

Electricity Networks Corporation

(t/a Western Power)

Electricity Transmission Licence (ETL 2)

Performance Audit Report

January 2013

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Acronym List

Acronym / Reference	Description
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 failures
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 used to transfer customers between retailers

Acronym / Reference	Description
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	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

Acronym / Reference	Description
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 transmission licence (“ETL2”) granted by the Economic Regulation Authority (the “Authority”). ETL2 provides Western Power with the legal right to transmit electricity to customers.

Audit Background

Western Power’s transmission 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 transmission 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 – Compliance Elements which Require Corrective Measures*. 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 Transmission Licence, ETL2, for the 14 month period 1 May 2011 to 30 June 2012 and examined a total of 201 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 ETL 2 Performance Report; and
- A review and evaluation of the areas which have been highlighted by the Authority under the "Our Approach and Methodology" section; and

The key legislation governing the licensing of transmitters of electricity is the Electricity Industry Act 2004. Where applicable, other regulatory requirements that supported the ETL2 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 (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.

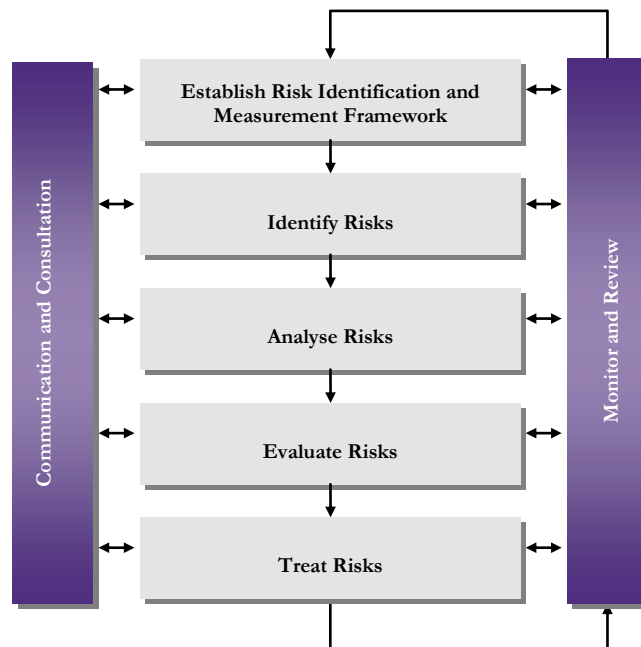
An audit is not designed to detect all weaknesses in control procedures as it is not performed continuously throughout the period and the tests performed are on a sample basis. Accordingly, readers of this report should not rely on this report to identify all potential instances of non-compliance which 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 transmission 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 transmission licence on 30 March 2006.

The key legislation that governs the licensing of transmitters 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.

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

Risk treatment

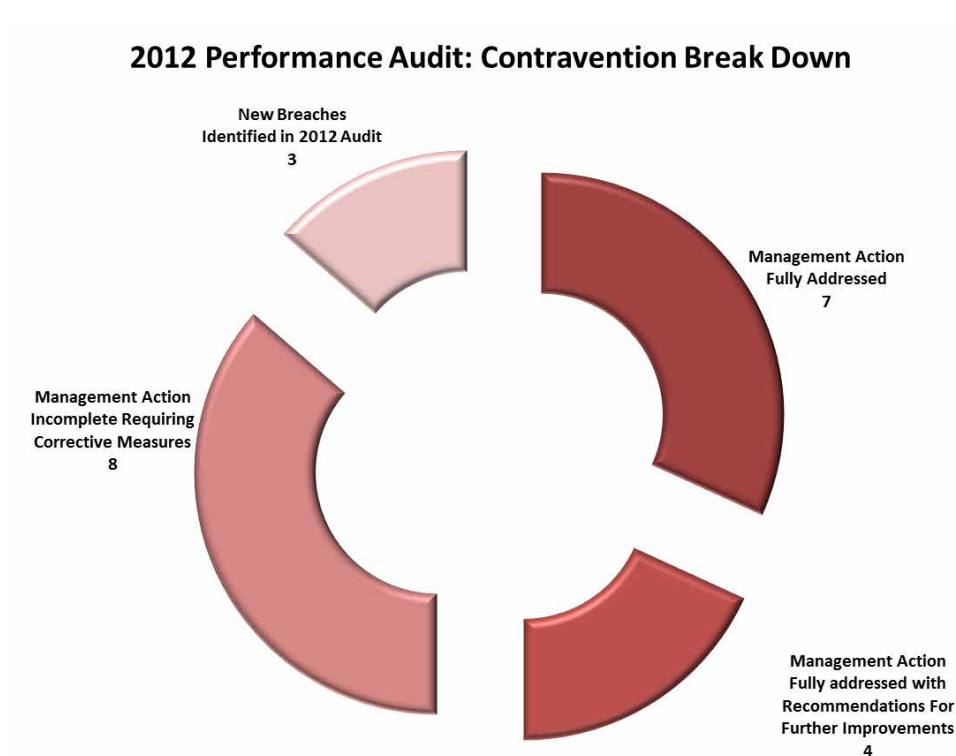
If a control risk is identified, which in the Auditor's professional judgement, left untreated, could cause Western Power to become non-compliant with its obligation under the licence, Grant Thornton has provided recommendations to mitigate the risk to an appropriately low level. The treatment of risks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

Team Members	Hours
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
Total	805

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 28 contraventions identified in the 2011 report were able to be fully addressed. Consequently, 19 of the 22 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:

Font in black	Refer to 2011 Electricity Compliance Reporting Manual
Font in blue	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 Metering Code clause 3.5(6)	339 326	✓			
Electricity Industry Metering Code clause 3.11(1)	347 334		✓		
Electricity Industry Metering Code clause 3.16(3)	360 347			✓	
Electricity Industry Metering Code clause 3.16(5)	361 348			✓	
Electricity Industry Metering Code clause 3.16(6)	362 349			✓	
Electricity Industry Metering Code clause 3.18(1)	363 350		✓		
Electricity Industry Metering Code clause 3.21(1)	366 353			✓	

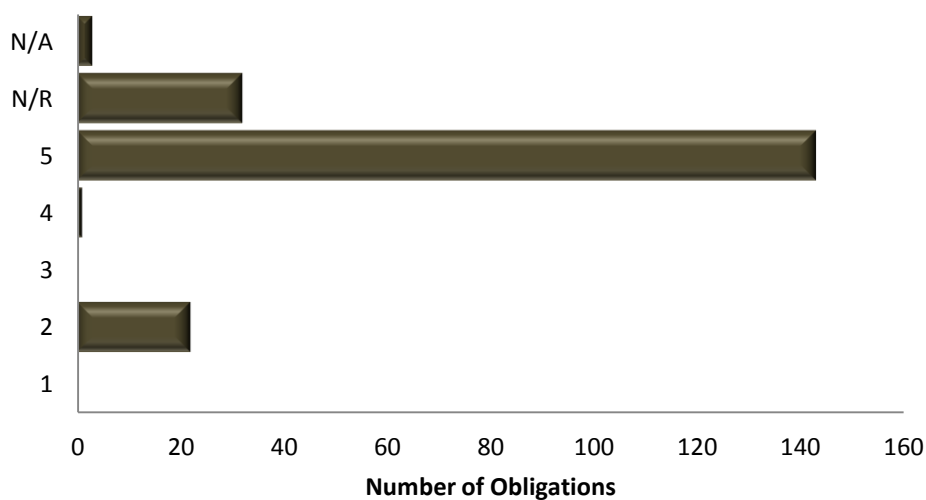
Obligations	Manual Reference Obligation	Management Action Fully Addressed	Management Action Fully Addressed with Recommendations For Further Improvements	Management Action Incomplete Requiring Corrective Measures	New Breach Identified in 2012 Audit
Electricity Industry Metering Code clause 4.8(4)	386 373	✓			
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		✓		

8. Overall Compliance Summary

The performance audit covers Western Power's ETL 2, for the 14 month period 1 May 2011 to 30 June 2012 and tested a total of 201 licence obligations.

The following graph illustrates the compliance profile of Western Power.

Graph 1 – Western Power's Compliance Summary



Compliance Rating Scale	1	2	3	4	5	N/R	N/A
Number of Obligations	0	22	0	1	143	32	3

Table 2 represents the audit compliance summary for each manual reference obligation.

