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	<p>Web Portal Functional Specification DM#2231181</p> <p>CDN DM#9136272</p>
383	<p>MBS - System B2B Transactions, System Auditing</p> <p>2 MBS functional specification DM#2415207</p> <p>The Metering Service Centre User Task Manual documents evidence to satisfy this obligation</p> <p>Web Portal Functional Specification DM#2231181</p> <p>CDN DM#9136272</p> <p>Metering Technical Investigation Process DM#8426956</p> <p>Crossed Meter Investigation Procedure DM#7209350</p>
384	<p>DM#9084888</p> <p>XML Transaction Timeframes DM#9145869</p> <p>XML Format Guide Build Pack</p> <p>XML Formal Guide Participant Build pack</p>
385	<p>Users Requests for Read-Only Password Process DM#9058075</p>
386	<p>Passwords Authority Level Matrix on Metering Installations DM#8572290</p> <p>Passwords Authority Level Matrix on Metering Database DM#8600731</p>
387	<p>Passwords Authority Level Matrix on Metering Installations DM#8572290</p> <p>Passwords Authority Level Matrix on Metering Database DM#8600731</p>
388	<p>HUB Export of Energy Data DM#9084993</p>
389	<p>Draft SLA Synergy Document DM#7478158.</p> <p>Escalated Issues letter from Synergy DM#9060853</p> <p>B2B WP-Synergy Meeting Minutes of 15 Feb DM#9075596</p>
390	<p>Draft SLA Synergy Document DM#7478158.</p> <p>Escalated Issues letter from Synergy DM#9060853</p> <p>B2B WP-Synergy Meeting Minutes of 15 Feb DM#9075596</p>

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
391	IDM Overdue Reading Report DM#9038836 IDE Gaps report DM#9038855 WR3738 (2) ETA July 2012 Metering IT Program Update DM#8858927
392	Annual Read Schedule/Max Estimates DM#9134592 Reporting DM#9134800 Annual Read Letter DM#9139471
394	Model SLA: Work Instructions DM#8883030
396	IDM Overdue Reading Report DM#9038836 IDE Gaps Report DM#9038855 WR3738 (2) ETA July 2012 Metering IT Program Update DM#8858927
397	WR3738 (2) ETA July 2012 Metering IT Program Update DM#8858927
398	MBS functional specification DM#2415207 Metering Service Centre User Task Manual Web Portal Functional Specification DM#2231181; Western Power Guide to the Metering Portal B2B WP-Synergy Meeting Minutes of 15 Feb DM#9075596
399	DM#9084888 XML Transaction Timeframes DM#9145869 XML Format Guide Build Pack XML Formal Guide Participant Build Pack
400	DM#9084888

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	XML Transaction Timeframes DM#9145869 XML Format Guide Build Pack XML Formal Guide Participant Build Pack
401	DM#9084888 XML Transaction Timeframes DM#9145869 XML Format Guide Build Pack XML Formal Guide Participant Build Pack
402	XML Transaction Timeframes DM#9161420 AEMO NEM12/NEM13 Specification
403	DM#9084888 XML Transaction Timeframes DM#9145869 XML Format Guide Build Pack XML Formal Guide Participant Build Pack
404	XML Transaction Timeframes DM#9145869 XML Format Guide Build Pack XML Formal Guide Participant Build Pack
405	DM#9084888 Read Dates Recorded in MBS/Hub DM#9084993 XML Transaction Timeframes DM#9161420 AEMO NEM12/NEM13 Specification
413	NEM File Sample DM#9084888 Standing Data Process Build Pack XML Transaction Time Frames DM#9145869
415	MBS Functional Specification DM#2415207 The Metering Service Centre User Task Manual Web Portal Functional Specification DM#2231181

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	Western Power guide to the Metering Portal Meter Data Process Build Pack Meter Data Process Participant Build Pack
416	MBS Functional Specification DM#2415207 The Metering Service Centre User Task Manual Web Portal Functional Specification DM#2231181 Western Power guide to the Metering Portal Meter Data Process Build Pack Meter Data Process Participant Build Pack
417	PMD & MDV DM 9116196 XML Transaction Timeframes DM 9163623 XML File Format Guide Build Pack Meter Data Process Validation MV90 DM#9165726 Validation IDM Business IDM DM#9146616
418	Meter Performance Testing Process DM#8572371 Meter Performance Test Request Form DM#1247047 Meter Test Process Flowchart DM#8575903 Model SLA The MBS, MVRS and MV90 Functional Specification User Guide DM#9027727 MVRS User Guide DM#9093828 MBS Functional Specification DM#2415207
419	Metrology Procedure (clause 3.9) DM#2389991 Meter Performance Testing Process DM#8572371 Meter Test Process Flowchart DM#8575903 Meter Performance Test Request Form DM#1247047 Model SLA

