

Rottnest Island Authority's Electricity Generation Licence 2015 Performance Audit and Asset Management System Review

2015 POST AUDIT IMPLEMENTATION PLAN – Performance Audit

EIA = Electricity Industry Act 2004

EIMC = Electricity Industry (Metering) Code 2012

PERFORMANCE AUDIT							
Ref No/ 2015	Oblig No	Licence Requirement / Rating	Finding	Recommendation	Action	By Whom	Date
1	102	Rating: B2 Lic Ref: C20.1, Electricity Industry Act section 14(1)(a) A licensee must provide for an asset management system.	A revised AMS is being developed at present and will require completion of the development to achieve compliance.	The AMS has been subject to development and change in the review period and its development has not been completed. The AMS should be finalised and documented.	Strategic Asset Plan (SAP) is almost complete. Multi utility asset management plan (MUAMP) is being prepared. Other Asset Management Plans (OAMP) Asset Management System is currently in progress.	RIA	SAP: Oct 15 MUAMP: Nov 15 OAMP July 2016 July 2016
2	103	Rating: C2 Lic Ref: C20.2, C20.3, Electricity Industry Act section 14(1)(b) A licensee must notify details of the asset management system and any substantial changes to it to the Authority.	There have been significant feasibility and development activities to implement a revised AMS. These have included the use of external entities such as Horizon Power to evaluate the AMS. The development has not been completed however there are sufficient changes to date, such as the creation of a new Strategic Asset Management Framework and the lapse of the Asset Management Plan to require notification to the Authority	The Authority should be notified of the changes to the asset management system and of the program for completion of the development.	See above. This plan should also close the action in terms of notifying the Authority.	RIA	See above.
3	125	Rating: A2 Lic Ref: C17.1 & 17.2 A licensee must publish any information it is directed by the Authority to publish, within the timeframes specified.	The 2012/2013 Code of Conduct Report was published two days late on the RIA website due to staff absence as reported in the Compliance Reports – Electrical for 2014.	Ensure there are procedures in place to cater for the publication of all information required by the Authority within the timeframes specified in the event of both planned and unplanned staff absences.	There are procedures in place for planned absences. On this one off occasion unexpected sickness caused 2 days delay in publishing the report on the RIA website.	N/A	Completed

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Ref No/ 2015	Oblig No	Licence Requirement / Rating	Finding	Recommendation	Action	By Whom	Date
4	127	Rating: B2 Lic Ref: C29.1 A distributor must create and maintain a Priority Restoration Register.	Documents that are superseded or that could be misleading should be clearly identified and if applicable, removed from circulation. It is expected that only one Priority Restoration Register should be in existence.	Ensure document control across multiple versions of Priority Restoration Register to remove potential ambiguity and incorrect use.	Update Priority Restoration Register to distinguish between the two scenarios Annual review of documentation	RIA	31/10/15
5	130	Rating: B2 Lic Ref: C23.1, Code of Conduct clause 2.2 (1) A retailer or electricity marketing agent must ensure that standard form contracts, that are not unsolicited consumer agreements, are entered into in the manner set out, and the contract is provided as specified in clause 2.2(1).	The Code of Conduct requires the Standard Form Contract (SFC) to show the supply address(es). The current SFC only shows one supply address for the business customer, however electricity is supplied to the business customer both at its business address and at its living address(es).	The Standard Form Contract should show both the Business address and the rented unit addresses, either within the document or by referring to a separate schedule.	Commercial residential procedure: McGees provide the Standard Form Contract to the business on Rottneest Island when a new lease agreement is being signed. The lease includes the residential properties assigned to the business at the time. The residences are continually changing, although the businesses hold the lease, i.e. a business could be allocated unit 502 and then subsequently allocated 503 a day later. Every six month the RIA reviews the residential accommodation occupancy and make changes to the allocations based on limited availability and business requirements, which are seasonal.	RIA	Completed
6, 7	131	Rating: B2 Lic Ref: C23.1, Code of Conduct clause 2.2 (2) Subject to subclause 2.2(3), the retailer or electricity marketing agent must give to the customer the specified information in subclause 2.2(2) no later than on, or with, the customer's first bill.	Two examples of RMA invoices during the audit period were provided – neither included a 24hr telephone number for faults and emergencies (EVIDENCE: INV. NOS. IV2684166, IV2684164). The audit found that general information on the safe use of electricity was not provided to customers during the audit period or made available via the RIA website.	Publish general information on the safe use of electricity on the RIA website and refer to this in the Standard Form Contract. As part of the tendering process for a new residential property manager, ensure utility statements are compliant with Code requirements, including, among others, reference to a 24 hr telephone number for faults and emergencies.	The RIA Manager Project Tenders & Procurement has confirmed that utility statements are compliant with Code requirements, including, among others, reference to a 24 hr telephone number for faults and emergencies. This is now part of the qualitative criteria for the new tendering process. RIA expects the tender to be commenced the final quarter of 2015.	RIA	30/12/2015
-	137	Rating: B1	While McGees include separate telephone numbers for enquiries, 24hr	Refer to obligation 131	See above		

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Ref No/2015	Oblig No	Licence Requirement / Rating	Finding	Recommendation	Action	By Whom	Date
		Lic Ref: C5.1, Code of Conduct clause 2.4 (2) A retailer or electricity marketing agent must ensure that a customer is able to contact the retailer or electricity marketing agent on the retailer's or electricity marketing agent's telephone number during normal business hours for the purposes of enquiries, verifications and complaints.	faults, payment, interpretive services and the Energy Ombudsman, RMA only include a single general enquiries telephone number on customer bills.				
-	155	Rating: B2 Lic Ref: C5.1, Code of Conduct clause 4.5(1) Unless the customer agrees otherwise, a retailer must include the minimum prescribed information in subclause 4.5(1) on the customer's bill.	RMA bills are compliant with all applicable requirements of subclause 4.5 (1) with the exception of: <ul style="list-style-type: none"> No. of days covered by the bill not explicit. Average daily cost of consumption not stated. Average daily consumption not stated. Meter identification number not included. Missing statement regarding available assistance for payment difficulties. Missing telephone number for the electricity ombudsman. Missing 24hr telephone number for faults and emergencies. Usage comparison bar chart incorrectly labelling electricity consumption for the bill period, last bill period and same bill period last year. 	Recommendation as per Obligation 131 – As part of the tendering process for a new residential property manager, ensures utility statements are compliant with Code requirements.	See above item 6, & 7.	RIA	30/12/15
8	158	Rating: B1 Lic Ref: C5.1, Code of Conduct clause 4.7	PFM's "PRO-RNI-I03-033-1 Meter Readings Monthly Procedure" provides for monthly meter readings. This refers	[OFI] Update Meter Readings Monthly Procedure to refer to Electricity Industry Metering Code 2012 and	Update Meter Reading procedure with new code.	RIA	30/10/15