Key:

Font in black	Refer to 2011 Electricity Compliance Reporting Manual
Font in blue	Refer to 2010 Electricity Compliance Reporting Manual

Table 2 – Compliance Profile Summary Table

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 Customer Transfer Code clause 2.2(1)(a)	1 1	Unlikely	Minor	Low	Strong								✓
Electricity Industry Customer Transfer Code clause 2.2(1)(b)	2 2	Unlikely	Moderate	Medium	Strong								✓
Electricity Industry Customer Transfer Code clause 3.1(1)(a)	3 3	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Customer Transfer Code clause 3.1(1)(b)	4 4	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Customer Transfer Code clause 3.1(2)	5 5	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 Customer Transfer Code clause 3.7(1)	10 10	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 3.7(2)	11 11	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 3.8(1)	12 12	Unlikely	Minor	Low	Strong					✓			
Electricity Industry Customer Transfer Code clause 3.8(2)(a)	13 13	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 3.8(2)(b)	14 14	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 3.8(3)	15 15	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code	20 20	Unlikely	Moderate	Medium	Strong					✓			

Obligations	Manual Reference Obligation	Likelihood	Consequence	Inherent Risk	Adequacy of Existing Controls	Compliance Rating							
		(A=Likely, B=Probable, C=Unlikely)	(1=Minor, 2=Moderate, 3=Major)	(Low, Medium, High)	(S=Strong, M=Moderate, W=Weak)	1	2	3	4	5	N / R	N / A	
clause 3.10(1)													
Electricity Industry Customer Transfer Code clause 3.10(2)	21 21	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 4.1	22 22	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 4.9(1)	31 31	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 4.9(2)	32 32	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 4.9(3)	33 33	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 4.9(6)	34 34	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 Customer Transfer Code clause 4.10(1)	35 35	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 4.10(2)	36 36	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 4.10(3)	37 37	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer clause 4.11(1)	38 38	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 4.11(3)	39 39	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 4.12(3)	40 40	Unlikely	Minor	Low	Strong					✓			
Electricity Industry Customer Transfer Code	41 41	Likely	Moderate	High	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	
clause 4.13													
Electricity Industry Customer Transfer Code clause 4.14	42 42	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 4.15	43 43	Unlikely	Minor	Low	Strong					✓			
Electricity Industry Customer Transfer Code clause 5.1(1)	46 46	Unlikely	Minor	Low	Strong					✓			
Electricity Industry Customer Transfer Code clause 5.1(3)	47 47	Unlikely	Minor	Low	Strong						✓		
Electricity Industry Customer Transfer Code clause 5.1(4)	48 48	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 6.2	49 49	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Customer Transfer Code	50 50	Unlikely	Minor	Low	Strong					✓			

Obligations	Manual Reference Obligation	Likelihood	Consequence	Inherent Risk	Adequacy of Existing Controls	Compliance Rating							
		(A=Likely, B=Probable, C=Unlikely)	(1=Minor, 2=Moderate, 3=Major)	(Low, Medium, High)	(S=Strong, M=Moderate, W=Weak)	1	2	3	4	5	N / R	N / A	
clause 6.3(1)													
Electricity Industry Customer Transfer Code clause 6.3(2)	51 51	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Customer Transfer Code clause 6.6	54 54	Unlikely	Moderate	Medium	Strong					✓			
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						✓		

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 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						✓		
Electricity Industry Customer Transfer Code Annex 3	62 62	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Customer Transfer Code Annex 4 clause A4.1	63 63	Unlikely	Moderate	Medium	Strong			✓					
Electricity Industry Customer Transfer Code Annex 4 clause A4.2	64 64	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 Customer Transfer Code Annex 5 clause A5(5)	65 65	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code Annex 5 clause A5(6)	66 66	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code Annex 5 clause A5(7)	67 67	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code Annex 6 clause A6.2(a)	68 68	Unlikely	Minor	Low	Strong					✓			
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					✓			

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 Customer Transfer Code Annex 6 clause A6.7	71 71	Unlikely	Minor	Low	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					✓			
Electricity Industry Act section 17(1)	105 85	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Act section 31(3)	106 86	Unlikely	Minor	Low	Strong					✓			
Electricity Industry Act section 41(6)	107 87	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Act section 115(1)	112 95	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industrv Act	113	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	
section 115(2)	96												
Distribution Licence condition 15.2 or 15.5 Transmissi on Licence condition 12.2 or 12.5	103	Unlikely	Moderate	Medium	Strong					<div>✓</div>			
Distribution Licence condition 15.3 or 15.6 Transmissi on Licence condition 12.3 or 12.6	104	Unlikely	Moderate	Medium	Strong					<div>✓</div>			
Distribution Licence condition 12.1 Transmissi on Licence condition 12.1	119 105	Unlikely	Moderate	Medium	Strong					<div>✓</div>			
Distribution Licence condition 13.4 Transmissi on Licence condition 13.4	120 106	Unlikely	Moderate	Medium	Strong						<div>✓</div>		
Distribution Licence condition 14.2 Transmissi on Licence condition 14.2	121 107	Unlikely	Moderate	Medium	Strong					<div>✓</div>			

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	
Distribution Licence condition 20.5 Transmissi on Licence condition 20.5	122 108	Unlikely	Moderate	Medium	Strong					✓			
Distribution Licence condition 15.1 Transmissi on Licence condition 15.1	123 109	Unlikely	Moderate	Medium	Strong						✓		
Distribution Licence condition 16.1 Transmissi on Licence condition 16.1	124 110	Unlikely	Moderate	Medium	Strong					✓			
Distribution Licence condition 17.1 and 17.2 Transmissi on Licence condition 17.1 and 17.2	125 111	Unlikely	Moderate	Medium	Strong					✓			
Distribution Licence condition 18.1 Transmissi on Licence condition 18.1	126 112	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 2.2(1)(a)	330 317	Unlikely	Minor	Low	Strong							✓	
Electricity Industry Metering Code clause 2.2(1)(b)	331 318	Unlikely	Moderate	Medium	Strong							✓	
Electricity Industry Metering Code clause 3.1	332 319	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Metering Code clause 3.2(1)	333 320	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Metering Code clause 3.3(1)	334 321	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Metering Code clause 3.3(3)	335 322	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Metering Code clause 3.5(1) and (2)	336 323	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 3.5(3)	337 324	Unlikely	Moderate	Medium	Moderate					✓			
Electricity Industry Metering Code clause 3.5(4)	338 325	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.5(6)	339 326	Probable	Moderate	Medium	Strong		✓						
Electricity Industry Metering Code clause 3.5(9)	340 327	Probable	Moderate	Medium	Moderate					✓			
Electricity Industry Metering Code clause 3.7	341 328	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.8	342 329	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.9(3)	343 330	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering	344 331	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 3.9(7)													
Electricity Industry Metering Code clause 3.9(9)	345 332	Unlikely	Moderate	Medium	Strong							✓	
Electricity Industry Metering Code clause 3.10	346 333	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Metering Code clause 3.11(1)	347 334	Likely	Moderate	High	Strong			✓					
Electricity Industry Metering Code clause 3.11(2)	348 335	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Metering Code clause 3.11(3)	349 336	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Metering Code clause 3.12(1)	350 337	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Metering Code clause	351 338	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	
3.12(2)													
Electricity Industry Metering Code clause 3.12(3)	352 339	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Metering Code clause 3.12(4)	353 340	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Metering Code clause 3.13(1)	354 341	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Metering Code clause 3.13(c)	355 342	Unlikely	Moderate	Medium	Strong							✓	
Electricity Industry Metering Code clause 3.13(4)	356 343	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Metering Code clause 3.14(3)	357 344	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Metering Code clause 3.16(1)	358 345	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 3.16(2)	359 346	Unlikely	Moderate	Medium	Strong						✓		
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						✓		

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 3.21(1)	366 353	Probable	Moderate	Medium	Strong		✓						
Electricity Industry Metering Code clause 3.21(2)	367 354	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.22	368 355	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.23(a)	369 356	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.23(b)	370 357	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.25	371 358	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.29	373 360	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause	374 361	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	
4.1(1)													
Electricity Industry Metering Code clause 4.1(2)	375 362	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 4.1(3)	376 363	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 4.2(1)	377 364	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 4.3(1)	378 365	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 4.4(1)	379 366	Unlikely	Minor	Low	Strong					✓			
Electricity Industry Metering Code clause 4.5(1)	380 367	Unlikely	Minor	Low	Strong					✓			
Electricity Industry Metering Code clause 4.6(1)	382 369	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 4.6(2)	383 370	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 4.7	384 371	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 4.8(3)	385 372	Unlikely	Moderate	Medium	Strong					✓			
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	390 377	Unlikely	Minor	Low	Strong					✓			

Obligations	Manual Reference Obligation	Likelihood	Consequence	Inherent Risk	Adequacy of Existing Controls	Compliance Rating							
		(A=Likely, B=Probable, C=Unlikely)	(1=Minor, 2=Moderate, 3=Major)	(Low, Medium, High)	(S=Strong, M=Moderate, W=Weak)	1	2	3	4	5	N / R	N / A	
clause 5.1(2)													
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					✓			
Electricity Industry Metering Code clause 5.6(1)	396 383	Probable	Moderate	Medium	Moderate		✓						
Electricity Industry Metering Code clause 5.7	397 384	Probable	Moderate	Medium	Moderate					✓			
Electricity Industry Metering Code clause 5.8	398 385	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.9	399 386	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering	400 387	Unlikely	Moderate	Medium	Strong		✓						

Obligations	Manual Reference Obligation	Likelihood	Consequence	Inherent Risk	Adequacy of Existing Controls	Compliance Rating							
		(A=Likely, B=Probable, C=Unlikely)	(1=Minor, 2=Moderate, 3=Major)	(Low, Medium, High)	(S=Strong, M=Moderate, W=Weak)	1	2	3	4	5	N / R	N / A	
Code clause 5.10													
Electricity Industry Metering Code clause 5.11	401 388	Unlikely	Moderate	Medium	Strong								
Electricity Industry Metering Code clause 5.12(1)	402 389	Probable	Moderate	Medium	Strong								
Electricity Industry Metering Code clause 5.13	403 390	Unlikely	Moderate	Medium	Strong								
Electricity Industry Metering Code clause 5.14(3)	404 391	Unlikely	Moderate	Medium	Strong								
Electricity Industry Metering Code clause 5.15	405 392	Unlikely	Moderate	Medium	Strong								
Electricity Industry Metering Code clause 5.19(5)	413 400	Unlikely	Moderate	Medium	Strong								
Electricity Industry Metering Code clause 5.20(1)	415 402	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 5.20(2)	416 403	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.20(4)	417 404	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.21(2)	418 405	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.21(4)	419 406	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.21(8)	422 409	Probable	Moderate	Medium	Strong		✓						
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					✓			

