McGill Engineering Services Pty Ltd



Engineering, Adjudication & Arbitration Services ABN 45 106 691 169

WALKAWAY WIND POWER PTY LTD ELECTRICITY GENERATION LICENCE EGL 2 ASSET MANAGEMENT SYSTEM REVIEW

Prepared By Kevan McGill 30 April 2013

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McGill Engineering Services Pty Ltd



Engineering, Adjudication & Arbitration Services ABN 45 106 691 169

Neil Raffan Risk & Sustainability Manager – Australia Infigen Energy Level 22, 56 Pitt Street, Sydney NSW 2000

Dear Mr Raffan

Asset Management System Review Electricity Licence

The fieldwork on the asset management system review of Generation Licence EGL 2 for the review period (1 February 2010 to 31 January 2013) is complete and I am pleased to submit the report to you.

In my opinion, the Licensee maintained, in all material aspects, effective control procedures and an effective asset management system in relation to the Generation Licence EGL 2 for the review period on the relevant clauses referred to within the scope section of this report.

There are no items to address.

Yours sincerely

Kevan McGill Director

Date 30 April 2013

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Executive Summary

Walkaway Wind Power Pty Ltd (Walkaway) holds Generation Licence EGL 2 issued by the Economic Regulation Authority under the Electricity Industry Act 2004 (WA). The Electricity Industry Act 2004 (WA) requires the holder of Generation Licence to undertake a Review, and provide the Authority a report, by an independent expert on the effectiveness of their Asset Management System. This Review of the Walkaway Asset Management System was conducted in accordance with the guidelines issued by the Economic Regulation Authority (*Authority*) for the review period (1 February 2010 to 31 January 2013) to assess the Licensee's asset management systems.

Following development of an Asset Management System Review Plan and its approval by the *Authority*, Walkaway appointed McGill Engineering Services to undertake the Review.

OVERALL CONCLUSION

In my opinion, the Licensee maintained, in all material aspects, an effective asset management system in relation to the Generation Licence EGL 2 for the review period based on the relevant clauses referred to within the asset management review objectives (Page 7) of this report.

There are no items to address.

LICENCE

The Licensee is a subsidiary of the Infigen Energy Group (Infigen) and does not have the role to carry out the strategic asset management roles or any strategic decisions on customers. Infigen Energy carries out these functions.

AMS REVIEW – METHODOLOGY AND SUMMARY

The overall effectiveness rating for an asset management process is based on a combination of the process and policy adequacy rating and the performance rating. The rating systems are given below followed by a summary table of the Asset Management Effectiveness.

RATING SYSTEM

The definition tables for process and policy adequacy rating and the performance rating are provided below.

Asset management process and policy definition adequacy ratings

Rating	Description	Criteria
A	Adequately defined	 Processes and policies are documented. Processes and policies adequately document the required performance of the assets. Processes and policies are subject to regular reviews, and

		updated where necessary
		 The asset management information system(s) are adequate in relation to the assets that are being managed.
в	Requires some improvement	 Process and policy documentation requires improvement. Processes and policies do not adequately document the required performance of the assets. Reviews of processes and policies are not conducted regularly enough. The asset management information system(s) require minor improvements (taking into consideration the assets that are being managed).
с	Requires significant improvement	 Process and policy documentation is incomplete or requires significant improvement. Processes and policies do not document the required performance of the assets. Processes and policies are significantly out of date. The asset management information system(s) require significant improvements (taking into consideration the assets that are being managed).
D	Inadequate	 Processes and policies are not documented. The asset management information system(s) is not fit for purpose (taking into consideration the assets that are being managed).

Asset management review effectiveness rating scale

Rating	Description	Criteria
1	Performing effectively	 The performance of the process meets or exceeds the required levels of performance. Process effectiveness is regularly assessed and corrective action taken where necessary.
2	Opportunity for improvement	 The performance of the process requires some improvement to meet the required level. Process effectiveness reviews are not performed regularly enough. Process improvement opportunities are not actioned.
3	Corrective action required	 The performance of the process requires significant improvement to meet the required level. Process effectiveness reviews are performed irregularly, or not at all. Process improvement opportunities are not actioned.
4	Serious action required	• Process is not performed, or the performance is so poor that the process is considered to be ineffective.

ASSET MANAGEMENT EFFECTIVENESS SUMMARY

A summary of the auditor's assessment of both the process and policy definition rating and the performance rating for each key process in the Licensee's asset management system using the scales described below.

Asset management effectiveness summary

ASSET MANAGEMENT SYSTEM	Asset management process and policy definition adequacy rating	Asset management performance rating
1. Asset planning	А	1
2. Asset creation/ acquisition	А	1
3. Asset disposal	А	NR^1
4. Environmental analysis	А	1
5. Asset operations	А	1
6. Asset maintenance	А	1
7. Asset Management Information System	А	1
8. Risk management	А	1
9. Contingency planning	А	1
10. Financial planning	А	1
11. Capital expenditure planning	А	1
12. Review of AMS	A	1

A Not Rated (NR) score is given when there was insufficient evidence relevant within the audit period to make a determination.

It is not implied that any assessment at "A" or "1" means that there is not scope for continuous improvement, rather that no recommendations for improvement have been recommended in this report.

RECOMMENDATIONS

Asset Maintenance

An opportunity for improvement was identified. While there is fire detection system in the switch room, an early warning system such as Vesda could improve vulnerability against failure of this common mode item.

Risk Management

An opportunity for improvement was identified. Install vented rack for LPG storage.

POST REVIEW IMPLEMENTATION PLAN

The Licensee will provide a post review implementation plan.

¹ NR – Not Rated

Asset Management System Review

ASSET MANAGEMENT SYSTEM REVIEW OBJECTIVES

Under the *Electricity Industry Act 2004* (the Act) section 14, the holder of a Generation Licence must develop an Asset Management Plan and maintain an asset management system to manage the assets accordingly for delivery of a reliable service to its customers. The Act requires a review of the asset management system every two years (or other time approved by the *Authority*).

This report is an impartial review of the Licensee's asset management effectiveness under the Audit Guidelines: Electricity, Gas and Water Licence published by the ERA.

