



McGill Engineering Services Pty Ltd

Engineering, Adjudication & Arbitration Services ABN 45 106 691 169

AER Retail Pty Ltd

Electricity Retail Licence ERL 18 Performance Audit





McGill Engineering Services Pty Ltd

Engineering, Adjudication & Arbitration Services ABN 45 106 691 169

Luca Castelli
Director
AER Retail Pty Ltd

Dear Mr Castelli

Performance Audit Electricity Licences

The fieldwork on the performance audit of Retail Licence ER18 for the audit period (21 November 2012 to 30 November 2014) is complete and I am pleased to submit the report to you. The report reflects my findings and opinions.

In my opinion, the Licensee has maintained a high level of compliance with the licence conditions. There were 2 non compliances.

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the Retail licence (ERL 18) for the audit period on the relevant clauses referred to within the scope section of this report.

Yours sincerely

Kevan McGill
Director

Date 25 March 2015



Table of Contents

1	Electricity Retail Licence Audit	4
2	Executive Summary	4
2.1	Overall Conclusion	4
2.2	Audit period	4
2.3	Previous audit non compliances and recommendations	4
2.4	Issues from current audit	4
2.4.1	Compliance elements requiring corrective measures	4
3	Performance Audit	5
3.1	Performance Audit Objectives	5
3.2	Scope Limitation	6
3.3	Inherent Limitations	6
3.4	Statement of Independence	7
3.5	Scope of the Audit	7
3.6	Key Contacts Interviewed	8
3.7	Audit Requirements	9
3.8	Overall Conclusion	10
3.9	Findings	10
3.10	Audit compliance and controls rating scales	10
3.11	Establishing the Context	13
3.11.1	Audit Results and Recommendations	13
3.11.2	Compliance elements requiring Corrective measures	13
3.11.3	Suggestions for improvement	13
3.11.4	Post Audit Implementation Plan	13
3.12	Detailed findings	13
3.12.1	Audit work undertaken	13
3.13	Audit evidence	14
3.14	Audit Findings - Details	15
3.14.1	Electricity Industry Customer Transfer Code – Licence Conditions and Obligations	15
3.14.2	Electricity Industry Act – Licence Conditions and Obligations	29
3.14.3	Electricity Licences – Licence Conditions and Obligations	31
3.14.4	Electricity Industry Metering Code – Licence Conditions and Obligations (all licence condition Licence clause 5.1)	34



1 Electricity Retail Licence Audit

2 Executive Summary

This performance audit was conducted in accordance with the guidelines issued by the Economic Regulation Authority (*Authority*) for the audit period (21 November 2012 to 30 November 2014).

2.1 Overall Conclusion

In my opinion, the Licensee has maintained a high level of compliance with the licence conditions. There were 2 non-compliances requiring corrective actions. There are no issues with the integrity of reporting to the *Authority* or other statutory organisations.

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the Retail Licence (ERL 18) for the audit period based on the relevant clauses referred to within the scope section (Page 7) of this report.

2.2 Audit period

This audit covers the period 21 November 2012 to 30 November 2014. This is the first audit.

2.3 The Licensee

The licensee (ERL 18) is a small retailer (less than 50m customers). The business is as an electricity retailer. This is a first audit so there have been no changes since an earlier audit. There are a number of customers supplied under management and control of the Licensee and are exempt under the commercial supply provisions of the Exemption Order. The “supplier” of the exempted customers is not a small use customer.

2.4 Previous audit non compliances and recommendations

This is the first audit so there are no previous non compliances or recommendations

2.5 Issues from current audit

There are 2 issues from current audit.

2.5.1 Compliance elements requiring corrective measures

The actions requiring corrective measures are:

Table of Current Audit Non Compliances/Recommendations			
Unresolved at end of current Audit period			
Reference (no./year)	Non Compliance/Controls improvement (Rating / Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Auditors' Recommendation	Management action taken by end of Audit period



01/2015 105	B2 <i>Electricity Industry Act section 17(1)</i> 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. The Licensee paid the fees and within 30 days of ERA invoices. However the ERA invoices were not issued in time with the requirement to pay by anniversary date. The control process for accounts payable operated correctly but the compliance control for meeting the anniversary date was defective. Controls are now in place to ensure payments made by anniversary date.	Monitor time based compliance controls for efficacy.	Prepared compliance monitoring obligations .in tabular form.
02/2015 124	B2 <i>Retail Licence condition 16.1</i> 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. The annual reports were completed and on time. However the issue of not paying fees by anniversary date should have been notified. Controls are good for meeting reporting dates but compliance controls failed.	Monitor time based compliance controls for efficacy	Prepared compliance monitoring obligations .in tabular form

3 Performance Audit

3.1 Performance Audit Objectives

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

The primary objective of the audit is to audit the effectiveness of measures taken by the Licensee to maintain quality and performance standards. The Act states a performance audit is an audit of the effectiveness of measures taken by the Licensee to meet the performance criteria specified in the licence. The licence states that performance standards are contained in *applicable legislation*. Performance criteria are defined in the licence as:

- (a) the terms and conditions of the *licence*; and
- (b) any other relevant matter in connection with the *applicable legislation* that the *Authority* determines should form part of the *performance audit*.



The licence also provides for individual licence conditions namely - the *Authority* may prescribe *individual performance standards* in relation to the *Licensee* of its obligations under this *licence* or the *applicable legislation* (the Act and subordinate legislation).

The audit was done in compliance with prevailing ERA documents “Audit and Review Guidelines: Electricity and Gas Licences (hereinafter “Guidelines”)¹ and the Electricity Compliance Reporting Manual (hereinafter “Manual”)². The latest manual was issued 3 weeks before the end of the audit period. There is no difference in obligations from the manual referenced in the audit plan and the latest manual. However the numbering has been aligned with the latest manual.

The Licensee appointed McGill Engineering Services Pty Ltd to conduct the audit of its Retail 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.

The audit was conducted in a manner consistent with Australian Auditing Standards (AUS) 808 “Planning Performance Audits” and AUS 806 “Performance Auditing”. McGill Engineering Services Pty Ltd evaluated the adequacy and effectiveness of the controls and performance by the Licensee relative to the standards referred in the Retail Licence through a combination of enquiries, examination of documents and detailed testing for Electricity Retail Licence ERL 18 for the Licensee.

This is the first audit of AER.

3.2 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.

There are a number of customers supplied under management and control of the Licensee and are exempt under the Exemption Order. The “supplier” of the exempted customers is not a small use customer.

3.3 Inherent Limitations

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

An audit is not designed to detect all weaknesses in compliance measures as an audit is not performed continuously throughout the period and the audit procedures performed on the compliance measures are undertaken on a test basis.