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	<p>MBS, MVRS and MV90 Functional Specification</p> <p>User guide DM#9027727</p> <p>MVRS User guide DM#9093828</p> <p>MBS Functional Specification DM#2415207</p>
422	<p>Workflow Procedure for Meter Test DM#8575903</p> <p>Model SLA</p> <p>Work Instructions DM#8883030</p> <p>Meter Performance Testing Process DM#8572371</p> <p>Meter Performance Test Request Form DM#1247047</p> <p>Updated DM#8883030</p>
423	<p>Workflow Procedure for Meter Test DM#8575903</p> <p>Model SLA</p> <p>Updated DM#8883030</p>
424	<p>Project Plan DM#3292538</p> <p>Notification of Affected Parties for Non-Compliant Metering Installation DM#8984816</p> <p>Notification/ Letter DM#8763342</p> <p>Three-phase non-compliant meters DM#5541075</p> <p>2010/ 2011 Compliance Testing Program DM#8939247</p>
425	<p>Our current meters do not have stored error correction data capabilities;</p> <p>Sender Document Part E DM#3958468</p> <p>Revenue Meters Technical Specifications DM#8117564</p>
426	<p>IDM Overdue Reading Report DM#9038836</p> <p>IDE Gaps report DM#9038855</p> <p>Procedures in relation to Appendix 2 between MV90 and MBS Validations of Interval Data DM#9146616.</p> <p>WR3738 (2) ETA July 2012</p>

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	Metering IT Program Update DM#8858927
427	Interval Data Validation Process DM#9146616 WR3738 (2) ETA July 2012 Metering IT Program Update DM#8858927
428	Manual process described DM#8447124
429	MDV Corrupt Meter Data DM#9163623 MV90 Validation DM#9165726 Validation process DM#9146616
430	DM#8700364, DM#8700397, DM#8700456 Interval Process DM#8447124 Basic MBS Spec 2249451
431	DM#8700364, DM#8700397 & DM#8700456 Reviewing Before Substitution DM#9157286
432	DM#8700364, DM#8700397 & DM#8700456 XML Example MDV DM#9163623 MV90 Validation DM#9165726 Validation process IDM DM#9146616
433	Exception Report Procedure DM#8908261 XML and Timings Corrupt Meter DM#9163623 Meter Replacement DM#9157286 VR: Components of a Metering Installation (CT, VT or a meter)DM 9199300
434	Web Portal Functional Specification DM#2231181 Special Reads DM#9157286
435	MBS Functional Specifications DM#2415207
436	MBS Functional Specifications DM#2415207

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	<p>Web Portal Functional Specification DM#2231181</p> <p>Substitution Examples DM#9157286</p>
437	<p>MBS Functional Specifications DM#2415207</p> <p>Web Portal Functional Specification DM#2231181</p> <p>Substitution Examples DM#9157286</p>
438	<p>Interval Substitution Process DM#8447124</p> <p>Basic MBS Functional Specifications DM#2249451</p>
440	<p>Final Recommendation Report (Amendments to the Metering Code) - <a href="http://www.energy.wa.gov.au/cproot/2789/2/">http://www.energy.wa.gov.au/cproot/2789/2/</a></p> <p>OOE%20Metering%20Code%20Final%20Reportv2.pdf - 2.5.7</p> <p>Email Correspondence to Horizon Power DM#8959239</p>
441	<p>Final Recommendation Report (Amendments to the Metering Code) - <a href="http://www.energy.wa.gov.au/cproot/2789/2/">http://www.energy.wa.gov.au/cproot/2789/2/</a></p> <p>OOE%20Metering%20Code%20Final%20Reportv2.pdf - 2.5.7</p> <p>Email Correspondence to Horizon Power DM#8959239</p>
442	<p>Final Recommendation Report (Amendments to the Metering Code) - <a href="http://www.energy.wa.gov.au/cproot/2789/2/">http://www.energy.wa.gov.au/cproot/2789/2/</a></p> <p>OOE%20Metering%20Code%20Final%20Reportv2.pdf - 2.5.7</p> <p>Email Correspondence to Horizon Power DM#8959239</p>
443	<p>Final Recommendation Report (Amendments to the Metering Code) - <a href="http://www.energy.wa.gov.au/cproot/2789/2/">http://www.energy.wa.gov.au/cproot/2789/2/</a></p> <p>OOE%20Metering%20Code%20Final%20Reportv2.pdf - 2.5.7</p> <p>Email Correspondence to Horizon Power DM#8959239</p>
444	<p>Final Recommendation Report (Amendments to the Metering Code) - <a href="http://www.energy.wa.gov.au/cproot/2789/2/">http://www.energy.wa.gov.au/cproot/2789/2/</a></p> <p>OOE%20Metering%20Code%20Final%20Reportv2.pdf - 2.5.7</p> <p>Email Correspondence to Horizon Power DM#8959239</p>