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		Other than in respect of a Type 7 connection, a retailer must use its best endeavours to ensure that meter reading data is obtained as frequently as is required to prepare its bills; and, in any event, at least once every 12 months.	to the Electricity Industry Metering Code 2005. The applicable Code is now the Electricity Industry Metering Code 2012.	associated clauses.			
9	172	<p>Rating: B2</p> <p>Lic Ref: C5.1, Code of Conduct clause 4.16(1)(a)</p> <p>If a review of a bill has been conducted and the retailer is satisfied that the bill is correct, the retailer may require a customer to pay the unpaid amount; must advise the customer that the customer may request the retailer to arrange a meter test in accordance with the applicable law; and must advise the customer of the existence and operation of the retailer's internal complaints handling processes and details of any applicable external complaints handling processes.</p>	<p>While customers are aware of the Standard Form Contract upon the execution of their business premise leases, the Code requires that a customer's entitlement to further review is reiterated upon each complaint. In this regard, the audit found that customers were not advised as per Code requirements for the two complaints above.</p> <p>While RMA have been advised by the RIA to refer customer's making a complaint to the "Utilities Customer Complaints Procedure" and there is evidence of this occurring on at least one occasion in an email to the Rottnest Hotel on 28 August 2014, it does not appear that this is routinely and consistently done for each and every complaint.</p> <p>The "Utilities Customer Complaints Procedure" does not specifically refer to a customer's right for a meter test.</p>	<p>Prepare and utilise a standard template when advising customers of the outcome of all bill reviews / complaints, referring to the Standard Form Contract and Utilities Customer Complaints Procedure either via website link or email attachment.</p> <p>Modify the Utilities Customer Complaints Procedure for consistency with the Standard Form Contract and include a customer's right for a meter test.</p>	<p>Utilities Customer Complaints Form will be updated to include the customer's right for a meter test.</p> <p>RIA has not always ensured the customers are formally advised through the complaints procedure, although the procedure includes this. RIA will train appropriate staff.</p>	RIA / PFM	30/12/2015
-	187	<p>Rating: A2</p> <p>Lic Ref: C5.1, Code of Conduct clause 5.1</p> <p>The due date on the bill must be at least 12 business days from the date of that bill. Unless a retailer specifies a later date, the date of dispatch is the</p>	<p>The audit found that there were at least two non-compliant RMA invoices even after the bill templates had been used and revised in May 2013 (IV2592320). RMA invoices IV2684166 and IV2684164 (both dated 7/08/13) have their Date Due set the same as the</p>	<p>Refer to obligation 131</p> <p>– As part of the tendering process for a new residential property manager, ensure utility statements are compliant with Code requirements.</p>	<p>Refer to action and dates of obligation 131</p>		

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		date of the bill.	Invoice Date.				
11	188	<p>Rating: B2</p> <p>Lic Ref: C5.1, Code of Conduct clause 5.2</p> <p>A retailer must offer the following specified minimum payment methods: in person at one or more payment outlets located within the Local Government District of the customer's supply address; by mail; for residential customers, by Centrepay; electronically by means of BPay or credit card; and by telephone by means of credit card.</p>	<p>The McGees bill examined shows payment can be made by phone, in person, by mail (cheque) and direct credit (electronically). Credit card payment is not offered by phone and electronically. BPay is also not offered as an electronic payment method.</p> <p>The RMA bills examined only show direct credit as an electronic payment method.</p>	<p>Confer with the Authority with respect to the practicality of offering and adding all minimum payment methods as per Code requirements.</p>	<p>McGees are currently contracted to RIA to provide commercial management and advice. McGees do not have the facility of credit card payment or BPay. The RIA Manager Project Tenders & Procurement has confirmed that credit card and BPay requirements are part of the qualitative criteria for the new tendering process.</p> <p>RIA expects the tender to be commenced the final quarter of 2015.</p>	RIA	30/12/2015
12	189	<p>Rating: NA</p> <p>Code of Conduct clause 5.3</p> <p>A retailer must, prior to commencing a direct debit facility, obtain the customer's verifiable consent and agree with the customer the date of commencement of the direct debit facility and the frequency of the direct debits.</p>	<p>The Standard Form Contract also indicates payment can be made in person at the Contract Services office, Rottneest Island. Neither McGees or RMA indicate that payment in person is accepted at this location.</p>	<p>[OFI] Ensure consistency between Standard Form Contract and available payment methods / locations.</p>	<p>The new Tender for property management on Rottneest Island will include a request for this requirement for the option of paying in person for electricity consumption charges. The tender is due to be published on Tenders WA end of September 2015</p>	RIA	31/01/2016
13	280	<p>Rating: A2</p> <p>Lic Ref: C5.1, Code of Conduct clause 10.3A</p> <p>At least once a year, a retailer must provide a customer with written details of the retailer's and distributor's obligations to make payments to the customer under Part 14 of this Code and under any other legislation in Western Australia, including the amount of the payment and the</p>	<p>A letter to customers dated 1 July 2013 was sighted – this included reference to clauses 14.1, 14.2 and 14.3, but omitted clauses 14.4 and 14.5.</p>	<p>Edit the letter to customers sent by McGees each year – remove the clause numbering 14.1, 14.2 and 14.3 to cover the RIA's obligations both as a retailer and a distributor.</p>	<p>Letter to customers dated 01/08/2015 includes this recommendation and numbering has been amended accordingly.</p>	RIA	Completed