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

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

¹ Economic Regulation Authority: Audit and Review guidelines: Electricity, and Gas Licences April 2014

² Economic Regulation Authority: Electricity Compliance Reporting Manual May 2014/July 2014/September 2104



3.4 Statement of Independence

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

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

There are no independence threats due to:

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

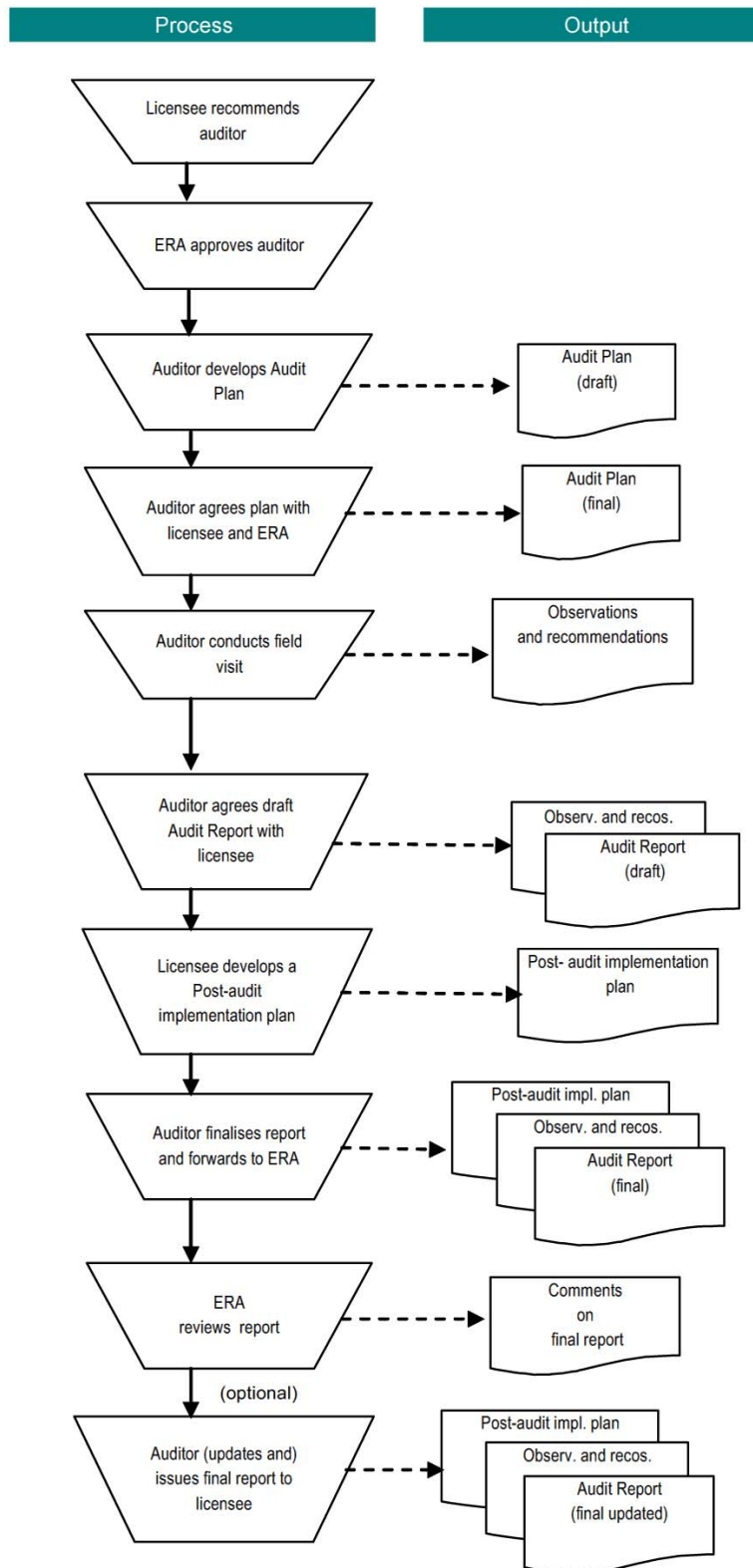
There is no risk of a self-review threat as:

- no work has been undertaken by the auditor, or a member of the audit/review team, for the Licensee within the previous 24 months; or
- the auditor is currently undertaking for the Licensee; or
- the auditor has submitted an offer, or intends to submit an offer, to undertake for the Licensee within the next 6 months; and
- 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.

3.5 Scope of the Audit

The audit was conducted in accordance with flow chart:

During this audit the Applecross office was visited.



3.6 Key Contacts Interviewed

The key contacts interviewed were:

- Licensee:



- Luca Castelli, Director AER Retail Pty Ltd
- McGill Engineering Services Pty Ltd:
 - Kevan McGill.

The audit was conducted during November 2014 to January 2015. Kevan McGill spent about 100 hours on the audit.

3.7 Audit Requirements

Compliance with licence conditions was examined according to the likely inherent risk and the adequacy of controls to manage that risk.

Nature of audit work conducted

The *Authority* guidelines for performance audits require that the audit considers:

- Process compliance** - the effectiveness of systems and procedures in place throughout the audit period, including the adequacy of internal controls.
- Outcome compliance** – the actual performance against standards prescribed in the licence throughout the audit period.
- Output compliance** – the existence of the output from systems and procedures throughout the audit period (that is, proper records exist to provide assurance that procedures are being consistently followed and controls are being maintained).
- Integrity of performance reporting** – the completeness and accuracy of the performance reporting to the Authority.
- Compliance with any individual licence conditions** - the requirements imposed on the specific Licensee by the Authority or specific issues for follow-up that are advised by the Authority.

Stage	Auditor	Standard
1. Risk & Materiality Assessment Outcome - Operational/ Performance Audit Plan	K McGill	ASA 300 Planning ASA 315: Risk Assessments and Internal Controls AUS 808: Planning Performance Audits AS/NZS 4360:2004: Risk Management ERA Guidelines
2. System Analysis	K McGill	AUS 810: Special Purpose Reports on Effectiveness of Control Procedures
3. Fieldwork Assessment and testing of; <ul style="list-style-type: none">• The control environment• Information system• Compliance procedures• Compliance attitude	K McGill	AUS 502: Audit Evidence AUS 806: Performance Auditing
4. Reporting	K McGill	ASA 300 Planning AUS 806: Performance Auditing



3.8 Overall Conclusion

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the Retail (ERL 18) licence for the audit period based on the relevant clauses referred to within the scope section of this report.

There are 2 non-compliances that the licensee required corrective actions.

3.9 Findings

The conclusions of each of the elements of the licence are summarised in the following table. The audit risk as determined for each licence condition is also shown. The details of the audit can be seen in the detailed audit findings section (Page 13)

3.10 Audit compliance and controls rating scales

Performance audit compliance and controls rating scales			
Adequacy of Controls Rating		Compliance Rating	
Rating	Description	Rating	Description
A	Adequate controls - no improvement needed	1	Compliant
B	Generally adequate controls – improvement needed	2	Non-compliant – minor impact on customers or third parties
C	Inadequate controls -significant improvement required	3	Non-compliant – moderate impact on customers or third parties
D	No controls evident	4	Non-compliant – major impact on customers or third parties



Item	Licence Clause/Condition reference (Cl.=clause, Sch.=schedule)	Obligations under condition	Licence Type (R + Retail)	Type	Audit Priority	Adequacy of Controls (NP=Not Performed)					Compliance Rating (NR = Not Rated)				
Licence Conditions - Electricity Industry (Licence Conditions) Regulation Obligations - Electricity Industry Customer Transfer Code Clause					Priority	Adequacy of controls rating					Compliance Rating				
						A	B	C	D	NP	1	2	3	4	NR
6.	r ³ .5(2)	3.2(2)	R	2	4	✓					✓				
7.	5(2)	3.4(1)	R	2	4	✓					✓				
8.	5(2)	3.5(3)	R	2	4					✓					✓
9.	5(2)	3.6(2)	R	2	4					✓					✓
16.	5(2)	3.9(1)	R	2	4					✓					✓
17.	5(2)	3.9(2)	R	2	4					✓					✓
18.	5(2)	3.9(3)	R	2	4	✓					✓				
19.	5(2)	3.9(4)	R	2	4					✓					✓
23.	5(2)	4.2(2)	R	2	4	✓					✓				
24.	5(2)	4.3	R	2	4	✓					✓				
25.	5(2)	4.4(1)	R	2	4	✓					✓				
26.	5(2)	4.4(2)	R	2	4					✓					✓
27.	5(2)	4.5(1)	R	2	4	✓					✓				
28.	5(2)	4.6(3)	R	2	4					✓					✓
29.	5(2)	4.7	R	2	4	✓					✓				
30.	5(2)	4.8(2)	R	2	4					✓					✓
34.	5(2)	4.9(6)	R	2	4					✓					✓
39.	5(2)	4.11(3)	R	2	4					✓					✓
40.	5(2)	4.12(3)	R	NR	5					✓					✓
43.	5(2)	4.15	R	NR	5					✓					✓
44.	5(2)	4.16	R	2	4					✓					✓
45.	5(2)	4.17	R	2	4	✓					✓				
48.	5(2)	5.1(4)	R	2	4	✓					✓				
49.	5(2)	6.2	R	2	4	✓					✓				
52.	5(2)	6.4(1)	R	2	4					✓					✓
53.	5(2)	6.4(2)	R	2	4					✓					✓
54.	5(2)	6.6	R	2	4	✓					✓				
55.	5(2)	7.1(1)	R	NR	5					✓					✓
56.	5(2)	7.1(2)	R	NR	5					✓					✓