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 5.21(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						✓		
Electricity Industry Metering Code clause 5.22(6)	431 418	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 5.23(1)	432 419	Unlikely	Moderate	Medium	Strong					<div>✓</div>			
Electricity Industry Metering Code clause 5.23(3)	433 420	Unlikely	Moderate	Medium	Strong					<div>✓</div>			
Electricity Industry Metering Code clause 5.24(1)	434 421	Unlikely	Moderate	Medium	Strong					<div>✓</div>			
Electricity Industry Metering Code clause 5.24(2)	435 422	Unlikely	Moderate	Medium	Strong					<div>✓</div>			
Electricity Industry Metering Code clause 5.24(3)	436 423	Unlikely	Moderate	Medium	Strong					<div>✓</div>			
Electricity Industry Metering Code clause 5.24(4)	437 424	Unlikely	Moderate	Medium	Strong					<div>✓</div>			
Electricity Industry Metering Code clause 5.25	438 425	Unlikely	Moderate	Medium	Strong					<div>✓</div>			
Electricity Industry Metering	440 427	Unlikely	Moderate	Medium	Strong						<div>✓</div>		

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 5.29													
Electricity Industry Metering Code clause 5.30(1)	441 428	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Metering Code clause 5.31(1)	442 429	Unlikely	Moderate	Medium	Strong		✓						
Electricity Industry Metering Code clause 5.31(2)	443 430	Unlikely	Moderate	Medium	Strong		✓						
Electricity Industry Metering Code clause 5.34(2)	444 431	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Metering Code clause 6.1(1)	445 432	Probable	Moderate	Medium	Moderate		✓						
Electricity Industry Metering Code clause 6.20(4)	447 434	Unlikely	Minor	Low	Strong							✓	
Electricity Industry Metering Code clause	448 435	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	
7.2(1)													
Electricity Industry Metering Code clause 7.2(2)	449 436	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Metering Code clause 8.1(1)	454 441	Unlikely	Minor	Low	Strong							✓	
Electricity Industry Metering Code clause 8.1(2)	455 442	Unlikely	Minor	Low	Strong							✓	
Electricity Industry Metering Code clause 8.1(3)	456 443	Unlikely	Minor	Low	Strong							✓	
Electricity Industry Metering Code clause 8.1(4)	457 444	Unlikely	Moderate	Medium	Strong							✓	
Electricity Industry Metering Code clause 8.3(2)	458 445	Unlikely	Minor	Low	Strong							✓	
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 5(1)	459 446	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	
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 8	460 447	Unlikely	Minor	Low	Strong					✓			
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 9	461 448	Likely	Moderate	High	Moderate					✓			
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 10(1)	462 449	Unlikely	Minor	Low	Strong					✓			
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 10(2)	463 450	Unlikely	Minor	Low	Strong					✓			
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 13(2)	465 452	Likely	Moderate	High	Moderate		✓						
Electricity Industry (Network Quality and	466 453	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	
Reliability of 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 23(1)	474 461	Unlikely	Minor	Low	Strong						✓		
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 23(2)	475 462	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry (Network Quality and Reliability of Supply) Code 2005	476 463	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	
clause 24(3)													
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 24(4)	477 464	Unlikely	Moderate	Medium	Strong							✓	
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 25(2)	478 465	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 25(3)	479 466	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 26	480 467	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 27(1)	481 468	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 (Network Quality and Reliability of Supply) Code 2005 clause 27(3)	482 469	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Act section 61 and 65	487	Unlikely	Moderate	Low	Strong						✓		
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 ETL2 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
Electricity Industry Customer Transfer Code clause 7.1(1)	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.	<p>The dispute procedure has been developed and agreed to by the Metering Account Managers, and published to major customers.</p> <p>The recommendation and the management action have been addressed.</p>
Electricity Industry Customer Transfer Code clause 7.1(2)	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 Industry Metering Code - Excluding Type 1 and Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
Electricity Industry Metering Code clause 3.5(6)	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"> 1. That Western Power review and update the current system set up of charges within MBS; and 2. That a secondary review of the charges be undertaken by another Commercial Officer. 	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.	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.
			2. A secondary review of the charges will now be undertaken by another Commercial Officer before billing.	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
Electricity Industry Metering Code clause 3.11(1)	A network operator must ensure that a metering installation on its network permits collection of data within the timeframes and to the level of availability specified.	<ol style="list-style-type: none"> Where feasible to program the MBS functionality to allow auto-substitution of interval data in accordance with the rules of the Metering Code; and 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%). 	1. Investigate the feasibility of MBS and MV90 functionality to allow auto substitution of interval data.	Western Power provided documentation to substantiate a feasibility study had been conducted and a business case approved for this scope of works. The recommendation and management action have been addressed.
			2. If feasible, implement the solution.	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.
			3. Enhance the current manual process to identify any missing data by establishing additional reporting from MBS.	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. Refer to detail findings section 11.

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.	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.

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

Source	Obligation	Recommendation	Management Action	Observation
Electricity Industry Metering Code clause 3.16(3)	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.	That Western Power establishes and formalises an agreement with Synergy such that energy data may be collected in 15 minute intervals.	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>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
Electricity Industry Metering Code clause 3.16(5)	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.	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.	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>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
Electricity Industry Metering Code clause 3.16(6)	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).
Electricity Industry Metering Code clause 3.18(1)	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
Electricity Industry Metering Code clause 3.21(1)	Meters containing an internal real time clock must maintain time accuracy as prescribed. Time drift must be measured over a period of 1 month.	<ol style="list-style-type: none"> 1. Establish time drift monitoring mechanisms for all types of metering installations on a monthly basis; and 2. Implement correct system parameters to ensure the time accuracy for its meters to reflect the requirements under the Electricity Industry Metering Code. 	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>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.	<p>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.</p> <p>Whilst sample based testing identified further issues surrounding this obligation, the recommendation and management action have been addressed.</p> <p>Refer to Detailed Findings section 11.</p>
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.			

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

Source	Obligation	Recommendation	Management Action	Observation
Electricity Industry Metering Code clause 5.3	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.	<p>Walkthrough of the revised manual process confirmed the enhancement of the current manual process through the establishment of additional reports from MBS.</p> <p>The recommendation and management action have been finalised.</p>

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

Source	Obligation	Recommendation	Management Action	Observation
Electricity Industry Metering Code clause 5.6(1)	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.
Electricity Industry Metering Code clause 5.7	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
Electricity Industry Metering Code clause 5.11	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.
Electricity Industry Metering Code clause 5.12(1)	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
Electricity Industry Metering Code clause 5.21(8)	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"> 1. Consider personnel within the Metering Infrastructure Team to complete the results of the meter test against the service order within MBS; 2. Continue the review by the Commercial Officer for the accuracy of the records and charges related to meter tests; and 3. Review and update the current system set up of charges within MBS. 	<ol style="list-style-type: none"> 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. 2. Process put in place for Commercial Officer review at time of service order closure and secondary review by Commercial Officer before billing. 	<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> <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 clause 5.21(9)	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.			

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

Source	Obligation	Recommendation	Management Action	Observation
			3. Western Power will align the current system set up of charges within MBS against the applicable SLA.	<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.</p>

Electricity Industry Metering Code - Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
Electricity Industry Metering Code clause 5.22(1)	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.	<p>That Western Power should program the MBS functionality to allow the validation of energy data using:</p> <ul style="list-style-type: none"> The check meter to verify revenue meter data accuracy; and A nominated maximum value for screening purposes. 	<ul style="list-style-type: none"> Western Power will investigate the feasibility of the MBS system change with possible inclusion in MBS 6.5 release; and If feasible, Western Power will implement the MBS system change. If not feasible, Western Power will establish an alternative action. 	<p>We obtained documentation that substantiated that a feasibility study had been undertaken and the inclusion of the requirement within MBS 6.5.</p> <p>This management action has been finalised.</p>
				<p>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.</p> <p>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.</p> <p>Implementation of MBS 6.5 occurred in June 2012 and whilst the actionable date was not met the manual work around addressed the observation.</p>

Electricity Industry Metering Code - Section 32 Notice

Source	Obligation	Recommendation	Management Action	Observation
Electricity Industry Metering Code clause 5.22(2)	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.	1. Western Power will investigate the feasibility of the MBS system change with possible inclusion in MBS 6.5 release; and	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.
			2. If feasible, Western Power will implement the MBS system change. If not feasible, Western Power will establish an alternative action.	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
Electricity Industry Metering Code clause 5.31(1)	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>
Electricity Industry Metering Code clause 5.31(2)	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
Electricity Industry Metering Code clause 6.1(1)	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.	1. MBS system changes for enhanced reporting to be scoped and business case prepared.	Western Power has examined the feasibility of enhancing its MBS, IT project has been developed and a business case has been approved.
			2. To be included in planned MBS system release 6.5.	<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
Electricity Industry Metering Code clause 8.1(1)	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.	That Western Power develops a dispute resolution framework and ensures that it be communicated across the various Branches directly involved with all Code Participants.	Western Power will develop and implement a documented dispute resolution procedure.	<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
Electricity Industry Metering Code clause 8.1(2)	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).
Electricity Industry Metering Code clause 8.1(3)	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
Electricity Industry Metering Code clause 8.1(4)	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).
Electricity Industry Metering Code clause 8.3(2)	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
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 24(3)	A distributor or transmitter must complete a quality investigation requested by a customer in accordance with specified requirements.	<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"> 1. Contact the relevant customer and extend the due date for the completion of the investigation; and 2. Retain corresponding records to confirm that the customer has acknowledged the due date extension. 	<ol style="list-style-type: none"> 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. 	<p>Review of the revised policies and processes confirmed a clear articulation of the activities and responsiveness timeframes.</p> <p>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
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 24(4)	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 ETL2 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.