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		eligibility criteria for the payment.					
-	300	Rating: B2 Lic Ref: C5.1, Code of Conduct clause 12.1(3) A retailer or a distributor must advise the customer in accordance with subclause 12.1(3).	Findings as per Code of Conduct clause 4.16(1)(a), Obligation 172.	Refer to obligation 172.	Utilities Customer Complaints Procedure includes the Code of Conduct requirements under clause 12.1(3) (a) (b) (i) (ii).	RIA	Completed
14	301	Rating: B1 Lic Ref: C5.1, Code of Conduct clause 12.1(3) Upon receipt of a written complaint by a customer, a retailer or distributor must acknowledge the complaint within 10 business days and respond to the complaint within 20 business days.	The complaint handling process described in the Standard Form Contract, section 17 states "A representative of the Rottneest Island Authority will acknowledge the complaint within 10 business days and shall address the complaint within 20 business days." In contrast, the Utilities Customer Complaints Procedure states the "RIA will aim to acknowledge written queries or complaints by a customer within 10 business days and respond to queries or complaints by addressing the matters within 15 business days."	[OFI] Ensure consistency between the Utilities Customer Complaints Procedure and Standard Form Contract.	The RIA has made the determination that addressing the utility matters within 15 business days provides a speedier response time and is in line with the Water Services Code of Conduct 2013. RIA would prefer to maintain consistency to all utility complaints. The Standard Form Contract will be amended to reflect 15 business days, to be approved by the ERA. The general complaints to the RIA will remain at 20 business days. In this instance the RIA don't believe we should extend the required response time to the customer for consistency is appropriate.	RIA	31/01/2015
-	307	Rating: B2 Lic Ref: C5.1, Code of Conduct clause 13.3 The report specified in clause 13.1 must be published by the date specified by the Authority. In accordance with clause 13.3(2), a report is published if: - copies of it are available to the public without cost, at places where the retailer or distributor transacts business	As per "Compliance Report – Electrical" sent to the Authority for the year ended 30/6/14, the 2012/13 Code of Conduct Report was published two days late on the RIA website due to a staff member's absence.	Refer to obligation 125.	There are procedures in place for planned absences. On this one off occasion unexpected sickness caused 2 days delay in publishing the report on the RIA website.	N/A	Completed

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		with the public; and - a copy of it is posted on the retailer or distributor's website.					
15, 16, 17	319	Rating: C2 Lic Ref: C5.1, Electricity Industry Metering Code clause 3.1 A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and also comply with any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act.	A report showing the progress of the meter replacement roll-out and due date for completion was requested, but not provided. The Summary of Master Meter Replacement table, does not clearly show how many meters were replaced in 2013, 2014 and 2015, or when all meters will be compliant. Meters should be supplied with certification of Calibration; sample evidence of this was not provided during the audit. The RIA does not have a metrology procedure in place.	Confirm when all meters will have certificate of calibration and therefore be compliant. Provide evidence of calibration certificates for new meters. Confirm with the Authority the options available to the RIA with respect to adopting a pre-approved metrology procedure (such as that used by Horizon Power).	All meters will have a Certificate of Calibration and therefore be compliant. Evidence of Certificates of Calibration for new meters or replaced meters will be provided. The summary of the master meter replacement table will show clearly how many meters were replaced and when all meters will be compliant. A Rottnest Island Metrology Procedure pre-approved such as that used by Horizon Power will be provided.	PFM PFM PFM	30/06/2016 30/06/2016 30/06/2016
18	320	Rating: C2 Lic Ref: C5.1, Electricity Industry Metering Code clause 3.2(1) An accumulation meter must at least conform to the requirements specified in the applicable metrology procedure and display, or permit access to a display of the measurements specified in subclauses 3.2(1)(a)(b) using dials, a cyclometer, an illuminated display panel or some other visual means.	PFM's "PRO-RNI-I03-030-1 Meter Installation and Calibration Procedure" prescribes that new meters must comply with the Metrology Procedure and National Measurement Act and be installed in accordance with the Electricity Industry Metering Code 2005. The applicable Code is now the Electricity Industry Metering Code 2012.	[OFI] Update Meter Installation and Calibration Procedure to refer to Electricity Industry Metering Code 2012 and associated clauses. Refer to obligation 319.	Update the Meter Installation Procedure Annual review of procedures.	PFM	01/01/2016
19	326	Rating: C2 Lic Ref: C5.1, Electricity Industry Metering Code clause 3.5(1) and (2) A network operator must ensure that there is a metering installation at every connection point on its network which is	Insufficient evidence supplied to determine metering installation compliance with prescribed functionality requirements.	Document the prescribed metering installation functionality requirements, including applicable drawings if necessary.	Establish a process or register of all connection points. Document the prescribed metering installation functionality requirements, including drawings or photos if necessary.	PFM	01/01/2015

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		not a Type 7 connection point. Unless it is a Type 7 metering installation, the metering installation must meet the functionality requirements prescribed.			Update for any new connections.		
-	327	Rating: C2 Lic Ref: C5.1, Electricity Industry Metering Code clause 3.5(3) A network operator must, unless otherwise agreed, for each metering installation on its network, on and from the time of its connection to the network, provide, install, operate and, subject to subclause 3.7(5), maintain the metering installation in the manner prescribed.	Findings as per Electricity Industry Metering Code clause 3.1, Obligation 319.	Refer to obligation 319.	As action 319.	PFM	01/01/2015
20	328	Rating: D2 Lic Ref: C5.1, Electricity Industry Metering Code clause 3.5(4) A network operator must ensure that, except for a Type 7 metering installation, the metering point for a revenue metering installation is located as close as practicable to the connection point in accordance with good electricity industry practice.	Insufficient evidence supplied to determine compliance.	Establish a documented process to ensure that installations are performed as close as practicable to the connection point, with sample drawings and photos if appropriate.	Establish a documented process to ensure that installations are performed as close as practicable to the connection point, with sample drawings or photos if appropriate. Refer to obligation 326.	PFM	01/01/2016
21	330	Rating: D2 Lic Ref: C5.1, Electricity Industry Metering Code clause 3.5(9) If a network operator becomes aware that a metering installation does not comply with the Code, the network operator must advise affected parties of the non-compliance and arrange for the non-compliance to be corrected as	The audit found that no evidence was available to confirm that affected parties were advised as per Code requirements.	Ensure a procedure is in place to advise affected parties of all metering installation non compliances. Evidence should be retained for auditing purposes.	Ensure a procedure is in place to advise affected parties of all metering installation non compliances. Evidence retained for auditing purposes.	PFM	31/10/15