The review was conducted in March / April 2013 and examined the asset management processes used by the Licensee in delivering the services to its customers. These services include lifecycle processes for:

- Asset planning;
- Asset creation/acquisition;
- Asset disposal;
- Environmental analysis;
- Asset operations;
- Asset maintenance;
- Asset management information system (AMIS);
- Risk management;
- Contingency planning;
- Financial planning;
- Capital expenditure planning; and
- Review of the asset management system.

As well as the processes, the asset management supporting systems were tested as to their use and effectiveness. Data used by the Licensee was also examined with respect to its effectiveness for asset management and the delivery of outcomes.

The recommendations identified in the previous review were examined and the outcomes included in this report.

Tests were undertaken through interviews and investigation of the processes to assess whether they were being performed as documented.

The Licensee appointed McGill Engineering Services Pty Ltd to conduct the review of its Generation Licence with approval from the *Authority*. A preliminary assessment was conducted with the Licensee's management to determine the inherent risk and the state of control for each compliance element of the Licence obligation. McGill Engineering Services Pty Ltd then prioritised the audit coverage based on the risk profile of the

Licensee with an emphasis on providing greater focus and depth of testing for areas of higher risk to provide reasonable assurance that the Licensee had complied with the standards, outputs and outcomes under the Licence obligations.

STATEMENT OF INDEPENDENCE

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

I have not undertaken and do not contemplate undertaking any other work with the Licensee.

There are no independence threats due to:

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

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

- o no work
 - has been undertaken by the auditor, or a member of the audit/review team, for the licensee within the previous 36 months; and
 - is currently being undertaking for the licensee; and
 - is currently proposed to be submitted by the auditor as an offer to undertake work for the licensee within the next 6 months; and
- familiarity there is no close family relationship with a licensee, its directors, officers or employees, and
- the auditor is not nor is perceived to be too sympathetic to the licensee's interests.

REVIEW (AUDIT) PERIOD

The review (audit) period is 1 February 2010 to 31 January 2013. The previous review period was 1 February 2008 to 31 January 2010.

SCOPE LIMITATION

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

PREVIOUS ACTIONS

There are previous actions to review from the Audit Report for the period 1st February 2008 to 31st January 2010, as shown below:

Ref	Description	Compliance	R	Corrective Action	Post Review Implementation Plan	Actions taken	Further recommendations
2.5	Commissioning tests are documented and completed	The auditor examined the documentation pertaining to the failure of a significant asset component (gear box). The Component Inspection Report on Turbine 21346 identified a failed asset that was subsequently replaced. We were not able to sight the decommissioning report or the engineer's report that described the failure mode of the asset. Neither were we able to sight the commissioning report of the replacement blade. After further investigations the location of the failed unit was identified, but it was not easily assessed. After discussions with the site supervisor, it was established that most equipment did not go through a commissioning phase as failed equipment is generally replaced. In addition as the site is relatively new (circ 5 years) there have been few replacements. We were able to sight work instructions that identified equipment that had been replaced, but this did not include a commissioning component. With regards to commissioning test, the auditor's opinion is that the design of this wind farm permits a replacement strategy without an established commissioning phase. This is driven by the commonality of components to all turbines and number of differing components being far lower than a coal fuelled power station. The auditor also recognises that replacement equipment is tested prior to being on site by the manufacturers. However we do note that we were not able to clearly identify the location of failed assets. That is the smaller items (circuit boards, controllers) were not clearly marked as unfit for service. This does leave a potential risk that a failed components could be inadvertently re- used.	B2	Improve documentation on commissioning of new or refurbished equipment. Review the approach to maintenance documentation and identification so to prevent failed equipment being returned to service.	Details of equipment that has failed and is removed from service shall be entered into the service report on SAP along with the relevant equipment serial number and references to other reports filed to facilitate traceability. Details of new or replacement equipment that is installed shall be entered into the service report on SAP along with the relevant equipment serial number and references to other reports filed to facilitate traceability.	Refurbished equipment is given new ID in SAP to distinguish from old and faulty items.	None - Action completed
5.6	Staff receive training commensurate with their responsibilities	We examined the training records of the staff on site and found that the documentation was lacking. Initially a high level review was undertaken that examined the first aid training and vehicle training. We found that according to the records kept on site we were not able to determine who had in date certification or who required refresher courses. The auditor would like to highlight that we believe that the training has been	C3	Review the approach to how assurance is attained that site staff and visiting site staff have the appropriate training and certification. Review site induction process to ensure that all	The Training Matrix shall be maintained to identify all current competencies and required competencies. With reference to the Training Matrix a gap analysis shall be	Training matrix maintained and updated. Induction form reviewed. Details of certificates filed. One first aid	None - Action completed

		 undertaken and this pertains to a record keeping issue. Specific details are given below. First aid training We examined the list of authorised first aider on site, we found that according to the documentation certification had expired. We were not able to sight copies of the certificate nor were we able to confirm that the training had been undertaken, Forklift truck certification - We examined the list of personnel who were listed as having a licence to drive a forklift truck. As above we were not able to sight copies of licences for fork lift truck drivers; however some of the drivers had their licence on them. Visiting technicians - Vestas utilise technicians that are based on other wind farms or other countries. A site induction is undertaken and a requirement is that copies of licences are obtained. We found that an attending technician had not supplied copies of the forklift truck licence and did not have the licence on them. We have no reason to believe that the person is not authorised, however we do believe that the inability to note who has a licence to an unacceptable risk. We understand that Vestas are in the process of implementing a central system for all documentation and licensing, but the site supervisors do not have access to all visiting technicians, therefore are unable to verify that that appropriate training as been undertaken and is in date. 		visiting site staff have the appropriate qualifications before commencement of work.	conducted to determine training requirements. At induction new personnel including visiting technicians and subcontractors shall be requested to provide a copy of certificates of competency prior to work start and these shall be filed on site. The Induction form shall be revised to incorporate the requirement to identify and provide evidence of competencies.	certificate was old but the person was on restricted duties not requiring first aid qualifications. The form has been amended.	
7.5	Physical security access controls appear adequate	Site security is adequate for a remote location with the main office locked over night and the compound secured. We did note two issues: 1) Site vehicle was stationary with the keys in the ignition during the day. The is the possibility that an unauthorised person can access the vehicle 2) Fuel kept outside the compound in a container that was not locked. A new chemical shed has been constructed however during the audit the chemicals were stored outside the compound	C3	Review site security with regards to vehicle security and equipment outside the secure compound.	The Induction form shall be revised to incorporate security requirements. The keys to all vehicles stored outside the compound shall be placed on a key board in a secure place in the site office. All hazardous substances shall be stored in the new chemical shed hat has been constructed in the site compound.	Form modified. Policy is to remove keys from vehicles. Action communicated at tool box meeting. Hazardous substances stored in Chemical store. Installed LPG gas to be in vented rack (by regulation cannot be inside chemical store).	None - Actions completed Note that this item from the last review is out of context of an AM IT system security requirements. New actions are under Risk management.