³ r = Regulation



Licence Conditions - Electricity Industry (Licence Conditions) Regulation Obligations - Electricity Industry Customer Transfer Code Clause					Priority	Adequacy of controls rating					Compliance Rating				
						A	B	C	D	NP	1	2	3	4	NR
57.	5(2)	7.1(3)	R	2	4					✓					✓
58.	5(2)	7.2(4)	R	NR	5					✓					✓
59.	5(2)	7.3(2)	R	NR	5					✓					✓
68.	5(2)	Annex 6 clause A6.2(a)	R	NR	5	✓					✓				
69.	5(2)	Annex 6 clause A6.2(b)	R	2	4	✓					✓				
70.	5(2)	Annex 6 clause A6.6	R	NR	5	✓					✓				
71	5(2)	Annex 6 clause A6.7	R	NR	5	✓					✓				

Licence Conditions – Licence Clause – Retail Obligations- Electricity Industry Act Section					Priority	Adequacy of controls rating					Compliance Rating				
						A	B	C	D	NP	1	2	3	4	NR
101.	14.1	s ⁴ 13(1)	R	NR	5	✓					✓				
105.	4.1	s17(1)	G	2	4		✓					✓			
106	5.1	s31(3)	R	NR	5					✓					✓
107.	5.1	s41(6)	R	2	4					✓					✓
110	5.1	s76	R	2	4					✓					✓
113	5.1	s115(2)	R	2	4	✓					✓				

Licence Conditions – Electricity Industry Act Section Obligations- Licence Clause – Retail					Priority	Adequacy of controls rating					Compliance Rating				
						A	B	C	D	NP	1	2	3	4	NR
119.	s11	12.1	R	2	4	✓					✓				
120.	s11	13.4	R	2	4					✓					✓
121.	s11	14.2	R	2	4	✓					✓				
122.	s11	20.5	R	2	4					✓					✓
123.	s11	15.1	R	2	4					✓					✓
124.	s11	16.1	R	2	4		✓					✓			
125.	s11	17.1&17.2	R	2	4					✓					✓
126.	s11	18.1	R	2	4	✓					✓				

Licence Conditions – Licence clause Obligations- Electricity Industry Metering Code Clause					Priority	Adequacy of controls rating					Compliance Rating				
						A	B	C	D	NP	1	2	3	4	NR
324.	5.1	3.3B	R	2	4	✓					✓				
339.	5.1	3.11(3)	R	2	3					✓					✓
364.	5.1	3.27	R	2	4					✓					✓
371.	5.1.	4.4(1)	R	NR	5					✓					✓
372.	5.1	4.5(1)	R	NR	5	✓					✓				
373.	5.1	4.5(2)	R	2	4					✓					✓
388.	5.1	5.4(2)	R	NR	5					✓					✓
401.	5.1	5.16	R	2	4					✓					✓

⁴ s = Section of Act



Licence Conditions – Licence clause Obligations- Electricity Industry Metering Code Clause					Priority	Adequacy of controls rating					Compliance Rating				
						A	B	C	D	NP	1	2	3	4	NR
402.	5.1	5.17(1)	R	2	4					✓					✓
405.	5.1	5.18	R	2	4					✓					✓
406.	5.1	5.19(1)	R	NR	5					✓					✓
407.	5.1	5.19(2)	R	NR	5					✓					✓
408.	5.1	5.19(3)	R	2	4					✓					✓
410.	5.1	5.19(6)	R	NR	5					✓					✓
416.	5.1	5.21(5)	R	2	4					✓					✓
417.	5.1	5.21(6)	R	2	4					✓					✓
435.	5.1	5.27	R	2	4					✓					✓
448.	5.1	6.1(2)	R	2	4	✓					✓				
451.	5.1	7.2(1)	R	NR	5	✓					✓				
453.	5.1	7.2(4)	R	2	4					✓					✓
454.	5.1	7.2(5)	R	2	4					✓					✓
455.	5.1	7.5	R	2	4	✓					✓				
456.	5.1	7.6(1)	R	2	4					✓					✓
457.	5.1	8.1(1)	R	NR	5					✓					✓
458.	5.1	8.1(2)	R	NR	5					✓					✓
459.	5.1	8.1(3)	R	NR	5					✓					✓
460.	5.1	8.1(4)	R	2	4					✓					✓
461.	5.1	8.3(2)	R	NR	5					✓					✓

3.11 Establishing the Context

The key legislation that governs the licensing of providers of electricity is the Electricity Industry Act 2004. In turn, the compliance elements in the Corporation’s Operating Licence were examined and referred to throughout the audit process.

3.11.1 Audit Results and Recommendations

Summary of significant results

There are 2 non-compliances.

3.11.2 Compliance elements requiring Corrective measures

There are 2 Issues requiring corrective action:

3.11.3 Suggestions for improvement

There are no suggestions for improvement.

3.11.4 Post Audit Implementation Plan

The Licensee will address any post audit actions but there will be 2 actions to be given in a post audit plan.

3.12 Detailed findings

The following sets out the audit findings

3.12.1 Audit work undertaken

We conducted interviews and enquiries to:

- Understand the control environment by determining the responsibility matrix and key control points
- Obtain the policies and procedures for managing licensed areas; and



- Identify the information systems and processes employed to manage licensed areas
- Determine the level of understanding of the systems and processes for managing licensed areas
- In reviewing the procedures and protocols for managing provision of services within a licensed area, where applicable, we obtained flowcharts of the processes and assessed the reasonableness of the decision matrix and the adequacy of the control points implemented by the Licensee.

3.13 Audit evidence

- Retail Licence
- Financial statements
- Licence fee invoices, journal entries
- ERA annual returns
- Compliance spreadsheet
- Verifiable consent forms
- Sample client files
- Sample transfers
- Portal screen captures.
- Financial auditor letter on accounting standards
- Financial reports
- Access Contract (ETAC)
- ERA Approval of auditor - 2014 Audit and Review - ERL018 - AER Retail Pty Ltd
- Letter from ERA Approving Audit Plan



3.14 Audit Findings - Details

The following sets out the audit findings

3.14.1 Electricity Industry Customer Transfer Code – Licence Conditions and Obligations

Item 6 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1	
Licence: Retail			
Electricity Industry Customer Transfer Code 3.2(2) A retailer must submit a separate data request for each exit point unless otherwise agreed.			
Observations			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Evidence: interviewed Director. Documents: Sample transfers on portal, Portal screen captures			
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
Transfers in the audit period (37) took place using the Western Power portal which constrains data requests to exit points. The portal does not allow data requests for more than one NMI at a time.			
Issues			
None			
Recommendations			
None			
Item 7 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1	
Licence: Retail			
Electricity Industry Customer Transfer Code 3.4(1) A retailer, unless otherwise agreed, must submit a data request electronically and must not submit more than a prescribed number of standing or historical data requests in a business day.			
Observations			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Evidence: interviewed Director. Documents: Sample transfers on portal. Portal screen captures			
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
There have been 2505 data requests. All transfers are conducted electronically with the portal. The portal does not allow data requests for more than the prescribed number (20) per day. AER Retail has requested increasing the limit to 50 requests per day.			
Issues			
None			
Recommendations			
None			
Item 8 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated	
Licence: Retail			
Electricity Industry Customer Transfer Code 3.5(3) A retailer must withdraw a request for historical consumption data if the contestable customer's verifiable consent ceases to apply before the network operator provides the historical consumption data.			



Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Director. Documents: verifiable consent forms									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
All customers have verifiable consent. There have been requests for historical consumption data on the Portal but all with current verifiable consents. There has been no need to withdraw a request because of no verifiable consent.									
Issues									
None									
Recommendations									
None									

Item 9	Adequacy of controls rating	Compliance rating							
Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Not Performed	Not Rated							
Licence: Retail									
Electricity Industry Customer Transfer Code 3.6(2) A retailer must pay any reasonable costs incurred by the network operator for work performed in relation to a withdrawn request for historical consumption data.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Director. Documents: client file									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no withdrawn requests.									
Issues									
None									
Recommendations									
None									

Item 16	Adequacy of controls rating	Compliance rating							
Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Not Performed	Not Rated							
Licence: Retail									
Electricity Industry Customer Transfer Code 3.9(1) A retailer may only use data relating to a contestable customer to provide a contestable customer with a quotation for the supply of electricity by the retailer to the contestable customer or to initiate a transfer in relation to the contestable customer.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Director. Documents: client file									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been quotes for supply. A written consent is maintained on file. AER maintains a contestable customer's historical consumption data for its own internal purposes only.									
Issues									
None									
Recommendations									
None									



Performance Audit Report ERL 18

Item 17 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: Retail									
Electricity Industry Customer Transfer Code 3.9(2) A retailer must not aggregate a contestable customer's historical consumption data with that of other contestable customers for the purposes of internal business development, if requested not to do so by the customer.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director. Documents: client file									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no requests not to aggregate data. The economics of supply proposals is stand-alone, so it is not necessary to aggregate the meter data of candidate customers. However, the data pertaining to customers being supplied must be aggregated in order to verify the IMO invoices. This is also necessary for assessing energy quantities to be purchased by means of bilateral transaction.									
Issues									
None									
Recommendations									
None									
Item 18 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
Electricity Industry Customer Transfer Code 3.9(3) A retailer must not disclose a contestable customer's data to any other person without the verifiable consent of the contestable customer, except in the circumstances defined.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director. Documents: client file									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
No data has been disclosed. A written consent is maintained on file. AER maintains a contestable customer's historical consumption data for its own internal purposes only.									
Issues									
None									
Recommendations									
None									
Item 19 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: Retail									
Electricity Industry Customer Transfer Code 3.9(4) A retailer must keep a copy of the verifiable consent received from a contestable customer for two years.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Director. Documents: Verifiable consent forms									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Verifiable consent forms sighted. As all are less than 2 years old cannot verify retention. All VCFs									



are maintained in both electronic and hard copy formats. Internal procedures require that an electronic copy of all documents be maintained perpetually.

Issues

None

Recommendations

None

Item 23 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1
--	-------------------------------------	----------------------------

Licence: Retail

Electricity Industry Customer Transfer Code 4.2(2)
A retailer must submit a separate customer transfer request for each exit point unless otherwise agreed.

Observations

Documents Compliance

Evidence: interviewed Director. Documents: Sample transfer on portal. Portal screen captures, client file

Process Outcome Output Reporting Compliance

Customer transfers were carried out with Western Power Portal which constrains customer transfer requests to single requests for exit points. The portal does not allow transfer requests for more than one NMI at a time. Western Power is responsible for allocating NMIs to exit points.

Issues

None

Recommendations

None

Item 24 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1
--	-------------------------------------	----------------------------

Licence: Retail

Electricity Industry Customer Transfer Code 4.3
A retailer's reason for a transfer must be specified in the customer transfer request form as either to transfer a contestable customer to the retailer which submitted the customer transfer request or to reverse an erroneous transfer.

Observations

Documents Compliance

Evidence: interviewed Director. Documents: Sample transfer on portal. Portal screen captures, client file

Process Outcome Output Reporting Compliance

All transfers are conducted electronically with the portal. The portal provides for transfer reasons of either "Erroneous Transfer" or "New Customer Transfer" and requires that one of them be checked as a condition of acceptance. AER has not transferred a customer in error.

Issues

None

Recommendations

None



Item 25 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
Electricity Industry Customer Transfer Code 4.4(1) A retailer may only submit a customer transfer request if it has an access contract for the network, unless it is to reverse an erroneous transfer.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director. Documents: ETAC									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
AER Retail has an ETAC with a 15 year term and option to extend for a further 15 years. Western Power only issues authority to access the portal to those with an ETAC.									
Issues									
None									
Recommendations									
None									
Item 26 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Rated	Compliance rating Not Rated							
Licence: Retail									
Electricity Industry Customer Transfer Code 4.4(2) A retailer that submits a customer transfer request to reverse an erroneous transfer must ensure the transfer was made in error and, if it is an incoming retailer, confirm the identity of the previous retailer.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director. Documents: Not applicable									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There were no erroneous transfers to reverse. Retailers have the functionality to cause a customer to be transferred to them (normal) or away from them after having first caused a customer to be erroneously transferred to them. They do not have the functionality to direct Western Power to transfer a customer to a particular party. Consequently, a notice of Erroneous Transfer informs Western Power to restore the customer to its original retailer.									
Issues									
None									
Recommendations									
None									
Item 27 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
Electricity Industry Customer Transfer Code 4.5(1) A retailer, unless otherwise agreed, must submit a customer transfer request electronically and must not submit more than a prescribed number of customer transfer requests in a business day or with the same nominated transfer date.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director. Documents: Portal screen, transfer documents									



Performance Audit Report ERL 18

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
All transfers were via the Western Power portal which is on the internet (TCP/IP as per definition of electronic) and constrains the number of transfers to less than the prescribed number. The portal limits customer transfers to the prescribed limit of 20, which limit also applies to transfers with the same nominated transfer date.									
Issues									
None									
Recommendations									
None									
Item 28 Electricity Industry (Licence Conditions) Regulations regulation 5(2)					Adequacy of controls rating Not Performed			Compliance rating Not Rated	
Licence: Retail									
Electricity Industry Customer Transfer Code 4.6(3) A retailer must withdraw a customer transfer request if the contestable customer's verifiable consent ceases to apply before the transfer occurs.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director. Documents: Sample transfer on portal. Portal screen captures, client file									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
No customer Verifiable consents have ceased. Verifiable Consent to transfer is different from Verifiable Consent to access data. In practice, a customer would only be transferred after contractual terms have been agreed and the consent to transfer would be implicit in those terms in order for the retailer to fulfil its obligations. Equally, withdrawal of consent to transfer would constitute breach of contract.									
Issues									
None									
Recommendations									
None									
Item 29 Electricity Industry (Licence Conditions) Regulations regulation 5(2)					Adequacy of controls rating A			Compliance rating 1	
Licence: Retail									
Electricity Industry Customer Transfer Code 4.7 A retailer must nominate a transfer date in a customer transfer request in accordance with specified timeframes, except if the customer transfer request is to reverse an erroneous transfer.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director. Documents: Sample transfer on portal. Portal screen captures, client file									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Transfer requests have used the Western Power portal which requires a transfer date to be nominated. Transfers are entered into the portal shortly before they are due to take place, bearing in mind that Western Power requires 3 business days in the metro area to transfer customers to the new retailer, and 5 business days for country areas.									
Issues									
None									
Recommendations									