As these areas of special interest cover both the EDL1 and ETL2, the commentary within this report are only extracts that relate to the ETL2. For full commentary on all the special areas of interest, please see the Western Power Electricity EDL 1 Performance Audit Report 2012.

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 17th 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 actionable items relating to the ETL2.

1. Contravention of clause 5.1 of the Electricity Transmission Licence ETL2 (“ETL2”)

- 1.1. 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 by 30 April 2012, that Western Power took the necessary measures to validate energy data using the check meter to verify revenue meter data accuracy and a nominated maximum value for screening purposes.*

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 does not use partial check meters and therefore there is no requirement to appropriately adjust for difference in metering installation accuracy.

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.

- 1.2. *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 plans 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.

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

Discussions 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 made 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 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

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 4.13	
Compliance Manual Reference	41	41
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<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"> • 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 • 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. 	

Recommendation	That Western Power continues to investigate the data loading issue between MVRS and MV90 and implements the necessary rectifications.
Management Response	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).
Management Actions	Enable Type 5 meters to be manually read as part of MBS upgrade 6.6.
Implementation Date	31 October 2013.
Responsible person	Tony Shanahan – Branch Manager Metering.

Licence Condition	<p>Electricity Industry (Licence Conditions) Regulations regulation 5(2)</p> <p>Distribution Licence condition 5.1</p> <p>Transmission Licence condition 5.1</p>	
Obligations Under	<p>Electricity Industry Customer Transfer Code Annex 4 clause A4.1</p> <p>Electricity Industry Metering Code clause 5.10</p>	
Compliance Manual Reference	63 & 400	63 & 387
Obligation Description		
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.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<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>	
Recommendation	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.	

Management Response	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).
Management Actions	<ol style="list-style-type: none"> 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. 2. If feasible, implement the solution (via MBS 6.6 upgrade or another project depending on solution).
Implementation Date`	<ol style="list-style-type: none"> 1. 31 December 2012. 2. 31 October 2013.
Responsible person	Tony Shanahan – Branch Manager Metering.

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.5(6)	
Compliance Manual Reference	339	326
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<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.</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>	
2011 Compliance Report – Status of Remedial Action	Western Power had implemented the remedial actions stated within the 2011 Compliance Report.	
Recommendation	None – requirement has been addressed.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.11(1)	
Compliance Manual Reference	347	334
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<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"> • Remote locations of a number of its metering installations; • Weather; and • Availability of communication facilities from the respective TELCO where the communication link uses a SIM card. <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>	
2011 Compliance Report – Status of Remedial Action	<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>	

Recommendation	<ol style="list-style-type: none"> 1. Review the new COGNOS report to determine and ensure the integrity of the report. 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.
Management Response	<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>
Management Actions	Finalise current COGNOS reporting project to deliver on-going monitoring of all meters.
Implementation Date	30 November 2012.
Responsible Person	Tony Shanahan – Branch Manager Metering.
Status of Management Action	Closed.

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.16(3)	
Compliance Manual Reference	360	347
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<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"> • 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 • to allow for interval energy data to be recorded in a trading interval or sub-multiples of a trading interval. <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"> 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 the draft copy of the “Proposed Amended Electricity Industry Metering Code, July 2012”.
2011 Compliance Report – Status of Remedial Action	No further action was required as Western Power was awaiting the outcome of the Metering Code amendments to be finalised.
Recommendation	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.
Management Response	<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>
Management Actions	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.
Implementation Date	If revised Metering Code is not gazetted by 31 March 2013, investigate necessary compliance processes by 30 June 2013.
Responsible Person	Tony Shanahan – Branch Manager Metering.

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.16(5) Electricity Industry Metering Code clause 3.16(6)	
Compliance Manual Reference	361 & 362	348 & 349
Obligation Description		
	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.
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<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"> • clause 3.16(4) be removed from the Metering Code; and • the Authority considers a consequential amendment to the Metrology Procedure to remove the requirement for the 	

	<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"> 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 the draft copy of the “Proposed Amended Electricity Industry Metering Code, July 2012”.
2011 Compliance Report – Status of Remedial Action	No further action was required as Western Power was awaiting the outcome of the Metering Code amendments to be finalised.
Recommendation	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.
Management Response	<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>
Management Actions	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.
Implementation Date	If revised Metering Code is not gazetted by 31 March 2013 investigate necessary compliance processes to ensure compliance by 30 June 2013.
Responsible Person	Tony Shanahan – Branch Manager Metering.

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.18(1)	
Compliance Manual Reference	363	350
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<ol style="list-style-type: none"> 1. 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. 2. <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 	

	<p>not reveal any exceptions.</p> <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>1. 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>
2011 Compliance Report – Status of Remedial Action	<p>Western Power had implemented the remedial actions in the timeframes specified.</p>
Recommendation	<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>

Management Response	<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>
Management Actions	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.
Implementation Date	If revised Metering Code is not gazetted by 31 March 2013 then investigate necessary compliance processes to ensure compliance by 30 June 2013.
Responsible Person	Tony Shanahan – Branch Manager Metering.

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.21(1)	
Compliance Manual Reference	366	353
Obligation Description	Meters containing an internal real time clock must maintain time accuracy as prescribed. Time drift must be measured over a period of 1 month.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<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>
2011 Compliance Report – Status of Remedial Action	<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>
Recommendation	<p>That Western Power:</p> <ol style="list-style-type: none"> 1. Review the time accuracy maintained for all Type 5 meters, and correct the time drift where inaccuracies are identified; and 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.
Management Response	<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>

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

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 4.8(4) Electricity Industry Metering Code clause 4.8(5)	
Compliance Manual Reference	386 & 387	373 & 374
Obligation Description		
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.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<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"> application requests for access to the metering database required approval from the Officer’s Team Leader/Manager and an MBS Service Support personnel; 	

	<ul style="list-style-type: none"> • application requests for access to the metering installation required approval from the Metering Services Branch personnel; • MBS passwords are required to be changed every 30 days; and • MBS user accounts are locked if a password is attempted wrongly after 3 times. <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>
2011 Compliance Report – Status of Remedial Action	Western Power had implemented the remedial actions in the timeframes specified.
Recommendation	None – requirement has been addressed.

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.3	
Compliance Manual Reference	391	378
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<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"> • Access restrictions to customer's premise, preventing a field officer from obtaining energy data; • Delays in meter reading rounds caused by adverse weather conditions; and • Logistical issues encountered for Type 5 meters that require a special probe to obtain readings. <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>	
2011 Compliance Report – Status of Remedial Action	<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>	
Recommendation	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.
Management Response	<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>
Management Actions	<ol style="list-style-type: none"> 1. Replacement of current meter reading handheld data units to improve field technology reliability. 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. 3. Review meter reading field resourcing and if feasible implement any efficiencies to increase the level of compliance.
Implementation Date	<ol style="list-style-type: none"> 1. 30 April 2013. 2. 31 October 2013. 3. 31 March 2013.
Responsible person	Tony Shanahan – Branch Manager Metering.

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.6(1)	
Compliance Manual Reference	396	383
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<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"> • Not detecting a metering point that required substitute data within the prescribed timeframe; • Waiting for a meter to be reprogrammed before substituted data was provided; • Deciding not to provide substituted data due to the meter belonging to a decommissioned site; and • Requiring a confirmation that a site was offline before the manual substitution took place. <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>	

2011 Compliance Report – Status of Remedial Action	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.
Recommendation	None- requirement has been addressed.

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.12(1)	
Compliance Manual Reference	402	389
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<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>	
2011 Compliance Report – Status of Remedial Action	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.	
Recommendation	Western Power investigates MBS to determine the cause of the delay in order to ascertain whether the issue is systemic and rectify the issue.	
Management Response	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.	

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

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.21(8)	
Compliance Manual Reference	422	409
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<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>	

2011 Compliance Report – Status of Remedial Action	<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 has not addressed the remedial action to align the current system set up of charges within MBS against the applicable SLA by the action date as it has opted to obtain a MOU from the retailer stating that they are prepared to incur the relevant fee, but hold the right to reconsider at a later date.</p>
Recommendation	That Western Power retains evidence of review to substantiate secondary review had been undertaken.
Management Response	Western Power acknowledges the auditor's findings and recommendation.
Management Actions	Adjust the secondary review process to ensure a way of retaining evidence of the review when no adjustment has occurred.
Implementation Date	30 November 2013.
Responsible Person	Tony Shanahan – Branch Manager Metering.

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.22(1)	
Compliance Manual Reference	426	413
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<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"> 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. 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. <p>Following March 2012, Western 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. Discussions revealed that</p>	

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

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.22(2)	
Compliance Manual Reference	427	414
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<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>	
2011 Compliance Report – Status of Remedial Action	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.	
Recommendation	None – requirement has been addressed.	

Licence Condition	Distribution Licence e condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.31(1) Electricity Industry Metering Code clause 5.31(2)	
Compliance Manual Reference	442 & 443	429 & 430
Obligation Description		
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.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<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"> • assess the compliance of each metering installation in the Horizon network as required under 5.31(1) of the Metering Code; and • upgrade non-compliant meters as required under 5.31(2) of the Code. <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 (formerly 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"> 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 the draft copy of the "Proposed Amended Electricity Industry Metering Code, July 2012".
2011 Compliance Report – Status of Remedial Action	No further action was required as Western Power was awaiting the outcome of the Metering Code amendments to be finalised.
Recommendation	None – requirement has been addressed.