CONTACTS

The key contacts were:

- Licensee:
 - o Carsten Johansen, Site & Technical Manager Alinta Wind Farm
 - o Gary Mackay, Vestas Fleet Manager
 - o Neil Raffan, Risk & Sustainability Manager Australia
- Vestas Australian Wind Technology Pty Ltd (key service provider):
 - o Anthony Russell, Site Supervisor
 - o Matt Dickie, Area Service Manager
- McGill Engineering Services Pty Ltd:
 - o Kevan McGill, John McLoughlin

The review was conducted during March / April 2013. Kevan McGill and John McLoughlin took approximately 60 (50/10) hours on the review.

LICENSED SYSTEMS

Generation

Walkaway Wind Power Pty Ltd has a wind farm at Walkaway (near Geraldton). There are 54 wind turbines and associated infrastructure, providing a total electricity generation capacity of 89.1MW.

REVIEW EVIDENCE

The following was considered in the review.

- Generation Licence
- Licence fee invoice /receipts
- ERA annual returns
- Infigen Australian Business Strategy April 2012 (Asset Mgt Extracts)
- Asset Policy
- Alinta/Walkaway FY13 Asset Management Plan
- Plant Risk Register
- RCA Reports
- Vestas Monthly Reports November & December 2012
- Infigen Monthly Performance Reports November & December 2012
- WWP statutory accounts
- WWP 5 Year financial plan
- Walkaway land lease payments
- Safety Reliability Maintenance & Technical Management Plan Alinta Wind farm (SRMTMP)
- Outage information
- Risk planning information
- Directors approval of Annual reports notes
- Asset management information
- Financial data sighted

OVERALL CONCLUSION

In my opinion, the Licensee maintained, in all material aspects, effective control procedures and an effective asset management system in relation to the Generation Licence EGL 2 for the review period based on the relevant clauses referred to within the asset management review objectives (Page 7) of this report.

FINDINGS

The conclusions of each of the elements of the licence are summarised in the following tables.

ASSET MANAGEMENT SYSTEM REVIEW RESULTS AND RECOMMENDATIONS

Asset Planning	Process/Policy rating A	Effectiveness rating 1						
1. Asset planning	1. Asset planning							
	cused on meeting customer need the right service at the right price							
Observations								
matters and accordingly the full	nd its currency the parent/owning company and scope of asset management is n ike the decisions if and when to i	not able to be carried out						
There is an Asset Management licensed plant.	Plan (AMP) that covers the asse	et management for the						
	s a renewable energy business v his plant. Asset Planning is core							
The organisational arrangement	Allocation of responsibilities / statutory obligations The organisational arrangements allocate responsibilities. There is documentation (AMP) requiring compliance with statutory obligations. Staff responsibilities are assigned in local plan and policy documents.							
 Evaluation Criteria summary Lic Planning process and object integrated with business plan 	ives reflect the needs of all stake	holders and is						
the parent company	not carry out these functions and . For the operating/maintaining full IP meets the requirement.							
Service levels are defined								
Response: The AMP defines service levels. The owners require service level to be delivered. The Power purchase agreement also specifies service levels e.g. Minimum Supply Obligations (i.e. Minimum MWh that need to be generated in certain time periods).								
	and management) are considere							
Response: The Licensee does not carry out these and the parent will either decide to make an asset investment or not. Non asset options would be a decision that asset option is not pursued.								
 Lifecycle costs of owning and operating assets are assessed 								
Response: The AMP meets this criterion as lifecycle costs of owning and operating assets are assessed.								
Funding options are evaluate								

Response: The Licensee cannot carry out evaluation of funding options for development outside this plant and if it is carried out it will be by the parent company.

- Costs are justified and cost drivers identified
- Response: Costs of the plant are monitored and costs are justified and cost drivers identified for the licensed plant.
- Likelihood and consequences of asset failure are predicted
- Response: The AMP meets this criterion as there are risk assessments of asset failure and consequences.
- Plans are regularly reviewed and updated
- Response: The review of the broader aspects cannot be undertaken by the Licensee but the AMP for this asset can be reviewed.

Evaluation Criteria summary – Infigen Energy

- Planning process and objectives reflect the needs of all stakeholders and is integrated with business planning
- Response: Asset planning is a core business function. The needs of stakeholders are part of the process.
- Service levels are defined
- Response: The AMP defines service levels. The power purchase agreement also specifies service levels.
- Non-asset options (e.g. demand management) are considered
- Response: As an energy business, non asset solutions are a rejection of an acquisition or development decision.
- Lifecycle costs of owning and operating assets are assessed
- Response: The process meets this criterion as lifecycle costs of owning and operating assets are assessed.
- Funding options are evaluated
- Response: The policy has a compressive evaluation of funding options.
- Costs are justified and cost drivers identified
- Response: Costs of the plant are monitored and costs are justified and cost drivers identified.
- Likelihood and consequences of asset failure are predicted
- Response: There are risk assessments of asset failure and consequences.

	•	Plans are	regularly	reviewed	and on	a 12 i	months c	ycle.
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Asset management process and policy definition							
Process	V	Policy	Q				
• Evidence: interviewed Site & Technical Manager, Vestas Fleet Manager, Risk & Sustainability Manager. Inspected site. Documents: Include Asset Management Plan (AMP), Financial statements, Job safety and environmental analysis procedure (in SRMTMP), Risk policy and specific risk management procedures. Alinta/Walkaway FY13 Asset Management Plan long term maintenance agreement, Operations and maintenance manual contents, Infigen Australian Business Strategy.							
Asset management performance							
Process ☑ Documentation ☑ Availability ☑ Use ☑							
Issues							

The Licensee conducts the shorter timeframe asset management elements, (operations and maintenance by contract to the equipment manufacturer – Vestas and the balance of plant to Tenix (a well established contractor) and longer term issues for the licensed assets, such as the competitive environment and whole of life of the plant issues, are undertaken by the parent body. The Licensee does not carry out these functions as it is not within their role to undertake this work. There has been broad asset planning activity by the owner in the review period with plant installed in South Australia and NSW.

