

**Electricity Networks Corporation
trading as Western Power**

Electricity Distribution Licence (EDL1) and
Electricity Transmission Licence (ETL2)

2020 Performance Audit

Final report

30 November 2020



ASSURANCE
ADVISORY
GROUP

Level 11, 251 Adelaide Terrace
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30 November 2020

Mr Rudi James
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Dear Rudi

Electricity Distribution (EDL1) and Transmission (ETL2) Licence – 2020 Performance audit report

We have completed the performance audit of Western Power's EDL1 and ETL2 licences for the period 1 July 2017 to 30 June 2020 and are pleased to submit our report to you.

I confirm that this report is an accurate presentation of the findings and conclusions from our audit procedures.

If you have any questions or wish to discuss anything raised in the report, please contact Andrew Baldwin at abaldwin@assuranceadvisory.com.au or myself at slinden@assuranceadvisory.com.au.

Yours sincerely

Stephen Linden
Director
Assurance Advisory Group Pty Ltd

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1. Independent assurance practitioner's report

Modified opinion

We have undertaken a reasonable assurance engagement on Electricity Networks Corporation trading as Western Power's (**Western Power**) compliance, in all material respects, with the conditions of its Electricity Distribution Licence (EDL1) and Electricity Transmission Licence (ETL2) (the **Licences**) and relevant legislative obligations for the period 1 July 2017 to 30 June 2020. Our evaluation was made against the licence obligations listed in the July 2018 Electricity Compliance Reporting Manual and in accordance with the Economic Regulation Authority's (the **ERA**) March 2019 Audit and Review Guidelines: Electricity and Gas Licences (the **Guidelines**).

This single report has been prepared to represent our findings and conclusions in relation to both performance audits (i.e. for the EDL1 and ETL2 Licences), reflecting Western Power's obligations as the network operator of its transmission and distribution networks. The report highlights any instances where the obligation relates to only one of the Licences.

In our opinion, based on the procedures we have performed and the evidence we have obtained, except for the effects of the matters described in the Basis for modified opinion paragraph below, Western Power has complied, in all material respects, with its licence conditions and relevant legislative obligations for the period 1 July 2017 to 30 June 2020.

Basis for modified opinion

During the period 1 July 2017 to 30 June 2020, Western Power did not comply with applicable licence obligations as outlined below. Other than for obligations 413 and 479, Western Power identified and disclosed these matters for Type 1 and Type 2 obligations in its relevant Annual Compliance reports to the ERA¹:

Reporting Manual number and Licence obligation		Description
35	<p>Electricity Industry Customer Transfer Code clause 4.10(1)</p> <p><i>A network operator must take certain action in accordance with a defined timetable following the receipt of a valid customer transfer request, subject to clauses 4.10(2) and 4.10(3) of the Electricity Industry Customer Transfer Code and using all reasonable endeavours to affect the transfer.</i></p>	In several instances during the audit period, Western Power did not conduct the required meter read on the nominated transfer date.
39	<p>Electricity Industry Customer Transfer Code 4.11(3)</p> <p><i>A network operator and the retailer must take certain action if the contestable customer's meter is not read on the nominated transfer date.</i></p>	In several instances during the audit period where the required meter read was not conducted on the nominated transfer date, Western Power did not agree a new nominated transfer date with the incoming retailer.

¹ Note that as obligations 464 and 468 are Type NR obligations, they were not disclosed in the relevant Annual Compliance reports

Reporting Manual number and Licence obligation		Description
41	<p>Electricity Industry Customer Transfer Code 4.13 <i>A network operator must within two business days after the transfer date give an electronic notice of the transfer and the transfer date to the incoming retailer, the previous retailer and, if applicable AEMO.</i></p>	During the audit period, Western Power did not provide the prescribed notification to the incoming retailer and the previous retailer within two business days for between 1.4% and 2.61% of transfers on an annual basis.
77	<p>Electricity Industry (Obligation to Connect) Regulations regulation 8 <i>A distributor that is obliged to energise premises must do so within a defined timetable.</i></p>	During the audit period, Western Power did not comply with the obligation to connect customers within the prescribed timeframe for between 0.28% and 2.61% of requests on a monthly basis.
105	<p>Electricity Industry Act section 17(1) <i>A licensee must pay the prescribed licence fees to the ERA according to clauses 6, 7 and 8 of the Economic Regulation Authority (Licensing Funding) Regulations 2014.</i></p>	In one instance during the audit period, Western Power did not pay a prescribed licence fee by the due date.
124	<p>Electricity Licences – Distribution and Transmission Licence condition 4.5.1 <i>A licensee must provide the ERA, in the manner prescribed, with any information that the ERA requires in connection with its functions under the Electricity Industry Act.</i></p>	In one instance during the audit period, Western Power did not submit standing data to the ERA in the timeframe prescribed (one day late).
244	<p>Small Use Customer Code of Conduct Clause 8.2 <i>A distributor must reconnect the customer's supply address upon the request of a retailer, within the timeframes specified in subclause 8.2(2).</i></p>	During the audit period, Western Power did not comply with the obligation to reconnect customers within the prescribed timeframe for between approximately 0.7% and 0.9% of applications on a monthly basis.
301	<p>Small Use Customer Code of Conduct Clause 12.1(4) <i>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.</i></p>	In 12 instances during the audit period, Western Power did not acknowledge a customer complaint within the prescribed timeframe.
333	<p>Electricity Industry Metering Code clause 3.9(3) <i>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.</i></p>	Western Power's systematic sampling and testing for accuracy identified 245, 68 and 26 non-compliant meters for the 2017/18, 2018/19 and 2019/20 reporting periods respectively.

Reporting Manual number and Licence obligation		Description
341	<p>Electricity Industry Metering Code clause 3.11A(2)</p> <p><i>Subject to clause 3.11A(3), if a "population" of meters is deemed to have failed under AS 1284.13, the network operator must ensure that all the meters that make up the population are removed and replaced with new meters within 3 years of the testing of the population.</i></p>	As at 30 June 2020, Western Power had 20 non-compliant meters remaining on its network, which is a reduction of 1,793 non-compliant meters during the audit period.
357	<p>Electricity Industry Metering Code clause 3.21(1)</p> <p><i>Meters containing an internal real time clock must maintain time accuracy as prescribed. Time drift must be measured over a period of 1 month.</i></p>	During the audit period, Western Power reported an annual non-compliance rate of between 0.9% and 1.75%, where meters containing an internal real time clock did not maintain the prescribed accuracy requirements.
376	<p>Electricity Industry Metering Code clause 4.7</p> <p><i>If standing data for a metering point is updated in the registry, the network operator must, within 2 business days after the update (or such other time as is specified in the applicable service level agreement) notify the update to the current user and each previous user, if the updated standing data relates to a period or periods when the previous user was the current user.</i></p>	<p>In November 2019, Western Power did not provide notification in the required timeframe for updates to 28 sets of standing data.</p> <p>Over the audit period, Western Power's reported compliance exceeded 99.99%.</p>
385	<p>Electricity Industry Metering Code clause 5.3</p> <p><i>A network operator must, for each metering point on its network, obtain energy data from the metering installation and transfer the energy data into its metering database by no later than 2 business days after the date for the scheduled meter reading for the metering point (or such other time as is specified in the applicable service level agreement).</i></p>	During the audit period, Western Power reported annual compliance levels of between approximately 98.8% and 99.4%, relating to transfer of energy data into its metering database within the timeframes prescribed.
386	<p>Electricity Industry Metering Code clause 5.4(1)</p> <p><i>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.</i></p>	During the audit period, Western Power reported annual compliance levels of between approximately 98.8% and 98.6% relating to undertaking an actual read at least once every 12 months.
391	<p>Electricity Industry Metering Code clause 5.6(1)</p> <p><i>Subject to subclause 5.6(2), a network operator must provide validated, and where necessary, substituted or estimated energy data for a metering point to the user for the metering point and the IMO within the timeframes prescribed in subclause 5.6(1)(2).</i></p>	During the audit period, Western Power consistently reported an annual compliance level of approximately 99.95%, relating to the provision of validated, substituted or estimated energy data within the prescribed timeframes.

Reporting Manual number and Licence obligation		Description
397	<p>Electricity Industry Metering Code clause 5.12(1) <i>If a user gives a network operator an energy data request for a metering point in accordance with the communication rules and the energy data request relates only to a time or times for which the user was the current user at the metering point, then the a network operator must provide a user with a complete set of energy data for the a metering point within the timeframes prescribed.</i></p>	<p>During the audit period, Western Power disclosed a small number of instances where it did not comply with the requirements of clause 5.12(1) for providing energy data within two business days. Over the audit period, Western Power's reported compliance exceeded 99.69%.</p>
404	<p>Electricity Industry Metering Code clause 5.17A(3) <i>A network operator must comply with a direction under subclause 5.17A(1) within the timeframes prescribed.</i></p>	<p>In 130 instances during the audit period, Western Power did not provide data within 10 business days of receiving a direction. These instances occurred during the 2018/19 reporting year and comprised 3.91% of directions received.</p>
413	<p>Electricity Industry Metering Code clause 5.20(4) <i>If a Code participant requests verification of energy data under subclause 5.20(3), the network operator must, in accordance with the metrology procedure:</i></p> <ul style="list-style-type: none"> • <i>subject to subclause 5.20(5), use reasonable endeavours to verify energy data; and</i> • <i>inform the requesting Code participant of the result of the verification and provide the verified energy data to that Code participant within the timeframes prescribed.</i> 	<p>In several instances during the audit period, Western Power did not verify energy data within the two-day timeframe prescribed by its Model SLA.</p>
415	<p>Electricity Industry Metering Code clause 5.21(4) <i>A test or audit under subclause 5.21(1) is to be conducted in accordance with the metrology procedure and the applicable service level agreement.</i></p>	<p>In several instances during the audit period, Western Power did not perform tests within the seven-day timeframe prescribed by its Model SLA.</p>
423	<p>Electricity Industry Metering Code clause 5.22(2) <i>The network operator must use check metering data, where available, to validate energy data provided that the check metering data has been appropriately adjusted for differences in metering installation accuracy in accordance with subclause 3.13.</i></p>	<p>Up until 6 April 2018 when an effective solution was implemented, Western Power's processes were designed to publish energy data to the market prior to it being validated against check metering data, which did not meet the requirement of the Metering Code.</p>

Reporting Manual number and Licence obligation		Description
434	<p>Electricity Industry Metering Code clause 5.25</p> <p><i>A network operator must ensure the accuracy of estimated energy data in accordance with the methods in its metrology procedure and ensure that any transformation or processing of data preserves its accuracy in accordance with the metrology procedure.</i></p>	In 296 instances during the audit period, Western Power incorrectly published customer supplied readings to market as actuals, which does not comply with the requirements of the Metering Code.
447	<p>Electricity Industry Metering Code clause 6.1(1)</p> <p><i>A network operator must, in relation to its network, comply with the agreements, rules, procedures, criteria and processes prescribed.</i></p>	As a result of Western Power's failure to meet a number of the requirements of its Metrology Procedure and its Model SLA, as described above at obligation 415 and 434, Western Power was unable to demonstrate compliance with clause 6.1(1) of the Metering Code.
455	<p>Electricity Industry Metering Code clause 7.5</p> <p><i>A Code participant must subject to subclauses 5.17A and 7.6 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.</i></p>	In one instance during the audit period, Western Power improperly disclosed confidential information (relating to customer email addresses in a group email).
464	<p>Electricity Industry (Network Quality and Reliability of Supply) Code section 9</p> <p><i>A distributor or transmitter must, as far as reasonably practicable, ensure that the supply of electricity is maintained and the occurrence and duration of interruptions is kept to a minimum.</i></p>	During the audit period, Western Power consistently reported an annual compliance level of approximately 95%, relating to the prescribed number of outages permitted by the Electricity Industry (Network Quality and Reliability of Supply) Code.
467	<p>Electricity Industry (Network Quality and Reliability of Supply) Code section 12(3)</p> <p><i>A distributor must take prescribed action in the event of a significant interruption to a small use customer.</i></p>	<i>Obligations 467 and 468</i> During the audit period, Western Power's small use customers continued to have interruptions, which breached the requirements of the NQRS Code owing to adverse climatic events.
468	<p>Electricity Industry (Network Quality and Reliability of Supply) Code section 13(2)</p> <p><i>A distributor or transmitter must, so far as reasonably practicable, ensure that customers in specified areas do not have average total lengths of interruptions of supply greater than specified durations.</i></p>	

Reporting Manual number and Licence obligation		Description
472	<p>Electricity Industry (Network Quality and Reliability of Supply) Code section 18</p> <p><i>A distributor operating a relevant distribution system must, in specified circumstances, make a payment to a customer within a specific timeframe for a failure to give required notice of planned interruption.</i></p>	In one instance during the audit period, Western Power did not make the required service standard payment within 30 days of application.
473	<p>Electricity Industry (Network Quality and Reliability of Supply) Code section 19</p> <p><i>A distributor operating a relevant distribution system must, in specified circumstances, make a payment to a customer within a specific timeframe if a supply interruption exceeds 12 hours.</i></p>	In 19 instances during the audit period, Western Power did not pay a customer the required service standard within the timeframes prescribed by the NQRS Code.
479	<p>Electricity Industry (Network Quality and Reliability of Supply) Code section 24(3)</p> <p><i>A distributor or transmitter must complete a quality investigation requested by a customer in accordance with specified requirements.</i></p>	In four instances during the audit period, Western Power did not complete a quality investigation requested by a customer within the required 20-day timeframe.

We conducted our engagement in accordance with Standard on Assurance Engagements ASAE 3100 *Compliance Engagements (ASAE 3100)* issued by the Auditing and Assurance Standards Board.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Western Power management's responsibility for compliance with the conditions of the Licences

Western Power's management is responsible for:

- Compliance with the Licences as evaluated against the conditions within the Licences, for the period 1 July 2017 to 30 June 2020
- Identifying risks that threaten the conditions within the Licences identified above being met
- Identifying suitable compliance requirements as specified by the ERA
- Identifying, designing and implementing controls to enable the conditions within the Licences to be met and to monitor ongoing compliance.

Our independence and quality control

We have complied with the independence and other relevant ethical requirements relating to assurance engagements, which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour. We applied Auditing Standard ASQC 1 *Quality Control for Firms that Perform Audits and Reviews of Financial Reports and Other Financial Information, and Other Assurance Engagements* in undertaking this assurance engagement.

Our responsibilities

Our responsibility is to express an opinion on Western Power's compliance, in all material respects, with the licence obligations as evaluated against its Licence Conditions for the period 1 July 2017 to 30 June 2020. ASAE 3100 requires that we plan and perform our procedures to obtain reasonable assurance about whether, Western Power has complied, in all material respects, with the licence obligations as evaluated against its Licence Conditions for the period from 1 July 2017 to 30 June 2020.

A reasonable assurance engagement in accordance with ASAE 3100, to report on Western Power's compliance with the licence obligations as evaluated against its Licence Conditions involves performing procedures to obtain evidence about the compliance activity and controls implemented to meet the conditions within the Licences. The procedures selected depend on our judgement, including the identification and assessment of risks of material non-compliance with the licence obligations as evaluated against its Licence Conditions.

Our procedures included:

- Utilising the Audit Guidelines and the July 2018 Electricity Compliance Reporting Manual (the **Reporting Manual**) as a guide for development of a risk assessment and document review to assess controls
- Development of an Audit Plan for approval by the ERA and an associated work program, set out in Appendix A
- Interviews with and representations from relevant Western Power staff to gain an understanding of process controls
- Review of documents and walkthrough of processes and controls to support the assessment of compliance and the effectiveness of the control environment in accordance with Licence obligations
- Sample testing where relevant for obligations rated as an audit priority 3 and above in the approved Audit Plan.

Inherent Limitations

Because of the inherent limitations of an assurance engagement, together with the internal control structure, it is possible that fraud, error or non-compliance with compliance requirements may occur and not be detected.

A reasonable assurance engagement relating to the period from 1 July 2017 to 30 June 2020 does not provide assurance on whether compliance with the Licences will continue in the future.

Restricted use

This report has been prepared for use by Western Power for the purpose of satisfying its obligation under Section 13 of the Electricity Industry Act 2004. We disclaim any assumption of responsibility for any reliance on this report to any person other than Western Power, or for any other purpose other than that for which it was prepared. We understand that a copy of the report will be provided to the ERA for the purpose of reporting on the performance audit for the Licences. We agree that a copy of this report will be given to the ERA in connection with this purpose, however we accept no responsibility to the ERA or to anyone who is provided with or obtains a copy of our report.

Stephen Linden

Director

Assurance Advisory Group Pty Ltd

30 November 2020

2. Executive Summary

2.1 Introduction and Background

The Economic Regulation Authority (the **ERA**) has under the provisions of the Electricity Industry Act 2004 (the **Act**), issued to Electricity Networks Corporation trading as Western Power (**Western Power**) an Electricity Distribution Licence (EDL1) and Electricity Transmission Licence (ETL2) (the **Licences**).

Western Power operates the South West Interconnected System (**SWIS**) electricity network, and is responsible for maintenance, operation and expansion activities in relation to the network.

Section 13 of the Act requires Western Power to provide to the ERA a performance audit (the **audit**) conducted by an independent expert acceptable to the ERA not less than once in every 24-month period unless otherwise approved by the ERA. With the ERA's approval, Assurance Advisory Group (**AAG**) has been appointed to conduct the audit for the period 1 July 2017 to 30 June 2020 (**audit period**).

The audit has been conducted in accordance with the ERA's March 2019 issue of the *Audit and Review Guidelines: Electricity and Gas Licences* (**Audit Guidelines**).