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
445	<p>Communication Rules</p> <p>Build Pack, Schemes, Guidelines, B2B Processes and Web Portal User Access &amp; Guides - <a href="http://www.westernpower.com.au/retailersgenerators/Build_Pack.html">http://www.westernpower.com.au/retailersgenerators/Build_Pack.html</a></p> <p>Metering Management Plan <a href="http://www.erawa.com.au/electricity/library/Approved%20Metering%20Management%20Plan.pdf">http://www.erawa.com.au/electricity/library/Approved%20Metering%20Management%20Plan.pdf</a></p> <p>Meter Tender Document Part E (Meter Technical Specifications) DM#3958468</p> <p>MBS Functional Specifications on Types 1 to 4 installations DM#2415207</p> <p>Registration Process Service Connect Scheme <a href="http://www.westernpower.com.au/documents/Network_contractors/service_connect_guidelines.pdf">http://www.westernpower.com.au/documents/Network_contractors/service_connect_guidelines.pdf</a></p> <p>Auditing process Service Connect Scheme Guidelines <a href="http://www.westernpower.com.au/documents/networkcontractors/service_connect_guidelines.pdf">http://www.westernpower.com.au/documents/networkcontractors/service_connect_guidelines.pdf</a></p> <p>WR # 3756</p> <p>IT Business Case Review DM#9170923</p>
447	Risk and Compliance Communication Process
448	<p>MBS Functional Specification DM#2415207</p> <p>Metering Service Centre User Task Manual</p> <p>Web Portal Functional Specification DM#2231181</p> <p>General contact information is available on the Western Power website <a href="http://www.westernpower.com.au/">http://www.westernpower.com.au/</a></p> <p>Specific Information for Code Participants Regarding Contacting and Sending Information to Western Power <a href="http://www.westernpower.com.au/retailersgenerators/index.html">http://www.westernpower.com.au/retailersgenerators/index.html</a></p>
449	<p>Standing Data Notification to retailers (MBS Functionality) DM#2415207</p> <p>The Metering Service Centre User Task Manual, <a href="http://www.westernpower.com.au/documents/Retailers_generators/buildPack/USERTASKMANUAL.pdf">http://www.westernpower.com.au/documents/Retailers_generators/buildPack/USERTASKMANUAL.pdf</a></p> <p>Customer Charter - <a href="http://www.westernpower.com.au/documents/">http://www.westernpower.com.au/documents/</a></p>

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	Customer Charter/customerCharterSummary.pdf 5/ Website: Contact Us - <a href="http://www.westernpower.com.au/customerservice/contactus/index.html">http://www.westernpower.com.au/customerservice/contactus/index.html</a>
454	Dispute Resolution Process DM#8651492
455	Dispute Resolution Process DM#8651492
456	Dispute Resolution Process DM#8651492
457	Dispute Resolution Process DM#8651492
458	Dispute Resolution Process DM#8651492
459	WA Distribution Connections Manual Technical Rules Design Checks DM#6500068 Modelling tool for conducting assessment for disturbances DM#5183964 Modelling tool for conducting assessment for distortion DM#5273956 PQ complaints handling process DM#1921610 and DM#3732350
460	Disconnection Process DM#1165772
461	Emergency Management Plans Fault Process DM#4471544 Emergency Response Generators Work Instructions DM#2123938 Guidelines for the Management of Planned Outages in Hot Weather
462	Emergency Management Plans Fault Process DM#4471544 Emergency Response Generators Work Instructions DM#2123938 Guidelines for the Management of Planned Outages in Hot Weather
463	Emergency Management Plans