The owner would be rated A/1.

For the roles within the capacity of the Licensee to undertake the rating would be A/1 but this cannot reflect the broader roles, so a Not rated/ Not Rated rating is appropriate. It is worth noting that whilst a rating has been provided above, this function is not undertaken by the Licensee i.e. Walkaway Wind Power Pty Ltd but by Infigen Energy.

Recommendation

None - as the Licensee does not undertake the strategic roles.

Asset Creation	Process/Policy rating A	Effectiveness rating 1					
2 Asset creation and acquisitior)	1					
Asset creation/acquisition means the provision or improvement of an asset where the outlay can be expected to provide benefits beyond the year of outlay.							
Observations							
Procurement of major electricity time. There has been no asset of Licensee. The Licensee is a sub resources and accordingly the L	Policies and procedures for asset creation / sample creation activities Procurement of major electricity plant is a very significant exercise taking considerable time. There has been no asset creation of the generation plant in the audit period by the Licensee. The Licensee is a subsidiary of the parent/owning company and has no resources and accordingly the Licensee has no capacity to undertake asset creation functions. There has not been any major capital development since commissioning.						
The owner, Infigen, has made a NSW.	sset creations in the audit period	I in South Australia and					
Meeting statutory obligations There are documents (AMP) red obligations.	quiring employees and contracto	rs to meet statutory					
assessment of non-asset sol Response: The Licensee canno	Indertaken for new assets, includ lutions of carry out these functions as the creation functions to be undertake	e Licensee's role does					
 Response: The Licensee cannon not allow the asset of the AMP includes life cycle cost Projects reflect sound engine Response: There will be no asset Commissioning tests are door Response: This will be the outco asset and when the set of the cost of the co	of carry out these functions as the creation functions to be undertake ting of this asset. eering and business decisions et creation by the Licensee.	en. any deciding to create an tract is put in place –					
completed and docu checklists.(9.4 of SF <i>Comment from last</i> or refurbished equip documentation and returned to service. than commissioning Action: Details of eq be entered into the s serial number and re Details of new or rep into the service repo	Imented with acceptance testing RMTMP plan) audit: Improve documentation on ment. Review the approach to m identification so to prevent failed Note: this item is actually an issu	and handover a commissioning of new baintenance equipment being ue for maintenance rather moved from service shall the relevant equipment facilitate traceability. alled shall be entered at equipment serial					

Refurbished equipment is given new ID in SAP to distinguish from old and faulty items.

 Ongoing legal/environmental/safety obligations of the asset owner are assigned and understood

Response: These responsibilities are assigned in the AMP.

Evaluation Criteria summary –Infigen Energy

- Full project evaluations are undertaken for new assets, including comparative assessment of non-asset solutions
- Response: The acquisition policy has full project assessments with testing of worst case downside case. Non asset solutions will result in not proceeding with the project.
- Evaluations include all life-cycle costs

Response: The project evaluations include life cycle costing.

- Projects reflect sound engineering and business decisions
- Response: There is a comprehensive project evaluation of engineering and business decisions.
- Commissioning tests are documented and completed
- Response: The commissioning of this plant was completed and documented with acceptance testing and handover checklists.
- Ongoing legal/environmental/safety obligations of the asset owner are assigned and understood

Response: These responsibilities are assigned and understood.

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Asset management process and policy definition

Process	\checkmark	Policy
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Evidence interviewed Site & Technical Manager, Vestas Fleet Manager, Risk & Sustainability Manager. Inspected site. Documents: Include Asset Management Plan (AMP), Financial statements, Job safety and environmental analysis procedure (in SRMTMP), Risk policy and specific risk management procedures. Walkaway Australia asset acquisition policy, long term maintenance agreement, Operations and maintenance manual contents, Infigen Australian Business Strategy.

Asset management performance

Process	V	Documentation	Ŋ	Availability	V	Use	\square

Issues

The owner Infigen Energy carries out the long term and strategic elements of an asset management system. The Licensee does not carry out these functions. There has been asset creation activity by the owner in the review period in South Australia and NSW.

The owner would be rated A/1 but as the Licensee does not carry out all the roles defined in the Audit Guidelines the ratings are Not Rated/ Not Rated.

Recommendation

None - as the Licensee does not undertake the asset creation roles.

Asset Disposal	Process/Policy rating A	Effectiveness rating Not Rated						
3. Asset disposal								
Effective asset disposal frameworks incorporate consideration of alternatives for the disposal of surplus, obsolete, under-performing or unserviceable assets. Alternatives are evaluated in cost-benefit terms.								
Observations								
Policies and procedures for ass There is no disposal action in th The responsibility for asset disp Licensee.	e audit period to form an opinio	n about effectiveness.						
The owner (Infigen Energy) has Australian activity in the review		ations/processes but no						
Meeting statutory obligations There are documented obligations statutory obligations.	ons requiring employees and co	ntractors to comply with						
systematic review process	forming assets are identified as							
Response: The Licensee is response: monthly performance has a focus on performance has a focus on performance for the second sec	e reporting. The operation and i	•						
The reasons for under-utilisa corrective action or disposal	tion or poor performance are cri undertaken	itically examined and						
Response: The operation and mDisposal alternatives are evaluated and the second sec	aintenance plan has a focus on	performance.						
Response: There is no likelihoo								
There is a replacement strate Response: The plan (AMP) mee not plant replaceme	ets this criterion and allow for ec	uipment replacement but						
The owner (Infigen Energy) has review period.	disposal and remediation proce	esses but no activity in the						
Evaluation Criteria summary - In	• •							
 Under-utilised and under-per systematic review process 	forming assets are identified as	part of a regular						
Response: There are regular sy determines if the as	vstematic review processes of p set is being used enough to war							
 The reasons for under-utilisa corrective action or disposal 	tion or poor performance are cri undertaken	itically examined and						
Response: The performance ass								