2.2 Observations

Control environment

In considering Western Power's internal control procedures, structure and environment, its compliance culture and its information systems specifically relevant to those licence obligations subject to audit, we observed that Western Power has:

- Maintained an Obligations Register to capture:
 - Key details of all Licence obligations
 - Assigned obligation owners and contacts throughout the business
 - Key controls in place, including systems, processes, procedures, reports and other references
 - Details of past compliance performance, including results from prior performance audits and non-compliances reported to the ERA via Annual Compliance Reports
- Continued to further strengthen its internal compliance monitoring and reporting processes, which enables it to proactively identify and self-report non-compliances in a timely manner
- In addition to its core Regulatory Compliance Team, comprised of three full time staff, assigned and empowered several staff throughout the business to take on a visible compliance support role, particularly to assist operational teams in monitoring and improving their compliance performance
- Further developed the compliance culture across the organisation, which enables staff to recognise Licence obligations, monitor compliance levels and identify and report instances of non-compliance. Examples of strength in Western Power's compliance culture include:
 - Key staff have a strong understanding of the obligations for which they have been assigned ownership
 - Non-compliances are routinely self-reported by staff throughout the organisation

- Staff are encouraged to be transparent in reporting compliance and non-compliance results internally and, where relevant, external to the organisation
- A high percentage completion of compliance-related training
- Implemented several technology enhancements to assist in improving its level of compliance
- Further developed its working relationship with retailers to identify risks and improvement opportunities in related or sequential processes.

Compliance performance

Overall, we observed that:

- Western power maintains a very strong commitment to address all Type 1 obligations, relating to disconnections, priority restoration and customers requiring life support equipment
- Western Power has demonstrated continued improvement in controls and capabilities to meet its licence obligations, resulting in an improved overall compliance performance. A total of 29 obligations were rated as non-compliant during the audit period, compared with 37 during the previous audit period
- All except two of the non-compliances observed by this audit were identified by Western Power prior to the audit and duly included in annual compliance reports to the ERA, where required (i.e. for Type 1 and 2 obligations)
- 18 (>50%) of the non-compliances observed by this audit are continuous or recurring non-compliances, for which Western Power:
 - Recognises that the significant challenges for maintaining full compliance at all times include:
 - The extent and volume of transactions and activity
 - Matters currently outside of its control
 - Maintains effective monitoring and reporting controls to identify non-compliances, their causes, and potential actions to further maximise compliance results
 - Has committed to continuously consider opportunities to implement appropriate technology, process and/or people solutions to minimise or resolve compliance issues that are within its control. Potential opportunities for further refining Western Power's approach to managing obligations that are continually non-compliant have been presented to Western Power for consideration, separate to this audit report
- Four non-compliances observed by this audit were caused by administrative errors, each of which were identified and addressed in a timely manner
- One non-compliance, relating to obligation 479 (completion of qualifying power quality investigations within 20 business days) was caused by inattention to Western Power's prescribed process, and requires action by Western Power to prevent recurrence. Refer to Issue and Recommendation 2/2020
- Western Power implemented all except one of the action plans in response to recommendations raised during the 2017 Performance Audit, which has served to further improve its controls over its Licence compliance obligations. The one action plan that has not yet been implemented relates to a long-term plan for replacing meters deemed to be non-compliant with the Metering Code. Refer to Issue and Recommendation 1/2020

- There are several potential opportunities for Western Power to continue to further improve controls over its Licence compliance obligations. The potential opportunities raised by this audit have been presented to Western Power for consideration as improvement opportunities, separate to this audit report.

2.3 Findings

The following tables summarise the assessments made during the audit on Western Power's compliance and the adequacy of controls in place for Western Power to manage its compliance with the relevant obligations or conditions of the Licences.

Table 1 sets out the rating scale defined by the ERA in the Audit Guidelines for the assessment of the level of compliance with the conditions of the Licence. For the highest possible compliance rating to be achieved, Western Power was required to demonstrate it has maintained mature processes and controls, which facilitate compliance with relevant obligations.

Table 1: Control adequacy and compliance rating scale

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
N/P	Not performed – A controls rating was not required	N/R	Not rated – No activity took place during the audit period

Table 5 at section 3 of this report provides further detail on the controls and compliance rating scales. The above rating scale is defined by the Audit Guidelines.

Table 2: Summary of findings, by compliance and controls ratings

		Compliance rating					Total
		1	2	3	4	N/R	
Controls rating	A	4	15			2	21
	B	1	13				14
	C		1				1
	D						0
	N/P	190				51	241
	Total	195	29	0	0	53	277

Table 3: Summary of findings, by audit priority and controls rating

Audit Priority	Controls rating					Total
	A	B	C	D	N/P	
Priority 1						
Priority 2	13	12				25
Priority 3	6					6
Priority 4		2	1		203	206
Priority 5	2				38	40
Total	21	14	1	0	241	277

Table 4: Summary of findings, by audit priority and compliance rating

Audit Priority	Compliance rating					Total
	1	2	3	4	N/R	
Priority 1						
Priority 2	4	19			2	25
Priority 3		6				6
Priority 4	169	2			35	206
Priority 5	22	2			16	40
Total	195	29	0	0	53	277

Note that, in accordance with the Audit Guidelines:

- Obligations assessed as being “not applicable” to Western Power’s operations have not been included within this report
- A control rating is only provided for those obligations with a Priority 1, 2 or 3 rating, where an obligation is assessed as non-compliant, or where a control improvement opportunity is identified.

Specific assessments for each Licence obligation are summarised at Table 5 in the “Summary of findings” section of this report.

Detailed findings, including relevant observations, recommendations and action plans are located in section 4 “Detailed findings, recommendations and action plans”.

2.4 Western Power’s response to previous audit recommendations

This audit considered Western Power’s progress in completing the action plans detailed in the 2017 performance audit report.

Based on our examination of relevant documents, discussion with staff and consideration of the results of our testing against the associated licence obligations, we determined that Western Power has completed and closed out six of the seven action plans detailed in the 2017 performance audit report.

The one action plan (3/2017: Obligation 341 - Electricity Industry Metering Code clause 3.11A(2)) not yet completed and closed out relates to Western Power’s ongoing program to replace or remove non-compliant direct connect meters. During the audit period, the number of non-compliant meters

has been reduced from 1,813 to 20, with a Management Plan in place to replace or remove the remaining meters as soon as practicable.

Refer to section 5 “Previous audit non-compliances and recommendations” for further detail.

2.5 Current audit non-compliances, recommendations and action plans

A. Resolved during current audit period

Licence obligation ref no. / Recommendation ref from previous audit	Non-compliance / Controls improvement (Rating / Licence obligation / Details of non-compliance or inadequacy of controls)	Date resolved & action taken by the licensee	Auditor’s comments
35 (2/2017)	<p>B2</p> <p><i>Electricity Industry Customer Transfer Code</i></p> <p><i>Clause 4.10(1)</i></p> <p>In several instances during the audit period, Western Power did not conduct the required meter read on the nominated transfer date.</p>	Western Power has continued to recognise that the extent and volume of customer transfer activity poses a significant challenge for maintaining full compliance at all times, and that it will continue to maintain effective monitoring and reporting controls to identify non-compliances, their causes, and additional actions to further minimise underlying delays and scheduling issues.	This audit makes no further recommendation.
39 (2/2017)	<p>B2</p> <p><i>Electricity Industry Customer Transfer Code</i></p> <p><i>Clause 4.11(3)</i></p> <p>In several instances during the audit period where the required meter read was not conducted on the nominated transfer date and where a response had not been received from the incoming retailer, Western Power did not agree a new nominated transfer date with the incoming retailer.</p>	Western Power has continued to recognise that the extent and volume of customer transfer activity poses a significant challenge for maintaining full compliance at all times, and that it will continue to maintain effective monitoring and reporting controls to identify non-compliances, their causes, and additional actions to further minimise underlying delays and scheduling issues, and to improve communications with incoming retailers.	This audit makes no further recommendation.
41 (1/2017)	<p>B2</p> <p><i>Electricity Industry Customer Transfer Code</i></p> <p><i>Clause 4.11(3)</i></p> <p>During the audit period, Western Power did not provide the prescribed notification to the incoming retailer and the previous retailer within two business days for between 1.4% and 2.61% of transfers on an annual basis.</p>	Western Power has continued to recognise that the extent and volume of customer transfer activity poses a significant challenge for maintaining full compliance at all times, and that it will continue to maintain effective monitoring and reporting controls to identify non-compliances, their causes, and additional actions to further minimise underlying delays and scheduling issues	This audit makes no further recommendation.

Licence obligation ref no. / Recommendation ref from previous audit	Non-compliance / Controls improvement (Rating / Licence obligation / Details of non-compliance or inadequacy of controls)	Date resolved & action taken by the licensee	Auditor's comments
77 (1/2017)	<p>B2 <i>Electricity Industry (Obligation to Connect) Regulations</i> <i>Regulation 8</i></p> <p>During the audit period, Western Power did not comply with the obligation to connect customers within the prescribed timeframe for between 0.28% and 2.61% of requests on a monthly basis.</p>	<p>Western Power has continued to recognise that the volume of customer energisation activity poses a significant challenge for maintaining full compliance at all times, and that it will continue to maintain effective monitoring and reporting controls to identify non-compliances, their causes, and additional actions to further minimise underlying delays and scheduling issues.</p>	<p>This audit makes no further recommendation.</p>
105	<p>A2 <i>Electricity Industry Act</i> <i>Section 17(1)</i></p> <p>In one instance during the audit period, Western Power did not pay a prescribed licence fee by the due date. The non-compliance was attributed to an oversight in the payments process.</p>	<p>Resolved: August 2018</p> <p>Western Power implemented additional steps within the payments process to prevent recurrence.</p>	<p>No further action required.</p>
124	<p>A2 <i>Electricity Licences – Distribution and Transmission Licence</i> <i>Licence condition 4.5.1</i></p> <p>In one instance during the audit period, Western Power did not submit standing data to the ERA in the timeframe prescribed (one day late).</p>	<p>Resolved: October 2017</p> <p>Western Power initiated additional steps to record such requests for standing data and in its annual compliance reporting checklist and supporting calendar to enable timely response to the ERA.</p>	<p>No further action required.</p>
244 (1/2017)	<p>A2 <i>Small Use Customer Code of Conduct</i> <i>Clause 8.2</i></p> <p>During the audit period, Western Power did not comply with the obligation to reconnect customers within the prescribed timeframe for between approximately 0.7% and 0.9% of applications on a monthly basis.</p>	<p>Western Power has continued to recognise that the volume of customer re-energisation activity poses a significant challenge for maintaining full compliance at all times, and that it will continue to maintain effective monitoring and reporting controls to identify non-compliances, their causes, and additional actions to further minimise underlying delays and scheduling issues.</p>	<p>This audit makes no further recommendation.</p>

Licence obligation ref no. / Recommendation ref from previous audit	Non-compliance / Controls improvement (Rating / Licence obligation / Details of non-compliance or inadequacy of controls)	Date resolved & action taken by the licensee	Auditor's comments
301	<p>A2</p> <p><i>Small Use Customer Code of Conduct Clause 12.1(4)</i></p> <p>In 12 instances during the audit period, Western Power did not acknowledge a customer complaint within the prescribed timeframe.</p>	<p>Resolved: June 2019</p> <p>Western Power undertook a full review of the extent and cause of instances where customer complaints were not acknowledged within the 10 day timeframe. Appropriate additional controls were implemented.</p>	No further action required.
333	<p>A2</p> <p><i>Electricity Industry Metering Code Clause 3.9(3)</i></p> <p>Western Power's systematic sampling and testing for accuracy identified 245, 68 and 26 non-compliant meters for the 2017/18, 2018/19 and 2019/20 reporting periods respectively.</p>	Western Power has continued to recognise that the volume of its meters presents a significant challenge for maintaining full compliance at all times, and that it will continue to systematically test its meters in accordance with its defined testing program.	This audit makes no further recommendation.
357 (1/2017)	<p>B2</p> <p><i>Electricity Industry Metering Code Clause 3.21(1)</i></p> <p>During the audit period, Western Power reported an annual non-compliance rate of between 0.9% and 1.75%, where meters containing an internal real time clock did not maintain the prescribed accuracy requirements.</p>	Western Power has continued to recognise that the volume of its current fleet of interval meters presents a significant challenge for maintaining full compliance at all times, and that it will continue to monitor the time accuracy of its interval meters and correct the time drift in meters where inaccuracies are identified.	This audit makes no further recommendation.
376	<p>A2</p> <p><i>Electricity Industry Metering Code Clause 4.7</i></p> <p>In November 2019, Western Power did not provide notification in the required timeframe for updates to 28 sets of standing data.</p> <p>Over the audit period, Western Power's reported compliance exceeded 99.99%.</p>	Western Power attributed this breach to the impact of an MBS system upgrade, which temporarily impacted the timeliness of notifications. Subsequent monitoring indicated the issue was not systematic, with 100% compliance achieved since November 2019.	No further action required.
385 (1/2017)	<p>B2</p> <p><i>Electricity Industry Metering Code Clause 5.3</i></p> <p>During the audit period, Western Power reported annual compliance levels of between approximately 98.8% and 99.4%, relating to transfer of energy data into its metering database within the timeframes prescribed.</p>	Western Power has continued to recognise that the volume of meter reading activity poses a significant challenge for maintaining full compliance at all times, and that it will continue to maintain effective monitoring and reporting controls to identify non-compliances with the aim of further improving performance.	This audit makes no further recommendation.

Licence obligation ref no. / Recommendation ref from previous audit	Non-compliance / Controls improvement (Rating / Licence obligation / Details of non-compliance or inadequacy of controls)	Date resolved & action taken by the licensee	Auditor's comments
386 (1/2017)	<p>B2</p> <p><i>Electricity Industry Metering Code Clause 5.4(1)</i></p> <p>During the audit period, Western Power reported annual compliance levels of between approximately 98.8% and 98.6% relating to undertaking an actual read at least once every 12 months.</p>	Western Power has continued to recognise that the volume of meter reading activity poses a significant challenge for maintaining full compliance at all times, and that it will continue to maintain effective monitoring and reporting controls to identify non-compliances with the aim of further improving performance.	This audit makes no further recommendation.
391 (1/2017)	<p>B2</p> <p><i>Electricity Industry Metering Code Clause 5.6(1)</i></p> <p>During the audit period, Western Power consistently reported an annual compliance level of approximately 99.95%, relating to the provision of validated, substituted or estimated energy data within the prescribed timeframes.</p>	Western Power has continued to recognise that the volume of meter reading and validation activity poses a significant challenge for maintaining full compliance at all times, and that it will continue to maintain effective monitoring and reporting controls to identify non-compliances with the aim of further improving performance.	This audit makes no further recommendation.
397	<p>B2</p> <p><i>Electricity Industry Metering Code Clause 5.12(1)</i></p> <p>During the audit period, Western Power disclosed a small number of instances where it did not comply with the requirements of clause 5.12(1) for providing energy data within two business days. Over the audit period, Western Power's reported compliance exceeded 99.69%.</p>	Western Power has continued to recognise that the volume of data validation and reporting activity poses a significant challenge for maintaining full compliance at all times, and that it will continue to maintain effective monitoring and reporting controls to identify non-compliances with the aim of further improving performance.	This audit makes no further recommendation.
404 (1/2017)	<p>A2</p> <p><i>Electricity Industry Metering Code Clause 5.17A(3)</i></p> <p>In 130 instances during the audit period, Western Power did not provide data within 10 business days of receiving a direction. These instances occurred during the 2018/19 reporting year and comprised 3.91% of directions received.</p>	<p>Resolved: December 2018</p> <p>Western Power identified the cause of the breaches as relating to:</p> <ul style="list-style-type: none"> • A temporary impact from the implementation of an MBS system upgrade • Two manual data entry errors. Western Power subsequently reinforced the importance of correct data entry with its personnel. 	No further action required.

Licence obligation ref no. / Recommendation ref from previous audit	Non-compliance / Controls improvement (Rating / Licence obligation / Details of non-compliance or inadequacy of controls)	Date resolved & action taken by the licensee	Auditor's comments
413	<p>B2</p> <p><i>Electricity Industry Metering Code Clause 5.20(4)</i></p> <p>In several instances during the audit period, Western Power did not validate energy data within the two-day timeframe prescribed by its Model SLA.</p>	<p>Western Power has recognised that the volume of data validation and reporting activity poses a significant challenge for maintaining full compliance with the two business day timeframe and has committed to maintaining effective monitoring and reporting controls to identify future non-compliances any related issues and improvement opportunities.</p> <p>We note that Western Power's revised Model SLA, effective from 1 November 2020 reverts to the 5-business day timeframe and a service standard target of 100% (i.e. consistent with the Metering Code).</p>	This audit makes no further recommendation.
415 (1/2017)	<p>B2</p> <p><i>Electricity Industry Metering Code Clause 5.21(4)</i></p> <p>In several instances during the audit period, Western Power did not perform tests within the seven-day timeframe prescribed by its Model SLA.</p>	<p>Western Power has continued to recognise that the difficulties in accessing customer sites, the time taken to travel to geographically isolated sites and prioritisation of resources poses a significant challenge for maintaining full compliance at all times, and that it will continue to maintain effective monitoring and reporting controls to identify non-compliances with the aim of further improving performance.</p>	This audit makes no further recommendation.
423 (5/2017)	<p>A2</p> <p><i>Electricity Industry Metering Code Clause 5.22(2)</i></p> <p>Up until 6 April 2018 when an effective solution was implemented, Western Power's processes were designed to publish energy data to the market prior to it being validated against check metering data, which did not meet the requirement of the Metering Code.</p>	<p>Resolved: April 2018</p> <p>Western Power implemented an effective solution within its MBS System.</p>	No further action required.
434 (6/2017)	<p>B2</p> <p><i>Electricity Industry Metering Code Clause 5.25</i></p> <p>In 296 instances during the audit period, Western Power incorrectly published customer supplied readings to market as actuals, which does not comply with the requirements of the Metering Code.</p>	<p>Western Power has continued to recognise that the volume of meter data activity poses a significant challenge for maintaining full compliance at all times, and that it will continue to maintain effective monitoring and reporting controls to identify non-compliances with the aim of further improving performance.</p>	This audit makes no further recommendation.