None		
Item 30 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail		
Electricity Industry Customer Transfer Code 4.8(2) A retailer must pay any reasonable costs incurred by a network operator for providing and/or installing a meter if a customer transfer request is withdrawn.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: interviewed Director. Documents: Sample transfer on portal. Portal screen captures, client file		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/>
No transfer requests have been withdrawn. So no costs to pay. Western Power issues a monthly invoice detailing chargeable transactions.		
Issues		
None		
Recommendations		
None		
Item 34 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail,		
Electricity Industry Customer Transfer Code 4.9(6) A network operator and retailer must agree to a revised nominated transfer date in certain circumstances.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: interviewed Director. Documents: Sample transfer on portal screen captures, client file		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/>
No objections were raised and so no revised dates were necessary. This pertains to customer transfers and occurs primarily when Western Power has negotiated with a customer a power outage necessary to upgrade a meter which will generally require amendment of the retailer's proposed transfer date.		
Issues		
None		
Recommendations		
None		
Item 39 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail		
Electricity Industry Customer Transfer Code 4.11(3) A network operator and the retailer must take certain action if the contestable customer's meter is not read on the nominated transfer date.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>



Evidence: interviewed Director. Documents: Sample transfers									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
All meters were read before transfers occurred. This provision relates to transfers between retailers. It entails the retailer accepting Western Power's reasonable endeavours to make a transfer on time. It is not practicable for the meter to be not read as contestable meters store data for 35 days and are usually read remotely.									
Issues									
None									
Recommendations									
None									
Item 40									
Electricity Industry (Licence Conditions) Regulations regulation 5(2)					Adequacy of controls rating			Compliance rating	
					Not Performed			Not Rated	
Licence: Retail									
Electricity Industry Customer Transfer Code 4.12(3) The parties to an access contract must negotiate in good faith any necessary amendments to the access contract arising from certain circumstances.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Director. Documents: ETAC									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no changes to AER ETAC. Consequently there is nothing to negotiate.									
Issues									
None									
Recommendations									
None									
Item 43									
Electricity Industry (Licence Conditions) Regulations regulation 5(2)					Adequacy of controls rating			Compliance rating	
					Not Performed			Not Rated	
Licence: Retail									
Electricity Industry Customer Transfer Code 4.15 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.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Director. Documents: Sample transfers									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no erroneous transfers. This provision applies when a retailer mistakenly instructs Western Power to allocate to it a new customer. The regulations allocate to a retailer costs and the corresponding right to raise revenue against them, by sending to the retailer through the Western Power portal, Meter Data pertaining to the customer. In the event of an erroneous transfer, Meter Data may (depending on the time for which it is unnoticed) be provided to the erroneous retailer – and also to the IMO. Where an erroneous transfer is corrected, the Meter Data is subsequently sent to the correct retailer and the IMO, and the IMO is notified of removal of the data originally sent to the erroneous retailer. This may (but need not) result in a cash outflow for the erroneous retailer, which is subsequently corrected by means of a refund (which will generally be an offset). The occurrence of an erroneous transfer is detected by the absence of expected Meter Data or									



the delivery of unexpected Meter Data.
Issues
None
Recommendations
None

Item 44 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: Retail									
Electricity Industry Customer Transfer Code 4.16 An incoming retailer must retain a copy of a verifiable consent given by a contestable customer in relation to the lodgement of a customer transfer request for two years, except in the case of a customer transfer request to reverse an erroneous transfer.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Director. Documents: Sample transfers									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no erroneous transfers to reverse None are older than 2 years to verify retention. All VCFs are maintained in both electronic and hard copy formats. Internal procedures require that an electronic copy of all documents be maintained perpetually									
Issues									
None									
Recommendations									
None									

Item 45 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
Electricity Industry Customer Transfer Code 4.17 A previous retailer must not bill a contestable customer for charges incurred after the transfer time, except in the case of an erroneous transfer.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director. Documents: Sample transfer, client file									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no erroneous transfers. Previous customers have not been billed for charges after the transfer Invoicing is based only on meter data provided through the "Meter Data Notify" function; data delivered to that facility pertains only to a bone fide customer (albeit which may subsequently reversed and cancelled). Consequently, the customer is known to have transferred once its data commences or ceases to be provided through that facility.									
Issues									
None									
Recommendations									
None									



Item 48 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
Electricity Industry Customer Transfer Code 5.1(4) A network operator and a retailer must comply with approved communication rules.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director. Documents: Sample transfers, portal screen captures									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
All transfers and data transactions are done electronically with the portal. Communication with Western Power's account manager is via email and standard formats.									
Issues									
None									
Recommendations									
None									
Item 49 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
Electricity Industry Customer Transfer Code 6.2 A licensee's notice in relation to a data request or customer transfer request must identify the exit point to which it relates.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director. Documents:., portal screen captures									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The Licensee's notice in relation to a data request or customer transfer request identifies the exit point. All transfers and data transactions are done electronically with the portal. Western Power uses the NMI as the unique identifier. Western Power is responsible for allocating NMIs to exit points.									
Issues									
None									
Recommendations									
None									
Item 52 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: Retail									
Electricity Industry Customer Transfer Code 6.4(1) A retailer must notify its contact details to a network operator within three business days of a request.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Director. Documents: Not applicable									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The network operator has not made a request. The contact details were provided with the initial access contract.									
Issues									



None
Recommendations
None

Item 53 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: Retail									
Electricity Industry Customer Transfer Code 6.4(2) A retailer must notify any change in its contact details to a network operator at least three business days before the change takes effect.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Director. Documents: Not applicable									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no changes to contact details.									
Issues									
None									
Recommendations									
None									

Item 54 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
Electricity Industry Customer Transfer Code 6.6 A network operator or a retailer must send required electronic communications to the applicable electronic communication address, in accordance with Annex 6.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director. Documents: Not applicable									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The use of the Western Power portal satisfies the requirements of Annexe 6. Fax and email are in accordance with the requirements. All transfers and data transactions are done electronically with the portal. Other communications are by email to the correct addresses.									
Issues									
None									
Recommendations									
None									

Item 55 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated	
Licence: Retail			
Electricity Industry Customer Transfer Code 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.			
Observations			
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>



Evidence: interviewed Director. Documents: Not applicable									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
No disputes have occurred.									
Issues									
None									
Recommendations									
None									

Item 56 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: Retail									
Electricity Industry Customer Transfer Code 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.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Director. Documents: Not applicable									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
No disputes have occurred.									
Issues									
None									
Recommendations									
None									

Item 57 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: Retail									
Electricity Industry Customer Transfer Code 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.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Director. Documents: Not applicable									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
No disputes have occurred.									
Issues									
None									
Recommendations									
None									

Item 58 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail		
Electricity Industry Customer Transfer Code 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.
Observations
Documents <input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Director. Documents: Not applicable
Process <input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
No disputes have occurred.
Issues
None
Recommendations
None

Item 59 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail		
Electricity Industry Customer Transfer Code 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.		
Observations		
Documents <input type="checkbox"/> Compliance <input type="checkbox"/>		
Evidence: interviewed Director. Documents: Not applicable		
Process <input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>		
No disputes have occurred.		
Issues		
None		
Recommendations		
None		

Item 68 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1
Licence: Retail		
Electricity Industry Customer Transfer Code Annex 6 clause A6.2(a) 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.		
Observations		
Documents <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>		
Evidence: interviewed Director. Documents: Portal screen views		
Process <input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>		
The communication systems meet this requirement. There are back up systems/power supplies. All transfers and data transactions are done electronically with the portal which provides the prescribed availability. Other communications are by email and are available at all times.		
Issues		
None		
Recommendations		
None		