		turbine manufac			ce c	ontract.	
 Disposal alternatives are evaluated 							
Response:	Response: The assets have defined contract life and will not be disposed within that period.						
There is	s a r	eplacement strate	egy f	or assets			
Response							sposed within that
	•	riod. Opportunities		•		•	-
		intained for contra				•	•
					•		ctures to be removed
							a depth of 300mm. vners. Walkaway is
			-				ioning the site at the
		d of the leases in					
							-
Asset ma	nage	ement process a	nd p	olicy definition			
Process	V	Policy	V				
Evidence	: inte	erviewed Site & Te	echn	ical Manager, Ve	stas	Fleet Man	ager, Risk &
Sustainab	ility I	Manager. Inspecte	ed si	te. Documents: In	clud	le Asset M	anagement Plan
• • •		ial statements, Jo		-		•	• •
					•		alkaway Australia
-				-		it, Operatio	ons and maintenance
manual co	nier	nts, Infigen Austra	llall	Dusiness Strategy	/.		
Asset ma	nag	ement performar	nce				
Process	V	Documentation	V	Availability	V	Use	
Issues							
The owne	r Infi	gen Energy carrie	s ou	it the long term ar	nd st	rategic ele	ments of an asset
				-		-	
no asset d	management system. The Licensee does not carry out these functions. There has been no asset disposal activity in the review period.						
The owne	r wo	uld be rated A/No	t Ra	ted but as the Lice	anco	o is unable	a to carry out all the
	The owner would be rated A/Not Rated but as the Licensee is unable to carry out all the roles defined in the Audit Guidelines the ratings are Not Rated/ Not Rated.						
Recomme	enda	ntion					
None - as	the	Licensee does no	t uno	dertake the asset	disp	osal roles.	

	A	1							
4. Environmental analysis									
Environmental analysis examines the asset system environment and assesses all external factors affecting the asset system.									
Observations									
Standards / monitoring / reporting / breaches The Licensee is a subsidiary of the parent/owning company and has no resources and accordingly the Licensee has no capacity to undertake the strategic environmental assessment roles. The Licensee has environmental management policies. Reporting and monitoring tools are appropriate.									
The Licensee has planning app	roval from the City of Greater Ge	eraldton.							
	sponsibility for market surveilland IP addresses the economic, tech m the perspective of this asset.								
The principal external opportunity is carbon pricing and raising the cost of competitors. Threats are extreme weather – lightning (affects blades as internal lightning protection is not totally effective) and high wind fluctuations (affects gear boxes). There are major spares holdings for critical plant failures such as a spare generator in Perth, spare gear boxes in Geraldton and 3 spare blades on site. Critical minor spares are held.									
The input of the external enviror his plant but not in relation to st	nment to asset planning is carrie trategic environmental issues.	d out by the Licensee for							
There have been no environme	ntal issues.								
Evaluation Criteria summary - L	icensee								
 Opportunities and threats in the system environment are assessed Response: Opportunities/threats for this plant are part of the arrangement with the owning company (as per the AMP). The Licensee does not carry out the external functions as the Licensee's business model and resources are those consistent with operating and maintaining wind turbine generation plant and they do not have the capacity to undertake external environmental functions outside those affecting this plant. 									
Performance standards (ava response, etc) are measured	ilability of service, capacity, cont d and achieved	inuity, emergency							
Response: The arrangement wi defined and measur	ith the owner meets this criterion red and achieved.	with service standards							
Compliance with statutory ar									
policy documents re obligations. There h	ith the owner meets this criterion equire compliance with statutory a ave been no environmental brea	and regulatory							
 Achievement of customer s Response: The plant has achieved 	ervice levels ved the required performance tail	rgets.							

Evaluation Criteria summary - Infigen Energy

- Opportunities and threats in the system environment are assessed
- Response: Opportunities and threats assessment is part of the acquisition policy.
- Performance standards (availability of service, capacity, continuity, emergency response, etc) are measured and achieved

Response: The service standards are defined and measured and achieved.

- Compliance with statutory and regulatory requirements
- Response: The policy documents require compliance with statutory and regulatory obligations.
- Achievement of customer service levels

Response: The plant has achieved the required performance targets.

 $\mathbf{\nabla}$

Asset management process and policy definition

☑ Policy

Evidence: interviewed Site & Technical Manager, Vestas Fleet Manager, Risk & Sustainability Manager. Inspected site. Documents: Include Asset Management Plan (AMP), Financial statements, Job safety and environmental analysis procedure (in SRMTMP), Risk policy and specific risk management procedures. Walkaway Australia asset acquisition policy, long term maintenance agreement, Operations and maintenance manual contents, Infigen Australian Business Strategy.

Asset management performance

Process 🗹 Docu	mentation	Availability [N	Use	\checkmark

Issues

Process

There are no environmental breaches reported.

For the roles that are within the capacity of the Licensee the rating would be A/1 but this cannot reflect the broader roles, so a Not rated/ Not Rated rating is appropriate. It is worth noting that whilst a rating has provided above, this function is not undertaken by the Licensee i.e. Walkaway Wind Power Pty Ltd but by Infigen Energy.

Recommendation

None

Asset operations	Process/Policy rating A	Effectiveness rating
5. Asset operations		
Operations functions relate levels and costs.	e to the day-to-day running of asse	ets and directly affect service
Observations		
The generation assets are standards. The operational site, performing local switc maintenance on the turbing constrained by Western Po	or asset operation / sample activitie 54 wind turbines. The plant is cor I policies are well documented T hing in order to conduct schedule es and balance of plant. The plant ower from their operations centre. registered Market Participant, Ali	nstructed to appropriate The Licensee operates the d and unscheduled t can be remotely The plant is bid into the
The asset register is part or spreadsheet for balance of	of the Licensee's maintenance IT s f plant assets.	system. Walkaway has a
Energy as described above	<i>ptions</i> he Licensee in combination with W e. The resourcing is appropriate a hg procedures and practices.	
Evaluation Criteria summa	ry	
 Operational policies and required 	d procedures are documented and	d linked to service levels
Response: The arrangeme defined. Opera	ent with the owner meets this crite tional procedures are documented	d.
Response: The arrangeme	pplied to prioritise operations tasks ent with the owner meets this crite predominantly) based on risk asse	erion with operations
	d in an Asset Register including as In assessment of assets' physical/	
Response: Asset registers system.	are contained with the appropriat	te information in the IT
-	neasured and monitored	
Response: Operational com measured and	sts – equipment, fuel, staffing, cor monitored.	ntracts and materials are
Staff receive training co	mmensurate with their responsibi	ilities
Item from last r site staff and vi Review site ind appropriate qua Action: The Tra competencies a	aining commensurate with their respective: Review the approach to he review: Review the approach to he sisting site staff have the appropria duction process to ensure that all alifications before commencemen aining Matrix shall be maintained t and required competencies. to the Training Matrix a gap analy	ow assurance is attained that ate training and certification. visiting site staff have the t of work. to identify all current

