

2019 RIA Performance Audit - Post Audit Implementation Plan - 25 November 2019

Recommendation reference (no/year)	Non-Compliance/Control improvement	Auditor's Recommendation	Action proposed to be taken by the licensee	Responsibility
01/2019	<p>B2/131</p> <p>Information is provided to customers via the Standard Form Contract and monthly utility bills.</p> <p>The Standard Form Contract includes the following: • reference to the Code of Conduct and tariff information being available from the RIA website</p> <ul style="list-style-type: none"> • general information on the Code of Conduct, • assistance with payment difficulties; and • Complaints handling. <p>The Utility Statements issued by McGee's to customers includes a 24hr telephone number for faults and emergencies stated on their statements and not invoices (EVIDENCE: INV. NOS. 109186 and 118903).</p>	<p>RIA to instruct McGee's to include the 24-hour emergency number on their invoices as part of the tendering process for a new residential property manager, ensure utility statements are compliant with Code requirements.</p> <p>Two examples of AHR invoices during the audit period were provided and they included a 24hr telephone number for faults and emergencies on invoices the audit found that general information on the safe use of electricity provided to customers during the audit period and was available via the RIA website.</p>	<p>Redesign of invoices underway – January 2020.</p>	<p>Director Planning and Contracts</p>
02/2019	<p>B2/290</p> <p>Documentation prepared by the licensee for information purposes is in accordance with the requirements.</p> <p>Both McGee's and AHR billings are not as user friendly and some information is not set out in an intuitive manner</p>	<p>AMR to increase font size for ease of reading and McGee's to include 24 hour service faults and difficulties contact number to front of invoice</p>	<p>Redesign of invoices underway – January 2020.</p>	<p>Director Planning and Contracts</p>
03/2019	<p>C2/379</p> <p>Existing metering points are not secure. Not known whether new meters will have</p>	<p>RIA to confirm what devices and methods will be in-place to ensure that existing and new meter energy data</p>	<p>Ria have instructed PFM to secure all existing meter points by way of fitting a "tag</p>	<p>Director Infrastructure</p>

	appropriate security protections.	cannot be access by local or remote unauthorised users.	seal” to each meter to prevent unauthorised access Confirmation of the completion of this process is to be provided by PFM at the conclusion of the December 2019 meter reading.	
04/2019	B2/155 Code of Conduct, clause 4.5(1) We performed a walkthrough with McGee’s and reviewed a sample of two invoices for the audit period. It was noted that both invoices complied with clause 4.5(1) and included all required information. However, the invoices did not possess a 24 hour emergency phone number.	It is recommended that McGee’s includes PFM’s 24 emergency phone number on their invoices. This is required by the Code, but is currently not complied with by McGee’s in their billing of customers.	Redesign of invoices underway – January 2020	Director Planning and Contracts
05/2019	B2/159 Code of Conduct, clause 4.8(1). Through our enquiry and system walkthrough with McGee’s, it was noted that that McGee’s has not used estimation for any customer bills during the audit period. Where metering data is unable to be provided for a particular month, the electricity amount per the invoice will be nil, and the amount will be added to the next month’s invoice. The code clause assumes an estimated bill will be issued to a customer if a bill cannot be based on an actual reading. Metering Code clause 5.3 requires a network operator to provide the retailer with energy data, which is either actual data or estimated data. Therefore, a default \$0 bill with nil reading is not compliant to the obligation. RIA should estimate a reading instead to avoid any potential bill shock for customers. It was also noted that there is no formal policy held by McGee’s or RIA in the event that metering data cannot be provided	RIA should ensure if a bill cannot be based on an actual meter reading, an estimated bill is issued to the customer following the prescribed methodologies per Metering Code for creating estimated readings.	A new Policy on estimation of RIA utility bills will be implemented. Key provision of this policy includes the requirement for RIA to estimate a customer’s bill if it is unable to gain a read for the supply address. RIA will then bill the customer and ensuring the bill clearly states that it is an estimated reading- December 2019.	Director Planning and Contracts
06/2019	B2/124 ERA annual compliance report EIRL3 covering period July 2017 - June 2018 was submitted to	Ensure the annual electricity licence reporting datasheets report are issued to ERA no later than the 1 October dead-	We will ensure the information is published by the correct date, 1 October –	Director Environment Heritage and Parks