Licence obligation ref no. / Recommendation ref from previous audit	Non-compliance / Controls improvement (Rating / Licence obligation / Details of non-compliance or inadequacy of controls)	Date resolved & action taken by the licensee	Auditor's comments
447 (1/2017)	<p>B2</p> <p><i>Electricity Industry Metering Code Clause 6.1(1)</i></p> <p>As a result of Western Power's failure to meet a number of the requirements of its Metrology Procedure and its Model SLA, as described above at obligations 77, 244, 415 and 434, Western Power was unable to demonstrate compliance with clause 6.1(1) of the Metering Code.</p>	Western Power's compliance with this obligation is driven by its ability to comply with other obligations under the Metering Code (refer to 415 and 434 above) and other related Codes (refer to 77 and 244) above.	This audit makes no further recommendation.
455	<p>A2</p> <p><i>Electricity Industry Metering Code Clause 7.5</i></p> <p>In one instance during the audit period, Western Power improperly disclosed confidential information (relating to customer email addresses in a group email).</p>	<p>Resolved: March 2018</p> <p>Western Power notified the relevant parties of the breach and corrected its group email procedures to prevent a recurrence.</p>	No further action required.
464 (1/2017)	<p>A2</p> <p><i>Network Quality and Reliability of Supply Code Section 9</i></p> <p>During the audit period, Western Power consistently reported an annual compliance level of approximately 95%, relating to the prescribed number of outages permitted by the Electricity Industry (Network Quality and Reliability of Supply) Code.</p>	Western Power has continued to recognise that it is a significant challenge to maintain full compliance with this requirement, and reports its performance in its Annual Reliability and Power Quality reports as required by the Electricity Industry (Network Quality and Reliability of Supply) Code.	This audit makes no further recommendation.
467 (1/2017)	<p>A2</p> <p><i>Network Quality and Reliability of Supply Code Section 12(3)</i></p> <p>During the audit period, Western Power's small use customers continued to have interruptions, which breached the requirements of the NQRS Code owing to adverse climatic events.</p>	Western Power has continued to recognise that it will continue to breach this requirement while the NQRS Code does not exclude adverse weather events, and has submitted a request to Energy Policy WA for the NQRS Code to be amended to align with Service Standard Benchmarks in Western Power's Access Arrangement.	This audit makes no further recommendation.

Licence obligation ref no. / Recommendation ref from previous audit	Non-compliance / Controls improvement (Rating / Licence obligation / Details of non-compliance or inadequacy of controls)	Date resolved & action taken by the licensee	Auditor's comments
468 (1/2017)	<p>A2</p> <p><i>Network Quality and Reliability of Supply Code</i></p> <p><i>Section 13(2)</i></p> <p>During the audit period, Western Power's small use customers continued to have interruptions, which breached the requirements of the NQRS Code owing to adverse climatic events.</p>	Western Power has continued to recognise that it will continue to breach this requirement while the NQRS Code does not exclude adverse weather events, and has submitted a request to Energy Policy WA for the NQRS Code to be amended to align with Service Standard Benchmarks in Western Power's Access Arrangement.	This audit makes no further recommendation.
472	<p>A2</p> <p><i>Network Quality and Reliability of Supply Code</i></p> <p><i>Section 18</i></p> <p>In one instance during the audit period, Western Power did not make the required service standard payment within 30 days of application.</p>	<p>Resolved: January 2020</p> <p>Western Power attributed the non-compliance to human error and provided coaching and refresher training to relevant staff.</p>	No further action required.
473	<p>B2</p> <p><i>Network Quality and Reliability of Supply Code</i></p> <p><i>Section 18</i></p> <p>In 19 instances during the audit period, Western Power did not pay a customer the required service standard within the timeframes prescribed by the NQRS Code.</p>	<p>Resolved: June 2019</p> <p>In September 2017, Western Power corrected an error in the automated payment process for Electronic Funds Transfers to customers.</p> <p>In June 2019, Western Power implemented a fortnightly reconciliation process to monitor the timeliness of its Extended Outage Payment Scheme payments.</p>	This audit discussed potential process improvement opportunities with the Customer Service Centre Team, however makes no further recommendation.

B. Unresolved at end of current audit period

Reference (no./year)	Non-compliance / Controls improvement (Rating / Licence obligation reference number and licence obligation / Details of noncompliance or inadequacy of controls)	Auditor's recommendation	Action taken by Western Power by end of audit period
1/2020	<p>A2</p> <p><i>Obligation 341 - Electricity Industry Metering Code Clause 3.11A(2)</i></p> <p>Since Western Power first recognised that there were approximately 320,000 non-compliant direct connect meters on its network, it developed an action plan (approved by the EnergySafety division of the Department of Commerce) to replace the non-compliant meters by 1 December 2015. An amendment to the Code confirmed that only approximately 54,000 of the 320,000 meters were non-compliant.</p> <p>Western Power has continued to implement its Management Plan for replacing or removing the remaining meters as soon as practicable, taking into account safety concerns or access constraints.</p> <p>As at 30 June 2020, 20 non-compliant meters remained.</p>	<p>Western Power close-out the Management Plan to address the remaining non-compliant meters by determining the likelihood of those meters being replaced or removed, and any relevant timeframe for replacement or removal.</p>	<p>During the audit period, Western Power continued to implement the Management Plan to reduce the number of non-compliant meters from 1,813 to 20.</p>
2/2020	<p>C2</p> <p><i>Obligation 479 - Network Quality & Reliability of Supply Code Section 24(3)</i></p> <p>Section 24(3) of the NQRS Code requires Western Power to complete power quality investigations within 20 working days for qualifying requests by customers who consider that their supply of electricity did not comply with the voltage fluctuation and harmonic standards specified by the NQRS Code.</p> <p>In accordance with Action Plan 7/2017, Western Power amended its processes for managing and monitoring the completion of its power quality investigations to enable it to adequately distinguish between investigations per the NQRS Code requirements and service standard targets.</p> <p>Since approximately April 2018, Western Power had not effectively applied that component of its power quality investigation process and as a result, failed to identify and adequately track the progress of four written requests for investigation that triggered the NQRS Code's requirement for power quality investigations to be completed within 20 working days. In all four cases, occurring between December 2018 and April 2020, the investigation was not completed within the required timeframe.</p> <p>This result was recognised by Western Power when preparing the requested information for this audit.</p>	<p>Western Power:</p> <ol style="list-style-type: none"> 1. Further expand on its design of processes for identifying and adequately tracking the progress of written requests for power quality investigations that trigger the NQRS Code's requirement for investigations to be completed within 20 working days. 2. Embed those processes into its regular (monthly, quarterly and/or annual) monitoring and reporting practices. 3. Strengthen awareness of the relevance of this process and underlying NQRS Code obligations. 	<p>n/a</p>

2.6 Scope and objectives

We have conducted a reasonable assurance audit in order to state whether, in our opinion, based on our procedures, Western Power has complied, in all material respects, with the conditions of its Licences as outlined in the approved Audit Plan (dated May 2020) during the period 1 July 2017 to 30 June 2020.

Our engagement was conducted in accordance with Australian Standard on Assurance Engagements ASAE 3100 Compliance Engagements, issued by the Australian Auditing and Assurance Standards Board and provides reasonable assurance as defined in ASAE 3100. The procedures we performed are described in more detail in section 2.7 below.

A reasonable assurance engagement in accordance with ASAE 3100 involves performing procedures to obtain evidence about the compliance with the conditions of the Licences. The nature, timing and extent of procedures selected depend on the assurance practitioner's professional judgement, including the assessment of the risks of material misstatement in compliance with the conditions of the Licences. In making those risk assessments, we considered internal controls in relation to compliance with the conditions of the Licences.

ASAE 3100 also requires us to comply with the relevant ethical requirements of the Australian professional accounting bodies.

The ERA has summarised the requirements of the applicable legislation that it expects to be reported upon and included in the scope of this audit in its July 2018 Electricity Compliance Reporting Manual.

The Audit Plan approved by the ERA for this audit sets out Western Power's Licence obligations confirmed to be included in the scope of the audit, along with the risk assessments and audit priority assigned to each licence obligation.

2.6.1 Deviation from Audit Plan

The following obligations were included in the scope of this audit, subsequent to the ERA's approval of the Audit Plan in May 2020. Both obligations are specific to Western Power and were included in the June 2020 edition of the ERA's Electricity Compliance Reporting Manual:

- Obligation 469A: *Electricity Industry (Network Quality and Reliability of Supply) Code clause 13B*
- Obligation 469B: *Electricity Industry (Network Quality and Reliability of Supply) Code clause 13C*

These obligations relate to temporary reliability standards that apply to supply to Eastern Goldfields and North Country from 1 October 2018 to 30 September 2023.

Both obligations are Type NR and are assessed as Audit Priority 5.

2.7 Approach

Our approach for this audit involved the following activities, which were undertaken during the period May to August 2020:

- Utilising the Audit Guidelines and Reporting Manuals as a guide, developed a risk assessment, which involved discussions with key staff and document review to assess controls
- Developed an Audit Plan (see Appendix A) for approval by the ERA and an associated work program
- Interviewed relevant Western Power representatives to gain understanding of process controls (see Appendix B for staff involved)
- Reviewed relevant documentation and walked through systems, processes and controls to assess overall compliance and effectiveness in accordance with Licence obligations (see Appendix B for reference listing)
- Sample tested relevant obligations (assessed as an audit priority 2 or 3) and where there was relevant activity, determined whether transactions complied with the requirements of the obligation
- Reported findings to Western Power for review and response.

3. Summary of Ratings

Table 1 in section 2 above sets out the rating scale defined by the ERA in the Audit Guidelines for the assessment of the level of compliance with the conditions of the Licences. For the highest possible compliance rating to be achieved, Western Power was required to demonstrate it has maintained effective processes and controls, which facilitate compliance with relevant obligations.

The remainder of this report provides:

- A summary of the findings for the compliance obligations (at Table 5 below)
- Detailed findings, including relevant observations, recommendations and action plans (at Section 4).

Table 5: Compliance Ratings

Refer to Detailed Findings at section 4 and Audit Plan at Appendix A for descriptions of the obligations. Note that detailed findings are not presented for those obligations assessed to be not applicable to Western Power's operations for the period subject to audit - refer to the Audit Plan at Appendix A for further explanation.

Legend:

Distribution only
 Transmission only
 Both Distribution and Transmission

No	Obligation reference	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
9 Electricity Industry Customer Transfer Code – Licence Conditions and Obligations												
1	Clause 2.2(1)(a)	Priority 5					N/P					N/R
2	Clause 2.2(1)(b)	Priority 4					N/P					N/R
2A	Clause 2.3	Priority 4					N/P					N/R
3	Clause 3.1(1)(a)	Priority 4					N/P	1				
4	Clause 3.1(1)(b)	Priority 4					N/P	1				
5	Clause 3.1(2)	Priority 4					N/P					N/R
10	Clause 3.7(1)	Priority 4					N/P	1				
11	Clause 3.7(2)	Priority 4					N/P	1				
12	Clause 3.8(1)	Priority 5					N/P	1				
13	Clause 3.8(2)(a)	Priority 4					N/P	1				
15	Clause 3.8(3)	Priority 4					N/P	1				
20	Clause 3.10(1)	Priority 4					N/P	1				
21	Clause 3.10(2)	Priority 4					N/P	1				
22	Clause 4.1	Priority 4					N/P	1				
31	Clause 4.9(1)	Priority 4					N/P	1				
32	Clause 4.9(2)	Priority 4					N/P	1				
33	Clause 4.9(3)	Priority 4					N/P	1				
34	Clause 4.9(6)	Priority 4					N/P	1				
35	Clause 4.10(1)	Priority 2		B					2			
36	Clause 4.10(2)	Priority 4					N/P	1				

No	Obligation reference	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
37	Clause 4.10(3)	Priority 4					N/P	1				
38	Clause 4.11(1)	Priority 4					N/P	1				
39	Clause 4.11(3)	Priority 2		B					2			
40	Clause 4.12(3)	Priority 5					N/P					N/R
41	Clause 4.13	Priority 2		B					2			
42	Clause 4.14	Priority 4					N/P	1				
43	Clause 4.15	Priority 5					N/P	1				
48	Clause 5.2	Priority 4					N/P	1				
48A	Clause 6.1	Priority 4					N/P	1				
49	Clause 6.2	Priority 4					N/P	1				
50	Clause 6.3(1)	Priority 5					N/P	1				
51	Clause 6.3(2)	Priority 4					N/P					N/R
54	Clause 6.6	Priority 4					N/P	1				
55	Clause 7.1(1)	Priority 5					N/P					N/R
56	Clause 7.1(2)	Priority 5					N/P					N/R
57	Clause 7.1(3)	Priority 4					N/P					N/R
58	Clause 7.2(4)	Priority 5					N/P					N/R
59	Clause 7.3(2)	Priority 5					N/P					N/R
60	Annex 1	Priority 4					N/P	1				
61	Annex 2	Priority 4					N/P	1				
62	Annex 3	Priority 4					N/P	1				
63	Annex 4 clause A4.1	Priority 4					N/P	1				
64	Annex 4 clause A4.2	Priority 4					N/P	1				
65	Annex 5 clause A5.1(5)	Priority 4					N/P	1				
66	Annex 5 clause A5.1(6)	Priority 4					N/P	1				
67	Annex 5 clause A5.1(7)	Priority 4					N/P	1				
10 Electricity Industry (Obligation to Connect) Regulations – Licence Conditions and Obligations												
72	Regulation 4	Priority 4					N/P	1				
73	Regulation 5(5)	Priority 4					N/P	1				
74	Regulation 5(6)	Priority 4					N/P	1				
75	Regulation 6	Priority 4					N/P	1				
76	Regulation 7(1)	Priority 4					N/P	1				
77	Regulation 8	Priority 2	A						2			
11 Electricity Industry (Customer Contracts) Regulations – Licence Conditions and Obligations												
99	Regulation 36	Priority 4					N/P	1				
12 Electricity Industry Act - Licence Conditions and Obligations												
101	Section 13(1)	Priority 5					N/P	1				
102	Section 14(1)(a)	Priority 5					N/P	1				
103	Section 14(1)(b)	Priority 4					N/P					N/R

No	Obligation reference	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
104	Section 14(1)(c)	Priority 5					N/P	1				
105	Section 17(1); ERA (Licensing Funding) Regulations 2014	Priority 3	A						2			
106	Section 31(3)	Priority 5					N/P	1				
107	Section 41(6)	Priority 4					N/P	1				
111	Section 101	Priority 4					N/P	1				
13 Electricity Licences – Licence Conditions and Obligations												
119	Licence condition 4.3.1	Priority 4					N/P	1				
120	Licence condition 5.2.4	Priority 4					N/P					N/R
121	Licence condition 5.3.2	Priority 4					N/P	1				
122	Licence condition 5.1.5	Priority 4					N/P	1				
123	Licence condition 4.4.1	Priority 4					N/P					N/R
124	Licence condition 4.5.1	Priority 3	A						2			
125	Licence condition 3.8.1, 3.8.2	Priority 4					N/P	1				
126	Licence condition 3.7.1	Priority 4					N/P	1				
127	Licence condition 6.9.1	Priority 2	A					1				
128	Licence condition 6.9.3	Priority 2	A									N/R
14 Code of Conduct – Licence Conditions and Obligations												
Part 7 Disconnection												
233	Clause 7.5	Priority 4					N/P	1				
234	Clause 7.6	Priority 2	A					1				
237	Clause 7.7(3)	Priority 2	A					1				
238	Clause 7.7(4)	Priority 2	A					1				
238A	Clause 7.7(4A)	Priority 5					N/P	1				
239	Clause 7.7(5)	Priority 5					N/P	1				
241	Clause 7.7(7)	Priority 4					N/P	1				
Part 8 Reconnection												
244	Clause 8.2	Priority 2	A						2			
Part 9 Pre-Payment Meters												
245	Clause 9.1(2)	Priority 4					N/P	1				
256	Clause 9.4(4)	Priority 4					N/P					N/R
258	Clause 9.5(2)	Priority 2	A									N/R
263	Clause 9.9(2))	Priority 4					N/P					N/R
Part 10 Information and Communication												
283	Clause 10.6	Priority 4					N/P	1				
284	Clause 10.7(1)	Priority 4					N/P	1				
285	Clause 10.7(2)	Priority 4					N/P	1				
286	Clause 10.7(3)	Priority 4					N/P	1				
287	Clause 10.7(4)	Priority 4					N/P	1				
288	Clause 10.8(1)	Priority 4					N/P	1				

No	Obligation reference	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
289	Clause 10.8(2)	Priority 4					N/P	1				
290	Clause 10.9	Priority 5					N/P	1				
291	Clause 10.10(1)	Priority 4					N/P	1				
292	Clause 10.10(2)	Priority 4					N/P	1				
294	Clause 10.11(1)	Priority 4					N/P	1				
295	Clause 10.11(2)	Priority 4					N/P	1				
296	Clause 10.12(1)	Priority 4					N/P	1				
Part 12 Complaints & Dispute Resolution												
298	Clause 12.1(1)	Priority 4					N/P	1				
299	Clause 12.1(2)	Priority 4					N/P	1				
300	Clause 12.1(3)	Priority 4					N/P	1				
301	Clause 12.1(4)	Priority 2	A						2			
303	Clause 12.3	Priority 4					N/P	1				
304	Clause 12.4	Priority 4					N/P	1				
Part 13 Reporting												
305	Clause 13.1	Priority 4					N/P	1				
306	Clause 13.2	Priority 4					N/P	1				
307	Clause 13.3	Priority 4					N/P	1				
Part 14 Service Standard Payments												
309	Clause 14.1(2)	Priority 4					N/P					N/R
311	Clause 14.2(2)	Priority 4					N/P					N/R
313	Clause 14.4(1)	Priority 4					N/P					N/R
314	Clause 14.5	Priority 4					N/P	1				
316	Clause 14.7(2)	Priority 4					N/P	1				
15 Electricity Industry Metering Code – Licence Conditions and Obligations												
Part 2 Code objectives and arms-length treatment												
317	Clause 2.2(1)(a)	Priority 5					N/P					N/R
318	Clause 2.2(1)(b)	Priority 4					N/P					N/R
Part 3 Meters and metering installations												
319	Clause 3.1	Priority 4					N/P	1				
320	Clause 3.2(1)	Priority 4					N/P	1				
321	Clause 3.3(1)	Priority 4					N/P	1				
322	Clause 3.3(3)	Priority 4					N/P	1				
323	Clause 3.3A(1)	Priority 4					N/P	1				
325	Clause 3.3C	Priority 4					N/P	1				
326	Clause 3.5(1) and (2)	Priority 4					N/P	1				
327	Clause 3.5(3)	Priority 4					N/P	1				
328	Clause 3.5(4)	Priority 4					N/P	1				
329	Clause 3.5(6)	Priority 4					N/P	1				
330	Clause 3.5(9)	Priority 4		B				1				