determine training requirements. At induction new personnel including visiting technicians and subcontractors shall be requested to provide a copy of certificates of competency prior to work start and these shall be filed on site. The Induction form shall be revised to incorporate the requirement to identify and provide evidence of competencies. One first aid certificate was old but the person was on restricted duties not requiring first aid. The form has been amended.				
 Performance measures such as unplanned outages 				
Response: Outage log including forced outages has been sighted.				
Asset management process and policy definition				
Process 🗹 Policy 🗹 Documentation 🗹				
Evidence: interviewed Site & Technical Manager, Vestas Fleet Manager, Risk & Sustainability Manager. Inspected site. Documents: Include Asset Management Plan (AMP), Financial statements, Job safety and environmental analysis procedure (in SRMTMP), Risk policy and specific risk management procedures. Walkaway Australia asset acquisition policy, long term maintenance agreement, Operations and maintenance manual contents, Infigen Australian Business Strategy.				
Asset management performance				
Process☑Documentation☑Availability☑Use				
Issues				
The asset operation is appropriate for the duty. The rating based on the scope of asset management available to the Licensee is A/1. On the roles defined in the Audit Guidelines the rating is A/1.				
Recommendation				
None				

Asset Maintenance	Process/Policy rating	Effectiveness rating							
6. Asset maintenance									
Maintenance functions relate to the upkeep of assets and directly affect service levels and costs.									
Observations									
	<i>et maintenance / sample activitie</i> nonitored as they are a key indic								
There are performance measure relate to the contract maintenan	estas (plant manufacturer) and T es that are being met. Note that t ice and may be more than is requ e contracts for the maintenance ws may not be required.	the following comments uired for the review							
incorporates condition, risk, brea prioritised on the basis of the wo availability. Spare parts required	lled by an IT system (SAP - 720) akdown and time based mainten orks impact on safety, environme d for standard jobs and inventorie packaged up in Melbourne and l kit for the work.	ance. Work orders are ent and operational es are being developed							
measures. The equipment man	The asset plan for operations, maintenance and contingencies contains performance measures. The equipment manufacturer requires maintenance to their standard and frequency to validate warrantee conditions.								
is a consequence of the high du hard). There have been a numb choice of jointing equipment. Th there has been no failure of repl	There have been failures due to lightning which is unavoidable and to gear boxes which is a consequence of the high duty and high wind factors on the site (plant is working very hard). There have been a number of cable joint faults mainly attributable to poor initial choice of jointing equipment. The current joints are to a high standard (Raychem) and there has been no failure of replaced joints. Repair is by jointers located in Geraldton and joining equipment spares are held (Tenix contract).								
<i>Training / resources / exceptions</i> Maintenance is scheduled well into the future and these actions appear appropriate for the type of equipment. The resourcing is appropriate and ongoing training is evident as are the operating procedures and practices. High Voltage training occurs. Plant maintenance appears to take due allowance of any exceptions in the licensed plant.									
 Evaluation Criteria summary Maintenance policies and prorequired 	ocedures are documented and li	nked to service levels							
	th the owner meets this criterion d procedures are documented.	with service standards							
. .	ertaken of asset performance an								
	th the owner meets this criterion of manufacturer's maintenance c	•							
•	ncy, corrective and preventative)								

Response:	The arrangement with the parent company meets this criterion. Maintenance
	plans are documented and completed on schedule. The equipment
	manufacturer requires maintenance to their standard and frequency to
	validate warranted conditions.

- Failures are analysed and operational/maintenance plans adjusted where necessary Response: Failures are analysed and adjustments made where necessary.
- Risk management is applied to prioritise maintenance tasks
- Response: Risk management is the key method of prioritising maintenance tasks. An opportunity for improvement was identified. While there is fire detection system in the switch room and early warning system such as Vesda could improve vulnerability against failure of this common mode item.
- Maintenance costs are measured and monitored

Response: Maintenance costs are measured and monitored.

• System maintenance strategy, including the methodology used to maintain the system and frequency of maintenance activities.

Response: The AMS meets this criterion with maintenance strategies defined.

• Performance measures such as unplanned outages

Response: Outage log including forced outages has been sighted.

Asset management process and policy definition

Process	V	Policy	\mathbf{N}	Documentation	$\mathbf{\nabla}$	

Evidence: interviewed Site & Technical Manager, Vestas Fleet Manager, Risk & Sustainability Manager. Inspected site. Documents: Include Asset Management Plan (AMP), Financial statements, Job safety and environmental analysis procedure (in SRMTMP), Risk policy and specific risk management procedures. Walkaway Australia asset acquisition policy, long term maintenance agreement, Operations and maintenance manual contents, Infigen Australian Business Strategy.

Asset management performance

Process	Ø	Documentation	Ø	Availability	Ø	Use	
		•		•		•	•

Issues

The maintenance is appropriate for the duty required.

The rating based on the scope of asset management available to the Licensee is A/1. On the roles defined in the Audit Guidelines the rating is A/1.

Recommendation

An opportunity for improvement was identified. While there is fire detection system in the switch room an early warning system such as Vesda could improve vulnerability against failure of this common mode item.