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		soon as practicable.					
22	332	<p>Rating: A1</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 3.8</p> <p>Subject to clause 3.27, a network operator must, for each metering installation on its network, ensure that the metering installation is secured by means of devices or methods which, to the standard of good electricity industry practice, hinder unauthorized access and enable unauthorized access to be detected.</p>	<p>Manual readings are taken on a monthly basis, at which time meters are inspected for unauthorised access. However, the audit found that this requirement was not specifically documented in PFM's "PRO-RNI-I03-033-1 Meter Readings Monthly Procedure".</p>	<p>[OFI] Update "PRO-RNI-I03-033-1 Meter Readings Monthly Procedure" to include inspection of meters for unauthorised access.</p>	<p>Update procedure with unauthorised access inspection.</p>	PFM	31/10/2015
23	333	<p>Rating: C3</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 3.9(3)</p> <p>Subject to subclauses 3.9(4), 3.9(5) and 3.9(7), each metering installation must meet at least the requirements for that type of metering installation specified in Table 3 in Appendix 1 of the Code.</p>	<p>Insufficient evidence supplied to determine compliance with requirements.</p>	<p>Confirm meter types applicable to Rottnest Island and provide evidence that metering installations meet requirements of Table 3 in Appendix 1 of the Code, including meters not yet replaced.</p>	<p>Confirm meter types applicable to Rottnest Island and metering installations meet requirements of Table 3 in Appendix 1 of the Code, including meters not yet replaced.</p> <p>Add to metering register.</p>	PFM	31/10/2015
-	340	<p>Rating: A2</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 3.11A(1)</p> <p>A network operator must ensure that the meters on its network are systematically sampled and tested for accuracy in accordance with AS 1284.13.</p>	<p>Findings as per Electricity Industry Metering Code clause 3.1, Obligation 319.</p>	<p>Refer to obligation 319 and 320</p>	<p>Refer to actions in obligation 319 and 320.</p>	PFM	01/01/2016
24	342	<p>Rating: D2</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 3.12(1)</p> <p>A network operator must ensure that</p>	<p>Insufficient evidence supplied to determine compliance with prescribed design requirements.</p> <p>Metering installations comply with PFM's "PRO-RNI-I03-030-1 Meter</p>	<p>Compliance of metering installation with at least the prescribed design requirements should be documented through applicable drawings if necessary and installation</p>	<p>Refer to action obligation 326.</p>	PFM	01/01/2016

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Ref No/ 2015	Oblig No	Licence Requirement / Rating	Finding	Recommendation	Action	By Whom	Date
		each metering installation complies with at least the prescribed design requirements.	Installation and Calibration Procedure" which requires compliance with the Electricity Industry Metering Code 2005. Compliance should be with the Electricity Industry Metering Code 2012.	conformance records. Refer to obligation 320.			
-	343	Rating: C2 Lic Ref: C5.1, Electricity Industry Metering Code clause 3.12(2) A network operator must ensure that instrument transformers in its metering installations comply with the relevant requirements of any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act and any requirements specified in the applicable metrology procedure.	The RIA does not have a metrology procedure in place.	Refer to obligation 319.	Refer to obligation 319.	PFM	01/01/2016
25	345	Rating: C2 Lic Ref: C5.1, Electricity Industry Metering Code clause 3.12(4) A network operator must maintain drawings and supporting information, to the standard of good electricity industry practice, detailing the metering installation for maintenance and auditing purposes.	Metering installation drawings were not available for the audit.	Develop metering installation drawings / plans, integrated with document control and asset management systems.	Document or photograph each installation and file Develop metering installation drawings, plans or records, integrated with document control and asset management systems.	PFM	01/01/2016
26	349	Rating: C2 Lic Ref: C5.1, Electricity Industry Metering Code clause 3.14(3) If, under clause 3.14(2), a metering installation uses metering class CTs	Compliance information was not available during the audit.	Document the compliance of all CTs and VTs with Table 3 in Appendix 1 of the Electricity Metering Code.	Document the compliance of all CT's with Table 3 in Appendix 1 of the Electricity Metering Code. If non-compliant replace meters	PFM	01/01/2016

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		and VTs that do not comply with the Table 3 in Appendix 1, then the network operator must either or both install meters of a higher class accuracy and apply accuracy calibration factors within the meter to compensate for CT and VT errors, in order to achieve the accuracy requirements in Table 3 in Appendix 1.					
27, 28, 29	366	<p>Rating: B3</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 4.1(1)</p> <p>A network operator must establish, maintain and administer a metering database containing, for each metering point on its network, standing data and energy data.</p>	<p>Distribution loss factor and reference test and calibration details and results are not included in the standing data maintained – this is a Code requirement.</p> <p>The audit found that instrument transformer connected ratio, calibration tables, summation scheme and data communication details are not included in the standing data maintained, however, insufficient information was supplied to determine applicability.</p> <p>Network tariff and customer contestability columns are included in the standing data maintained, but both columns are not populated with expected values.</p>	<p>Specify distribution loss factor and reference test and calibration details and results in metering register data.</p> <p>Document information to determine applicability of instrument transformer connected ratio, calibration tables, summation scheme and data communication details as per Table 2 of Code.</p> <p>[OFI] Specify network tariff description and customer contestability in metering register data.</p>	<p>Distribution loss factor, reference test, calibration details and results will be specified in the metering register data.</p> <p>Document information to determine applicability of instrument transformer connection ratio, calibration tables, summation scheme and date communication details as per Table 2 of Code will be provided.</p> <p>The metering database will include information that all customers are contestable and that all customers are subject to the same tariff.</p>	<p>PFM</p> <p>PFM</p> <p>PFM</p>	<p>30/06/2016</p> <p>30/06/2016</p> <p>30/06/2016</p>
30	367	<p>Rating: A2</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 4.1(2)</p> <p>A network operator must ensure that its metering database and associated links, circuits, information storage and processing systems are secured by means of devices or methods which, to the standard of good electricity industry practice, hinder unauthorized access and enable unauthorized access to be</p>	<p>A local branch server exists on Rottnest Island – during the audit, it was discovered that the local branch server is not isolated (its physical security is reliant on the general security of the office building).</p>	<p>Employ additional and documented controls to secure the local branch server from general office access. Ensure physical access to the server is maintained for authorised users only.</p>	<p>An electronic keypad on the external PFM office door has been installed and access to the office and server is maintained for authorised users only.</p>	<p>PFM</p>	<p>01/09/2015</p> <p>Completed</p>