Item 69 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
Electricity Industry Customer Transfer Annex 6 clause A6.2(b) A network operator and a retailer must establish a mechanism to generate an automated response message for each electronic communication (other than an automated response message) received at the electronic communication address.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director. Documents: Portal screens									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The communication system meets the requirements. All transfers and data transactions are done electronically with the portal which provides the prescribed automatic responses. Procedures implemented to send reply to all emails.									
Issues									
None									
Recommendations									
None									
Item 70 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
Electricity Industry Customer Transfer Annex 6 clause A6.6 The originator of an electronic communication must identify itself in the communication.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Director. Documents: Portal screens									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The communication system meets the requirements. All transfers and data transactions are done electronically with the portal which provides the prescribed identification.									
Issues									
None									
Recommendations									
None									
Item 71 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Adequacy of controls rating A	Compliance rating 1							
Licence: Retail									
Electricity Industry Customer Transfer Code Annex 6 clause A6.7 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.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Director. Documents: Portal screens									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The communication system meets the requirements. There is a consistent response. All transfers and data transactions are done electronically with the portal which provides the prescribed									



consistency.
Issues
None
Recommendations
None

3.14.2 Electricity Industry Act – Licence Conditions and Obligations

Item 101 Retail Licence condition 14.1	Adequacy of controls rating A	Compliance rating 1	
Licence: <i>Retail</i>			
<i>Electricity Industry Act section 13(1)</i> 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.			
Observations			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Evidence: Interviewed Luca Castelli. Documents: Compliance file. The licensee advised the Authority of the contract arrangements with the approval of the auditor.			
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>		
The Licensee has contracted with the auditor in accordance with the requirements.			
Issues			
None			
Recommendations			
None			

Item 105 Retail Licence condition 4.1	Adequacy of controls rating B	Compliance rating 2	
Licence: <i>Retail</i>			
<i>Electricity Industry Act section 17(1)</i> 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.			
Observations			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Evidence: Interviewed Luca Castelli. Documents: Licence invoices, Compliance spreadsheet.			
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>		
The Licensee paid the fees and within 30 days of ERA invoices However the ERA invoices were not issued in time with the requirement to pay by anniversary date. The control process for accounts payable operated correctly but the compliance control for meeting the anniversary date was defective. Controls are now in place to ensure payments made by anniversary date.			
Issues			
Monitor time based compliance controls for efficacy.			
Recommendations			
None			



Item 106 Retail Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Electricity Industry Act section 31(3)</i> A Licensee must take reasonable steps to minimise the extent or duration of any interruption, suspension or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Luca Castelli. Documents: Not Applicable		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting <input type="checkbox"/>
Compliance	<input type="checkbox"/>	
The onus on network availability lies with Western Power, not the electricity retailer. AER has no capacity to minimize 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.		
Issues		
None		
Recommendations		
None		
Item 107 Retail Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Electricity Industry Act section 41(6)</i> A Licensee must pay the costs of taking an interest in land or an easement over land.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Luca Castelli. Documents: Not Applicable.		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting <input type="checkbox"/>
Compliance	<input type="checkbox"/>	
AER has no requirement for an interest in or an easement over land.		
Issues		
None		
Recommendations		
None		
Item 110 Retail Licence condition 5.1	Adequacy of controls rating not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Electricity Industry Act section 76</i> If a designation under section 71(1) of the Electricity Industry Act is in force a licensee must perform the functions of a retailer of last resort and must carry out the supplier of last resort plan if it comes into operation under section 70 of the Electricity Industry Act.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Luca Castelli. Documents: Not Applicable.		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting <input type="checkbox"/>
Compliance	<input type="checkbox"/>	
There has been no designation.		



Issues
None
Recommendations
None

Item 113 Retail Licence condition 5.1	Adequacy of controls rating A	Compliance rating 1
---	----------------------------------	------------------------

Licence: *Retail*

Electricity Industry Act section 115(2)
A licensee that has, or is an associate of a person that has, access to services under an access agreement must not engage in conduct for the purpose of hindering or prohibiting access.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
-----------	-------------------------------------	------------	-------------------------------------

Evidence: Interviewed Luca Castelli. Documents: Lease payment journal entries.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
---------	-------------------------------------	---------	-------------------------------------	--------	-------------------------------------	-----------	-------------------------------------	------------	-------------------------------------

There have been no complaints about behaviour for the purpose of hindering or prohibiting access.

Issues

None

Recommendations

None

3.14.3 Electricity Licences – Licence Conditions and Obligations

Item 119 Electricity Industry Act section 11	Adequacy of controls rating A	Compliance rating 1
--	----------------------------------	------------------------

Licence: *Retail*

Retail Licence condition 12.1
A Licensee and any related body corporate must maintain accounting records that comply with the Australian Accounting Standards Board Standards or equivalent International Accounting Standards.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
-----------	-------------------------------------	------------	-------------------------------------

Evidence: Interviewed Luca Castelli. Documents Financial report summary. Financial auditors letter on accounting standards

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
---------	-------------------------------------	---------	-------------------------------------	--------	-------------------------------------	-----------	-------------------------------------	------------	-------------------------------------

The Licensee complies with Australian accounting standards.

Issues

None

Recommendations

None

Item 120 Electricity Industry Act section 11	Adequacy of controls rating Not Performed	Compliance rating Not Rated
--	--	--------------------------------

Licence: *Retail*



Retail Licence condition 13.4
A Licensee must comply with any individual performance standards prescribed by the Authority.

Observations

Documents Compliance

Evidence: Interviewed Luca Castelli. Documents: Not applicable.

Process Outcome Output Reporting Compliance

There are no individual performance standards.

Issues

None

Recommendations

None

Item 121 Electricity Industry Act section 11	Adequacy of controls rating A	Compliance rating 1
--	----------------------------------	------------------------

Licence: *Retail*

Retail Licence condition 14.2
A Licensee must comply, and require its auditor to comply, with the Authority's standard audit guidelines dealing with the performance audit.

Observations

Documents Compliance

Evidence: Interviewed Luca Castelli. Documents: The Licensee provided contracting arrangements to the Authority with the approval of the auditor. Compliance file

Process Outcome Output Reporting Compliance

The Licensee has contracted with the auditor in accordance with the requirements.

Issues

None

Recommendations

None

Item 123 Electricity Industry Act section 11	Adequacy of controls rating Not Performed	Compliance rating Not Rated
--	--	--------------------------------

Licence: *Retail*

Retail Licence condition 15.1
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.

Observations

Documents Compliance

Evidence: Interviewed Luca Castelli, listed staff on site. Documents: Retail licence.

Process Outcome Output Reporting Compliance

The Licensee is not under external administration nor was there a significant change in the circumstances upon which the licence was granted.

Issues

None

Recommendations

None



Item 124 Electricity Industry Act section 11	Adequacy of controls rating B	Compliance rating 2							
Licence: <i>Retail</i>									
<i>Retail Licence condition 16.1</i> 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.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Luca Castelli. Documents: Annual returns. Compliance spreadsheet									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The annual reports were completed and on time. However the issue of not paying fees by anniversary date should have been notified. Controls are good for meeting reporting dates but compliance controls failed.									
Issues									
Monitor time based compliance controls for efficacy.									
Recommendations									
None									
Item 125 Electricity Industry Act section 11	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: <i>Retail</i>									
<i>Retail Licence condition 17.1&17.2</i> A Licensee must publish any information it is directed by the Authority to publish, within the timeframes specified.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Luca Castelli Documents: Not applicable.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There was no requirement to publish any information.									
Issues									
None									
Recommendations									
None									
Item 126 Electricity Industry Act section 11	Adequacy of controls rating A	Compliance rating 1							
Licence: <i>Retail</i>									
<i>Retail Licence condition 18.1</i> Unless otherwise specified, all notices must be in writing.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Luca Castelli. Documents: Sample communication with ERA. Compliance spreadsheet.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The Authority did not require any notices. All material communication with the Authority is in writing.									
Issues									
None									



Recommendations

None

3.14.4 Electricity Industry Metering Code – Licence Conditions and Obligations (all licence condition Licence clause 5.1)

Item 324 Licence condition 5.1	Adequacy of controls rating A	Compliance rating 1
--	----------------------------------	------------------------

Licence: Retail

Electricity Industry Metering Code clause 3.3B

A user who is aware of bi-directional flows at a metering point which was not previously subject to a bi-directional electricity flows or any changes in a customer's or user's circumstances in a metering point which will result in bi-directional electricity flows must notify the network operator within 2 business days.