Asset Management Information System	Process/Policy rating A	Effectiveness rating						
7. Asset Management Informati	on System (MIS)							
An asset management information system is a combination of processes, data and software that support the asset management functions.								
Observations								
Policies and procedures The Licensee has a competent asset management information system with a number of elements. It has spreadsheets managing expenditure and the equipment contractor has a dedicated maintenance management database (SAP 720) to control a complex list of items. The maintenance system links project management to scheduled tasks to standard work plans (assisting with safety and change management), asset register and parts inventory. Documentation is appropriate.								
There is a backup server on site	Access to write to the database is controlled (passwords) and changes are tracked. There is a backup server on site which automatically backs up every week. The power station is a controlled access site which provides adequate physical security for IT systems.							
<i>Exceptions</i> No exceptions were noted.								
Evaluation Criteria summary								
 Adequate system document 	tation for users and IT operators							
Response: The SAP system is intuitive, there are u	sufficiently documented. It is eas ser manuals.	sy to use and reasonably						
 Input controls include appro system 	priate verification and validation	of data entered into the						
	to use with a maintenance focus appropriate verification and valid							
C J	trols appear adequate, such as equate with hierarchical access							
 Physical security access co 	•							
	adequate with the system on ac	cess controlled						
Items from last revie security requiremen	ew are out of context of Asset Ma ts – refer to Risk Management.	anagement IT system						
 Data backup procedures ap 								
Response: Data backup is robu	ist.							
	Licensee performance reporting	• •						
	elated to Licensee performance ent possible to assess with visua							
 Management reports appear obligations 	ar adequate for the Licensee to r	monitor licence						
Response: Management repor	ts appear adequate for the Licer tent possible to assess with visu							

	obligations are met by systems other than the maintenance IT system							
Asset ma	nag	ement process a	nd p	oolicy definition				
Process	V	Policy	V	Documentation	V			
Evidence: interviewed Site & Technical Manager, Vestas Fleet Manager, Risk & Sustainability Manager. Inspected site. Documents: Include Asset Management Plan (AMP), Financial statements, Job safety and environmental analysis procedure (in SRMTMP), Risk policy and specific risk management procedures. Walkaway Australia asset acquisition policy, long term maintenance agreement, Operations and maintenance manual contents, Infigen Australian Business Strategy.								
Asset ma	nag	ement performar	nce					
Process	Ŋ	Documentation	Ŋ	Availability	V	Use		
Issues								
The rating based on the scope of asset management available to the Licensee is A/1.								
Recommendation								
None.	None.							

Risk management	Process/Policy rating	Effectiveness rating						
8. Risk management								
Risk management involves the acceptable level of risk.	identification of risks and the	ir management within an						
Observations								
Policies and procedures There is evidence that risk bas security of the plant. Risk asse sighted. The AMP addresses th regulatory risks from the persp	ssment documents, risk plans ne economic, technological, m	and risk register have been						
<i>Training</i> There is evidence of training ar particularly in approaches to ta work.	-							
Evaluation Criteria summary								
. .	and procedures exist and are associated with the asset man with the owner meets this crite	nagement system						
drive maintenance								
 Risks are documented in a monitored 	a risk register and treatment p	lans are actioned and						
Response: The arrangement w been sighted.	vith the owner meets this crite	rion. The risk register has						
	ew (referred to under Asset Mare more relevant to this section	0						
	shall be revised to incorporat							
	icles stored outside the compound of the compound of the site office.	ound shall be placed on a						
	keys from vehicle and this ha	as been communicated at						
All hazardous subs	tances shall be stored in the r	new chemical shed that has						
been constructed in the site compound. Hazardous substances are stored in Chemical store. Installed LPG gas to be in vented rack (by regulation cannot be inside chemical store).								
	quences of asset failure are re	č						
Response: The AMS meets this criterion. The probability and consequences of asset failure are regularly assessed.								
Asset management process and policy definition								
Process 🗹 Policy	☑ Documentation ☑							
Evidence: interviewed Site & Technical Manager, Vestas Fleet Manager, Risk & Sustainability Manager. Inspected site. Documents: Include Asset Management Plan								

(AMP), Financial statements, Job safety and environmental analysis procedure (in SRMTMP), Risk policy and specific risk management procedures. Walkaway Australia asset acquisition policy, long term maintenance agreement, Operations and maintenance manual contents, Infigen Australian Business Strategy.							
Asset ma	nage	ement performar	nce				
Process	V	Documentation	V	Availability	V	Use	
Issues							
The previous review required: All hazardous substances shall be stored in the new chemical shed that has been constructed in the site compound. <i>Hazardous substances are stored in Chemical store. Installed LPG gas to be in vented rack (by regulation cannot be inside chemical store).</i> The rating based on the scope of asset management available to the Licensee is A/1.							
Recommendation							
Opportuni	ty foi	r improvement – I	nsta	Il vented rack for	LPG	storage.	

Continge	ncy planning	Pro A	ocess/Policy rating	I	Effectiveness rating				
9 Contine	9. Contingency planning								
Continger	icy plans document th	e ste	eps to deal with the u	unexpect	ed failure of an asset.				
Observat	ions								
The Licen	nent of contingency pla see has detailed main tdowns allowed to dea	tena	ince scheduled out f	for severa	al years, with minor and				
The maint outages.	enance regime is gea	red	o keeping the plant	operatior	nal without forced				
-	^f contingency plans see tests safety syste	ms r	outinely.						
 Conti opera 	 Evaluation Criteria summary Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks Response: The Licensee has documented procedures for plant failure. The plant had a plant failures and the contingency of a spare gearbox/generator/wind vanes was exercised by live actions. A "first responder" training exercise, simulating the safe recovery of an injured person in a wind turbine, was carried out while the review was on site. 								
Asset ma	nagement process a	ind p	oolicy definition						
Process	Delicy	V	Documentation	Z					
Evidence: interviewed Site & Technical Manager, Vestas Fleet Manager, Risk & Sustainability Manager. Inspected site. Documents: Include Asset Management Plan (AMP), Financial statements, Job safety and environmental analysis procedure (in SRMTMP), Risk policy and specific risk management procedures. Walkaway Australia asset acquisition policy, long term maintenance agreement, Operations and maintenance manual contents, Infigen Australian Business Strategy.									
Asset management performance									
Process	Documentation	×	Availability	Z Use					
Issues	Issues								
The rating based on the scope of asset management available to the Licensee is A/1.									
Recomm	endations								
None	-								