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		detected.					
-	369	Rating: B3 Lic Ref: C5.1, Electricity Industry Metering Code clause 4.2(1) A network operator must ensure that its registry complies with the Code and the prescribed clause of the market rules.	Findings as per Electricity Industry Metering Code clause 4.1(1), Obligation 366.	Refer to obligation 366.	Refer to action obligation 366.	PFM	01/01/2016
-	370	Rating: B3 Lic Ref: C5.1, Electricity Industry Metering Code clause 4.3(1) The standing data for a metering point must comprise at least the items specified.	Findings as per Electricity Industry Metering Code clause 4.1(1), Obligation 366.	Refer to obligation 366.	Refer to action obligation 366.	PFM	01/01/2016
-	380	Rating: A2 Lic Ref: C5.1, Electricity Industry Metering Code clause 4.8(4)(b) A network operator must have devices and methods in place that ensure that the data held in its metering database is secured from unauthorised local or remote access using the methods prescribed.	Findings as per Electricity Industry Metering Code clause 4.1(2), Obligation 367.	Refer to obligation 367.	Refer to action obligation 367.	PFM	Completed
31, 32, 33	386	Rating: C3 Lic Ref: C5.1, Electricity Industry Metering Code clause 5.4(1) A network operator must, for each meter on its network, at least once in every 12 month period undertake a meter reading that provides an actual value that passes the validation processes in Appendix 2.	There is no documented procedure associated with the validation of meter readings. There were three instances during the audit period of better quality actual values (second value) being available and replacing their first (actual) value due to errors in the meter readings being discovered and reported by customers.	Confirm metering types employed on Rottneest Island and cross reference with Code requirements for verification and validation. Develop verification and validation procedures for meter readings as per electricity Industry Metering Code Appendix 2. [OFI] Amend "PRO-RNI-I03-033-1 Meter Readings Monthly Procedure" to ensure Code compliance.	Confirm metering types employed on the island and cross reference with code requirement for verification and validation. Develop verification and validation procedures for meter readings as per electricity industry metering code Appendix 2.	PFM	01/01/2016

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Ref No/2015	Oblig No	Licence Requirement / Rating	Finding	Recommendation	Action	By Whom	Date
				[OFI] Review verification and validation procedures on an ongoing basis to minimise the acceptance of incorrect data.			
-	422	Rating: C3 Lic Ref: C5.1, Electricity Industry Metering Code clause 5.22(1) A network operator must validate energy data in accordance with this Code applying, as a minimum, the prescribed rules and procedures set out in Appendix 2 and must, where necessary, substitute and estimate energy data under this Code applying, as a minimum, the prescribed rules and procedures set out in Appendix 3.	Findings as per Electricity Industry Metering Code clause 5.4(1), Obligation 386.	Refer to obligation 386.	Refer to action obligation 386.	PFM	01/01/2016
34	442	Rating: B2 Lic Ref: C5.1, Electricity Industry Metering Code clause 5.37(1)(b) A network operator must provide a copy of the report described in subclause 5.37(1)(a) to the Minister and the Authority not less than 5 business days before it is published under subclause 5.37(3).	The Electricity Industry Metering Code Report 2013-2014 was provided to the Minister on 18/9/14 and published to the RIA website on 24/9/14, before the minimum 5 business day requirement had lapsed.	Incorporate a check prior to the publication of all required reports that confirms compliance with all minimum notice periods to the Minister and Authority.	There are procedures in place for planned absences. On this occasion the administrator published the report early on the RIA website due to planned leave and being pro-active. RIA is now aware of this requirement.	N/A	Completed
-	447	Rating: C2 Lic Ref: C5.1, Electricity Industry Metering Code clause 6.1(1) A network operator must, in relation to its network, comply with the agreements, rules, procedures, criteria and processes prescribed.	PFM have confirmed that Horizon Power has not been appointed the metering data agent for Rottnest Island and therefore, their metrology procedure does not currently apply. As per Obligation 319 – The RIA does not have a metrology procedure in place.	Refer to obligations 319 and 320.	Refer to action 319 and 320.	PFM	01/01/2016
35	462	Rating: B2 Lic Ref: C5.1, Electricity Industry	Further tests by Nilsen for the period of 2014-15 have shown issues with the	Establish a documented process to evaluate the results of independent	Establish a document process to evaluate the results of independent	PFM	31/10/2015

PERFORMANCE AUDIT							
Ref No/ 2015	Oblig No	Licence Requirement / Rating	Finding	Recommendation	Action	By Whom	Date
		(Network Quality and Reliability of Supply) Code 2005 clause 5(1) A distributor or transmitter must, as far as reasonably practicable, ensure that electricity supply to a customer's electrical installations complies with prescribed standards.	power supply quality however there has been no evaluation of the results.	tests of network quality of supply. Evaluate applicable results.	tests of network quality of supply. Evaluate applicable results.		
-	481	Rating: A2 Lic Ref: C5.1, Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 25(2) A distributor or transmitter must make available, at no cost, a copy of a document setting out its complaint handling processes to a small customer who makes a complaint to the distributor or transmitter or who asks to be given such information.	Findings as per Code of Conduct clause 4.16(1)(a), Obligation 172.	Refer to obligation 172.	Attachment 3 of the annual letter to customers includes the information for the utilities customer complaints resolution and refers to the RIA website. In this letter, links are provided to the RIA website for easy access for the customer.	RIA	Completed
-	484	Rating: A2 Lic Ref: C5.1, Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 27(1) A distributor or transmitter must prepare and publish a report about its performance in accordance with specified requirements.	The required date for publication of the network performance report is 1 October of each year; the 2013 report was published late due to staff absence.	Refer to obligation 125.	There are procedures in place for planned absences. On this one off occasion unexpected sickness caused 2 days delay in publishing the report on the RIA website.	N/A	Completed
-	485	Rating: A2 Lic Ref: C5.1, Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 27(3) A distributor or transmitter must give a copy of its report about its performance to the Minister and the Authority within the specified period.	As per Obligation 484, the 2014 report was published before the minimum 7 business day requirement had lapsed.	Refer to obligation 447.	There are procedures in place for planned absences. On this occasion the administrator published the report early on the RIA website due to planned leave and being pro-active. RIA is now aware of this requirement.	N/A	Completed