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 6.1(1)	
Compliance Manual Reference	445	432
Obligation Description	A network operator must, in relation to its network, comply with the agreements, rules, procedures, criteria and processes prescribed.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<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"> • Western Power does not have reporting capabilities across all elements of the model SLA. Enquires 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; • 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 & 310); and • 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. <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>	

	staff indicated that Western Power does not have a registration process relevant to this obligation.
2011 Compliance Report – Status of Remedial Action	<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>
Recommendation	<p>That Western Power:</p> <ol style="list-style-type: none"> 1. Implement reporting capabilities for the outstanding SLA line elements, remotely collected energy interval data and standing data provision. 2. Provide performance indicator reports to the remaining retailers for the SLA line elements that require reporting. 3. Formally enter into discussions with the remaining retailers whether reporting is required for SLA line elements that can be agreed upon. 4. In the event where Western Power is unable to meet its performance under the SLA, engage with affected Code participants and inform them of the actions undertaken, including the proposed strategies to improve performance.
Management Response	<p>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.</p>
Management Actions	<ol style="list-style-type: none"> 1. Implement reporting capabilities for the outstanding SLA line elements, remotely collected energy interval data and standing data provision. 2. Obtain formal confirmation from retailers of their requirements in terms of SLA reporting. 3. Provide performance indicator reports to the remaining retailers for the SLA line elements that require reporting. 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.

Implementation Date	<ol style="list-style-type: none"> 1. 30 November 2012. 2. 31 December 2012. 3. 31 January 2013. 4. As required.
Responsible person	Tony Shanahan – Branch Manager Metering.
Status of Management Actions	<ol style="list-style-type: none"> 1. Closed. 2. Status of management action not determined. 3. Status of management action not determined. 4. Status of management action not determined.

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 13(2)	
Compliance Manual Reference	465	452
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	2	
Audit Observations	<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"> • Perth CBD; • Urban areas other than the Perth CBD; and • Any other area of the State. <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"> • Weather conditions outside of Western Power's control; and • Planning and works surrounding the asset management system upgrade that did not facilitate for the average length of outages to be met. <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 the 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"> • CBD areas; • Urban areas; • Rural Short areas; and • Rural Long areas. <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>
Recommendation	<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>
Management Response	<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>

Management Actions	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.
Implementation Date	31 March 2013.
Responsible Person	Margaret Pyrchla – Branch Manager, Risk and Compliance.

13. Detailed Findings – Compliance Elements which Require Minor Improvements

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 27(1)	
Compliance Manual Reference	481	468
Obligation Description	A distributor or transmitter must prepare and publish a report about its performance in accordance with specified requirements.	
Reporting Type	2	
Compliance Rating	4	
Audit Observations	<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>	
Recommendation	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.	
Management Response	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.	
Management Actions	Network Performance branch to create a checklist that documents its processes for preparing the Annual Reliability and Power Quality report.	

Implementation Date	31 January 2013.
Responsible person	David Fyfe – Branch Manager Network Performance.

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

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 2.2(1)(a)	
Compliance Manual Reference	1	1
Obligation Description	A network operator must treat all retailers which are its associates on an arms-length basis.	
Reporting Type	NR	
Compliance Rating	N/A	
Audit Observations	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.	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 2.2(1)(b)	
Compliance Manual Reference	2	2
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	N/A	
Audit Observations	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.	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 3.1(1)(a)	
Compliance Manual Reference	3	3
Obligation Description	A network operator must publish a request for standing data form which must comply with Annex 1 of the Electricity Industry Customer Transfer Code.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 3.1(1)(b)	
Compliance Manual Reference	4	4
Obligation Description	A network operator must publish a request for historical data form which must comply with Annex 2 of the Electricity Industry Customer Transfer Code.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 3.1(2)	
Compliance Manual Reference	5	5
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 3.7(1)	
Compliance Manual Reference	10	10
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 3.7(2)	
Compliance Manual Reference	11	11
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 3.8(1)	
Compliance Manual Reference	12	12
Obligation Description	A network operator must use all reasonable endeavours to provide to the retailer the requested data under a valid data request.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 3.8(2)(a)	
Compliance Manual Reference	13	13
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 3.8(2)(b)	
Compliance Manual Reference	14	14
Obligation Description	A network operator must provide the requested data under a valid data request in accordance with a specified timetable.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 3.8(3)	
Compliance Manual Reference	15	15
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 3.10(1)	
Compliance Manual Reference	20	20
Obligation Description	A network operator must not charge for the provision of standing data.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 3.10(2)	
Compliance Manual Reference	21	21
Obligation Description	A network operator must not charge more for historical consumption data than the defined amounts.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Enquiries 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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 4.1	
Compliance Manual Reference	22	22
Obligation Description	A network operator must publish a customer transfer request form which must comply with Annex 3 of the Electricity Industry Customer Transfer Code.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 4.9(1)	
Compliance Manual Reference	31	31
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 4.9(2)	
Compliance Manual Reference	32	32
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 4.9(3)	
Compliance Manual Reference	33	33
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 4.9(6)	
Compliance Manual Reference	34	34
Obligation Description	A network operator and retailer must agree to a revised nominated transfer date in certain circumstances.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 4.10(1)	
Compliance Manual Reference	35	35
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 4.10(2)	
Compliance Manual Reference	36	36
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 4.10(3)	
Compliance Manual Reference	37	37
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 4.11(1)	
Compliance Manual Reference	38	38
Obligation Description	A transfer may only occur on a day the contestable customer's meter is actually read.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 4.11(3)	
Compliance Manual Reference	39	39
Obligation Description	A network operator and the retailer must take certain action if the contestable customer's meter is not read on the nominated transfer date.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 4.12(3)	
Compliance Manual Reference	40	40
Obligation Description	The parties to an access contract must negotiate in good faith any necessary amendments to the access contract arising from certain circumstances.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 4.14	
Compliance Manual Reference	42	42
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 4.15	
Compliance Manual Reference	43	43
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 5.1(1)	
Compliance Manual Reference	46	46
Obligation Description	A network operator must submit communication rules to the Authority within six months after the commencement of the Electricity Industry Customer Transfer Code.	
Reporting Type	NR	
Compliance Rating	N/R	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 5.1(3)	
Compliance Manual Reference	47	47
Obligation Description	A network operator must take certain action before submitting the communication rules to the Authority.	
Reporting Type	NR	
Compliance Rating	N/R	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 5.1(4)	
Compliance Manual Reference	48	48
Obligation Description	A network operator and a retailer must comply with approved communication rules.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 6.2	
Compliance Manual Reference	49	49
Obligation Description	A licensee's notice in relation to a data request or a customer transfer must identify the exit point to which it relates.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 6.3(1)	
Compliance Manual Reference	50	50
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 6.3(2)	
Compliance Manual Reference	51	51
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 6.6	
Compliance Manual Reference	54	54
Obligation Description	A network operator or a retailer must send required electronic communications to the applicable electronic communication address, in accordance with Annex 6.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	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)	
Compliance Manual Reference	55, 56, 57, 58 & 59	55, 56, 57, 58 & 59
Obligation Description		
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.	
Reporting Type	NR, NR, 2, NR and NR	

Compliance Rating	N/R
Audit Observations	<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 this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>
Recommendation	Nil.

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code Annex 1	
Compliance Manual Reference	60	60
Obligation Description	A network operator's request for standing data must require a retailer to provide certain information.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code Annex 2	
Compliance Manual Reference	61	61
Obligation Description	A network operator's request for historical consumption data must require a retailer to provide certain information.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code Annex 3	
Compliance Manual Reference	62	62
Obligation Description	A network operator's customer transfer request form must require a retailer to provide certain information.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code Annex 4 clause A4.2	
Compliance Manual Reference	64	64
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code Annex 5 clause A(2)	
Compliance Manual Reference	65	65
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code Annex 5 clause A5(6)	
Compliance Manual Reference	66	66
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code Annex 5 clause A5(7)	
Compliance Manual Reference	67	67
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code Annex 6 clause A6.2(a)	
Compliance Manual Reference	68	68
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code Annex 6 clause A6.2(b)	
Compliance Manual Reference	69	69
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code Annex 6 clause A6.6	
Compliance Manual Reference	70	70
Obligation Description	The originator of an electronic communication must identify itself in the communication.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code Annex 6 clause A6.7	
Compliance Manual Reference	71	71
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 14.1 Transmission Licence condition 14.1	
Obligations Under	Electricity Industry Act section 13(1)	
Compliance Manual Reference	101	81
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 20.1 Transmission Licence condition 20.1	
Obligations Under	Electricity Industry Act section 14(1)(a)	
Compliance Manual Reference	102	82
Obligation Description	A licensee must provide for an asset management system.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 20.2 and 20.3 Transmission Licence condition 20.2 and 20.3	
Obligations Under	Electricity Industry Act section 14(1)(b)	
Compliance Manual Reference	103	83
Obligation Description	A licensee must notify details of the asset management system and any substantial changes to it to the Authority.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 20.4 Transmission Licence condition 20.4	
Obligations Under	Electricity Industry Act 14(1)(c)	
Compliance Manual Reference	104	84
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 4.1 Transmission Licence condition 4.1	
Obligations Under	Electricity Industry Act section 17(1)	
Compliance Manual Reference	105	85
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Act section 31(3)	
Compliance Manual Reference	106	86
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Act section 41(6)	
Compliance Manual Reference	107	87
Obligation Description	A licensee must pay the costs of taking an interest in land or an easement over land.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<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) 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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Act section 115(1)	
Compliance Manual Reference	112	95
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Act section 115(2)	
Compliance Manual Reference	113	96
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	N/A	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry Act section 11	
Obligations Under	Distribution Licence condition 15.2 or 15.5 Transmission Licence condition 12.2 or 12.5 Distribution Licence condition 15.3 or 15.6 Transmission Licence condition 12.3 or 12.6	
Compliance Manual Reference	No new reference as the obligations have been removed from May 2011 manual	103 & 104
Obligation Description		
	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.
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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 & 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</p>	

	<p>or will otherwise affect the licence boundary. SPIDAWEB reports 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>
Recommendation	Nil.