No	Obligation reference	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
331	Clause 3.7	Priority 4					N/P	1				
332	Clause 3.8	Priority 4					N/P	1				
333	Clause 3.9(3)	Priority 2	A						2			
334	Clause 3.9(7)	Priority 4					N/P	1				
335	Clause 3.9(9)	Priority 4					N/P					N/R
336	Clause 3.10	Priority 4					N/P	1				
337	Clause 3.11(1)	Priority 4					N/P	1				
338	Clause 3.11(2)	Priority 4					N/P	1				
340	Clause 3.11A(1)	Priority 4					N/P	1				
341	Clause 3.11A(2)	Priority 2	A						2			
342	Clause 3.12(1)	Priority 4					N/P	1				
343	Clause 3.12(2)	Priority 4					N/P	1				
344	Clause 3.12(3)	Priority 4					N/P	1				
345	Clause 3.12(4)	Priority 4					N/P	1				
346	Clause 3.13(1)	Priority 4					N/P	1				
347	Clause 3.13(3)(c)	Priority 4					N/P					N/R
348	Clause 3.13(4)	Priority 4					N/P	1				
349	Clause 3.14(3)	Priority 4					N/P					N/R
350	Clause 3.16(1)	Priority 4					N/P	1				
351	Clause 3.16(2)	Priority 4					N/P	1				
352	Clause 3.16(3)	Priority 4					N/P	1				
353	Clause 3.16(3A)	Priority 4					N/P	1				
354	Clause 3.18(1)	Priority 4					N/P	1				
355	Clause 3.20(1)	Priority 4					N/P	1				
356	Clause 3.20(3)	Priority 4					N/P					N/R
357	Clause 3.21(1)	Priority 2		B					2			
358	Clause 3.21(2)	Priority 4					N/P	1				
359	Clause 3.22	Priority 4					N/P	1				
360	Clause 3.23(a)	Priority 4					N/P	1				
361	Clause 3.23(b)	Priority 4					N/P	1				
362	Clause 3.24A(1)	Priority 4					N/P					N/R
363	Clause 3.24B(1)	Priority 4					N/P					N/R
364	Clause 3.27	Priority 4					N/P	1				
365	Clause 3.29	Priority 4					N/P	1				
Part 4 Metering database												
366	Clause 4.1(1)	Priority 4					N/P	1				
367	Clause 4.1(2)	Priority 4					N/P	1				
368	Clause 4.1(3)	Priority 4					N/P	1				
369	Clause 4.2(1)	Priority 4					N/P	1				

No	Obligation reference	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
370	Clause 4.3(1)	Priority 4					N/P	1				
371	Clause 4.4(1)	Priority 5					N/P	1				
372	Clause 4.5(1)	Priority 5					N/P	1				
374	Clause 4.6(1)	Priority 4					N/P	1				
375	Clause 4.6(2)	Priority 4					N/P	1				
376	Clause 4.7	Priority 2	A						2			
377	Clause 4.8(3)	Priority 4					N/P	1				
378	Clause 4.8(3A)	Priority 4					N/P	1				
379	Clause 4.8(4)(a)	Priority 4					N/P	1				
380	Clause 4.8(4)(b)	Priority 4					N/P	1				
381	Clause 4.8(5)	Priority 4					N/P	1				
382	Clause 4.9	Priority 4					N/P	1				
Part 5 Metering services												
383	Clause 5.1 (1)	Priority 5					N/P	1				
384	Clause 5.1(2)	Priority 5					N/P	1				
385	Clause 5.3	Priority 2		B					2			
386	Clause 5.4(1)	Priority 2		B					2			
387	Clause 5.4(1A)	Priority 4					N/P	1				
389	Clause 5.5(2)	Priority 4					N/P	1				
390	Clause 5.5(2A)	Priority 4					N/P	1				
391	Clause 5.6(1)	Priority 2		B					2			
392	Clause 5.7	Priority 4					N/P	1				
393	Clause 5.8	Priority 4					N/P	1				
394	Clause 5.9	Priority 4					N/P	1				
395	Clause 5.10	Priority 4					N/P	1				
396	Clause 5.11	Priority 4					N/P	1				
397	Clause 5.12(1)	Priority 2		B					2			
398	Clause 5.13	Priority 4					N/P	1				
399	Clause 5.14(3)	Priority 4					N/P	1				
400	Clause 5.15	Priority 4					N/P	1				
403	Clause 5.17A(1)	Priority 4					N/P	1				
404	Clause 5.17A(3)	Priority 3	A						2			
409	Clause 5.19(5)	Priority 4					N/P	1				
411	Clause 5.20(1)	Priority 4					N/P					N/R
412	Clause 5.20(2)	Priority 4					N/P	1				
413	Clause 5.20(4)	Priority 4		B					2			
414	Clause 5.21(2)	Priority 4					N/P	1				
415	Clause 5.21(4)	Priority 2		B					2			
418	Clause 5.21(8)	Priority 4					N/P	1				

No	Obligation reference	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
419	Clause 5.21(9)	Priority 4					N/P	1				
420	Clause 5.21(11)	Priority 4					N/P	1				
421	Clause 5.21(12)	Priority 4					N/P	1				
422	Clause 5.22(1)	Priority 4					N/P	1				
423	Clause 5.22(2)	Priority3	A						2			
424	Clause 5.22(3)	Priority 4					N/P	1				
425	Clause 5.22(4)	Priority 4					N/P	1				
426	Clause 5.22(5)	Priority 4					N/P	1				
427	Clause 5.22(6)	Priority 4					N/P	1				
428	Clause 5.23(1)	Priority 4					N/P	1				
429	Clause 5.23(3)	Priority 4					N/P	1				
430	Clause 5.24(1)	Priority 4					N/P	1				
431	Clause 5.24(2)	Priority 4					N/P	1				
432	Clause 5.24(3)	Priority 4					N/P	1				
433	Clause 5.24(4)	Priority 4					N/P	1				
434	Clause 5.25	Priority 2		B					2			
436	Clause 5.29	Priority 4					N/P					N/R
437	Clause 5.30(1)	Priority 4					N/P					N/R
438	Clause 5.31(1)	Priority 4					N/P					N/R
439	Clause 5.31(2)	Priority 4					N/P					N/R
440	Clause 5.34(2)	Priority 4					N/P					N/R
441	Clause 5.37(1)(a)	Priority 4					N/P	1				
442	Clause 5.37(1)(b)	Priority 4					N/P	1				
443	Clause 5.37(1)(b)	Priority 4					N/P	1				
444	Clause 5.37(2)	Priority 4					N/P	1				
445	Clause 5.37(3)	Priority 4					N/P	1				
446	Clause 5.38	Priority 4					N/P	1				
Part 6 Documentation												
447	Clause 6.1(1)	Priority 2		B					2			
448A	Clause 6.2	Priority 5					N/P					N/R
448B	Clause 6.18	Priority 5					N/P					N/R
448C	Clause 6.19A(1)	Priority 5					N/P					N/R
448D	Clause 6.19B(1)	Priority 5					N/P					N/R
449	Clause 6.20(4)	Priority 5					N/P					N/R
450	Clause 6.20(5)	Priority 4					N/P					N/R
Part 7 Notes and confidential information												
451	Clause 7.2(1)	Priority 5					N/P	1				
452	Clause 7.2(2)	Priority 4					N/P					N/R
455	Clause 7.5	Priority 3	A						2			

No	Obligation reference	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
456	Clause 7.6(1)	Priority 4					N/P	1				
Part 8 Dispute resolution												
457	Clause 8.1(1)	Priority 5					N/P					N/R
458	Clause 8.1(2)	Priority 5					N/P					N/R
459	Clause 8.1(3)	Priority 5					N/P					N/R
460	Clause 8.1(4)	Priority 4					N/P					N/R
461	Clause 8.3(2)	Priority 5					N/P					N/R
16 Electricity Industry (Network Quality and Reliability of Supply) Code												
462	Clause 5(1)	Priority 5					N/P	1				
463	Clause 8	Priority 5					N/P	1				
464	Clause 9	Priority 5	A						2			
465	Clause 10(1)	Priority 5					N/P	1				
466	Clause 10(2)	Priority 5					N/P	1				
467	Clause 12(3)	Priority 2	A						2			
468	Clause 13(2)	Priority 5	A						2			
469	Clause 13(3)	Priority 4					N/P	1				
469A	Clause 13B	Priority 5					N/P	1				
469B	Clause 13C	Priority 5					N/P	1				
470	Clause 14(8)	Priority 4					N/P					N/R
471	Clause 15(2)	Priority 4					N/P					N/R
472	Clause 18	Priority 3	A						2			
473	Clause 19	Priority 2		B					2			
474	Clause 21(1)	Priority 4					N/P	1				
475	Clause 21(2)	Priority 4					N/P	1				
476	Clause 21(3)	Priority 4					N/P	1				
477	Clause 23(1)	Priority 5					N/P	1				
478	Clause 23(2)	Priority 4					N/P	1				
479	Clause 24(3)	Priority 4			C				2			
480	Clause 24(4)	Priority 4					N/P	1				
481	Clause 25(2)	Priority 4					N/P	1				
482	Clause 25(3)	Priority 4					N/P	1				
483	Clause 26	Priority 4					N/P	1				
483A	Clause 26(3) and (4)	Priority 4					N/P	1				
483B	Clause 26(5)	Priority 4					N/P	1				
484	Clause 27(1)	Priority 4					N/P	1				
485	Clause 27(3)	Priority 4					N/P	1				
17 Electricity Licences – Licensee Specific Conditions and Obligations												
490	Electricity Industry Act, sections 61 and 65	Priority 4					N/P					N/R

No	Obligation reference	Audit Priority	Controls rating					Compliance rating					
			A	B	C	D	N/P	1	2	3	4	N/R	
491	Electricity Industry Act, sections 62, 64 and 65	Priority 4					N/P						N/R
492	Electricity Industry Act, section 65	Priority 4					N/P						N/R
493	Electricity Industry Act, section 11	Priority 4					N/P	1					
494	Electricity Industry Act, section 11	Priority 4					N/P						N/R
The following obligations are applicable only for the period 1 July 2017 to 20 June 2018													
112	Electricity Industry Act, Section 115(1)	Priority 4					N/P	1					
113	Electricity Industry Act, Section 115(2)	Priority 4					N/P						N/R

4. Detailed findings and recommendations

This section has been structured in subsections for the relevant Codes and Regulations against which we assessed Western Power's compliance. The sections are:

- 4.1 Electricity Industry Customer Transfer Code
- 4.2 Electricity Industry (Obligation to Connect) Regulations
- 4.3 Electricity Industry (Customer Contracts) Regulations
- 4.4 Electricity Industry Act
- 4.5 Electricity Licences – Licence Conditions and Obligations
- 4.6 Code of Conduct
- 4.7 Electricity Industry Metering Code
- 4.8 Electricity Industry (Network Quality and Reliability of Supply) Code
- 4.9 Licence specific obligations
- 4.10 Obligations removed during the audit period.

Each section contains:

- **Assessment of compliance and control adequacy** – the conclusions from our audit procedures and our assessment of Western Power's compliance with the applicable obligations
- **Findings** – the auditor's understanding of the process and any issues that have been identified during the audit
- **Recommendations** – for improvement or enhancement of the process or control.

The compliance and control adequacy ratings have been summarised below for each sub-section.

Controls adequacy rating						Compliance rating					
A	B	C	D	NP	Total	1	2	3	4	NR	Total
4.1 Electricity Industry Customer Transfer Code											
	3			43	46	32	3			11	46
4.2 Electricity Industry (Obligation to Connect) Regulations											
1				5	6	5	1				6
4.3 Electricity Industry (Customer Contracts) Regulations											
				1	1	1					1
4.4 Electricity Industry Act											
1				7	8	6	1			1	8
4.5 Electricity Licences											
3				7	10	6	1			3	10
4.6 Code of Conduct											
Part 7 Disconnection											
3				4	7	7					7
Part 8 Reconnection											
1					1		1				1

Controls adequacy rating						Compliance rating					
A	B	C	D	NP	Total	1	2	3	4	NR	Total
Part 9 Pre-Payment Meters											
1				3	4	1				3	4
Part 10 Information and Communication											
				13	13	13					13
Part 12 Complaints and Dispute Resolution											
1				5	6	5	1				6
Part 13 Reporting											
				3	3	3					3
Part 14 Service Standard Payments											
				5	5	2				3	5
4.7 Electricity Industry Metering Code											
Part 2 Code objectives and arms-length treatment											
				2	2					2	2
Part 3 Meters and metering installations											
2	2			41	45	37	3			5	45
Part 4 The metering database											
1				15	16	15	1				16
Part 5 Metering services											
2	7			44	53	38	9			6	53
Part 6 Documentation											
	1			6	7		1			6	7
Part 7 Notes and confidential information											
1				3	4	2	1			1	4
Part 8 Dispute resolution											
				5	5					5	5
4.8 Electricity Industry (Network Quality & Reliability of Supply) Code											
4	1	1		22	28	20	6			2	28
4.9 Electricity licences – Licensee Specific Conditions and Obligations											
				5	5	1				4	5
4.10 Obligations removed during the audit period – applicable only for the period 1 July 2017 to 20 June 2018											
				2	2	1				1	2
21	14	1	0	241	277	195	29	0	0	53	277

4.1 Electricity Industry Customer Transfer Code – Licence Conditions and Obligations

No	Obligation under Condition	Findings	
1	A network operator must treat all retailers which are its associates on an arms-length basis. <i>Electricity Industry Customer Transfer Code clause 2.2(1)(a)</i>	<i>Obligations 1 and 2</i> The Senior Customer Relations Consultant confirmed that Western Power did not have an associate as a retailer during the audit period.	
	Priority 5		
2	A network operator must ensure that no retailer which is its associate receives a benefit in respect of the Electricity Industry Customer Transfer Code unless the benefit is either attributable to the arms-length application of the Electricity Industry Customer Transfer Code or the benefit is made available to all other retailers. <i>Electricity Industry Customer Transfer Code clause 2.2(1)(b)</i>		
	Priority 4		
2A	A network operator must prepare a report (for each year ending 30 June) as specified by the ERA; give a copy of the report to the Minister and the ERA at least 5 business days before it is published under clause 2.3(1)(c); and publish the report in accordance with clauses 1.6 and 2.3(2). <i>Electricity Industry Customer Transfer Code clause 2.3</i>	The Senior Compliance Specialist confirmed that the ERA did not specify any reporting requirements under the Customer Transfer Code during the audit period.	
	Priority 4		
3	A network operator must publish a request for standing data form which must comply with Annex 1 of the Electricity Industry Customer Transfer Code. <i>Electricity Industry Customer Transfer Code clause 3.1.(1)(a)</i>	<i>Obligations 3 and 60</i> Based on examination of Western Power's request for standing data form, we determined that the form is made available electronically via the Western Power Online Metering Portal (the Portal) and complies with the requirements of Annex 1 of the Electricity Industry Customer Transfer Code.	
	Priority 4		
4	A network operator must publish a request for historical data form which must comply with Annex 2 of the Electricity Industry Customer Transfer Code. <i>Electricity Industry Customer Transfer Code clause 3.1.(1)(b)</i>	<i>Obligations 4 and 61</i> Based on examination of Western Power's request for historical data form, we determined that the form is made available electronically via the Portal and complies with the requirements of Annex 2 of the Electricity Industry Customer Transfer Code.	
	Priority 4		
5	If a network operator publishes an amended data request form it must comply with Annex 1 or Annex 2 of the Electricity Industry Customer Transfer Code, as applicable. <i>Electricity Industry Customer Transfer Code clause 3.1.(2)</i>	The Reading Management Team Leader confirmed that Western Power did not amend its data request forms during the audit period.	
	Priority 4		

No	Obligation under Condition	Findings					
10	<p>A network operator must, subject to clause 3.7(3) of the Electricity Industry Customer Transfer Code, electronically notify a retailer if its data request is not valid.</p> <p><i>Electricity Industry Customer Transfer Code clause 3.7(1)</i></p>	<p><i>Obligations 10 to 15</i></p> <p>Through discussion with the Reading Management Team and walkthrough of the data request process, we determined that Western Power has the following mechanisms in place for handling data requests:</p> <ul style="list-style-type: none"> • <u>Invalid data requests:</u> <ul style="list-style-type: none"> ○ For requests made through the Portal, the online form has been configured to prevent invalid requests from being submitted ○ For requests made through Business to Business (B2B), MBS automatically conducts a validation of the request and, if the request fails validation, automated notification is sent to the submitting retailer ○ MBS validation is generally performed within five minutes of receiving the request. • <u>Valid data requests:</u> <ul style="list-style-type: none"> ○ Requests made through the Portal or B2B are actioned automatically through MBS via a daily batch job ○ The daily batch job communicates the data in an electronic form (via an excel based format), either via B2B or via email (if data is requested by a third party) • <u>Data requests without a NMI and where Western Power is unable to identify a single connection point relating to the request:</u> <ul style="list-style-type: none"> ○ MBS is configured to provide: <ul style="list-style-type: none"> ▪ Up to 10 likely connection points to the retailer ▪ The aforementioned points immediately following receipt of the request (performed automatically within MBS). 					
	Priority 4				Controls rating: N/P	Compliance rating: 1	
11	<p>A network operator must comply with clause 3.7(1) of the Electricity Industry Customer Transfer Code within defined timeframes depending on the number of standing or historical data requests that the retailer submits.</p> <p><i>Electricity Industry Customer Transfer Code clause 3.7(2)</i></p>						
	Priority 4				Controls rating: N/P	Compliance rating: 1	
12	<p>A network operator must use all reasonable endeavours to provide to the retailer the requested data under a valid data request.</p> <p><i>Electricity Industry Customer Transfer Code clause</i></p>						
	Priority 5				Controls rating: N/P	Compliance rating: 1	
13	<p>The network operator must (subject to clause 3.8(3)) provide the requested data under clause 3.8(1) electronically, in accordance with the communication rules.</p> <p><i>Electricity Industry Customer Transfer Code clause 3.8(2)(a)</i></p>						
	Priority 4	Controls rating: N/P	Compliance rating: 1				
15	<p>The network operator must electronically notify the retailer of the most likely connection points to which a data request relates, up to a maximum of 10, if a retailer submits a data request under clause 3.4 and the network operator has not allocated a NMI for the contestable customer's connection point and is unable to determine a single connection point related to the data request.</p> <p><i>Electricity Industry Customer Transfer Code clause 3.8(3)</i></p>						
	Priority 4	Controls rating: N/P	Compliance rating: 1				
20	<p>A network operator must not charge for the provision of standing data.</p> <p><i>Electricity Industry Customer Transfer Code clause 3.10(1)</i></p>	<p>The Reading Management Team Leader confirmed that Western Power does not charge for the provision of standing data.</p>					
	Priority 4				Controls rating: N/P	Compliance rating: 1	