2015 POST REVIEW IMPLEMENTATION PLAN – Asset Management System Review

ASSET MANAGEMENT SYSTEM REVIEW							
Item No	EC Ref	Rating / AMS Component Effectiveness Criteria	Asset Management System Deficiency	Recommendation	Action	By Whom	Date
1, 2, 3	1.1	C3 Asset management plan (AMP) covers key requirements.	<p>While the operation and maintenance of the assets has continued through the review period as per the framework established by the AMP 2011-12 there have been no updates to the AMP. A number of strategic and long range plans have been prepared however no detailed AMP has been maintained through the review period.</p> <p>While there is a process in the "Strategic Asset Management Framework" (SAMF) for the development of a strategic asset plan, there is no process for the development and updating of the asset management plan. Subsequent clarification has indicated that the strategic asset plan is the new asset management plan however this was not evident during the review.</p>	<ol style="list-style-type: none"> 1) The process for the development and updating of the Asset Management Plan (AMP) should be documented. 2) The extent of and the correlation between the PFM's and the RIA's asset management systems needs to be reviewed and defined. 3) A program should be in place to update the AMP. 	<p>The AMP is being updated and implementation of an asset management system application is scheduled for next 12 months. This includes the system being developed by PFM including the new Maximo Asset Register.</p> <p>The Multi Utility Asset Management Plan (MUAMP) and Other Asset Management Plans (OAMP) are currently being developed by RIA.</p> <p>Asset Management Policy has been drafted and will be approved by October 2015.</p> <p>On completion of this project the PFM system will become their resource and maintenance planning tool for FUSS related assets.</p>	<p>PFM</p> <p>RIA</p> <p>RIA</p>	<p>30/12/2015</p> <p>01/11/2015 – 30/06/2016</p> <p>30/10/2015</p>
4	1.2	A2 Planning process and objectives reflect the needs of all stakeholders and is integrated with business planning.	<p>While the planning process is documented in the "Strategic Asset Investment Plan" (SAIP), the SAIP presented to the auditors during the review had been superseded however this was not evidenced to the auditors during the review.</p>	<ol style="list-style-type: none"> 4) Revise the process to ensure that current critical documentation such as the SAIP is clearly in use by responsible staff. 	<p>The RIA Contracts & Project Officer will ensure that information such as the SAIP is communicated to all stakeholders at the monthly Facilities Management Operational Group (FMOG) meeting.</p> <p>Asset Management plans, schedules and policies are available to all RIA staff on the internal Intranet and only current versions of critical documentation will be in use.</p> <p>The updated RIA HP Records Management system includes version</p>	RIA	Completed

ASSET MANAGEMENT SYSTEM REVIEW							
Item No	EC Ref	Rating / AMS Component Effectiveness Criteria	Asset Management System Deficiency	Recommendation	Action	By Whom	Date
					control.		
-	1.8	B2 Likelihood and consequences of asset failure are predicted.	It does not appear that all assets are covered by the "Baseline Capex RIA Risk Assessment 2014".	Recommendation 16) addresses the finding.	This action is as per RIA Asset Condition Reports. Asset Conditions to be assessed and included in capital risk assessment twice year (July and January). PFM Enterprise Risk Management Plan includes utilities risks, and risks associated with natural disasters such as bush fires, which can impact the operation of utilities. The Risk Management Plan is reviewed and updated bi-annually.	RIA PFM	31/01/2016 and 31/07/2016 31/01/2016 and 31/07/2016
-	1.9	B2 Plans are regularly reviewed and updated.	The reviews of the AMP and of the asset management system (AMS), which were in progress during the last review (2013), have not been completed. No AMP has been issued in the current review period. There is no program for the review and update of the AMS and AMP.	Recommendations 1, 2 and 3 address the finding.	The AMP is being updated and implementation of an asset management system application is scheduled for next 12 months. This includes the system being developed by PFM including the new Maximo Asset Register. The Multi Utility Asset Management Plan (MUAMP) and Other Asset Management Plans (OAMP) are currently being developed by RIA. Asset Management Policy has been drafted and will be approved by October 2015. On completion of this project the PFM system will become their resource and maintenance planning tool for FUSS related assets.	PFM RIA RIA	30/12/2015 01/11/2015 – 30/06/2016 30/10/2015
5	2.5	B2 Ongoing legal/environmental/safety obligations of the asset owner are assigned and understood.	During the review period there were compliance breaches in respect of RIA however the breaches were not reported in registers and there was no	5) A compliance (or breach) register should be implemented recoding breaches of licence conditions, corrective actions, timing and	PFM will use the RMSS Enterprise database for all breaches, incidents and non-compliances as the breach/non-compliance register, recording	PFM	01/01/2016