Observations

Documents Compliance

Evidence: Interviewed Luca Castelli, Documents: The Licensee has no meters. Some customers have bi directional meters

Process Outcome Output Reporting Compliance

An incoming customer had a solar system without a bidirectional meter and this was corrected. AER is working through a procedure for identifying and converting meters to bidirectional where required. For all customers installing solar systems we have worked closely to ensure their meter has been bidirectional enabled.

Issues

None

Recommendations

None

Item 334 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
--	--	--------------------------------

Licence: Retail

Electricity Industry Metering Code clause 3.11(3)

A Code participant who becomes aware of an outage or malfunction of a metering installation must advise the network operator as soon as practicable.

Observations

Documents Compliance

Evidence: Interviewed Luca Castelli, Documents: The Licensee has no meters.

Process Outcome Output Reporting Compliance

The Licensee is not aware of any outages. The meter reading verification process showed no outages.

Issues

None

Recommendations

None

Item 364 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
--	--	--------------------------------

Licence: Retail



Electricity Industry Metering Code clause 3.27
 A person must not install a metering installation on a network unless the person is the network operator or a registered metering installation provider for the network operator doing the type of work authorised by its registration.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
-----------	-------------------------------------	------------	-------------------------------------

Evidence: Interviewed Luca Castelli. Documents: The Licensee has no meters.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
---------	--------------------------	---------	--------------------------	--------	--------------------------	-----------	--------------------------	------------	--------------------------

The retailer has not installed any meters. As a retailer, all metering installations are requested through Western Power who then engages its staff to conduct any necessary works. The retailer's metering agent is Western Power so it is unnecessary for the retailer to conduct any physical metering works (installation, upgrades, etc).

Issues

None

Recommendations

None

Item 371 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
--	--	--------------------------------

Licence: Retail

Electricity Industry Metering Code clause 4.4(1)
 A network operator and affected Code participants must liaise together to determine the most appropriate way to resolve a discrepancy between energy data held in a metering installation and data held in the metering database.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
-----------	--------------------------	------------	--------------------------

Evidence: Interviewed Luca Castelli. Documents: The Licensee has no meters.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
---------	--------------------------	---------	--------------------------	--------	--------------------------	-----------	--------------------------	------------	--------------------------

There has been no advice of a meter discrepancy and no corrected data provided..

Issues

None

Recommendations

None

Item 372 Licence condition 5.1	Adequacy of controls rating A	Compliance rating !
--	----------------------------------	------------------------

Licence: Retail

Electricity Industry Metering Code clause 4.5(1)
 A Code participant must not knowingly permit the registry to be materially inaccurate.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
-----------	--------------------------	------------	--------------------------

Evidence: Interviewed Luca Castelli. Documents: The Licensee has no meters.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
---------	--------------------------	---------	--------------------------	--------	--------------------------	-----------	--------------------------	------------	--------------------------

The Licensee has no way of knowing about Western Power's registry other than their details which have not changed.

Issues

None

Recommendations

None



Item 373 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail		
<i>Electricity Industry Metering Code clause 4.5(2)</i> If a Code participant (other than a network operator) becomes aware of a change to or an inaccuracy in an item of standing data in the registry, then it must notify the network operator and provide details of the change or inaccuracy within the timeframes prescribed.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Luca Castelli. Documents: The Licensee has no meters.		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting <input type="checkbox"/>
Compliance	<input type="checkbox"/>	
The Licensee has no way of knowing about Western Power's registry other than their details. The licensee is not aware of any inaccuracies in an item of standing data in the registry		
Issues		
None		
Recommendations		
None		
Item 388 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail		
<i>Electricity Industry Metering Code clause 5.4(2)</i> A user must, when reasonably requested by a network operator, use reasonable endeavours to assist the network operator to comply with the network operator's obligation.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Luca Castelli. Documents: The Licensee has no meters.		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting <input type="checkbox"/>
Compliance	<input type="checkbox"/>	
No requests were made of users or the Licensee.		
Issues		
None		
Recommendations		
None		
Item 401 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail		
<i>Electricity Industry Metering Code clause 5.16</i> A user that collects or receives energy data from a metering installation must provide the network operator with the energy data (in accordance with the communication rules) within the timeframes prescribed.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Luca Castelli. Documents: The Licensee has no meters.		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Reporting <input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>	
There are no meters to collect information or data from. (Meters are the Network Operators under the Meter Code). The retailer has no physical role in respect of metering.		
Issues		
None		



Recommendations

None

Item 402 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
--	--	--------------------------------

Licence: Retail

Electricity Industry Metering Code clause 5.17(1)

A user must provide standing data and validated (and where necessary substituted or estimated) energy data to the user's customer, to which that information relates, where the user is required by an enactment or an agreement to do so for billing purposes or for the purpose of providing metering services to the customer.

Observations

Documents Compliance

Evidence: Interviewed Luca Castelli. Documents: The Licensee has no meters.

Process Outcome Output Reporting Compliance

There are no meters to collect information or data from for billing. (Meters are the Network Operators under the Meter Code). The retailer is obligated to supply meter data to the customer on request and at no charge and would do so if there were any requests.

Issues

None

Recommendations

None

Item 405 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
--	--	--------------------------------

Licence: Retail

Electricity Industry Metering Code clause 5.18

A user that collects or receives information regarding a change in the energisation status of a metering point must provide the network operator with the prescribed information, including the stated attributes, within the timeframes prescribed.

Observations

Documents Compliance

Evidence: Interviewed Luca Castelli. Documents: The Licensee has no meters.

Process Outcome Output Reporting Compliance

There has been no change in energisation status. The network operator is the monopoly meter data agent. The retailer has no physical role in respect of metering.

Issues

None

Recommendations

None

Item 406 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
--	--	--------------------------------

Licence: Retail

Electricity Industry Metering Code clause 5.19(1)

A user must, when requested by the network operator acting in accordance with good electricity industry practice, use reasonable endeavours to collect information from customers, if any, that assists the network operator in meeting its obligations described in the Code and elsewhere.



Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Luca Castelli. Documents: The Licensee has no meters.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no requests. This relates to requiring the customer to grant access to the meter to Western Power. Otherwise, the network operator is the monopoly meter data agent. The retailer has no physical role in respect of metering.									
Issues									
None									
Recommendations									
None									

Item 407 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
--	--	--------------------------------

Licence: *Retail*

Electricity Industry Metering Code clause 5.19(2)
A user must, to the extent that it is able, collect and maintain a record of the address, site and customer attributes, prescribed in relation to the site of each connection point, with which the user is associated.

Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Luca Castelli. Documents: The Licensee has no meters.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The only connection points are with Western Power. There has been no request to collect and maintain a record of the address, site and customer attributes other than that provided at transfer. This information is collected by Western Power and the retailer takes it on trust unless there is a manifest error.									
Issues									
None									
Recommendations									
None									

Item 408 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
--	--	--------------------------------

Licence: *Retail*

Electricity Industry Metering Code clause 5.19(3)
A user must, after becoming aware of any change in a site's prescribed attributes, notify the network operator of the change within the timeframes prescribed.

Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Luca Castelli. Documents: The Licensee has no meters.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The only connection points are with Western Power and there have been no changes in attributes									
Issues									
None									
Recommendations									
None									



Item 410 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail		
<i>Electricity Industry Metering Code clause 5.19(6)</i> A user must use reasonable endeavours to ensure that it does not notify the network operator of a change in an attribute that results from the provision of standing data by the network operator to the user.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Luca Castelli. Documents: The Licensee has no meters.		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting <input type="checkbox"/>
Compliance	<input type="checkbox"/>	
There has been no standing data provided by the network operator.		
Issues		
None		
Recommendations		
None		
Item 416 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail		
<i>Electricity Industry Metering Code clause 5.21(5)</i> A Code participant must not request a test or audit unless the Code participant is a user and the test or audit relates to a time or times at which the user was the current user or the Code participant is the IMO.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Luca Castelli. Documents: The Licensee has no meters.		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting <input type="checkbox"/>
Compliance	<input type="checkbox"/>	
A retailer may request a test only if at the time of the request it is the incumbent retailer. AER has made no such requests.		
Issues		
None		
Recommendations		
None		
Item 417 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail		
<i>Electricity Industry Metering Code clause 5.21(6)</i> A Code participant must not make a test or audit request that is inconsistent with any access arrangement or agreement.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Luca Castelli. Documents: The Licensee has no meters.		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting <input type="checkbox"/>
Compliance	<input type="checkbox"/>	
A retailer may request a test only if at the time of the request it is the incumbent retailer. AER has made no such requests.		
Issues		
None		



Recommendations

None

Item 435 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
--	--	--------------------------------

Licence: Retail

Electricity Industry Metering Code clause 5.27

Upon request, a current user must provide the network operator with customer attribute information that it reasonably believes are missing or incorrect within the timeframes prescribed.

Observations

Documents Compliance

Evidence: Interviewed Luca Castelli. Documents: Not Applicable

Process Outcome Output Reporting Compliance

There have been no requests. This information is collected by Western Power and the retailer takes it on trust unless there is a manifest error.

Issues

None

Recommendations

None

Item 448 Licence condition 5.1	Adequacy of controls rating A	Compliance rating 1
--	----------------------------------	------------------------

Licence: Retail

Electricity Industry Metering Code clause 6.1(2)

A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed.

Observations

Documents Compliance

Evidence: Interviewed Luca Castelli. Documents: The Licensee has no meters.

Process Outcome Output Reporting Compliance

The Licensee uses only the Western Power portal to make all metering transactions and thus meet compliance with Western Power's rules, procedures, agreements and criteria and there have been no complaints.

Issues

None

Recommendations

None

Item 451 Licence condition 5.1	Adequacy of controls rating A	Compliance rating 1
--	----------------------------------	------------------------

Licence: Retail

Electricity Industry Metering Code clause 7.2(1)

Code participants must use reasonable endeavours to ensure that they can send and receive a notice by post, facsimile and electronic communication and must notify the network operator of a telephone number for voice communication in connection with the Code.

Observations

Documents Compliance



Evidence: Interviewed Luca Castelli. Documents: The Licensee has no meters.		
Process	<input type="checkbox"/>	Outcome
<input type="checkbox"/>	<input type="checkbox"/>	Output
<input type="checkbox"/>	<input type="checkbox"/>	Reporting
<input type="checkbox"/>	<input type="checkbox"/>	Compliance
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Western Power has the Licensee's relevant addresses and telephones number.		
Issues		
None		
Recommendations		
None		
Item 453 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Electricity Industry Metering Code clause 7.2(4)</i> A Code participant must notify its contact details to a network operator with whom it has entered into an access contract within 3 business days after the network operator's request.		
Observations		
Documents	<input type="checkbox"/>	Compliance
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Evidence: Interviewed Luca Castelli. Documents: The Licensee has no meters.		
Process	<input type="checkbox"/>	Outcome
<input type="checkbox"/>	<input type="checkbox"/>	Output
<input type="checkbox"/>	<input type="checkbox"/>	Reporting
<input type="checkbox"/>	<input type="checkbox"/>	Compliance
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Western Power has the Licensee's relevant addresses. There was no request in the audit period.		
Issues		
None		
Recommendations		
None		
Item 454 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Retail</i>		
<i>Electricity Industry Metering Code clause 7.2(5)</i> A Code participant must notify any affected network operator of any change to the contact details it notified to the network operator at least 3 business days before the change takes effect.		
Observations		
Documents	<input type="checkbox"/>	Compliance
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Evidence: Interviewed Luca Castelli. Documents: The Licensee has no meters.		
Process	<input type="checkbox"/>	Outcome
<input type="checkbox"/>	<input type="checkbox"/>	Output
<input type="checkbox"/>	<input type="checkbox"/>	Reporting
<input type="checkbox"/>	<input type="checkbox"/>	Compliance
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
There have been no address changes.		
Issues		
None		
Recommendations		
None		
Item 455 Licence condition 5.1	Adequacy of controls rating A	Compliance rating 1
Licence: <i>Retail</i>		
<i>Electricity Industry Metering Code clause 7.5</i> A Code participant must not disclose, or permit the disclosure of, confidential information provided to it under or in connection with the Code and may only use or reproduce confidential		



information for the purpose for which it was disclosed or another purpose contemplated by the Code.

Observations

Documents Compliance

Evidence: Interviewed Luca Castelli. Documents: The Licensee has no meters.

Process Outcome Output Reporting Compliance

There has been no disclosure of confidential information.

Issues

None

Recommendations

None

Item 456 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
--	--	--------------------------------

Licence: *Retail*

Electricity Industry Metering Code clause 7.6(1)

A Code participant must disclose or permit the disclosure of confidential information that is required to be disclosed by the Code.

Observations

Documents Compliance

Evidence: Interviewed Luca Castelli. Documents: The Licensee has no meters.

Process Outcome Output Reporting Compliance

There has been no confidential information to be disclosed. In practice, the only such information would be forecasts of future consumption.

Issues

None

Recommendations

None

Item 457 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
--	--	--------------------------------

Licence: *Retail*

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.

Observations

Documents Compliance

Evidence: Interviewed Luca Castelli. Documents: The Licensee has no meters.

Process Outcome Output Reporting Compliance

There have been no disputes (the Licensee has no disputes with Western Power).

Issues

None

Recommendations

None



Item 458 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail		
<i>Electricity Industry Metering Code clause 8.1(2)</i> If a dispute is not resolved within 10 business days after the dispute is referred to representative negotiations, the disputing parties must refer the dispute to a senior management officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Luca Castelli. Documents: The Licensee has no meters.		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no disputes (the Licensee has no disputes with Western Power).		
Issues		
None		
Recommendations		
None		
Item 459 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail		
<i>Electricity Industry Metering Code clause 8.1(3)</i> If the dispute is not resolved within 10 business days after the dispute is referred to senior management negotiations, the disputing parties must refer the dispute to the senior executive officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Luca Castelli. Documents: The Licensee has no meters.		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no disputes (the Licensee has no disputes with Western Power).		
Issues		
None		
Recommendations		
None		
Item 460 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Retail		
<i>Electricity Industry Metering Code clause 8.1(4)</i> If the dispute is resolved by representative negotiations, senior management negotiations or CEO negotiations, the disputing parties must prepare a written and signed record of the resolution and adhere to the resolution.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: Interviewed Luca Castelli. Documents: The Licensee has no meters.		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no disputes (the Licensee has no disputes with Western Power).		



Issues

None

Recommendations

None

Item 461 Licence condition 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
--	--	--------------------------------

Licence: *Retail*

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.

Observations

Documents Compliance

The Licensee has no meters.

Process Outcome Output Reporting Compliance

Evidence: Interviewed Luca Castelli. Documents: There have been no disputes (the Licensee has no disputes with Western Power).

Issues

None

Recommendations

None