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
	Fault Process DM#4471544 Emergency Response Generators Work Instructions DM#2123938 Guidelines for the Management of Planned Outages in Hot Weather
464	Emergency Management Plans Fault Process DM#4471544 Emergency Response Generators Work Instructions DM#2123938 Guidelines for the Management of Planned Outages in Hot Weather
465	Access Agreement 2010/2011 TCS Data Extract
466	Access Agreement 2010/2011 TCS Data Extract
467	N/A
468	N/A
469	Payment spreadsheet DM#8389579 Standard Service Payments (SSP) - Non-Notification Planned Outage Procedure DM#8517776 SSP Spreadsheet DM#8854960 Distribution LSE Daily Audit DM#9131917
470	EOPS Process DM#7685866 EOPS System Documentation DM#831367 TCS ETL Support Procedures DM#8549677 30 Day Review DM#9211096
471	SSP's and EOPS Website Information <a href="http://www.westernpower.com.au/customerservice/claims/index.html">http://www.westernpower.com.au/customerservice/claims/index.html</a> EOPS DM#8896007 SSP's DM#3838903

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
472	N/A
473	N/A
474	DM#4980719 PQ Monitoring instrument DM#6110695
475	DM#4980719 PI Historian Storage of Proactive Data Policy
476	Power Quality Investigation Documentation Requirement Quality Investigation Process reference
477	Power Quality Investigation Documentation Requirement Quality Investigation Process reference
478	Customer Resolution process DM#9145532 DM#7685866 EOPS Systems documentation DM#8313672 TC ETL Support procedure DM#8549677
479	Customer Resolution process DM#9145532 Extract from website relating to customer complaints
480	Funding Memo Project Plan 2012 'Buyers Guide' Feb 2012 Request for Quotation 2012 audit 2012 Contract order request 2012 Independent auditors quote 2012 Audit Plan
481	DM#7340094 DM#7478867

<b>Compliance Manual Reference</b>	<b>Documents Examined</b>
482	DM#7340094 DM#7478867
487	Draft Extension and Expansion Policy
488	Draft Extension and Expansion Policy Letter of notification from the Coordinator
489	Draft Extension and Expansion Policy Letter of notification from the Coordinator
490	Trouble Call Fault Management Plan notification
491	Trouble Call Fault Management Plan notification

## Appendix 2 – Audit Evidence – Additional Documents Examined

Documents Examined
Economic Regulation Authority – Decision to Approve Proposed Communication Rules
Customer Transfer Request and Data Request Samples
Sample of Electricity Transfer Access Contracts
Historical Consumption data request extracts
MBS Disaster Recovery Plan
Example of Western Power staff email correspondence identifying personnel as originator
ERG Base Fleet Report
ERG Fleet Status Report;
Management COGNOS 8 report Extract
AS/ISO 10002/2006
Streetlight Job Service Cards
Monthly Streetlight KPI Summaries

<b>Documents Examined</b>
Call Centre Daily Reports Extracts
Monthly Aspect Data Extracts for Call Centre Performance Indicators
Work Force Management Monthly and Annual Reports
End of Month (EOM) Reporting DM#9279619
Performance Reports for metering database
Metering reading monthly cycle reports for accumulation meters
AMRS monthly progress reports for meter reading
AMRS monthly forecast reports for meter reading
Retailer billing invoice extracts for provision of data
IDM Overdue Reading Report DM#9038836
IDE Gaps Report DM#9038855
Metering Installation Test Extracts – Completion Advice forms and extracts within MBS
MBS Energy Validation Report
Australian Energy Market Operator Metrology Procedures
Service Level Contract Metering Services with Horizon Power
Office of Energy Letter of Notification – Extensions and Expansions Policy
Office of Energy letter of notification – Electricity Networks Access Code Amendments (No.2) 2006
Monthly O2C DQM job set-up
Report to track O2C (DM#8879083).
Access Queue Monthly Monitoring Reports
Authority approval of Audit Plan for independent Expert's Asset Management review
Authority approval of independent Expert Asset Management review