Licence Condition	Electricity Industry Act section 11	
Obligations Under	Distribution Licence condition 12.1 Transmission Licence condition 12.1	
Compliance Manual Reference	119	105
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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 Practicing 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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry Act section 11	
Obligations Under	Distribution Licence condition 13.4 Transmission Licence condition 13.4	
Compliance Manual Reference	120	106
Obligation Description	A licensee must comply with any individual performance standards prescribed by the Authority.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry Act section 11	
Obligations Under	Distribution Licence condition 14.2 Transmission Licence condition 14.2	
Compliance Manual Reference	121	107
Obligation Description	A licensee must comply, and require its auditor to comply, with the Authority's standard audit guidelines dealing with the performance audit.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry Act section 11	
Obligations Under	Distribution Licence condition 20.5 Transmission Licence condition 20.5	
Compliance Manual Reference	122	108
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry Act section 11	
Obligations Under	Distribution Licence condition 15.1 Transmission Licence condition 15.1	
Compliance Manual Reference	123	109
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Electricity Industry Act section 11	
Obligations Under	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	
Compliance Manual Reference	124, 125 & 126	110, 111 & 112
Obligation Description		
	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.
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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> <p>Based on our enquiries and sample based testing we have concluded that western Power has adequate and effective controls</p>	

	in place to support compliance with this manual reference obligation.
Recommendation	Nil.

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 2.2(1)(a)	
Compliance Manual Reference	330	317
Obligation Description	A network operator must treat all Code participants that are its associates on an arms-length basis.	
Reporting Type	NR	
Compliance Rating	N/R	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 2.2(1)(b)	
Compliance Manual Reference	331	318
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.1	
Compliance Manual Reference	332	319
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>
Recommendation	Nil.

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.2(1)	
Compliance Manual Reference	333	320
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.3(1)	
Compliance Manual Reference	334	321
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Our review and discussions with the Metering Services Branch personnel 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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.3(3)	
Compliance Manual Reference	335	322
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.5(1) and (2)	
Compliance Manual Reference	336	323
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.5(3)	
Compliance Manual Reference	337	324
Obligation Description	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).	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>
Recommendation	Nil.

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.5(4)	
Compliance Manual Reference	338	325
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.5(9)	
Compliance Manual Reference	340	327
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.7	
Compliance Manual Reference	341	328
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.8	
Compliance Manual Reference	342	329
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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 have 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.
Recommendation	Nil.

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.9(3)	
Compliance Manual Reference	343	330
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.9(7)	
Compliance Manual Reference	344	331
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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.
Recommendation	Nil.

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.9(9)	
Compliance Manual Reference	345	332
Obligation Description	If compensation is carried out within the meter then the resultant metering system error must be as close as practicable to zero.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<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>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.10	
Compliance Manual Reference	346	333
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.11(2)	
	Electricity Industry Metering Code clause 3.11(3)	
Compliance Manual Reference	348 & 349	335 & 336
Obligation Description		
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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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 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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.12(1)	
Compliance Manual Reference	350	337
Obligation Description	A network operator must ensure that each metering installation complies with at least, the prescribed design requirements.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Our review and enquiries with the Metering Services Branch staff revealed that Western Power had policies and procedures in place to ensure that each metering installation complies with 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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.12(2)	
Compliance Manual Reference	351	338
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Our review and enquiries with the Metering Services Branch staff revealed that Western Power have policies and procedures in place to ensure that instrument transformers (CT or VT) in its metering installations comply 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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.12(3)	
Compliance Manual Reference	352	339
Obligation Description	A network operator must provide isolation facilities, to the standard of good electricity industry practice, to facilitate testing and calibration of the metering installation.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Our review and 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 and drawing. The practice is in accordance with the Western Australian Electrical Requirement guide which is aligned to the Australian Standards.</p> <p>Western Power utilise the Western Australian Distribution Connections Manual, Western Australian Electrical Requirements guide, Inspection Systems Plan and the High Voltage Transmission and Generation Metering guidelines as reference 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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.12(4)	
Compliance Manual Reference	353	340
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.13(1)	
Compliance Manual Reference	354	341
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.13 (c)	
Compliance Manual Reference	355	342
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<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 install partial check meters, the High Voltage Transmission and Generation Metering guidelines is available and 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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.13(4)	
Compliance Manual Reference	356	343
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.14(3)	
Compliance Manual Reference	357	344
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.16(1)	
Compliance Manual Reference	358	345
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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"> • have electronic data recording facilities that are able to measure and record internal energy data; • are capable of separately registering and recording flows in each direction if bi-directional electricity flows occur; and • store interval energy data for a period of at least 35 days from and including the day that data is first recorded. <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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.16(2)	
Compliance Manual Reference	359	346
Obligation Description	A network operator must ensure that a Type 1 metering installation to Type 4 metering installation on the network includes a communications link.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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 Gyr 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 & 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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.20(1)	
Compliance Manual Reference	364	351
Obligation Description	A network operator must, if reasonably requested by a Code participant, provide enhanced technology features in a metering installation.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.20(3)	
Compliance Manual Reference	365	352
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.21(2)	
Compliance Manual Reference	367	354
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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 Gyr 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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.22	
Compliance Manual Reference	368	355
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.23(a)	
Compliance Manual Reference	369	356
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.23(b)	
Compliance Manual Reference	370	357
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.25	
Compliance Manual Reference	371	358
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.29	
Compliance Manual Reference	373	360
Obligation Description	A network operator must publish a list of registered metering installation providers, including the prescribed details, and at least annually, update the list.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Code of Conduct clause 4.1(1)	
Compliance Manual Reference	374	361
Obligation Description	A network operator must establish, maintain and administer a metering database containing standing data and energy data for each metering point on its network.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 4.1(2)	
Compliance Manual Reference	375	362
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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"> • Western Power developed and implemented a "<i>password authority level matrix</i>" on its metering database; • Western Power developed and implemented a signature authority list for MBS to ensure approval to the metering database is given by appropriate personnel; • MBS passwords are required to be changed every 30 days; and • MBS user accounts are locked if a password is attempted wrongly after 3 times. <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.
Recommendation	Nil.

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 4.1(3)	
Compliance Manual Reference	376	363
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 4.2(1)	
Compliance Manual Reference	377	364
Obligation Description	A network operator must ensure that its registry complies with the Code and the prescribed clause of the market rules.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 4.3(1)	
Compliance Manual Reference	378	365
Obligation Description	The standing data for a metering point must comprise at least the items specified.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 4.4(1)	
Compliance Manual Reference	379	366
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 4.5(1)	
Compliance Manual Reference	380	367
Obligation Description	A Code participant must not knowingly permit the registry to be materially inaccurate.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 4.6(1)	
Compliance Manual Reference	382	369
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 4.6(2)	
Compliance Manual Reference	383	370
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>
Recommendation	Nil.

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 4.7	
Compliance Manual Reference	384	371
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 4.8(3)	
Compliance Manual Reference	385	372
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 4.9	
Compliance Manual Reference	388	375
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Metering code 5.1(1)	
Compliance Manual Reference	389	376
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Metering code 5.1(2)	
Compliance Manual Reference	390	377
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Metering Code clause 5.4(1)	
Compliance Manual Reference	392	379
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Metering Code clause 5.5(2)	
Compliance Manual Reference	394	381
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.7	
Compliance Manual Reference	397	384
Obligation Description	A network operator must provide replacement energy data to the user for the metering point and the IMO within the timeframes prescribed.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
2011 Compliance Report – Status of Remedial Action	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.	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.8	
Compliance Manual Reference	398	385
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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"> • B2B transactions; • Metering Services web Portal; • Western Power Contact Call Centre communications; and • Direct response to customer enquiries by email or telephone. <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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.9	
Compliance Manual Reference	399	386
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.11	
Compliance Manual Reference	401	388
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
2011 Compliance Report – Status of Remedial Action	Western Power had implemented the remedial action.	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.13	
Compliance Manual Reference	403	390
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.14(3)	
Compliance Manual Reference	404	391
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.15	
Compliance Manual Reference	405	392
Obligation Description	A network operator that provides energy data to a user or the IMO must also provide the date of the meter reading.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.19(5)	
Compliance Manual Reference	413	400
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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"> • Ensure a user is given notice; • Acknowledging receipt of a customer; and • Site or address attributes from the user within the timeframes prescribed. <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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.20(1)	
Compliance Manual Reference	415	402
Obligation Description	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	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.20(2)	
Compliance Manual Reference	416	403
Obligation Description	An Energy Data Verification Request Form must require a Code participant to provide the information prescribed.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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"> • Metering point's NMI and checksum; • The reason for the request; • Information related to interval and accumulation meters such as period in which the request relates; and • Where practicable information as the Code participant is reasonably able to provide to assist Western Power to comply with verification request. <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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.20(4)	
Compliance Manual Reference	417	404
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.21(2)	
Compliance Manual Reference	418	405
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.21(4)	
Compliance Manual Reference	419	406
Obligation Description	A test or audit is to be conducted in accordance with the metrology procedure and the applicable service level agreement.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.21(9)	
Compliance Manual Reference	423	410
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
2011 Compliance Report – Status of Remedial Action	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.	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.21(11)	
Compliance Manual Reference	424	411
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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 involved.</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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.21(12)	
Compliance Manual Reference	425	412
Obligation Description	The original stored error correction data in a meter must not be altered except during accuracy testing and calibration of a metering installation.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Metering code 5.22(3)	
Compliance Manual Reference	428	415
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Metering Code clause 5.22(4)	
Compliance Manual Reference	429	416
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Metering Code clause 5.22(5)	
Compliance Manual Reference	430	417
Obligation Description	Substitution or estimation of energy data is to be required when energy data is missing, unavailable or corrupted, including in the circumstances described.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Metering Code clause 5.22(6)	
Compliance Manual Reference	431	418
Obligation Description	A network operator must review all validation failures before undertaking any substitution.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.23(1)	
Compliance Manual Reference	432	419
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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 is removed or when exception reporting identify 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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.23(3)	
Compliance Manual Reference	433	420
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.24(1)	
Compliance Manual Reference	434	421
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.24(2)	
Compliance Manual Reference	435	422
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.24(3)	
Compliance Manual Reference	436	423
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.24(4)	
Compliance Manual Reference	437	424
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.25	
Compliance Manual Reference	438	425
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.29	
Compliance Manual Reference	440	427
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.30(1)	
Compliance Manual Reference	441	428
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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 cannot rate this compliance manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.34(2)	
Compliance Manual Reference	444	431
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 6.20(4)	
Compliance Manual Reference	447	434
Obligation Description	A network operator must amend any document in accordance with the Authority's final findings.	
Reporting Type	NR	
Compliance Rating	N/R	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 7.2(1)	
Compliance Manual Reference	448	435
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 7.2(2)	
Compliance Manual Reference	449	436
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under		
		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)
Compliance Manual Reference	454, 455, 456, 457 & 458	441, 442, 443, 444 & 445
Obligation Description		
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>
Reporting Type	NR, NR, NR, 2, NR
Compliance Rating	N/R
Audit Observations	<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 this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>
Recommendation	Nil.