	<p>ERA on 30 August 2018. The following 2017 annual electricity license reporting datasheets were issued to ERA on 20 September and published on RIA website on 6 October 2017:</p> <ul style="list-style-type: none"> • 2017 Electricity License Reporting Datasheets - Distribution • 2017 Electricity Performance Reporting Datasheets- Retail • 2017 Electricity License Reporting Datasheets Network Quality Reliability Code <p>The following 2018 annual electricity license reporting datasheets were submitted to ERA and published on the RIA website on 23 October 2018, outside the 1 October deadline stipulated by the ERA.</p> <ul style="list-style-type: none"> • 2018 Electricity License Reporting Datasheets Network Quality Reliability Code • 2018 Electricity License Reporting Datasheets - Distribution • 2018 Electricity Performance Reporting Datasheets - Retail 	<p>line following the reporting period. RIA should ensure controls and monitoring processes are in place to ensure compliance is achieved.</p>	<p>October 2020. Additionally, the RIA is planning to implement a compliance monitoring system that shall capture reporting obligation (rec 21/2019 of the PRIP)</p>	
07/2019	<p>B2/172 We note that during the audit period, there was only one request from a customer for McGee's/ RIA to review their electricity bill.</p> <p>Subsequently, the customer paid the bill amount owing with no further proceedings or action required.</p> <p>We note in the email correspondence between McGee's and the customer, McGee's advised the customer that they could request a meter test in accordance with the Code of Conduct. However, it was noted that the customer was not</p>	<p>RIA to ensure, when reviewing customers bill on request by the customer, that the customer is informed of the existence and operation of RIA's internal complaints handling processes and details of applicable external complaints handling processes.</p>	<p>March 2020, The RIA shall review the Utilities Customer Complaints Procedure and procedure when reviewing bills to ensure staff are aware to notify customers of the complaints procedures when the customer has requested a bill review.</p> <p>http://ria.wa.gov.au/policy-and-reports/utility-reports</p>	<p>Director Planning and Contracts</p>

	<p>informed of the existence and operation of RIA’s internal complaints handling processes and details of applicable external complaints handling processes.</p> <p>We reviewed the internal complaints register to confirm that no other requests for meter review, occurred during the audit period.</p>			
08/2019	<p>B2/306 The following 2017 datasheets and reports were provided to ERA on 20 September 2017, within the timeframe, manner and form specified by ERA.</p> <ul style="list-style-type: none"> • 2017 Electricity License Reporting Datasheets – Distribution • 2017 Electricity Performance Reporting Datasheets- Retail • 2017 Electricity License Reporting Datasheets Network Quality Reliability Code <p>The following 2018 datasheets and reports were provided to ERA in the manner and form specified by ERA, however these were provided on 23 October 2018, outside the timeframe (1 October) stipulated by the ERA.</p> <ul style="list-style-type: none"> • 2018 Electricity License Reporting Datasheets Network Quality Reliability Code • 2018 Electricity License Reporting Datasheets - Distribution • 2018 Electricity Performance Reporting Datasheets - Retail 	<p>Ensure the annual electricity licence reporting datasheets report are provided to ERA no later than the 1 October deadline following the reporting period. RIA should ensure controls and monitoring processes are in place to ensure compliance is achieved.</p>	<p>We will ensure the information is published by the correct date, 1 October – October 2020. Additionally, the RIA is planning to implement a compliance monitoring system that shall capture reporting obligation (rec 21/2019 of the PRIP)</p>	<p>Director Planning and Contracts</p>