<b>Documents Examined</b>
Minutes of Request for Quote Evaluation for Asset Management review
NetCIS Case creation example for providing customers distribution standards and metering arrangements information DM#8073588
Metering Branch example of records being kept for 7 years within MBS
Compliance testing reports used for Western Power meters
Western Australia Electricity Market Metrology Procedure for Metering Installations
Quality Assurance Monthly Audit Reports for metering installations
Health Check Report DM#9135002 for registry
Technical Investigation Report DM#8908245
Sample of standing data requests from Code participants
Sample of tests/audits for accuracy of metering installations
Daily Faulty Meter Report/Service Order Report DM#8903225
Examples of faulty meters being replaced DM#9157286
Western Power major customers contact details DM#4834474
Sample of customer complaints relating to Voltage Fluctuations or Harmonic Voltage Distortions
Annual Reliability and Power Quality Draft Report 2011/2012
Annual Reliability and Power Quality Report 2010/2011
Quarterly Performance Reports for Electricity Quality and Reliability
Sample of completed minor and major works requested by customers for network quality
Monthly KPI reporting extracts for network quality and reliability
Sample of reconnections during audit period
Sample of new connections during audit period

Documents Examined
Sample of disconnections during audit period
Record Keeping Report 2010/2011
Proof of payment relating to Western Power's renewal of licence
Complaints raw data for reporting
Service quality monthly reports
Life support equipment customer contact confirmation
Daily De-energisation Small Use Customers report
Western Power's control register
CURA extracts
Annual compliance reports
Annual compliance report worksheets
Certificate of Currency for the EDL1
Supplier invoice extract to the Authority
Supplier invoice extract to the Ombudsman
Historical consumption data
Interval data management maintain meter real time clock accuracy
Time accuracy compliance reports
Metering interval data operational weekly compliance report
Sample of standing and historical data requests from retailer
Data responses to retailer requests
Compare request and response by Western Power
EOPS extracts

<b>Documents Examined</b>
OAG Audit Report and Management Letter
DR test results June and December 2011

## Appendix 3 – Audit Evidence – Personnel who Assisted in the Audit

<b>Positions of Western Power Personnel</b>	<b>Branch</b>
Meter Installation Team Leader	Metering
Interval Data Coordinator	Metering
Basic Data Coordinator	Metering
Compliance Advisor	Risk & Compliance
Contract Administration Officer	Customer Solutions
AA3 Focus Engineer	Network Performance
Commercial Administrators	Metering
Access Solutions Manager	Customer Solutions
IT Applications Service Delivery Manager	IT
Reading Operations Coordinator	Metering
Business Analyst	Customer Assist
Energisation Administrator Team Leader	Customer Assist
Commercial Officer	Metering
Queue Manager	Customer Solutions
Laboratory Services Control	Metering
Engineering Team Leader	Network Performance
Interval Metering Analyst	Metering
Connections Team Senior Advisor	Customer Assist

<b>Positions of Western Power Personnel</b>	<b>Branch</b>
Standards, Policy & Data Quality Branch Manager	Standards, Policy & Data Quality
Asset Business Systems Manager	Network Performance
IT Service Manager	IT
Network Operations Manager	Network Operations
Major Customer Account Manager	Customer Solutions
Customer Assist Branch Manager	Customer Assist
Senior Editor – Complaints and Small Claims	Customer Assist
Customer Service Centre Team Leader	Customer Assist
Risk and Compliance Branch Manager	Risk & Compliance
Customer Service Centre Team Leader	Customer Assist
Reliability Analysis & Reporting Team Leader	Network Performance
Reading Operations Coordinator	Metering
Information Services Analyst	Metering
Network Engineer	Network Performance
Team Leader	Customer Solutions
Senior Process & Governance Analyst	Customer Assist
Pricing and Access Development Manager	Regulation & Pricing
Reading Management Administrator	Metering
Principal Distribution Policy Development Officer	Standards, Policy & Data Quality
Planned Outage Administrator	Customer Assist
Project Officer	Environment, Community & Approvals
Environment, Community & Approvals Branch Manager	Environment, Community & Approvals
Major Customer Account Manager	Customer Solutions
Compliance Advisor	Risk & Compliance
Customer Service Centre Manager	Customer Assist
Operational Standards and Development Manager	Standards, Policy & Data Quality
Technical Administrator	Metering
Metering Branch Manager	Metering
Complaints and Dispute Resolution Officer – Complaints and Small Claims	Customer Assist

<b>Positions of Western Power Personnel</b>	<b>Branch</b>
Metering Strategist	Metering
Operations Support & Document Control	Network Operations
Field Services Coordinator	Country
Team Coordinators	Country
Field officers	Country
Contract Manager	AMRS
Project Manager	AMRS
Risk Advisor	Risk & Compliance