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 5(1)	
Compliance Manual Reference	459	446
Obligation Description	A distributor or transmitter must, as far as reasonably practicable, ensure that electricity supply to a customer's electrical installations complies with prescribed standards.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	
Licence Condition	Distribution Licence condition 5.1	

	Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 8	
Compliance Manual Reference	460	447
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 9	
Compliance Manual Reference	461	448
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 10(1)	
Compliance Manual Reference	462	449
Obligation Description	A distributor or transmitter must, so far as reasonably practicable, reduce the effect of any interruption on a customer.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 10(2)	
Compliance Manual Reference	463	450
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 13(3)	
Compliance Manual Reference	466	453
Obligation Description	The average total length of interruptions of supply is to be calculated using the specified method.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 14(8)	
Compliance Manual Reference	467	454
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 15(2)	
Compliance Manual Reference	468	455
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 23(1)	
Compliance Manual Reference	474	461
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 23(2)	
Compliance Manual Reference	475	462
Obligation Description	A distributor or transmitter must keep records of information regarding its compliance with specific requirements for the period specified.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	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)	
Compliance Manual Reference	476 & 477	463 & 464
Obligation Description		
	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.
Reporting Type	2, 2	
Compliance Rating	N/R	
Audit Observations	<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 this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>
2011 Compliance Report – Status of Remedial Action	The remedial actions have been completed.
Recommendation	Nil.

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 25(2)	
Compliance Manual Reference	478	465
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 25(3)	
Compliance Manual Reference	479	466
Obligation Description	A document setting out a distributor's or transmitter's complaint handling process must contain the specified information.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 26	
Compliance Manual Reference	480	467
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 27(3)	
Compliance Manual Reference	482	469
Obligation Description	A distributor or transmitter must give a copy of its report about its performance to the Minister and the Authority within the specified period.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Western Power Transmission Licence Schedule 2 condition 2.1 Western Power Distribution Licence Schedule 2 condition 2.1	
Obligations Under	Electricity Industry Act section 61	
	Electricity Industry Act 65	
Compliance Manual Reference	487	(No old reference as it is new)
Obligation Description	The licensee must submit to the Coordinator a draft extension and expansion policy within the specified timeframe.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	<p>Western Power Transmission Licence Schedule 2 condition 2.2 & 2.3</p> <p>Western Power Distribution Licence Schedule 2 condition 2.2 & 2.3</p>	
Obligations Under	Electricity Industry Act section 62(1)(b)	
	Electricity Industry Act section 64(2)	
	Electricity Industry Act 65(d)	
Compliance Manual Reference	488 & 489	90,91 & 92
Obligation Description		
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.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<p>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.</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>	
Recommendation	Nil.	

Licence Condition	Western Power Transmission Licence Schedule 2 condition 3.1 Western Power Distribution Licence Schedule 2 condition 3.1	
Obligations Under	Electricity Industry Act 11	
Compliance Manual Reference	490	(No old reference as it is new)
Obligation Description	The licensee will operate and maintain a trouble call fault management system.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<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>	
Recommendation	Nil.	

Licence Condition	Western Power Transmission Licence Schedule 2 condition 3.2 Western Power Distribution Licence Schedule 2 condition 3.2	
Obligations Under	Electricity Industry Act 11	
Compliance Manual Reference	491	(No old reference as it is new)
Obligation Description	The licensee must provide prior notification to the Authority if it intends to outsource its trouble call fault management system.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<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>	
Recommendation	Nil.	

Appendix 1 – Audit Evidence – Documents Examined

Compliance Manual Reference	Documents Examined
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 http://www.westernpower.com.au/retailersgenerators/Metering_portal.html
5	Metering Service Centre User Task Manual MBS functional specification DM#2415207

Compliance Manual Reference	Documents Examined
	Web Portal Functional Specification DM#2231181 http://www.westernpower.com.au/retailersgenerators/Metering_portal.html
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

Compliance Manual Reference	Documents Examined
	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

Compliance Manual Reference	Documents Examined
	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

Compliance Manual Reference	Documents Examined
	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



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



Compliance Manual Reference	Documents Examined
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

Compliance Manual Reference	Documents Examined
	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
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

Compliance Manual Reference	Documents Examined
	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
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

Compliance Manual Reference	Documents Examined
	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
242	N/A
330	DM#9511402 DM#8996513
331	DM#9511402 DM#8996513
332	Meter Tender Document Part E DM#3958468 Revenue Meters Technical Specifications DM#8117564
333	Meter Tender Document Part E: DM#3958468 Revenue Meters Technical Specifications DM#8117564
334	Meter Tender Document Part E: DM#3958468 Revenue Meters Technical Specifications DM#8117564
335	Meter 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) - http://www.westernpower.com.au/electricalcontractors/ETIC.html Inspection System Plan DM#1271273 Revenue Protection Policy DM#1298586

Compliance Manual Reference	Documents Examined
	Contractor Connect & Service Connect Schemes http://www.westernpower.com.au/electricalcontractors/Connection_schemes.html
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 - http://www.westernpower.com.au/documents/ WA_Distribution_Connections_Manual.pdf Metering Technical Requirements – High Voltage Transmission & Generation Metering DM#7560244 Technical Rules - http://www.westernpower.com.au/documents/aboutus/Access arrangement/2007/Technical%20Rules/TECHNICALRULES.pdf
339	Model SLA http://www.era.wa.gov.au/electricity/library/Approved%20Model%20Service%20Level%20Agreement.pdf 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	Meter Tender Document Part E DM#3958468 Revenue Meters Technical Specifications DM#8117564 Certification from Supplier of Remote Communication Modules DM#8842444
342	WAER (wiring requirements) – http://www.commerce.wa.gov.au/EnergySafety/PDF/

Compliance Manual Reference	Documents Examined
	<p>Publications/WA_Electrical_Requirements.pdf</p> <p>Inspections processes DM#6664951, DM#6698606 & DM#6647627</p> <p>Revenue Protection processes DM#6718579, DM#7209350 & DM#6685744</p> <p>Contractor Connect Scheme requirements – http://www.westernpower.com.au/documents/networkcontractors/contractor_connect_scheme.pdf</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 - http://www.westernpower.com.au/documents/WA_Distribution_Connections_Manual.pdf</p> <p>Metering Technical Requirements – High Voltage Transmission & Generation Metering DM#7560244</p>
344	<p>Metering Technical Requirements – High Voltage Transmission & Generation Metering – DM#7560244</p> <p>Technical Rules http://www.westernpower.com.au/documents/aboutus/Access arrangement/2007/Technical%20Rules/TECHNICALRULES.pdf</p> <p>MBS Functionality Determination of the Type of Installation.</p> <p>MBS Metering Installation information & Functionality</p>
345	<p>Meter Tender Document Part E DM#3958468</p> <p>Revenue Meters Technical Specifications DM#8117564</p> <p>L & G EM5300 Meter (Code 0214 & 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> <p>IDM Overdue Reading report DM#9038836</p> <p>Enhancement of Current Manual Process IDE Gaps Report DM#9038855</p>

Compliance Manual Reference	Documents Examined
348	<p>Exception report procedure documents process DM#8908261</p> <p>Example of daily report DM#8903225</p> <p>Model SLA</p> <p>Meter Installation Repair, Model SLA - http://www.era.wa.gov.au/electricity/library/Approved%20Model%20Service%20Level%20Agreement.pdf</p>
349	<p>Western Power Fault Contact Number 131351</p> <p>Information Available on Website Home Page</p> <p>http://www.westernpower.com.au/ http://www.westernpower.com.au/customerservice/reportaproblem/index.html</p> <p>Model SLA</p>
350	<p>WADCM - http://www.westernpower.com.au/documents/WA_Distribution_Connections_Manual.pdf</p> <p>Metering Technical Requirements – High Voltage Transmission & Generation Metering DM#7560244</p> <p>Technical Rules - http://www.westernpower.com.au/documents/aboutus/Access arrangement/2007/Technical%20Rules/TECHNICALRULES.pdf</p>
351	<p>WADCM - http://www.westernpower.com.au/documents/WA_Distribution_Connections_Manual.pdf</p> <p>Metering Technical Requirements – High Voltage Transmission & Generation Metering DM#7560244</p> <p>Technical Rules - http://www.westernpower.com.au/documents/aboutus/Access arrangement/2007/Technical%20Rules/TECHNICALRULES.pdf</p>
352	<p>WAER (wiring requirements) – http://www.commerce.wa.gov.au/energysafety/PDF/Publications/WA_Electrical_Requirements.pdf</p> <p>Inspections System Plan – DM#3097251</p> <p>WADCM - http://www.westernpower.com.au/documents/</p>