No	Obligation under Condition			Findings
21	A network operator must not charge more than the defined amount for the provision of historical consumption data. The charge is to be determined under the metering code, or, if the metering code does not provide means for determining the charge, by an agreement between the network operator and retailer. <i>Electricity Industry Customer Transfer Code clause 3.10(2)</i>			<p>Through discussion with the Reading Management Team and walkthrough of the historical consumption data request process, we determined that Western Power's processes provide for:</p> <ul style="list-style-type: none"> • Retailers to be charged for the data request, if the period for which data has been requested exceeds 12 months • The fixed charge for the data to comply with the Model SLA • Access to raise bills for data requests to be segregated from the Metering Services Team (restricted to the Commercial Services Team) • Portal based requests to include mandatory fields for the data period, which is used by MBS to automatically calculate the period of the request • Retailers to be invoiced for data requests at the end of each month.
	Priority 4	Controls rating: N/P	Compliance rating: 1	
22	A network operator must publish a customer transfer request form which must comply with Annex 3 of the Electricity Industry Customer Transfer Code. <i>Electricity Industry Customer Transfer Code clause 4.1</i>			<p><i>Obligations 22 and 62</i></p> <p>Through discussion with the Reading Management Team and examination of the Customer Transfer Request (CTR) form, we determined that:</p> <ul style="list-style-type: none"> • Western Power's CTR form is available on Western Power's website and complies with Annex 3 of the Electricity Industry Customer Transfer Code • B2B customers can access the CTR form through the portal • B2B fields comply with Annex 3 of the Electricity Industry Customer Transfer Code.
	Priority 4	Controls rating: N/P	Compliance rating: 1	
31	A network operator must object to a customer transfer request in certain circumstances as set out in clause 4.9(1) of the Electricity Industry Customer Transfer Code. <i>Electricity Industry Customer Transfer Code clause 4.9(1)</i>			<p><i>Obligations 31 to 34</i></p> <p>Through discussion with the Reading Management Team and walkthrough of the CTR process, we determined that Western Power has the following mechanisms in place to object to CTRs:</p> <ul style="list-style-type: none"> • MBS and the Portal is configured to automatically accept or reject CTRs based on the requirements contained under clause 4.9(1) • MBS and the Portal rejections can occur due to incorrectly completed CTRs • CTR rejections are reported within the Metering Services monthly compliance reports • Upon rejection, MBS and the Portal automatically advise the retailer per clause 4.9(3) <ul style="list-style-type: none"> ○ A predefined script has been developed to provide the relevant advice (e.g. advice on how to enter into an access contract) ○ Given the automated notification functionality, advice is provided within five minutes of rejection. • In the instance where grounds for objection are unable to be resolved within two business days and the nominated transfer date would as a result be non-compliant with the timeframes specified by the Electricity Industry Customer Transfer Code, Western Power will liaise with the retailer to agree a revised transfer date.
	Priority 4	Controls rating: N/P	Compliance rating: 1	
32	A network operator must not object to a customer transfer request otherwise than in accordance with clause 4.9(1) of the Electricity Industry Customer Transfer Code. <i>Electricity Industry Customer Transfer Code clause 4.9(2)</i>			
	Priority 4	Controls rating: N/P	Compliance rating: 1	
33	A network operator that objects to a customer transfer request must give an electronic notice detailing specified information to a retailer within the timeframe prescribed. <i>Electricity Industry Customer Transfer Code clause 4.9(3)</i>			
	Priority 4	Controls rating: N/P	Compliance rating: 1	
34	A network operator and retailer must agree to a revised nominated transfer date in certain circumstances. <i>Electricity Industry Customer Transfer Code clause 4.9(6)</i>			<p>The Reading Management Team Leader confirmed that, during the period 1 July 2017 to 30 June 2020, Western Power has not objected to a CTR in circumstances other than those listed under clause 4.9(1).</p>
	Priority 4	Controls rating: N/P	Compliance rating: 1	

No	Obligation under Condition	Findings		
35	<p>A network operator must take certain action in accordance with a defined timetable following the receipt of a valid customer transfer request, subject to clauses 4.10(2) and 4.10(3) of the Electricity Industry Customer Transfer Code and using all reasonable endeavours to affect the transfer.</p> <p><i>Electricity Industry Customer Transfer Code clause 4.10(1)</i></p>	<p>Through discussion with the Reading Management Team, walkthrough of Western Power's CTR process and examination of a sample of monthly compliance reports, we determined that:</p> <ul style="list-style-type: none"> • MBS and the Portal automatically notify the current retailer of the nominated transfer date and any changes thereafter • Western Power uses reasonable endeavours to ensure the meter is read and the transfer is completed on the nominated transfer date • Effective monthly compliance monitoring and reporting was applied throughout the audit period to identify CTRs not performed within the required timeframes and for any breaches to be prioritised and resolved. <p>For each of the 2017/18, 2018/19 and 2019/20 reporting years, Western Power self-reported that as it was not able to read some meters on the nominated transfer date and did not agree a new nominated transfer date with the incoming retailer, it did not comply with the obligation to effect a transfer in accordance with the Code requirements for 2.61%, 2.51% and 1.4% of transfers respectively. A total of approximately 7,700 transfers were performed during the audit period.</p> <p>These non-compliances were primarily due to:</p> <ul style="list-style-type: none"> • Delays in receiving energy data from field officers' hand-held devices, partly due to issues with communication network coverage in remote areas • Scheduling and access issues resulting in meter readings not being carried out on the nominated transfer date • Failure to renegotiate transfer dates in accordance with the Code where either a response was not sent to the retailer or received from the retailer • Suitably qualified field resources not immediately available to safely address all issues on site • Temporary system issues post-implementation of the MBS upgrade in November 2018, which resulted in processing delays. <p>The non-compliance trend, although not eliminated, improved during the audit period due to several procedural changes implemented by Western Power, including:</p> <ul style="list-style-type: none"> • Issue of mobile broadband modems to field staff to assist in mitigating transfer issues caused by the need to transfer data by landline modem • Reinforcement with the contract service provider of the importance of timely meter readings for customer transfers and the requirement to upload energy data for processing within the required timeframe, plus the need to advise Western Power when they cannot meet the time frame, so a new date can be agreed with the retailer concerned. <p>Western Power has continued to recognise that the extent and volume of customer transfer activity poses a significant challenge for maintaining full compliance at all times, and has committed to maintaining effective monitoring and reporting controls to identify non-compliances, their causes and any opportunity to further minimise underlying scheduling and resourcing issues.</p>		
	Priority 2	Controls rating: B	Compliance rating: 2	This audit makes no further recommendation in relation to this matter.

No	Obligation under Condition	Findings		
36	<p>A network operator must take certain action if it considers that it is unlikely to be able to meet its obligations under clause 4.10(1) of the Electricity Industry Customer Transfer Code within the defined timetable.</p> <p><i>Electricity Industry Customer Transfer Code clause 4.10(2)</i></p>	<p>Through discussion with the Reading Management Team and walkthrough of the CTR process, we determined that:</p> <ul style="list-style-type: none"> Western Power endeavours to complete all CTRs on the nominated transfer date Should Western Power become aware of a CTR that is likely not to be completed on the nominated transfer date, Western Power: <ul style="list-style-type: none"> Investigates the reasons for delay (majority of delays are due to readings required to be obtained physically for Type 5 meters, which although growing in volume, still make up less than 1% of meters) Immediately upon becoming aware of the delay, electronically notifies the retailer of the reasons for not being able to meet the nominated transfer date Liaises with the retailer to agree a revised transfer date. MBS automatically notifies the retailer of the agreed revised transfer date Metering Services staff are trained on the requirements of the Electricity Industry Customer Transfer Code, specifically in relation to the timeframes for notification. 		
	Priority 4	Controls rating: N/P	Compliance rating: 1	
37	<p>In the specified circumstances, a network operator must within one business day of the receipt of the customer transfer request electronically notify the retailer of the most likely connection points that are related to the customer transfer request, up to a maximum of 10.</p> <p><i>Electricity Industry Customer Transfer Code clause 4.10(3)</i></p>	<p>Through discussion with the Reading Management Team and walkthrough of the CTR process, we determined that Western Power uses the following process to notify the retailer of likely connection points:</p> <ul style="list-style-type: none"> MBS has been configured to automatically notify retailers of up to 10 likely connection points Western Power will liaise with the requesting retailer via email should any changes be required to the request as a result. 		
	Priority 4	Controls rating: N/P	Compliance rating: 1	
38	<p>A transfer may only occur on a day on which an actual value is obtained from the contestable customer's meter.</p> <p><i>Electricity Industry Customer Transfer Code clause 4.11(1)</i></p>	<p>Through discussion with the Reading Management Team and walkthrough of Western Power's CTR process, we determined that Western Power's processes and procedures provide for:</p> <ul style="list-style-type: none"> Once a valid CTR has been received, a meter read to be automatically scheduled to occur on the nominated transfer date When the meter read has been performed, the transfer to be processed If it is not possible for the meter to be read on the nominated transfer date, Western Power to liaise with the incoming retailer within one business day to arrange a new transfer date Compliance to be monitored through automated reporting. 		
	Priority 4	Controls rating: N/P	Compliance rating: 1	

No	Obligation under Condition			Findings
39	<p>A network operator and the retailer must take certain action if the contestable customer's meter is not read on the nominated transfer date.</p> <p><i>Electricity Industry Customer Transfer Code clause 4.11(3)</i></p>			<p>Through discussion with the Reading Management Team, walkthrough of Western Power's CTR process and examination of a sample of monthly compliance reports, we determined that, in the instance where a contestable customer's meter is not read on the nominated transfer date, Western Power's processes and procedures provide for:</p> <ul style="list-style-type: none"> • A revised nominated transfer date to be proposed to the incoming retailer • Acceptance of the proposal to be received from the incoming retailer • Following acceptance, MBS to be updated with the revised nominated transfer date. MBS is configured to automatically notify the current retailer of the change. • Compliance to be monitored and reported on a monthly basis <p>As described at obligation 35 above, for each of the 2017/18, 2018/19 and 2019/20 reporting years, Western Power self-reported that as it was not able to read some meters on the nominated transfer date and did not agree a new nominated transfer date with the incoming retailer, it did not comply with the requirements of the Code for 2.61%, 2.51% and 1.4% of transfers respectively. Refer to obligation 35 above for a description of the causes of non-compliances and actions taken by Western Power to improve compliance levels.</p> <p>Western Power has continued to recognise that the extent and volume of customer transfer activity poses a significant challenge for maintaining full compliance at all times, and has committed to maintaining effective monitoring and reporting controls to identify non-compliances, their causes and any opportunity to further minimise underlying scheduling, resourcing and communication issues.</p>
	Priority 2	Controls rating: B	Compliance rating: 2	This audit makes no further recommendation for control improvement.
40	<p>The parties to an access contract must negotiate in good faith any necessary amendments to the access contract arising from certain circumstances.</p> <p><i>Electricity Industry Customer Transfer Code clause 4.12(3)</i></p>			<p>The Senior Customer Relations Consultant confirmed that during the audit period, other than instances where access contracts have been updated to reflect the relevant connection points being transferred for a non-reference service per the provision of clause 4.12(1) of the Customer Transfer Code, Western Power did not make any amendments to its access contracts to accommodate a transfer request.</p>
	Priority 5	Controls rating: N/P	Compliance rating: N/R	

No	Obligation under Condition	Findings	
41	<p>A network operator must within two business days after the transfer date give an electronic notice of the transfer and the transfer date to the incoming retailer, the previous retailer and, if applicable, AEMO.</p> <p><i>Electricity Industry Customer Transfer Code clause 4.13</i></p>	<p>Through discussion with the Reading Management Team, walkthrough of Western Power’s CTR process and examination of a sample of monthly compliance reports, we determined that:</p> <ul style="list-style-type: none"> • Western Power’s processes provide for electronic notification to incoming retailers, previous retailers and, if applicable, the AEMO of the transfer date once the transfer has been completed • Compliance monitoring and reporting was applied throughout the audit period to identify all instances of non-compliance with the requirements of clause 4.13 • Western Power uses COGNOS as its online portal, which shows live CTR reporting and provides an overall summary of compliance • Compliance is summarised by retailer, providing visibility on total compliant and non-compliant completed CTRs • Monthly compliance reports are provided to heads of functions. <p>As described at obligation 35 above, for each of the 2017/18, 2018/19 and 2019/20 reporting years, Western Power self-reported that it did not comply with the obligation to give the required notice to affected parties within two business days of the transfer for 2.61%, 2.51% and 1.4% of transfers respectively.</p> <p>Refer to obligation 35 above for a description of the causes of non-compliances and actions taken by Western Power to improve compliance levels.</p> <p>Western Power has continued to recognise that the extent and volume of customer transfer activity poses a significant challenge for maintaining full compliance at all times, and has committed to maintaining effective monitoring and reporting controls to identify non-compliances, their causes and any opportunity to further minimise underlying scheduling and resourcing issues, .</p> <p>This audit makes no further recommendation in relation to this matter.</p>	
Priority 2		Controls rating: B	Compliance rating: 2
42	<p>A network operator must, following a transfer, do all that is necessary to ensure that charges up to the transfer time are paid by or charged to the previous retailer and charges from the transfer time are paid by or charged to the incoming retailer.</p> <p><i>Electricity Industry Customer Transfer Code clause 4.14</i></p>	<p>Through discussion with the Reading Management Team and walkthrough of MBS, we determined that:</p> <ul style="list-style-type: none"> • The transfer time within MBS is used as the basis for calculating charges • MBS has been appropriately configured to allocate charges: <ul style="list-style-type: none"> ○ Up to the transfer time to the previous retailer ○ From the transfer time to the incoming retailer. 	
Priority 4		Controls rating: N/P	Compliance rating: 1
43	<p>In the case of a transfer to reverse an erroneous transfer, a network operator and all affected retailers (and, if applicable, AEMO) 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.</p> <p><i>Electricity Industry Customer Transfer Code clause 4.15</i></p>	<p>Through discussion with the Reading Management Team, we determined that Western Power’s processes for managing erroneous transfers provide for:</p> <ul style="list-style-type: none"> • An erroneous transfer to be reverted to its original state by issuing a notification with change reason code, showing as ‘erroneous’ within the XML transfer file • Actions to take in good faith to reverse an erroneous transfer. 	
Priority 5		Controls rating: N/P	Compliance rating: 1

No	Obligation under Condition			Findings
48	A network's communication rules apply in respect of data and information communication between the network operator and a retailer under this Code. <i>Electricity Industry Customer Transfer Code clause 5.2</i>			Through discussion with the Reading Management Team and consideration of the MBS system capabilities, we determined that: <ul style="list-style-type: none"> The MSB Build Pack (used to translate the Communication Rules) provides the foundation for communication of data with retailers Changes made to MBS Build Pack during the audit period (Change Requests 17 and 18) were communicated to users and supporting training made available.
	Priority 4	Controls rating: N/P	Compliance rating: 1	
48 A	All notices must be in writing and delivered as described in subclauses 6.1(a)-(c). <i>Electricity Industry Customer Transfer Code clause 6.1</i>			The Reading Management Team Leader confirmed that Western Power's processes provide for all notices to be delivered in writing.
	Priority 4	Controls rating: N/P	Compliance rating: 1	
49	A licensee's notice in relation to a data request or customer transfer request must identify the connection point to which it relates. <i>Electricity Industry Customer Transfer Code clause 6.2</i>			Through discussion with the Reading Management Team and examination of a sample notice (relating to a data or transfer request within MBS), we determined that Western Power's notices identify the NMI (connection point) to which it relates.
	Priority 4	Controls rating: N/P	Compliance rating: 1	
50	A network operator must use its reasonable endeavours to ensure that a retailer can give it a notice by post, facsimile or electronic communication and notify the retailer of a telephone number for voice communication. <i>Electricity Industry Customer Transfer Code clause 6.3(1)</i>			Based on examination of Western Power's website, official letterhead and other forms of communication (e.g. email signature) with retailers, we determined that appropriate mechanisms are in place to comply with the requirements of clause 6.3(1).
	Priority 5	Controls rating: N/P	Compliance rating: 1	
51	A network operator must notify each retailer of its initial contact details, and any amended contact details at least three business days before the change takes effect. <i>Electricity Industry Customer Transfer Code clause 6.3(2)</i>			The Senior Customer Relations Consultant confirmed that during the audit period, Western Power did not amend its contact details.
	Priority 4	Controls rating: N/P	Compliance rating: N/R	
54	A network operator or a retailer must send required electronic communications to the applicable electronic communication address, in accordance with the communication rules. <i>Electricity Industry Customer Transfer Code clause 6.6</i>			The Reading Management Team Leader confirmed that during the audit period, Western Power continued to utilise (and made no changes to) the following mechanisms for enabling electronic communications to be sent to the applicable electronic communication address, in accordance with the communication rules: <ul style="list-style-type: none"> Western Power's web portal, for the submission of transaction requests Nominated email addresses for relevant communications with retailers.
	Priority 4	Controls rating: N/P	Compliance rating: 1	