Financial	plann	ing	Pro A	ocess/Policy rating	Effectiveness rating			
10. Financial planning								
	•	• ·		f the asset management plar ivery to ensure its financial v				
Observat	ions							
The Licen	see ha	ng process / pla as financial plan d upgraded yea	s, bı	udgeting and monitoring proc year.	cesses. These are on an			
-	inancia	al progress. The		nce and approves the Licen ensee's managers are respo	-			
		ria summary	fine	ancial objectives and strates	ice and actions to			
		objectives		ancial objectives and strategi				
Response		•		e parent meets the obligation strategies and actions to ach				
		l plan identifies nditure	the	source of funds for recurrent	costs and any potential			
Response	earn	ings more than	suffi	ne parent meets the requirem cient to cover recurrent costs excess available from retaine	s and capital expenditure			
			• •	ections of operating statement palance sheets)	nts (profit and loss) and			
	e: The	financial plan p	rovic	les projections of operating s nancial position (balance she				
				redictions on income for the s beyond this period	next five years and			
	: The	financial plan p	rovid	les predictions on income for I provides long term forecast	2			
	nancia	l plan provides	for tl	ne operations and maintenar	nce, administration and			
• •	e: The	financial plan p	rovid	les for the operations and ma	aintenance,			
 administration and capital expenditure requirements of the services. Significant variances in actual/budget income and expenses are identified and 								
	: Signi		s in a	actual/budget income and ex	penses are identified			
• ·				en where necessary.				
Asset management process and policy definition								
Process	⊠ F	Policy	Ø	Documentation				
				ical Manager, Vestas Fleet lite. Documents: Include Asse	u			

(AMP), Financial statements, Job safety and environmental analysis procedure (in SRMTMP), Risk policy and specific risk management procedures. Walkaway Australia asset acquisition policy, long term maintenance agreement, Operations and maintenance manual contents, Infigen Australian Business Strategy, WWP 5 year financial plan.							
Asset ma	nag	ement performar	nce				
Process	Process 🗹 Documentation 🗹 Availability 🗹 Use						
Issues							
None							
The rating based on the scope of asset management available to the Licensee is A/1.							
Recommendation							
None							

Capital expenditure planning	Process/Policy rating A	Effectiveness rating							
11. Capital expenditure planning									
The capital expenditure plan provides a schedule of new works, rehabilitation and replacement works, together with estimated annual expenditure on each over the next five or more years.									
-	to be large and lumpy, projection ears, preferably longer. Projection n firm estimates.	-							
Observations									
Capital expenditure process / pa The Licensee has financial plan	lans s, budgeting and monitoring pro	cesses.							
mean that Walkaway has predic	al capital expenditure. The contra stable revenue and cost structure are more than adequate to fund	es. Under these							
Evaluation Criteria summary									
 There is a capital expenditu proposed, responsibilities a 	re plan that covers issues to be nd dates	addressed, actions							
	th the parent meets the obligatic ntain to the manufacturer's requi duled.								
• The plan provide reasons for	or capital expenditure and timing	of expenditure							
Response: The arrangement with the parent meets the obligations, capital expenditure is scheduled according to the service frequency (blade replacement etc) as required by the manufacturer. The long term service agreements with the turbine manufacturer and the balance of plant contract cover major planned works.									
• The capital expenditure pla in the asset management p	n is consistent with the asset life	and condition identified							
Response: The arrangement w	th the parent meets the obligation aintain to the manufacturer's required								
 There is an adequate process to ensure that the capital expenditure plan is regularly updated and actioned Response: The arrangement with the parent meets the obligations as the capital 									
expenditure plan is									
Asset management process a	and policy definition								
Process 🗹 Policy	☑ Documentation ☑								
Sustainability Manager. Inspect	echnical Manager, Vestas Fleet ed site. Documents: Include Ass bb safety and environmental ana	et Management Plan							

				-				
SRMTMP). Risk policy and specific	SRMTMP), Risk policy and specific risk management procedures. Walkaway Australia							
	0	•						
asset acquisition policy, long term m	laintenance agree	mer	it, Operatio	ons and maintenance				
manual contents, Infigen Australian	Business Strategy	/. W	WP 5 vear	financial plan.				
manaal contonto, migori / actianan		,	in o you	inialiolal plain				
• • • •								
Asset management performance								
Process 🗹 Documentation 🗵	Availability	\mathbf{N}	Use	N				
	/ Wanability		000					
Issues								
None.								
None.								
The rating based on the scope of as	set management	avai	lable to the	e parent is A/1.				
Recommendation								
None								

Review of AMS	Process/Policy rati	ng	Effectiveness rating					
	A	U	1					
12. Review of AMS								
The asset management system	is regularly reviewed	and update	ed.					
Observations								
As a supplier of electricity the se There is ongoing review of asse contingencies.	-	•						
Evaluation Criteria summary - L	icensee							
 A review process is in place management system descril Response: The review of the s but by the parent c 	bed therein are kept c strategic level aspects	urrent						
 Independent reviews (e.g. in system 		ormed of th	e asset management					
Response: The review of the bro	ngement with the pare							
Evaluation Criteria summary – I	nfigen Energy							
 A review process is in place management system descril Response: Reviews are regula Independent reviews (e.g. in 	to ensure that the ass bed therein are kept c ar (monthly reporting a	urrent and annual	review).					
system	non o ovelito of the Lie							
			sponsibilities are carried I, Infigen's Internal Audit					
	•		ard. The audit program is					
-	ear based on a risk as		and in the past has					
included reviews of	f components of Infige	en's AMS.						
Asset management process a	nd policy definition							
Process 🗹 Policy	Documentation	V						
Evidence: interviewed Site & Te	echnical Manager, Ve	stas Fleet I	Vanager, Risk &					
Sustainability Manager. Inspected			-					
(AMP), Financial statements, Job safety and environmental analysis procedure (in								
SRMTMP), Risk policy and specific risk management procedures. Walkaway Australia asset acquisition policy, long term maintenance agreement, Operations and maintenance								
manual contents, Infigen Australian Business Strategy.								
Asset management performance								
Process 🗹 Documentation	Availability	☑ Use						
Issues	I		l					

Strategic asset planning is carried out by the parent company and they carry out continuous review of the process. There is a division of an asset management system where the owner carries out the strategic asset planning and the Licensee carries out the whole of plant life functions including shorter term and operational functions. The Licensee cannot carry out strategic functions as the Licensee's resources are such that they do not have the capacity to undertake asset review functions outside the licensed plant.

The arrangement with the parent has scheduled reviews. The owner would be rated A/1 and for the roles that are within the capacity of the Licensee the rating would be A/1 but this cannot reflect the broader roles, so a Not rated/ Not Rated rating is appropriate. It is worth noting that whilst a rating has provided above, this function is not undertaken by the Licensee i.e. Walkaway Wind Power Pty Ltd but by Infigen Energy

Recommendation

None - as the Licensee does not undertake the strategic roles.