Compliance Manual Reference	Documents Examined
	WA_Distribution_Connections_Manual.pdf 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 - http://www.westernpower.com.au/electricalcontractors/connectionsandmetering.html#connectionsmanuals.xml#connectionsmanual 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	Meter 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 Metering Technical Requirements – High Voltage Transmission & Generation Metering DM#7560244

Compliance Manual Reference	Documents Examined
	Revenue Meters Technical Specifications DM#8117564 Meter Completion Advice Form DM#8118447
360	Meter Tender Document Part E – DM#3958468 Revenue Meters Technical Specifications DM#8117564 Final Recommendation Report (Amendments to the Metering Code) - http://www.finance.wa.gov.au/cms/uploadedFiles/ Public_Uilities_Office/Energy_Initiatives/final-recommendations-report-august-2011.pdf (2.3.13 recommendation 16.2, page 12) DM#8911051
361	Final Recommendation Report (Amendments to the Metering Code) - http://www.finance.wa.gov.au/cms/uploadedFiles/Public_Uilities_Office/ Energy_Initiatives/final-recommendations-report-august-2011.pdf (2.3.13 recommendation 16.3, page 12) The Notional Wholesale Meter Calculation http://www.finance.wa.gov.au/cms/uploadedFiles/Public_Uilities_Office/ Energy_Initiatives/recommendations-report-april-2011.pdf - 2.3.12 recommendation
362	Final Recommendation Report (Amendments to the Metering Code) - http://www.finance.wa.gov.au/cms/uploadedFiles/Public_Uilities_Office/ Energy_Initiatives/final-recommendations-report-august-2011.pdf (2.3.13 recommendation 16.3, page 12) The Notional Wholesale Meter Calculation http://www.finance.wa.gov.au/cms/uploadedFiles/Public_Uilities_Office/ Energy_Initiatives/recommendations-report-april-2011.pdf - 2.3.12 recommendation
363	Meter Tender Document Part E DM#3958468 Revenue Meters Technical Specifications DM#8117564 WP L_G Meters Data Storage Capacities DM#8904575 Report DM#8935005

Compliance Manual Reference	Documents Examined
	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	Meter 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. Meter Tender Document Part E DM#3958468
369	Meter 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	Meter 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 IT Access to MBS DM#5073668
376	ASG Disaster Recovery Test Master Plan December 2011

Compliance Manual Reference	Documents Examined
	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 Web Portal Functional Specification DM#2231181 CDN DM#9136272

Compliance Manual Reference	Documents Examined
383	MBS - System B2B Transactions, System Auditing 2 MBS functional specification DM#2415207 The Metering Service Centre User Task Manual documents evidence to satisfy this obligation Web Portal Functional Specification DM#2231181 CDN DM#9136272 Metering Technical Investigation Process DM#8426956 Crossed Meter Investigation Procedure DM#7209350
384	DM#9084888 XML Transaction Timeframes DM#9145869 XML Format Guide Build Pack XML Formal Guide Participant Build pack
385	Users Requests for Read-Only Password Process DM#9058075
386	Passwords Authority Level Matrix on Metering Installations DM#8572290 Passwords Authority Level Matrix on Metering Database DM#8600731
387	Passwords Authority Level Matrix on Metering Installations DM#8572290 Passwords Authority Level Matrix on Metering Database DM#8600731
388	HUB Export of Energy Data DM#9084993
389	Draft SLA Synergy Document DM#7478158. Escalated Issues letter from Synergy DM#9060853 B2B WP-Synergy Meeting Minutes of 15 Feb DM#9075596
390	Draft SLA Synergy Document DM#7478158. Escalated Issues letter from Synergy DM#9060853 B2B WP-Synergy Meeting Minutes of 15 Feb DM#9075596
391	IDM Overdue Reading Report DM#9038836

Compliance Manual Reference	Documents Examined
	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 XML Transaction Timeframes DM#9145869 XML Format Guide Build Pack

Compliance Manual Reference	Documents Examined
	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 Western Power guide to the Metering Portal Meter Data Process Build Pack



Compliance Manual Reference	Documents Examined
	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 MV90 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 MBS, MVRs and MV90 Functional Specification MV90 User guide DM#9027727

Compliance Manual Reference	Documents Examined
	MVRS User guide DM#9093828 MBS Functional Specification DM#2415207
422	Workflow Procedure for Meter Test DM#8575903 Model SLA Work Instructions DM#8883030 Meter Performance Testing Process DM#8572371 Meter Performance Test Request Form DM#1247047 Updated DM#8883030
423	Workflow Procedure for Meter Test DM#8575903 Model SLA Updated DM#8883030
424	Project Plan DM#3292538 Notification of Affected Parties for Non-Compliant Metering Installation DM#8984816 Notification/ Letter DM#8763342 Three-phase non-compliant meters DM#5541075 2010/ 2011 Compliance Testing Program DM#8939247
425	Our current meters do not have stored error correction data capabilities; Meter Tender Document Part E DM#3958468 Revenue Meters Technical Specifications DM#8117564
426	IDM Overdue Reading Report DM#9038836 IDE Gaps report DM#9038855 Procedures in relation to Appendix 2 between MV90 and MBS Validations of Interval Data DM#9146616. WR3738 (2) ETA July 2012 Metering IT Program Update DM#8858927
427	Interval Data Validation Process DM#9146616



Compliance Manual Reference	Documents Examined
	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 Web Portal Functional Specification DM#2231181 Substitution Examples DM#9157286

Compliance Manual Reference	Documents Examined
437	MBS Functional Specifications DM#2415207 Web Portal Functional Specification DM#2231181 Substitution Examples DM#9157286
438	Interval Substitution Process DM#8447124 Basic MBS Functional Specifications DM#2249451
440	Final Recommendation Report (Amendments to the Metering Code) - http://www.energy.wa.gov.au/cproot/2789/2/ OOE%20Metering%20Code%20Final%20Reportv2.pdf - 2.5.7 Email Correspondence to Horizon Power DM#8959239
441	Final Recommendation Report (Amendments to the Metering Code) - http://www.energy.wa.gov.au/cproot/2789/2/ OOE%20Metering%20Code%20Final%20Reportv2.pdf - 2.5.7 Email Correspondence to Horizon Power DM#8959239
442	Final Recommendation Report (Amendments to the Metering Code) - http://www.energy.wa.gov.au/cproot/2789/2/ OOE%20Metering%20Code%20Final%20Reportv2.pdf - 2.5.7 Email Correspondence to Horizon Power DM#8959239
443	Final Recommendation Report (Amendments to the Metering Code) - http://www.energy.wa.gov.au/cproot/2789/2/ OOE%20Metering%20Code%20Final%20Reportv2.pdf - 2.5.7 Email Correspondence to Horizon Power DM#8959239
444	Final Recommendation Report (Amendments to the Metering Code) - http://www.energy.wa.gov.au/cproot/2789/2/ OOE%20Metering%20Code%20Final%20Reportv2.pdf - 2.5.7 Email Correspondence to Horizon Power DM#8959239
445	Communication Rules Build Pack, Schemes, Guidelines, B2B Processes and Web Portal User Access &

Compliance Manual Reference	Documents Examined
	<p>Guides - http://www.westernpower.com.au/retailersgenerators/Build_Pack.html</p> <p>Metering Management Plan http://www.erawa.com.au/electricity/library/Approved%20Metering%20Management%20Plan.pdf</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 http://www.westernpower.com.au/documents/</p> <p>Network contractors/service_connect_guidelines.pdf</p> <p>Auditing process Service Connect Scheme Guidelines http://www.westernpower.com.au/documents/networkcontractors/</p> <p>service_connect_guidelines.pdf</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 http://www.westernpower.com.au/</p> <p>Specific Information for Code Participants Regarding Contacting and Sending Information to Western Power http://www.westernpower.com.au/retailersgenerators/index.html</p>
449	<p>Standing Data Notification to retailers (MBS Functionality) DM#2415207</p> <p>The Metering Service Centre User Task Manual, http://www.westernpower.com.au/documents/</p> <p>Retailers generators/buildPack/USERTASKMANUAL.pdf</p> <p>Customer Charter - http://www.westernpower.com.au/documents/</p> <p>Customer Charter/customerCharterSummary.pdf</p> <p>5/ Website: Contact Us -</p>



Compliance Manual Reference	Documents Examined
	http://www.westernpower.com.au/customerservice/contactus/index.html
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 Fault Process DM#4471544 Emergency Response Generators Work Instructions DM#2123938



Compliance Manual Reference	Documents Examined
	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
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

Compliance Manual Reference	Documents Examined
	Request for Quotation 2012 audit 2012 Contract order request 2012 Independent auditors quote 2012 Audit Plan
481	DM#7340094 DM#7478867
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;
Outage Management COGNOS 8 report Extract
AS/ISO 10002/2006
Streetlight Job Service Cards
Monthly Streetlight KPI Summaries

Documents Examined
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

Documents Examined
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

Documents Examined
OAG Audit Report and Management Letter
DR test results June and December 2011

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

Positions of Western Power Personnel	Branch
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

Positions of Western Power Personnel	Branch
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

Positions of Western Power Personnel	Branch
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