ASSET MANAGEMENT SYSTEM REVIEW							
Item No	EC Ref	Rating / AMS Component Effectiveness Criteria	Asset Management System Deficiency	Recommendation	Action	By Whom	Date
			recording of corrective actions and their closure.	closures.	breaches of licence conditions, corrective actions, timing and closures This will include all RIA non-compliances and breaches to ensure consistency. The RIA will not maintain their own breach register. The scope of breaches will be included in the RMSS policy and procedure.	PFM	01/01/2016
6	3.1	A2 Under-utilised and under-performing assets are identified as part of a regular systematic review process.	The SAMF and the Financial Management Manual indicate an Asset Disposal Plan should be prepared, however this has not occurred.	6) An Asset Disposal Plan should be prepared in accordance with the Financial Management Manual and the Strategic Asset Framework.	The Asset Disposal Plan will form part of asset category AMPs to be developed in the next 12 months. The Multi Utility Asset Management Plan is currently being developed by RIA.	RIA	01/11/2015 – 30/06/2015
-	3.3	B2 Disposal alternatives are evaluated.	No record was available documenting the evaluation of asset disposal alternatives for the disposal of generator-set 7.	Recommendation 6) addresses the finding.	No further action.	PFM	Completed
-	4.3	B2 Compliance with statutory and regulatory requirements.	RIA maintains the "RIA Electrical Water Gas Licence Compliance Register" which identifies the compliance requirements of the "Electricity Regional Licence", however it does not register breaches, corrective actions and closure of breaches.	Recommendation 5) addresses the finding.	No further action.	PFM	Completed
-	5.1	B2 Operational policies and procedures are documented and linked to service levels required.	The electrical assets operational policies are not sufficiently clear due to the lack of an up to date AMP.	Recommendation 3) addresses the finding.	No further action.	PFM	Completed
7, 8	5.3	C2 Assets are documented in an Asset Register including asset type, location, material, plans of components, an assessment of assets' physical/structural condition and	At present the asset register is not complete. Work is still ongoing and some assets are not included (all of the HV system). A preventative maintenance plan has not been issued at this point.	7) The asset register should be completed and should include those properties required in the Authority's Effectiveness Criteria.	See item 1,2 & 3 (C3) response. Finalisation of the asset register is contingent upon continued asset discovery. This is a dynamic process with stage 1 & 2 complete and stage 3 completed by February 2016.	RIA	01/11/2015 - 30/06/2016

ASSET MANAGEMENT SYSTEM REVIEW							
Item No	EC Ref	Rating / AMS Component Effectiveness Criteria	Asset Management System Deficiency	Recommendation	Action	By Whom	Date
		accounting data.	At present due to the asset management system database being in progress there is no link to asset drawings as drawings are out of date; there is a disconnect between drawings and physical installation. There is insufficient information to verify the link between the operational asset register (Maximo) and the current fixed accounting asset register (RIA).	8) The link between the Physical Asset Register and the Accounting Asset Register should be documented.	The physical asset register and the accounting asset register will have common financial codes and therefore this link will be manual only.		31/07/2016
9	5.4	B2 Operational costs are measured and monitored.	There is a lack of clarity on how operational costs will be tracked in future, whether they will be tracked in Maximo or another system.	9) Plan for recording and managing operational costs needs to be defined and the process documented.	Determine system to be used to track operational costs Document process and communicate to stakeholders	PFM	01/01/2016
10	5.5	B2 Staff resources are adequate and staff receive training commensurate with their responsibilities.	PFM use a "Rottnest Island Competency Matrix" which had been updated post the review period but required further updating as it still included ex-employees.	10) The "Rottnest Island Competency Matrix" needs to be updated.	Update competency matrix to reflect current staff	PFM	31/10/2015
11	6.2	B1 Regular inspections are undertaken of asset performance and condition.	While individual asset maintenance tasks are generated monthly, no overall maintenance schedule was sighted so that the program of annual maintenance and inspections was not clear.	11) Document which inspections are regularly performed and how often. Plan of annual maintenance and inspections should be clearly defined. This could be documented in the AMP.	Generate and overall maintenance and inspection schedule from Maximo when all asset data is completed.	PFM	01/01/2016
-	6.3	B1 Maintenance plans (emergency, corrective and preventative) are documented and completed on schedule.	While individual asset maintenance tasks are generated monthly, no overall maintenance schedule was sighted so that the program of annual maintenance and inspections is not clear.	Recommendation number 11) addresses this finding.	No further action.	PFM	Completed
12	7.1	A2 Adequate system documentation for users and IT operators.	During the review we received two versions of PFM's Restoration Priority Register Electrical Services – one	12) [OFI]: Review procedure for document control between PFM and RIA systems to ensure correct	Refer compliance obligation 127	PFM	01/10/2015

ASSET MANAGEMENT SYSTEM REVIEW							
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			issued 30/03/09 and last updated 15/11/12, the other issued/updated 14/8/13 (PRO-ROT-ELEC-41.01).	version control and currency.			
13	7.2	B2 Input controls include appropriate verification and validation of data entered into the system.	The procedure used for the process of validation and verification conducted by PFM Melbourne for data provided by their Rottneest Island branch office, prior to the data being accepted by systems such as Maximo. was requested during the review, but not received. Three meter readings were incorrectly read during the audit period.	13) [OFI]: Review verification and validation procedures on an ongoing basis to minimise the acceptance of incorrect data.	No further action proposed: Procedure already in place. Review verification and validation procedures (Recommendation 13).	PFM	01/01/2015
14	7.4	B2 Physical security access controls appear adequate.	A local branch server exists on Rottneest Island – during the review, it was discovered that the local branch server is not isolated (its physical security is reliant on the general security of the office building).	14) Employ additional controls to isolate the physical security of the local branch server from general office security. Ensure physical access to the server is maintained for authorised users only.	Refer action compliance obligation 367.	PFM	31/10/2015
15	7.5	B2 Data backup procedures appear adequate and backups are tested.	While PFM provided evidence of a successful restore operation for the branch level server, this was dated 5th June 2015, outside of the audit period. More comprehensive test results for offsite managed systems were not sighted during the review. Evidence of RIA's failover, redundancy and restoration tests done during the audit period were sighted however the test documentation requires improvement.	15) Maintain adequate evidence of regular failover, redundancy and restoration tests completed.	PFM Melbourne to undertake a redundancy and restoration test and record.	PFM	01/01/2016
16	8.3	B2 The probability and consequences of asset failure are regularly assessed.	In the new "Baseline Capex Risk Assessment 2014" there was no risk assessment on the HV Transmission Line or 11 kV Distribution poles, no risk identified for pole down, fire risk, vegetation fire, loss of environmental	16) The "Baseline Capex RIA Risk Assessment 2014" should be re-assessed to include all significant assets and as per the findings (such as, but not limited to, pole top fires, HV transmission line,	This action is as per RIA Asset Condition Reports. Asset Conditions to be assessed and included in capital risk assessment twice year (July and January). PFM Enterprise Risk Management Plan	RIA	31/01/2016 and 31/07/2016