No	Obligation under Condition	Findings						
55	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. <i>Electricity Industry Customer Transfer Code clause 7.1(1)</i>	<p><i>Obligations 55 to 59</i></p> <p>The Senior Customer Relations Consultant confirmed that during the audit period, Western Power did not enter into a dispute in connection with the Electricity Industry Customer Transfer Code.</p>						
	Priority 5			Controls rating: N/P	Compliance rating: N/R			
56	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. <i>Electricity Industry Customer Transfer Code clause 7.1(2)</i>			<p><i>Obligations 55 to 59</i></p> <p>The Senior Customer Relations Consultant confirmed that during the audit period, Western Power did not enter into a dispute in connection with the Electricity Industry Customer Transfer Code.</p>				
	Priority 5					Controls rating: N/P	Compliance rating: N/R	
57	If the dispute is resolved, the disputing parties must prepare a written and signed record of the resolution and adhere to the resolution. <i>Electricity Industry Customer Transfer Code clause 7.1(3)</i>					<p><i>Obligations 55 to 59</i></p> <p>The Senior Customer Relations Consultant confirmed that during the audit period, Western Power did not enter into a dispute in connection with the Electricity Industry Customer Transfer Code.</p>		
	Priority 4							Controls rating: N/P
58	A disputing party that refers a dispute to the arbitrator must provide the arbitrator with prescribed details of the nature of the dispute. <i>Electricity Industry Customer Transfer Code clause 7.2(4)</i>							<p><i>Obligations 55 to 59</i></p> <p>The Senior Customer Relations Consultant confirmed that during the audit period, Western Power did not enter into a dispute in connection with the Electricity Industry Customer Transfer Code.</p>
	Priority 5	Controls rating: N/P	Compliance rating: N/R					
59	A disputing party must at all times conduct itself in a manner that is directed towards achieving the objectives in clause 7.3(1) of the Electricity Industry Customer Transfer Code. <i>Electricity Industry Customer Transfer Code clause 7.3(2)</i>	<p><i>Obligations 55 to 59</i></p> <p>The Senior Customer Relations Consultant confirmed that during the audit period, Western Power did not enter into a dispute in connection with the Electricity Industry Customer Transfer Code.</p>						
	Priority 5			Controls rating: N/P	Compliance rating: N/R			
60	A network operator's request for standing data form must require a retailer to provide certain information. <i>Electricity Industry Customer Transfer Code Annex 1</i>			<p><i>Refer to finding for obligation 3.</i></p>				
	Priority 4					Controls rating: N/P	Compliance rating: 1	
61	A network operator's request for historical consumption data form must require a retailer to provide certain information. <i>Electricity Industry Customer Transfer Code Annex 2</i>			<p><i>Refer to finding for obligation 4.</i></p>				
	Priority 4					Controls rating: N/P	Compliance rating: 1	

No	Obligation under Condition			Findings
62	A network operator's customer transfer request form must require a retailer to provide certain information. <i>Electricity Industry Customer Transfer Code Annex 3</i>			<i>Refer to finding for obligation 22.</i>
	Priority 4	Controls rating: N/P	Compliance rating: 1	
63	A network operator must provide certain information, if available, to a retailer who submits a request for standing data. <i>Electricity Industry Customer Transfer Code Annex 4 clause A4.1</i>			Through discussion with the Reading Management Team and examination of MBS, we determined that MBS has been configured to provide the relevant information under Annex 4 A4.1 of the Electricity Industry Customer Transfer Code.
	Priority 4	Controls rating: N/P	Compliance rating: 1	
64	A network operator must provide certain metering data, if available, in a prescribed manner to a retailer who submits a request for historical consumption data. <i>Electricity Industry Customer Transfer Code Annex 4 clause A4.2</i>			Through discussion with the Reading Management Team and walkthrough of Western Power's process for executing historical consumption data requests, we determined that those processes provide for: <ul style="list-style-type: none"> Customers to be provided with interval data up to a minimum of 12 months If interval data is unavailable, MBS to provide accumulation data.
	Priority 4	Controls rating: N/P	Compliance rating: 1	
65	A network operator must respond to a request from a retailer for a NMI and checksum for a connection point within one business day of receiving the request. <i>Electricity Industry Customer Transfer Code Annex 5 clause A5.1(5)</i>			<i>Obligations 65 to 67</i> Through discussion with the Reading Management Team and walkthrough of MBS and Western Power's Web Portal and the B2B Portal, we determined that: <ul style="list-style-type: none"> NMI discoveries are performed automatically through MBS within the prescribed timeframe Requests, which do not have a single NMI, are automatically provided with up to 99 most likely connection points Valid requests with single NMIs for a connection point are executed as per the requirements of the Code.
	Priority 4	Controls rating: N/P	Compliance rating: 1	
66	If a network operator, following a request from a retailer, cannot provide a single NMI and checksum for a connection point, it must provide the retailer with the most likely matches, up to a maximum of 99. <i>Electricity Industry Customer Transfer Code Annex 5 clause A5.1(6)</i>			
	Priority 4	Controls rating: N/P	Compliance rating: 1	
67	If a network operator, following a request from a retailer, can provide a single NMI and checksum for a connection point, it must do so unless otherwise advised by the retailer. <i>Electricity Industry Customer Transfer Code Annex 5 clause A5.1(7)</i>			
	Priority 4	Controls rating: N/P	Compliance rating: 1	

4.2 Electricity Industry (Obligation to Connect) Regulations

No	Obligation under Condition	Findings	
72	<p>A distributor must attach, or connect, premises to a distribution system if a retailer or customer takes certain action and the circumstances exist in regulation 5(1) of the Electricity Industry (Obligation to Connect) Regulations.</p> <p><i>Electricity Industry (Obligation to Connect) Regulations regulation 4</i></p>	<p><i>Obligations 72 and 73</i></p> <p>Through discussion with the Application and Finance Team Leader, Engineering Team Leader and Customer Connection Services Contract Manager, consideration of Western Power's customer connection arrangements and examination of information available on Western Power's website, we determined that during the audit period, Western Power maintained the following processes for managing customer connections:</p> <ul style="list-style-type: none"> Western Power recognises customer connection requests following receipt of a valid application made via the Western Power website or the Customer Service Centre (CSC). The Distribution Quotation Management System (DQM) is used to assesses applications for connection to the Western Power's distribution network 	
	Priority 4	Controls rating: N/P	Compliance rating: 1
73	<p>A distributor that is obliged to attach, or connect, premises to the distribution system under regulation 4 of the Electricity Industry (Obligation to Connect) Regulations must extend the distribution system to a suitable connection point.</p> <p><i>Electricity Industry (Obligation to Connect) Regulations regulation 5(5)</i></p>	<ul style="list-style-type: none"> Customers are connected in all instances where the distribution system does not need to be extended beyond the prescribed 100-metre boundary of the existing network Customers requesting connection outside of the prescribed 100-metre boundary of the existing network are registered either as a standard or detailed connection. The length of the required connection to a suitable connection point is validated using Western Power's GIS system to perform a point-to-point measurement, allowing a cost quotation to be prepared for agreement with the customer Upon acceptance by the customer, Western Power makes the extension to the suitable connection point. Customers are offered the option to pay in instalments as the extension work is completed. 	
	Priority 4	Controls rating: N/P	Compliance rating: 1
74	<p>The capacity and standard of an extension must be adequate for the supply required and in accordance with accepted good industry practice as it would be applied by a prudent distributor.</p> <p><i>Electricity Industry (Obligation to Connect) Regulations regulation 5(6)</i></p>	<p>Through discussion with the Engineering Team Leader and Customer Connection Services Contract Manager, and consideration of Western Power's customer connection arrangements, we determined that Western Power's connection practices applied during the audit period:</p> <ul style="list-style-type: none"> Were designed to ensure the capacity and standard of an extension is adequate for the supply required Followed accepted good industry practices, including: <ul style="list-style-type: none"> Western Australian Electrical Requirements Western Australian Distributors Manual Electricity Distribution Regulations 1997 Electricity Industry (Obligation to Connect) Regulations 2005 Electricity (Supply Standards and System Safety) Regulations 2000 AS/NZS 61000.3.3:1998 Electromagnetic Compatibility AS/NZS 61000.3.2:1998. 	
	Priority 4	Controls rating: N/P	Compliance rating: 1

No	Obligation under Condition			Findings
75	<p>A distributor that is obliged to attach, or connect, premises to the distribution system under regulation 4 of the Electricity Industry (Obligation to Connect) Regulations must do so within a defined timeframe.</p> <p><i>Electricity Industry (Obligation to Connect) Regulations regulation 6</i></p>			<p>Through discussion with the Application and Finance Team Leader, Engineering Team Leader and Customer Connection Services Contract Manager, examination of Western Power's connection procedures and walkthrough of DQM, we determined that during the audit period, Western Power maintained the following process to facilitate new connections:</p> <ul style="list-style-type: none"> • Applications submitted online or via the CSC are registered within DQM immediately (if via the CSC, registration is done over the phone) • A checklist within DQM must be completed to confirm OTC job categorisation • If passed (i.e. the job is an OTC job), the job will be prioritised for completion and measured against the timeframes under Electricity Industry (Obligation to Connect) Regulation 4 • Non-compliance reporting is generated to alert relevant officers of any breaches to the prescribed timeframes via a prescribed Tracker. <p>The Application and Finance Team Leader, Engineering Team Leader and Customer Connection Services Contract Manager advised that they were unaware of any instances where Western Power did not meet the prescribed timeframes for connecting premises to its distribution network.</p>
	Priority 4	Controls rating: N/P	Compliance rating: 1	
76	<p>A distributor must energise premises in certain prescribed circumstances.</p> <p><i>Electricity Industry (Obligation to Connect) Regulations regulation 7(1)</i></p>			<p>Through discussion with the designated Customer Service Team Leader, examination of connection procedures and walkthrough of DQM, we determined that Western Power only energises a premise following receipt of a completion advice from the electrical contractor.</p>
	Priority 4	Controls rating: N/P	Compliance rating: 1	

No	Obligation under Condition	Findings	
77	<p>A distributor that is obliged to energise premises must do so within a defined timetable.</p> <p><i>Electricity Industry (Obligation to Connect) Regulations regulation 8</i></p>	<p>Through discussion with the designated Customer Service Team Leader and a walkthrough of Western Power’s energisation processes we determined that:</p> <ul style="list-style-type: none"> • Western Power only energises a premise following receipt of a completion advice from the electrical contractor • Western Power’s energisation processes are designed to meet the prescribed timeframes for metropolitan and non-metropolitan areas • Western Power maintained robust monthly monitoring and reporting arrangements throughout the audit period, enabling it to monitor its performance in meeting prescribed energisation timeframes, including identifying non-compliances, their causes and any opportunity to further minimise underlying delays and scheduling issues. <p>We examined a sample of Western Power’s monthly reports on its compliance with prescribed energisation timeframes over the audit period, and discussed with the Customer Service Team Leader, the impact or potential future impact of process, resourcing and/or technology changes on Western Power’s compliance levels.</p> <p>For each of the 2017/18, 2018/19 and 2019/20 reporting years, Western Power self-reported that it did not comply with the obligation to energise premises within the prescribed time limits for 0.36, 0.28% and 0.31% of energisations respectively. A total of approximately 50,000 energisations were performed during the audit period.</p> <p>The cause of the breaches was attributed to:</p> <ul style="list-style-type: none"> • Technical issues being identified during energisations, which required specialist crews to attend the site • In country areas, emergency work took priority which resulted in delays in energisations • A small number of scheduling delays during a transition between back-office scheduling systems. The cause of these delays was promptly rectified. <p>Western Power has continued to recognise that the extent and volume of customer energisation activity poses a significant challenge for maintaining full compliance at all times, and has committed to maintaining effective monitoring and reporting controls to identify non-compliances, their causes and any opportunity to further minimise underlying delays and scheduling issues</p> <p>This audit makes no further recommendation in relation to this matter.</p>	
	Priority 2	Controls rating: A	Compliance rating: 2

4.3 Electricity Industry (Customer Contracts) Regulations – Licence Conditions and Obligations

No	Obligation under Condition	Findings		
99	<p>The licensee must determine, from time to time, the default supplier for each connection point that connects to a distribution system operated by the licensee.</p> <p><i>Electricity Industry (Customer Contracts) Regulations 2005 regulation 36</i></p>	<p>Through discussion with the Reading Management Team, we determined that Western Power’s processes provide for:</p> <ul style="list-style-type: none"> Records of default suppliers to be maintained for each connection point Details of the default suppliers for every NMI connected to the distribution system to be identified 		
<p>Priority 4</p>		<p>Controls rating: N/P</p>	<p>Compliance rating: 1</p>	

4.4 Electricity Industry Act – Licence Conditions and Obligations

No	Obligation under Condition	Findings		
101	A licensee must provide the ERA with a performance audit conducted by an independent expert acceptable to the ERA, not less than once every 24 months. <i>Electricity Industry Act Section 13(1)</i>	The previous performance audit for Western Power’s Licences was conducted by Deloitte in 2017, with a final report submitted to the ERA in November 2017. With the ERA’s approval, Assurance Advisory Group (AAG) was appointed to undertake the 2020 Performance Audit for the period 1 July 2017 to 30 June 2020.		
	Priority 5	Controls rating: N/P	Compliance rating: 1	
102	A licensee must provide for an asset management system. <i>Electricity Industry Act Section 14(1)(a)</i>	<i>Obligations 102 and 103</i> Through discussion with the Regulatory Compliance Team and examination of relevant documentation, we determined that Western Power has:		
	Priority 5	Controls rating: N/P	Compliance rating: 1	
103	A licensee must notify details of the asset management system and any substantial changes to it to the ERA. <i>Electricity Industry Act Section 14(1)(b)</i>	<ul style="list-style-type: none"> • Provided for an asset management system applicable to all of its operations • Previously notified the ERA of the details of its asset management system in accordance with the requirements of Section 14 (1) of the Act. Western Power’s asset management system continues to evolve, however the Senior Compliance Specialist confirmed that Western Power has not made any <i>substantial</i> changes to its asset management system during the audit period.		
	Priority 4	Controls rating: N/P	Compliance rating: N/R	
104	A licensee must provide the ERA with a report by an independent expert about the effectiveness of its asset management system every 24 months, or such longer period as determined by the ERA. <i>Electricity Industry Act Section 14(1)(c)</i>	The previous asset management system review for Western Power’s Licences was conducted by CutlerMerz in 2017, with a final report submitted to the ERA in September 2017. With the ERA’s approval, AMCL was appointed to undertake the 2020 asset management system review for the period 1 July 2017 to 30 June 2020.		
	Priority 5	Controls rating: N/P	Compliance rating: 1	
105	A licensee must pay the prescribed licence fees to the ERA within one month after the day of grant or renewal of its licence and within one month after each anniversary of that day over the term of the licence according to clauses 6, 7 and 8 of the <i>Economic Regulation Authority (Licensing Funding) Regulations 2014</i> . <i>Electricity Industry Act Section 17(1); ERA (Licensing Funding) Regulations 2014</i>	Western Power’s prescribed annual licence charge is due to be paid by 30 April each year, being one month after the 30 March anniversary date of its Transmission and Distribution Licences. Quarterly standing charges are also due within 30 days of an applicable notice (in the form of an invoice) being issued by the ERA. Through discussion with the Regulatory Compliance Team and examination of Western Power’s documents and records relating to the payment of invoices issued by the ERA, we determined that during the audit period, Western Power maintained generally effective processes for ensuring prescribed licence fees are paid on time. However, Western Power disclosed in its 2018/19 compliance register and annual compliance report an instance where it failed to pay a prescribed licence fee by the due date. The non-compliance was attributed to an oversight by the Financial Accounting team, where the 30-day payment terms was not recognised to override Western Power’s standard 45-day payment terms. To reduce the likelihood of future non-compliances, Western Power:		
	Priority 3	Controls rating: A	Compliance rating: 2	
		<ul style="list-style-type: none"> • Adjusted its payments process to reduce the payment terms for ERA invoices to “0” days • Set calendar reminders to be monitored by the Regulatory Compliance Team. Our sample testing of prescribed licence fees payable did not identify any further non-compliance. This audit makes no further recommendation in relation to this matter.		

No	Obligation under Condition			Findings
106	<p>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.</p> <p><i>Electricity Industry Act Section 31(3)</i></p>			<p>Through discussion with the Network Operations Development Manager and the Quality and Compliance Officer, and consideration of mechanisms Western Power's outage management, incident response and emergency response procedures, we determined that during the audit period, Western Power:</p> <ul style="list-style-type: none"> Maintained appropriate mechanisms, which were designed to minimise the extent and duration of disruption to customers due to an accident, emergency, potential danger or other unavoidable cause Applied considered resources and prioritisation methods, based on safety/hazard risk ratings for restoring supply to customers in the event of an accident, emergency, potential danger or other unavoidable cause.
	Priority 4	Controls rating: N/P	Compliance rating: 1	
107	<p>A licensee must pay the costs of taking an interest in land or an easement over land.</p> <p><i>Electricity Industry Act Section 41(6)</i></p>			<p>The Property Team Leader confirmed that, during the period 1 July 2017 to 30 June 2020, Western Power:</p> <ul style="list-style-type: none"> Continued to take ownership/easement in land to perform its functions as an Electricity Transmission and Distribution organisation Per the requirement of the Electricity Industry Act, appropriately paid for the costs relating to such land in accordance with the Energy Operators (Powers) Act 1979 and the Land Administration Act 1997.
	Priority 4	Controls rating: N/P	Compliance rating: 1	
111	<p>A retail, distribution or integrated regional licensee must not supply electricity to small use customers unless the licensee is a member of an approved scheme and is bound by and compliant with any decision or direction of the electricity ombudsman under the approved scheme.</p> <p><i>Electricity Industry Act section 101</i></p>			<p>Through discussion with the Regulatory Compliance Manager and examination of an extract of the member list from the Energy and Water Ombudsman Scheme, we determined that for the period 1 July 2017 to 30 June 2020, Western Power was a member of an approved scheme and did not supply electricity to customers outside of that approved scheme.</p>
	Priority 4	Controls rating: N/P	Compliance rating: 1	

