



Post-Audit Implementation Plan

Recommendation reference	Non-compliance / controls improvement	Auditor's recommendation	Action proposed to be taken by the licensee	Responsible person(s)	Target completion date
1/2019	<p>B2 Obligation 370: <i>Electricity Industry (Metering) Code 2012</i> clause 4.3(1) The 2016 Audit reported that Alinta needed to establish a metering database including all relevant metering information. Alinta has since implemented the database, however some prerequisite standing data has not been included.</p>	<p>Alinta should complete, or provide commentary on, the standing data omitted from its metering database, including:</p> <ul style="list-style-type: none"> • Item 14: NMI • Item 21: Data register coding details • Item 27: Algorithms. 	<p>Alinta will complete, or provide commentary on, the standing data items omitted from its metering database.</p>	<p>Head of Operations, Power Generation</p>	<p>31 Dec 2019</p>

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Recommendation reference	Non-compliance / controls improvement	Auditor's recommendation	Action proposed to be taken by the licensee	Responsible person(s)	Target completion date
2/2019	<p>B2 Obligations 319, 320, 326, 327, 336, 337, 340, 342-344, 357, 422, 447, 448A: <i>Electricity Industry (Metering) Code 2012 various clauses</i></p> <p>The 2016 Audit reported that Alinta has not established a clear metering management plan concerning:</p> <ul style="list-style-type: none"> • Installations and maintenance of meters in accordance with a metrology procedure, specifications under the National Measurements Act and the functionality and testing requirements under Part 3 of the Metering Code (obligations 319, 320, 326, 327, 336, 337, 340, 342-344, 357) • Management of validated energy data (obligation 422) • Compliance with all applicable agreements, rules, procedures, criteria and processes outlined on Part 6 of the Metering Code (obligations 447 & 448A). 	Alinta should complete a metering management plan to incorporate the technical requirements of the Metering Code relevant to Alinta's metering operations.	Alinta will complete a metering management plan incorporating the technical requirements of the Metering Code as part of the NWIS access project.	Head of Operations, Power Generation	30 Jun 2020

Post-Review Implementation Plan

Recommendation reference	Non-compliance / controls improvement	Auditor's recommendation	Action proposed to be taken by the licensee	Responsible person(s)	Target completion date
1/2019	<p>C3 Asset planning 1.1 <i>Asset Management Plan covers key requirements</i></p> <p>The Port Hedland Asset Management Plan (AMP) for FY2019-FY2023 was last reviewed on 2 Jul 2018 and is still in draft form, with a number of sections to be completed.</p>	<p>The AMP should be updated to include:</p> <ul style="list-style-type: none"> • Contingency arrangements • Future demand and forecast • Arrangements for review and update of the AMP • Reference the 12 key processes in the asset management lifecycle <p>The following sections of the AMP should be completed:</p> <ul style="list-style-type: none"> • 4.1.2 Basis of Operation and Maintenance Program – Asset Strategy • 4.1.3 Basis of Operation and Maintenance Program – Risk and Opportunities • 5.1.1 Key Assets – Port Hedland Facility • 5.1.2 Key Assets – Boodarie Facility • 5.2 Historical Asset Performance <p>The AMP should then be endorsed and approved.</p>	<p>Alinta will complete and update the AMP as recommended and seek endorsement and approval from senior management.</p>	<p>Head of Operations, Power Generation</p>	<p>30 Jun 2020</p>
2/2019	<p>B2 Asset planning 1.8 <i>Plans are regularly reviewed and updated</i></p> <p>Action Plan 1/2016 from the 2016 audit has not been fully completed.</p>	<p>Alinta should update the AMP to include:</p> <ul style="list-style-type: none"> • The 66 kV transmission network assets • Contingency plans. 	<p>Alinta will update the AMP to include the 66kV transmission network assets and contingency plans.</p>	<p>Head of Operations, Power Generation</p>	<p>30 Jun 2020</p>



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3/2019	<p>B2 Asset maintenance <i>6.4 Failures are analysed and operational/maintenance plans adjusted where necessary</i> Examination of InControl has determined that Alinta has not demonstrated:</p> <ul style="list-style-type: none"> • Consistency in performing root cause analysis or documenting lessons learnt • How results of failure analysis have been used to initiate changes in operational and maintenance (O&M) plans and engineering/asset renewal • There is a program in place to identify the expected asset performance or associated reliability/availability. 	<p>Alinta should consider developing an asset and system reliability/availability performance program to allow benchmarking root cause analysis of failure; be a base for building strategic models for identifying trends and predicting asset failures; and provide analyses behind the effectiveness of asset inspections when looked at from a fleet perspective. The program should include:</p> <ul style="list-style-type: none"> • Major identified failure modes of assets as related to the plan condition dashboard • Effectiveness of inspection • Ageing effects on O&M • Dedicated resource to review failures, trips and near misses and perform root cause analysis and benchmark against industry. 	<p>Alinta will consider developing an asset and system reliability/availability performance program incorporating the components of the recommendation.</p>	<p>Head of Operations, Power Generation</p>	<p>30 Jun 2020</p>

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4/2019	<p>B2 Asset maintenance <i>6.5 Risk management is applied to prioritise maintenance tasks</i> Sampling has determined a number of maintenance tasks were not completed within the timeframes set out in the Maintenance Work Process Manual.</p>	<p>Alinta should monitor completion of maintenance tasks against assigned risk priority.</p>	<p>Alinta will monitor and manage timeframes for completing maintenance tasks in accordance with assigned risk priority.</p>	<p>Head of Operations, Power Generation</p>	<p>30 Jun 2020</p>
5/2019	<p>B2 Risk management <i>8.1 Risk management policies and procedures exist and are being applied to minimise internal and external risks associated with the AMS</i> <i>8.2 Risks are documented in a risk register and treatment plans are actioned and monitored</i> Sampling has determined that some risks documented in InControl have not been reviewed or confirmed.</p>	<p>Alinta should:</p> <ul style="list-style-type: none"> • Establish an approach and timeframe for implementing treatment plans • Retain sufficient documentation to demonstrate plans have been actioned • Consider a methodology to review completed treatment plans to ensure they contain evidence as required. 	<p>Alinta will document timeframes for implementing treatment plans and ensure all relevant documentation is included in InControl.</p>	<p>Head of Operations, Power Generation</p>	<p>30 Jun 2020</p>

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6/2019	<p>B2</p> <p>Contingency planning</p> <p>9.1 <i>Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks</i></p> <p>Alinta's "umbrella" document that captures contingency plans for each key risk does not establish any testing arrangements and no testing is being applied.</p> <p>The Emergency Response Plan – Port Hedland has not been updated during the audit period.</p>	<p>Alinta should, to effectively plan against risks and test the effectiveness of contingency plans:</p> <ul style="list-style-type: none"> • Implement rigorous regular testing of business continuity plans and document results so existing plans can be improved on • Update the Emergency Response Plan – Port Hedland • Establish regular reviews of the business continuity and emergency response plans. 	<p>Alinta will update business continuity and emergency response plans as recommended and implement regular testing.</p>	<p>Head of Operations, Power Generation</p>	<p>30 Jun 2020</p>