09/2019	<p>C3/326 Electricity Industry Metering Code, clause 3.5(1) and (2) It was confirmed through inquiries that RIA/PFM does not comply with this requirement. We note that not every connection point has an individual meter. There are 510 connection points on Rottnest Island and only 205 meters. The unmetered connection points are mainly made up of RIA holiday accommodation units.</p>	<p>RIA should determine whether it intends to operate the holiday accommodation units as Type 7 connections, or if it intends for them to be metered connections that are not currently fitted with a meter. Per the Metering Code, the definition of a Type 7 connection point does not include residential short-stay accommodation. It is specific to small loads and loads consuming less than the starting electrical current of a meter.</p>	<p>Survey revenue and non-revenue connections to confirm the magnitude of revenue meters required. March 2020 RIA are currently updating the Single Line Diagrams (SLDs) of the existing low voltage network, including meters (both pre and post 2005), with completion by June 2020. These SLDs will provide the basis for identification of any missing meter at revenue connection and selection of meter at non-revenue connections, where warranted A capital plan will then be developed accordingly.</p>	Director Infrastructure
10/2019	<p>C2/342 Electricity Industry Metering Code, clause 3.12(1) There are meters at RIA with VT and CT connections. No evidence could be obtained that each metering installation complied with the prescribed design requirements. Furthermore, it was noted that the Rottnest Island Authority has a Metrology Procedure in place, however, it does not address the design of metering installations.</p>	<p>We recommend RIA to document evidence that each metering installation complies with the prescribed design requirements. RIA should also perform an update to the Metrology Procedure, to ensure that this procedure specifically addresses the design requirements of metering installations.</p>	<p>The RIA engaged an Electrical Engineering firm in July 2019 to recommend and select a standard meter and CT arrangement that complies with prescribed design requirements. This standard has been distributed for implementation on the Island and will be added to the Metrology Procedure by March 2020</p>	Director Infrastructure
11/2019	<p>C3/343 Electricity Industry Metering Code, clause 3.12(2) It was noted that there are a number of instrument transformers which are non-compliant to the requirements and these need to be replaced in order to achieve compliance.</p>	<p>RIA to put in a plan to upgrade the non-compliant instrument transformers. PFM and RIA should also maintain a compliance register to provide assurance all instrument transformers at Rottnest Island are compliant to the requirements.</p>	<p>Determine location of assets by visual inspection, record them in a register and certify they meet clause 3.12 and therein the accuracy needed. By means of Visually checking all 198 meters that need to be sealed and behind</p>	Director Infrastructure

			<p>an inaccessible door (not necessarily a lock, maybe a unique key), for the data collection to be kW, kVAR and kVA capable, and not to be a Type 7 connection point (being a data substitute for estimation purposes) by filling in the metering excel sheet.</p> <p>A capital plan for the required replacements will be developed accordingly for completion by June 2022.</p>	
12/2019	<p>C3/345 Electricity Industry Metering Code, clause 3.12(4) Based on our inquiry, we noted that PFM does not maintain drawings detailing metering installation of all meters at Rottnest Island, consistent with good electricity industry practice.</p>	<p>It is recommended that drawings of the metering installation on Rottnest Island are produced and maintained, to comply with good electricity industry practice.</p>	Refer 11/2019 – March 2020	Director Infrastructure
13/2019	<p>C3/349 Electricity Industry Metering Code, clause 3.14(3) On enquiry and walkthrough, it was noted that certain CT's on Rottnest Island are not compliant with Table 3 in Appendix 1. PFM and RIA have planned a Meter Replacement Project in the near future. This would involve not only updating the CT's, but the transformers and switchboards on Rottnest Island. As this is planned for the near future, RIA and PFM did not want to separately repair the CT's prior to this. This has resulted in several of the current CT's on Rottnest Island being non-compliant with Table 3 in Appendix 1 during the audit period.</p> <p>These meters are installed at Bathurst, Kingstown, Caroline Thomson, Longreach, Thomson Bay South, Tearooms and</p>	<p>We recommend that PFM and RIA have a program in place to rectify non-compliant CT's within a reasonable time frame, including a capital expenditure commitment. PFM and RIA should also maintain a compliance register to provide assurance all CT's at Rottnest Island are compliant to the requirements.</p>	Refer 12/2019 – June 2022	Director Infrastructure

	Geordie/Fays Bay. Six businesses are also metered via CT connected meters.			
14/2019	B2/483A The 2017 Network Quality and Reliability of Supply Performance Audit Report - Operation of Compliance Monitoring Systems was published on RIA website on 6 October 2017.	Ensure the network quality and reliability of supply independent report is published on RIA website no later than the 1 October deadline following the reporting period. RIA should ensure controls and monitoring processes are in place to ensure compliance is achieved.	We will ensure the information is published by the correct date, 1 October – October 2020. Additionally, the RIA is planning to implement a compliance monitoring system that shall capture reporting obligation (rec 21/2019 of the PRIP)	Director Planning and Contracts
15/2019	B2/485 The Rottnest Island Network Quality Report 2017-2018 was provided to ERA on 23 October 2018, the same day it was published on the RIA website.	Ensure the Network Quality report is provided to ERA not less than 7 days before it is published. RIA should ensure controls and monitoring processes are in place to ensure compliance is achieved.	We will ensure the information is published by the correct date, 1 October – October 2020. Additionally, the RIA is planning to implement a compliance monitoring system that shall capture reporting obligation (rec 21/2019 of the PRIP)	Director Infrastructure