4.5 Electricity Licences – Licence Conditions and Obligations

No	Obligation under Condition	Findings		
119	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. <i>Distribution and Transmission Licence condition 4.3.1</i>	Through discussion with the A/Financial Accounting Manager and examination of Western Power's annual statutory accounts and signed independent auditor's reports from the Office of the Auditor General, we determined that: <ul style="list-style-type: none"> For the financial years ended 30 June 2018 and 2019, Western Power maintained accounting records in compliance with Australian Accounting Standards There are no significant accounting transactions and/or items thought to jeopardise Western Power's on-going compliance with Australian Accounting Standards for the financial years ended 30 June 2020. 		
	Priority 4	Controls rating: N/P	Compliance rating: 1	
120	A licensee must comply with any individual performance standards prescribed by the ERA. <i>Distribution and Transmission Licence condition 5.2.4</i>	The Regulatory Compliance Manager confirmed that, during the period 1 July 2017 to 30 June 2020, Western Power was not prescribed individual performance standards by the ERA.		
	Priority 4	Controls rating: N/P	Compliance rating: N/R	
121	A licensee must comply, and require its auditor to comply, with the ERA's standard audit guidelines for a performance audit. <i>Distribution and Transmission Licence condition 5.3.2</i>	The 2017 performance audit conducted during the period July to November 2017 complied with the 2014 version of the ERA's Audit Guidelines. Western Power has instructed AAG to comply with the March 2019 issue of the ERA's Audit and Review Guidelines: Electricity and Gas Licences. The approved 2020 performance audit plan makes specific reference to those Guidelines.		
	Priority 4	Controls rating: N/P	Compliance rating: 1	
122	A licensee must comply, and must require the licensee's expert to comply, with the relevant aspects of the ERA's standard audit guidelines for an asset management system review. <i>Distribution and Transmission Licence condition 5.1.5</i>	The 2017 asset management system review conducted during the period July to September 2017 complied with the 2014 version of the ERA's Audit Guidelines. Western Power has instructed AMCL to comply with the March 2019 issue of the ERA's Audit and Review Guidelines: Electricity and Gas Licences. The approved 2020 asset management system review plan makes specific reference to those Guidelines.		
	Priority 4	Controls rating: N/P	Compliance rating: 1	
123	In the manner prescribed, a licensee must notify the ERA, if it is under external administration or if there is a significant change in the circumstances that the licence was granted which may affect the licensee's ability to meet its obligations. <i>Distribution and Transmission Licence condition 4.4.1</i>	During the period 1 July 2017 to 30 June 2020, Western Power was not under external administration and there were no significant changes affecting Western Power's ability to meet its obligations.		
	Priority 4	Controls rating: N/P	Compliance rating: N/R	

No	Obligation under Condition	Findings			
124	<p>A licensee must provide the ERA, in the manner prescribed, with any information that the ERA requires in connection with its functions under the Electricity Industry Act.</p> <p><i>Distribution and Transmission Licence condition 4.5.1</i></p>	<p>Through discussion with the Regulatory Compliance Team and examination of Western Power's documents and records, we determined that Western Power has well established and centrally coordinated processes in place to respond to the ERA's information requirements in connection with Western Power's functions under the Electricity Industry Act.</p> <p>We observed that:</p> <ul style="list-style-type: none"> • Responsibility has been clearly allocated to relevant teams throughout the organisation for: <ul style="list-style-type: none"> ○ Generating and validating data and references ○ Monitoring of compliance with licence obligations and notification of non-compliances in accordance with Western Power's Compliance Failure Reporting Procedure • The Regulatory Compliance Team is responsible for collating and validating information to be submitted to the ERA • In accordance with its requirement to submit annual compliance reports to the ERA by 31 August each year, Western Power submitted the 2017/18 and 2018/19 compliance reports by the due date of 31 August • Western Power disclosed in its 2017/18 breach register and annual compliance report an instance where it submitted requested standing data to the ERA one day late. The delay was attributed to an administrative oversight. To reduce the likelihood of future non-compliances, Western Power extended its procedures to require: <ul style="list-style-type: none"> ○ Standing data requests to be recorded in the ERA requests register and actioned appropriately ○ Known due dates for standing data requests to be recorded on Western Power's annual compliance reporting checklist with calendar reminders to be monitored by the Regulatory Compliance Team. <p>This audit makes no further recommendation in relation to this matter.</p>			
125	<p>A licensee must publish any information as directed by the ERA to publish, within the timeframes specified.</p> <p><i>Distribution and Transmission Licence condition 3.8.1 and 3.8.2</i></p>	Priority 4	Controls rating: N/P	Compliance rating: 1	<p>Through discussion with the Regulatory Compliance Team and examination of Western Powers records in relation to publication of datasheets in 2019 we determined that Western Power published requested datasheets by the due date.</p>
126	<p>All notices must be in writing, unless otherwise specified.</p> <p><i>Distribution and Transmission Licence condition 3.7.1</i></p>	Priority 4	Controls rating: N/P	Compliance rating: 1	<p>Through discussion with the Regulatory Compliance Team and examination of relevant communications, we determined that Western Power:</p> <ul style="list-style-type: none"> • Has processes in place to formally respond to all notices in writing • Maintains manual and scanned records to evidence formal communication with the ERA

No	Obligation under Condition	Findings	
127	<p>A distributor must create and maintain a Priority Restoration Register. <i>Distribution Licence condition 6.9.1</i></p>	<p>Through discussion with Network Operations Development Manager and the Quality and Compliance Officer, and examination of Western Power’s incident management procedures, we determined that:</p> <ul style="list-style-type: none"> • Western Power’s “Prioritising Network Restoration Guidelines” document serves as its Priority Restoration Register, as it lists the order of incidents requiring the restoration of power in the event of an unplanned interruption. The Guidelines were unchanged and effective throughout the audit period. • The Guidelines describe Western Power’s restoration methodology and reference Western Power’s supporting systems and procedures in place for ensuring restoration of power is in accordance with the prescribed priority. • Western Power’s Power on Fusion Incident Management Standard Operating Procedure (SOP) prescribes the rules and criteria to be used when dispatching fault jobs to field-based crews. Those rules and criteria: <ul style="list-style-type: none"> ○ Match the order of incidents listed in the Guidelines ○ Are reflected in numbered priorities built into Western Power’s Power on Fusion (PoF) system. Incident priorities are numbered from 1 to 100, with 1 being the highest priority. • Throughout the audit period, several minor revisions were made to the PoF Incident Management SOP, including re-categorisation of incidents. Each of those revisions were authorised in accordance with Western Power’s delegations of authority protocols. • We observed evidence of the application of the Guidelines and SOP to incidents scheduled and dispatched during the audit period • We tested that: <ul style="list-style-type: none"> ○ The conduct of regular internal audits occurred throughout the audit period ○ Other scheduled quality audits that now form part of Western Powers ISO quality management system occurred ○ The register of these audits is maintained (which also features the regular conduct of external audits) and that recommendations were being addressed ○ The Priority Restoration Register is applied to Western Power’s management of outages and restoration. 	
	Priority 2	Controls rating: A	Compliance rating: 1
128	<p>The Priority Restoration Register must comply with any criteria determined by the Minister. <i>Distribution Licence condition 6.9.3</i></p>	<p>The Network Operations Development Manager confirmed that, for the period 1 July 2017 to 30 June 2020, the Minister had not prescribed any specific criteria regarding the Priority Restoration Register.</p> <p>We observed that this obligation is recorded in Western Power’s Obligations Register and subject to annual review.</p>	
	Priority 2	Controls rating: A	Compliance rating: N/R

4.6 Code of Conduct – Licence Conditions and Obligations

No	Obligation under Condition	Findings	
Part 7 Disconnection			
233	<p>A distributor who disconnects or interrupts a customer's supply address for emergency reasons must provide a 24 hour emergency line and use its best endeavours to restore supply as soon as possible.</p> <p><i>Code of Conduct clause 7.5</i></p>	<p>Through discussion with the designated Customer Service Team Leader and examination of Western Power's website, we determined that:</p> <ul style="list-style-type: none"> • A 24-hour emergency hotline has been made available for customers, where information relating to emergency outages and expected restoration times can be obtained. • The 24-hour emergency number appears on the Western Power website and has been included in the 'shocks and tingles' TV advertisements. • Western Power endeavours to restore supply to customers as soon as practicable, in accordance with its priority restoration register. 	
	Priority 4	Controls rating: N/P	Compliance rating: 1
234	<p>Subject to subclause 7.6(3), a retailer or distributor must comply with the limitations specified in subclauses 7.6(1)-(2) when arranging for disconnection or disconnecting a customer's supply address.</p> <p><i>Code of Conduct clause 7.6</i></p>	<p>Through discussion with the Reading Operations Team, consideration of relevant policies and procedures, and walkthrough of a sample of de-energisation scenarios, we determined that Western Power's processes are designed to comply with clause 7.6 of the Code, by requiring:</p> <ul style="list-style-type: none"> • De-energisations not to be arranged if: <ul style="list-style-type: none"> ○ A customer has an active complaint registered within MBS – Western Power maintains an automated interface between MBS and the Customer Management System (CMS) (replaced the Network Customer Information System (NetCIS) in early 2019), which records customer complaints ○ The de-energisation is scheduled for a Friday, Saturday, Sunday, Public Holiday, the day before a Public Holiday, or after 2pm on a business day • De-energisations arranged that are in breach of the above criteria to be automatically cancelled in MBS. <p>We observed several instances where the retailer had requested a de-energisation to be performed in breach of the criteria, resulting in an immediate notification from the MBS system and subsequent cancellation.</p> <p>We also observed the Reading Operations Team's involvement in user acceptance testing of MBS system upgrades, to ensure system changes did not impact on the integrity of the critical controls over de-energisations.</p> <p>Our testing of de-energisation service orders raised during the period 1 July 2017 to 30 June 2020, indicated that all de-energisations were performed in compliance with clause 7.6 of the Code where:</p> <ul style="list-style-type: none"> • None of the customers had an active complaint registered in MBS at the time of disconnection • No disconnections were performed after 3pm Monday to Thursday, on a Friday or on a public holiday or the day before a public holiday • No customers' supply addresses, when de-energised, were designated as life support equipment (LSE) customers. 	
	Priority 2	Controls rating: A	Compliance rating: 1

No	Obligation under Condition	Findings		
237	<p>The distributor must comply with subclauses 7.7(3)(a)-(b) if a distributor has been informed by a retailer under subclause 7.7(1)(c), or by a relevant government agency, that a person residing at a customer's supply address requires life support equipment, or of a change of details notified to the retailer under subclause 7.7(2).</p> <p><i>Code of Conduct clause 7.7(3)</i></p>	<p>Through discussion with the Network Operations Development Manager and consideration of Western Power's policies and procedures for maintaining records of life support equipment addresses, we determined that:</p> <ul style="list-style-type: none"> • Western Power's processes provide a clear and consistent method for all retailers to provide details of LSE addresses, for Western Power to include on its LSE Register • For Synergy customers, an automatic update process is in place, whereby: <ul style="list-style-type: none"> ○ New LSE customers, or changes to LSE customer details, are registered in Western Power's system upon receipt of the update ○ Updates are sent automatically by Synergy every day at 3pm. • A monthly audit of the LSE Register is performed to confirm the accuracy and completeness of Western Power's records • There have been no instances during the audit period where a relevant government agency has informed Western Power of a person residing at a customer supply address requiring LSE. <p>Based on our walkthrough of the update process, testing of the automatic update process, examination of the LSE Register and examination of outputs from the monthly audits, we determined that Western Power's current processes are operating as described above.</p>		
	Priority 2	Controls rating: A	Compliance rating: 1	

No	Obligation under Condition	Findings
238	<p>If life support equipment is registered at a customers' supply address under subclause 7.7(3)(a), a distributor must comply with subclauses 7.7(4)(a) and (b). <i>Code of Conduct clause 7.7(4)</i></p> <p><i>Note that clause 7.7(4) requires distributors to:</i></p> <p><i>(a) not disconnect the customer's supply address for failure to pay a bill while the person continues to reside at that address and requires the use of life support equipment; and</i></p> <p><i>(b) Prior to any planned interruption, provide at least 3 business days written or electronic notice to the customer's supply address and any other address nominated by the customer, or notice by electronic means to the customer, and unless expressly requested in writing by the customer not to, use best endeavours to obtain verbal acknowledgement, written acknowledgement or acknowledgement by electronic means from the customer or someone residing at the supply address that the notice has been received.</i></p>	<p>Through discussion with the Planned Outage Notification Team Leader and Reading Operations Team, walkthrough of Western Power's de-energisation process and consideration of Western Power's Type 1 licence obligation framework specific to LSE customers, we determined that Western Power's processes provide for:</p> <ul style="list-style-type: none"> • Flags to be placed on LSE customer accounts within MBS, which will automatically cancel any scheduled de-energisation service order placed on the account. We observed instances of such cancellations of retailer initiated de-energisation requests • Manual notification to the field officer, if a new LSE customer has been registered to a supply address with an active de-energisation service order • LSE customers and/or their carers to be visited or contacted by telephone and notified of the planned interruption • Hand cards to be placed at addresses where no contact was able to be made • At least three business days' written notice of a planned outage and best endeavours to be used to obtain written or verbal confirmation that LSE customers and/or their carers have received that notice. Actions taken include: <ul style="list-style-type: none"> ○ 10 days prior – letter to be sent to the relevant LSE customer ○ At least five days prior – initiate process to obtain acknowledgement of receipt of the letter, via email, SMS or telephone (three attempts are made to contact customers by telephone) ○ Through the ONE system, daily check of customers captured in outage zone to confirm no changes have been made ○ On the day – field officer to perform a door knock to attempt to obtain final acknowledgement • Planned outages to potentially be cancelled should an LSE customer contact Western Power in relation to the outage • Where Western Power only became aware of a customer's LSE status within three business days of the outage, best endeavours to be used to notify any new LSE customer of the planned interruption and to confirm contact has been made with a residence of the supply address • Internal audits to be performed by Network Operations at planned intervals to verify that where retailers have notified Western Power of new LSE customers, that the change notification is valid, accurate and complete and that the customer is flagged in the Trouble Call System (TCS) • Its Type 1 licence obligation framework to be regularly reviewed to ensure it remains adequate. The most recent review was conducted in late 2018 • The Regulatory Compliance team to test the effectiveness of the Type 1 licence obligation framework specific to LSE customers. <p>Of our sample testing of planned outages where LSE customers were affected, all LSE customers were notified accordingly.</p>
Priority 2	Controls rating: A	Compliance rating: 1

No	Obligation under Condition	Findings	
238 A	A distributor must use best endeavours to contact the customer, or someone residing at the supply address, prior to an interruption to restore supply to a supply address that is registered as a life support equipment address. <i>Code of Conduct clause 7.7(4A)</i>	Through discussion with the Planned Outage Notification Team Leader and examination of Western Power's supply restoration processes, we determined that Western Power's processes provide for: <ul style="list-style-type: none"> LSE customers to be notified prior to an interruption to restore supply. Supply to LSE customers to be restored as soon as practicable. If attempts to notify the LSE customer fail, Western Power will act in the customer's best interests to restore supply. 	
	Priority 5	Controls rating: N/P	Compliance rating: 1
239	If a distributor has already provided notice of a planned interruption that will affect a supply address, prior to the distributor registering a customer's supply address as a life support equipment address, the distributor must use best endeavours to contact that customer or someone residing at the supply address prior to the planned interruption. <i>Code of Conduct clause 7.7(5)</i>	Through discussion with the Planned Outage Notification Team Leader and examination of Western Power's planned outage processes specific to LSE customers, we determined that, for the instances during the audit period where new LSE customers were registered in planned interruption areas, Western Power's processes provided for: <ul style="list-style-type: none"> The LSE customer register to be reviewed prior to performing the planned outage (to capture any new LSE customers registered) Best endeavours to be used to contact a residence of the supply address prior to the planned interruption, including for any new LSE customer additions The outage to be delayed where Western Power was notified by the field officer of the new LSE customer with the potential to be affected by the outage. 	
	Priority 5	Controls rating: N/P	Compliance rating: 1
241	A retailer or a distributor must remove the customer's details from the life support equipment register in the circumstances and timeframes specified in subclause 7.7(7). <i>Code of Conduct clause 7.7(7)</i>	Through discussion with the Network Operations Development Manager and consideration of Western Power's LSE policies and procedures, we determined that Western Power's processes provide for: <ul style="list-style-type: none"> Removal of the customer's details from the LSE Register when the customer vacates the supply address or no longer requires the life support equipment. Additional measures to be applied to ensure that a customer is not inappropriately removed from the register: <ul style="list-style-type: none"> Not to commence with removal until notification has been received from both MBS and the retailer Monthly reconciliation of the LSE register against the LSE customer information supplied by the retailer. 	
	Priority 4	Controls rating:	Compliance rating: 1

No	Obligation under Condition	Findings	
Part 8 Reconnection			
244	<p>A distributor must reconnect the customer's supply address upon the request of a retailer, within the timeframes specified in subclause 8.2(2).</p> <p><i>Code of Conduct clause 8.2</i></p>	<p>Section 8.2(2) of the Code of Conduct defines the 'timeframe' for reconnecting the customer's supply address to be:</p> <ul style="list-style-type: none"> • The next business day, if the request is received before 3pm, or within two business days, if received after 3pm, or on a Saturday, Sunday or Public Holiday for customers located in the metropolitan area • Within five business days, if the request is received prior to 3pm, or within six business days if received after 3pm or on a Saturday, Sunday or Public Holiday for customers located in regional areas. <p>Through discussion with the Reading Operations Team Leader and consideration of Western Power's re-energisation processes, we determined that Western Power has the following process in place to re-energise customers:</p> <ul style="list-style-type: none"> • Requests for re-energisation are received by Western Power from the retailer via a service order in MBS • Service orders are automatically scheduled to a field officer for completion • For instances where a service order cannot be completed (owing to safety or access issues), the Reading Operations Team is to follow-up with the Retailer to arrange for a revised date. <p>Through examination of a sample of monthly reports and a high-level analysis of all re-energisations performed throughout the audit period, we also determined that Western Power:</p> <ul style="list-style-type: none"> • Continued to maintain exception reporting throughout the audit period to identify all instances of non-compliance with the requirements of clause 8.2(2) • Reported that it achieved monthly compliance rates of greater than 98% throughout the audit period • Disclosed its non-compliance in its 2017/18 and 2018/19 compliance reports to the ERA. • Consistently attributed the cause of the breaches to: <ul style="list-style-type: none"> ○ Suitably qualified field resources were not immediately available to safely address all issues on site ○ Inability to obtain access to the meter due to site access issues. <p>Western Power has continued to recognise that the extent and increasing volume of customer re-energisation activity poses a significant challenge for maintaining full compliance at all times, and has committed to maintaining effective monitoring and reporting controls to identify non-compliances, their causes and any opportunity to further minimise underlying delays and scheduling issues.</p>	
Priority 2		Controls rating: A	Compliance rating: 2
		This audit makes no further recommendation in relation to this matter.	