ASSET MANAGEMENT SYSTEM REVIEW							
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			<p>assets and habitat. The "Rottnest Island Fire Emergency Prevention, Preparedness Response and Risk Review 2012" by the Fire & Emergency Services Authority of WA (FESA) noted that "A significant scrub fire caused by a pole top fire was responded to by the RIVFRS. The fire was contained within one hour of initial response and burned a total of 2700m2.", This risk has not been captured in the risk assessment; in addition there were two pole top fires on the same day in the period 2013-14 (however the customers had back-up power and there was no interruption). No risk identified for loss of supply to nursery/ emergency or loss of supply to borefields.</p> <p>The consequence of the loss of one of the step-up transformers is rated as inconsequential and the likelihood is rated as "rare"; however the SAP 2013 noted that the current demand is 1400 kW, maximum demand in 2009-10 was 1940 kW compared to a maximum capacity of 2140 kW. The lack of redundancy resulting from the use of two 1 MVA Step Up Transformers at the power house means that, if one transformer needs maintenance during the peak season, supply will be short of demand and consumption will have to be curtailed by up to around 50%.</p>	distribution pole down, loss of step up transformer, lack of transformer redundancy).	includes utilities risks, and risks associated with natural disasters such as bush fires, which can impact the operation of utilities. The Risk Management Plan is reviewed and updated bi-annually.	PFM	31/01/2016 and 31/07/2016
17	9.1	A2 Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks.	It does not appear that all the opportunities for improvement arising from Business Continuity Drills are actioned or evaluated further as in the last Drill a recommendation to establish	17) Opportunities for improvement noted in PFM's Business Continuity Drills should be followed up and assessed.	Track actions from Business Continuity Drills and assign.	PFM	31/10/2015

ASSET MANAGEMENT SYSTEM REVIEW							
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			individual back up power supply for the Nursing Post and the Police Station has not been documented in risk assessments.				
18	10.4	B2 The financial plan provides firm predictions on income for the next five years and reasonable indicative predictions beyond this period.	No indicative predictions beyond the five years were available.	18) Indicative projections of income beyond five years should be prepared.	Due to the seasonality aspects of the RIA's operations revenue predictions over the next 5 (five) years are based on best available estimates. A rigorous annual process ensures that these estimates are regularly updated to reflect the latest economic developments. In this context estimates beyond the five years are neither possible nor meaningful.	RIA	Completed
-	11.2	A2 The plan provide reasons for capital expenditure and timing of expenditure.	Some of the timing of individual projects in the detailed CAPEX, the "Baseline Revised Capex Plan 2014 to 2019 v3 8" does not appear to be consistent with actual activities.	Recommendation 19) addresses the finding.	Capex Plan to be revised twice yearly (in July and January) to accommodate modifications with both completed and upcoming works. This will include any reprioritisation of projects due to funding excess or shortfall	RIA	31/01/2016 and 31/07/2016
-	11.3	C3 The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan.	Due to the lack of an up-to-date AMP, asset life and condition have not been updated in the AMP since 2011. A risk assessment has been carried out in 2014 however it does not appear to have documented all electricity assets. Condition of assets was due to be assessed in 2014 however no document has been sighted.	Recommendations 3) and 16) address the finding.	See Item 1, 2 & 3 (C3) above. Mapping of the RIA's asset management system when completed and PFM system is expected to be completed in November 2015.	RIA	01/11/2015 - 30/06/2016
19	11.4	B2 There is an adequate process to ensure that the capital expenditure plan is regularly updated and actioned.	The current CAPEX, the "Baseline Revised Capex Plan 2014 to 2019 v3 8" does not appear to be up-to-date, e.g.: allocation of funds for Generator 1 replacement was set for Oct-Dec 2013, however the project had not	19) The detailed CAPEX Plan should be updated at least annually.	The Capex is approved annually by the Board, after updating based on new priority and risk assessments. This occurs in approximately April each year. Asset Conditions to be assessed and included in capital risk assessment	RIA	31/01/2016 and 31/07/2016

ASSET MANAGEMENT SYSTEM REVIEW							
Item No	EC Ref	Rating / AMS Component Effectiveness Criteria	Asset Management System Deficiency	Recommendation	Action	By Whom	Date
			<p>yet gone to tender at the end of the Review period (31 March 2015);</p> <p>the next generator replacement in the CAPEX was number 3, due for Jan-Mar 2015, however this is still to occur;</p> <p>the order of generator engine replacement is shown as 3, 5 and 2, however discussions with the licensee have indicated that the order of replacements may be 5, 2 and 6.</p>		twice year (July and January).		
20	12.1	C2 A review process is in place to ensure that the asset management plan and the asset management system described therein are kept current.	No documented plan is in place to show what the review and development program is and when those plans are due to be completed and implemented.	20) The asset management system and AMP review processes need to be documented and monitored.	See Item numbers 1,2 & 3 (C3) response.	RIA	01/11/2015 - 30/06/2016
-	12.2	C2 Independent reviews (e.g. internal audit) are performed of the asset management system.	There has been extensive review of the asset management system performed both by the licensee and the operator, however most of the review has not been documented and has not identified the targets of the review, the structure of the revised asset management system and the correlation of PFM's system with the RIA's system.	21) Recommendations 1) address the finding.	<p>The AMP is being updated and implementation of an asset management system application is scheduled for next 12 months. This includes the system being developed by PFM including the new Maximo Asset Register.</p> <p>The Multi Utility Asset Management Plan (MUAMP) and Other Asset Management Plans (OAMP) are currently being developed by RIA.</p> <p>Asset Management Policy has been drafted and will be approved by October 2015.</p> <p>On completion of this project the PFM system will become their resource and maintenance planning tool for FUSS related assets.</p>	<p>PFM</p> <p>RIA</p> <p>RIA</p>	<p>30/12/2015</p> <p>01/11/2015 – 30/06/2016</p> <p>30/10/2015</p>