No	Obligation under Condition	Findings
Part 9 Pre-Payment Meters		
245	A distributor may only operate a pre-payment meter and a retailer may only offer a pre-payment meter service in an area that has been declared by the Minister by notice published in the <i>Government Gazette</i> . <i>Code of Conduct clause 9.1(2)</i>	Through discussion with the Meter Installation Team Leader and consideration of policies and procedures, we determined that Western Power has only operated pre-payment meter services in areas which have been gazetted by the Minister.
	Priority 4	Controls rating: N/P
256	If a retailer requests the distributor to revert a pre-payment meter, a distributor must do so within 5 business days of receipt of the request for supply addresses within the metropolitan region, and within 10 business days for supply addresses within regional areas. <i>Code of Conduct clause 9.4(4)</i>	The Meter Installation Team Leader confirmed that during the period 1 July 2017 to 30 June 2020, there were no requests from retailers to revert a pre-payment meter.
	Priority 4	Controls rating: N/P
258	If a retailer requests a distributor to revert a pre-payment meter under subclause 9.5(1), the distributor must revert the pre-payment meter within the time frames specified in subclause 9.5(2)(a)-(b). <i>Code of Conduct clause 9.5(2)</i>	Through discussion with the Meter Installation Team Leader, examination of Western Power's policies and procedures for managing pre-payment meters and review of Western Power's Pre-payment Meter Register, we determined that: <ul style="list-style-type: none"> Western Power's procedures adequately provide for reversion of pre-payment meters, particularly in the event that a retailer advises that a customer is an LSE customer During the period 1 July 2017 to 30 June 2020, Western Power did not provide pre-payment meters relating to customers who became LSE customers and therefore, there was no requirement for a pre-payment meter to be reverted.
	Priority 2	Controls rating: A
263	If requested by a retailer, a distributor must check or test a pre-payment meter. <i>Code of Conduct clause 9.9(2)</i>	The Metering Technical Services Team Leader confirmed that for this audit period no request was made by a retailer to check or test a pre-payment meter.
	Priority 4	Controls rating: N/P
Part 10 Information and Communication		
283	On request and at no charge, a distributor must provide a customer with the information specified in subclause 10.6. <i>Code of Conduct clause 10.6</i>	Through discussion with the designated Customer Service Team Leader and examination of Western Power's website, we determined that Western Power provides distribution-related information consistent with clause 10.6 of the Code of Conduct to customers on request/online and at no charge. We confirmed that: <ul style="list-style-type: none"> In instances where customers have requested specified information, customers were not charged for that information Information is made available through the web site or otherwise forwarded to customers free of charge.
	Priority 4	Controls rating: N/P

No	Obligation under Condition	Findings							
284	On request a distributor must provide a customer with their consumption data. <i>Code of Conduct clause 10.7(1)</i>	<p><i>Obligations 284 to 287</i></p> <p>Through discussion with the designated Customer Service Team Leader and Reading Management Team, and consideration of Western Power's procedures and practices relating to the retention of and provision of consumption data to customers, we determined that:</p> <ul style="list-style-type: none"> • For those instances where customers had contacted the CSC to request consumption data during the audit period: <ul style="list-style-type: none"> ○ Western Power's procedures provided for such requests for consumption data to be met through the immediate provision of the data, at no charge ○ Where a customer had requested periodic notification of consumption data, the customer was registered within MBS to be provided data automatically • All data is archived for a minimum of seven years. 							
	Priority 4			Controls rating: N/P	Compliance rating: 1				
285	If a customer requests their consumption data under subclause 10.7(1), the distributor must provide the information at no charge in the circumstances specified in subclause 10.7(2)(a)-(b). <i>Code of Conduct clause 10.7(2)</i>			<p><i>Obligations 284 to 287</i></p> <p>Through discussion with the designated Customer Service Team Leader and Reading Management Team, and consideration of Western Power's procedures and practices relating to the retention of and provision of consumption data to customers, we determined that:</p> <ul style="list-style-type: none"> • For those instances where customers had contacted the CSC to request consumption data during the audit period: <ul style="list-style-type: none"> ○ Western Power's procedures provided for such requests for consumption data to be met through the immediate provision of the data, at no charge ○ Where a customer had requested periodic notification of consumption data, the customer was registered within MBS to be provided data automatically • All data is archived for a minimum of seven years. 					
	Priority 4					Controls rating: N/P	Compliance rating: 1		
286	A distributor must provide a customer with the requested consumption data within 10 business days of the receipt of: <ul style="list-style-type: none"> • the request: or, • payment of the distributor's reasonable charge for providing the consumption data (if payment is required and requested by the distributor within 2 business days of the request). <i>Code of Conduct clause 10.7(3)</i>					<p><i>Obligations 284 to 287</i></p> <p>Through discussion with the designated Customer Service Team Leader and Reading Management Team, and consideration of Western Power's procedures and practices relating to the retention of and provision of consumption data to customers, we determined that:</p> <ul style="list-style-type: none"> • For those instances where customers had contacted the CSC to request consumption data during the audit period: <ul style="list-style-type: none"> ○ Western Power's procedures provided for such requests for consumption data to be met through the immediate provision of the data, at no charge ○ Where a customer had requested periodic notification of consumption data, the customer was registered within MBS to be provided data automatically • All data is archived for a minimum of seven years. 			
	Priority 4							Controls rating: N/P	Compliance rating: 1
287	A distributor must keep a customer's consumption data for 7 years. <i>Code of Conduct clause 10.7(4)</i>							<p><i>Obligations 284 to 287</i></p> <p>Through discussion with the designated Customer Service Team Leader and Reading Management Team, and consideration of Western Power's procedures and practices relating to the retention of and provision of consumption data to customers, we determined that:</p> <ul style="list-style-type: none"> • For those instances where customers had contacted the CSC to request consumption data during the audit period: <ul style="list-style-type: none"> ○ Western Power's procedures provided for such requests for consumption data to be met through the immediate provision of the data, at no charge ○ Where a customer had requested periodic notification of consumption data, the customer was registered within MBS to be provided data automatically • All data is archived for a minimum of seven years. 	
	Priority 4								
288	On request, a distributor must inform a customer how the customer can obtain information on distribution standards and metering arrangements prescribed under the specified Acts that are relevant to the customer or adopted by the distributor. <i>Code of Conduct clause 10.8(1)</i>	<p>Through discussion with the designated Customer Service Team Leader and examination of Western Power's website, we determined that:</p> <ul style="list-style-type: none"> • CSC staff are trained and authorised to, upon request from a customer: <ul style="list-style-type: none"> ○ Provide the customer with relevant information on distribution standards and metering arrangements, or ○ Refer the customer to Western Power's website. • There were regular occasions during the audit period where a customer had made a request for information on distribution standards or metering arrangements. 							
	Priority 4								
289	A distributor must publish information on distribution standards and metering arrangements on the distributor's website. <i>Code of Conduct clause 10.8(2)</i>			<p>Western Power's website contains current information on its:</p> <ul style="list-style-type: none"> • Distribution standards -the website covers details on voltage limits, frequency, voltage fluctuations and harmonics • Metering arrangements, including responses to frequently asked questions. 					
	Priority 4								

No	Obligation under Condition	Findings		
290	To the extent practicable, a retailer and distributor must ensure that any written information that must be given to a customer by the retailer or distributor or its electricity marketing agent under the Code of Conduct is expressed in clear, simple, and concise language and is in a format that makes it easy to understand. <i>Code of Conduct clause 10.9</i>	Based on examination of the aforementioned documentation published on Western Power's website and provided to customers, we determined that the documents were expressed in clear, simple and concise language and were in a format that made it easy to understand.		
	Priority 5			
291	On request, a retailer and distributor must inform a customer how to obtain a copy of the Code of Conduct. <i>Code of Conduct clause 10.10(1)</i>	<i>Obligations 291 and 292</i> Through discussion with the designated Customer Service Team Leader and examination of Western Power's website, we determined that: <ul style="list-style-type: none"> • CSC staff are trained and authorised to, upon request from a customer: <ul style="list-style-type: none"> ○ Provide a copy of the Code on request to customers at no charge ○ Inform the customer where a copy of the Code can be located • A link to the Code is provided in the Complaint acknowledgement and response section of Western Power's website • A link to the ERA website (where the most up-to-date version of the Code can be located) is also included in the Regulation section of Western Power's website • A hard copy of the Code is available at Western Power's premises, to be physically collected • There were instances during the audit period where a customer had made a request for a copy of the Code of Conduct. 		
	Priority 4			
292	A retailer and distributor must make electronic copies of the Code of Conduct available on their websites, at no charge. <i>Code of Conduct clause 10.10(2)</i>			
	Priority 4			
294	On request and at no charge, a retailer and a distributor must make services available to a residential customer services to assist the residential customer to interpret information provided by the retailer or distributor (including independent multi-lingual and TTY services, and large print copies). <i>Code of Conduct clause 10.11(1)</i>	<i>Obligations 294 and 295</i> Through discussion with the designated Customer Service Team Leader and examination of relevant documentation, we determined that during the audit period, Western Power had: <ul style="list-style-type: none"> • Received requests from customers to make services available to assist the customer to interpret information provided by Western Power • Regularly used the Translation and Interpreter (multilingual) Services (TIS) • Offered large print communications, which forms part of the Disability Access and Inclusion Plan • The following mechanisms in place to address such requests: <ul style="list-style-type: none"> ○ Western Power subscribes to the National Relay Service (a 24/7 service run by the Commonwealth Government, which includes TTY services) ○ The Western Power visual style guide for preparing communications and publications includes the: <ul style="list-style-type: none"> ▪ National Relay Service hotline number ▪ National Interpreter Symbol and the associated TIS number ○ The Western Power website includes the National Interpreter Symbol and the National Relay Service hotline number. 		
	Priority 4			
295	For residential customers, a retailer and, if appropriate, a distributor, must include the information prescribed in subclause 10.11(2)(a) on its bills and bill-related information, reminder notices and disconnection warnings. <i>Code of Conduct clause 10.11(2)</i>			
	Priority 4			

No	Obligation under Condition	Findings	
296	<p>On request and at no charge, a distributor must advise a customer, of the availability of different types of meters, as well as their suitability to the customer's supply address, purpose, costs, and installation, operation and maintenance procedures.</p> <p><i>Code of Conduct clause 10.12(1)</i></p>	<p>Through discussion with the Metering Technical Services Team Leader and examination of the Western Power website, we determined that , in order to accommodate customer requests made during the audit period, the following information was made available either through the customer's retailer or via Western Power's website at no cost to the customer:</p> <ul style="list-style-type: none"> • Availability of different types of meters • Suitability of meters to the customer's supply address • Purpose, costs, and installation of meter types • Relevant operation and maintenance procedures for meters. 	
	Priority 4	Controls rating: N/P	Compliance rating: 1
Part 12 Complaints & Dispute Resolution			
298	<p>A retailer and distributor must develop, maintain and implement an internal process for handling complaints and resolving disputes.</p> <p><i>Code of Conduct clause 12.1(1)</i></p>	<p>Through discussion with the Complaints and Resolutions Team Leader, consideration of Western Power's complaints handling process, and examination of customer complaints records, we determined that:</p> <ul style="list-style-type: none"> • Throughout the audit period, Western Power maintained a complaints handling process to facilitate receiving and resolving complaints • CSC staff are provided with relevant training on the requirements of the Code, including: <ul style="list-style-type: none"> ○ Induction training to all new CSC staff ○ Annual refresher training for all Complaints and Resolutions staff for Type 1 breaches • Complaints are centrally managed by the Complaints and Resolutions Team Leader, with effective monitoring tools used to confirm complaints are closed out appropriately (e.g. Key Performance Indicators (KPIs) for time taken to create a CMS item, time for acknowledgement and time for closure) • Performance review processes are in place to drive quality of process, which includes: <ul style="list-style-type: none"> ○ Peer reviews on responses to complaints ○ Bi-annual performance reviews ○ Periodic review of calls by Team Leaders • Appropriate records are maintained within CMS (and previously NetCIS) to evidence receipt and resolution of complaints. 	
	Priority 4	Controls rating: N/P	Compliance rating: 1
299	<p>The complaints handling process under subclause 12.1(1) must comply with the requirements specified in subclauses 12.1(2)(a), (b) and (c) and be made available at no cost.</p> <p><i>Code of Conduct clause 12.1(2)</i></p>	<p>Through discussion with the Complaints and Resolutions Team Leader and examination of Western Power's Complaint Handling Process and Complaint Management, Reporting and Dispute Resolution Process, we determined that Western Power's process provides for:</p> <ul style="list-style-type: none"> • Compliance with AS ISO 10002-2014 • The process for lodging and escalation of complaints • Response times for complaints • The method of response, management and handling of complaints. 	
	Priority 4	Controls rating: N/P	Compliance rating: 1
<p>The complaints handling process has been made available to customers at no cost on Western Power's website or via the CSC.</p>			

No	Obligation under Condition	Findings	
300	<p>A retailer or a distributor must advise the customer in accordance with subclause 12.1(3).</p> <p><i>Code of Conduct clause 12.1(3)</i></p>	<p>Through examination of Western Power's complaints handling process and discussion with the Complaints and Resolutions Team Leader and CSC staff, we determined that Western Power's complaints handling process provides for:</p> <ul style="list-style-type: none"> All complaints to be escalated to the Complaints and Resolution Team. The Complaints and Resolution Team also offer further escalation to the Complaints and Resolution Team Leader The Complaints and Resolution Team to notify customers of their right to refer their complaints to the Ombudsman, if the customer is still not satisfied. 	
	Priority 4	Controls rating: N/P	Compliance rating: 1
301	<p>On 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.</p> <p><i>Code of Conduct clause 12.1(4)</i></p>	<p>Through discussion with the Complaints and Resolutions Team Leader and examination of Western Power's Customer Service Policy, we determined that Western Power's complaints handling process provides for:</p> <ul style="list-style-type: none"> Written complaints to be acknowledged within 10 business days and responded to within 20 business days Complaints lodged online through the Western Power website to be automatically acknowledged with a system generated message Internal KPIs to be monitored to manage complaints at 15 days without resolution. Compliance with prescribed timeframes to be monitored and reported on a monthly basis. <p>In its 2018/19 compliance reports to the ERA, Western Power disclosed 12 instances where it did not acknowledge a complaint within 10 business days. In 11 instances, the breach occurred during the transition from the previous NetCiS system to CMS and in one instance, the breach was caused by the complaint being received by another area of the business and not dealt with in a timely manner.</p> <p>Western Power undertook a full review of the extent and cause of instances where customer complaints were not acknowledged within the 10-day timeframe. The review concluded that all breaches were identified and appropriately addressed, plus appropriate additional controls were implemented to prevent recurrence.</p> <p>Western Power has also performed team refreshers on this requirement and has committed to achieving 100% compliance.</p> <p>Based on our additional sample testing of complaints recorded during the period 1 July 2017 to 30 June 2020, we determined that in all instances:</p> <ul style="list-style-type: none"> The complaint was acknowledged within the timeframes prescribed Details of the complaint were logged within NetCiS or CMS The complaint was resolved within the timeframes prescribed. <p>This audit makes no further recommendation in relation to this matter.</p>	
	Priority 2	Controls rating: A	Compliance rating: 2

No	Obligation under Condition			Findings
303	On request and at no charge, a retailer, distributor and electricity marketing agent must give a customer information that will assist the customer in utilising the respective complaints handling processes. <i>Code of Conduct clause 12.3</i>			Through discussion with the Complaints and Resolutions Team Leader and examination of Western Power's website (via the 'Contact Us' page), we determined that, for requests received by customers during the audit period, Western Power's complaints handling process was made available at no charge.
	Priority 4	Controls rating: N/P	Compliance rating: 1	
304	When a retailer, distributor or electricity marketing agent receives a complaint that does not relate to its functions, it must advise the customer of the entity that it reasonably considers to be the appropriate entity to deal with the complaint (if known). <i>Code of Conduct clause 12.4</i>			<p>Due to the nature of Western Power's role within the WA electricity market, Western Power frequently receives enquiries and complaints from customers relating to functions performed by retailers.</p> <p>Through discussion with the Complaints and Resolutions Team Leader and consideration of Western Power's complaints handling process, we determined that, for complaints received from customers that do not relate to its functions, Western Power's process provides for:</p> <ul style="list-style-type: none"> • Staff to recognise instances where a complaint does not relate to Western Power's functions • Guidance on the boundaries of Western Power/Synergy and related protocols • The matter to be referred to the relevant entity • The customer to be made aware of the reason for the referral • Retention of all third-party related complaints.
	Priority 4	Controls rating: N/P	Compliance rating: 1	
Part 13 Reporting				
305	A retailer and a distributor must prepare a report in respect of each reporting year setting out the information specified by the ERA. <i>Code of Conduct clause 13.1</i>			<p><i>Obligations 305 to 307</i></p> <p>Through discussion with the Senior Compliance Specialist and Regulatory Compliance Manager and examination of relevant documentation, we determined that Western Power:</p> <ul style="list-style-type: none"> • Prepared its annual datasheets for the 2017/18 and 2018/19 periods, in accordance with the relevant Electricity Distribution Licence Performance Reporting Handbook • Provided 2017/18 and 2018/19 datasheets to the ERA by the due date • Published the 2018/19 datasheets on its website within 7 days of notification.
	Priority 4	Controls rating: N/P	Compliance rating: 1	
306	The report specified in clause 13.1 must be provided to the ERA by the date, and in the matter and form, specified by the ERA. <i>Code of Conduct clause 13.2</i>			
	Priority 4	Controls rating: N/P	Compliance rating: 1	
307	The report specified in clause 13.1 must be published by the date specified by the ERA. In accordance with clause 13.3(2), a report is published if: <ul style="list-style-type: none"> • Copies of it are available to the public without cost, at places where the retailer or distributor transacts business with the public; and • A copy of it is posted on the retailer or distributor's website. <i>Code of Conduct clause 13.3</i>			
	Priority 4	Controls rating: N/P	Compliance rating: 1	

No	Obligation under Condition	Findings	
Part 14 Service Standard Payments			
309	Subject to clause 14.6, if a retailer is liable to and makes a payment under subclause 14.1(1) due to an act or omission of a distributor, the distributor must compensate the payment to the retailer. <i>Code of Conduct clause 14.1(2)</i>	<p><i>Obligations 309 and 311</i></p> <p>The Reading Operations Team Leader confirmed that, during the period 1 July 2017 to 30 June 2020, Western Power did not compensate any retailers for an act or omission on Western Power's behalf.</p> <p>For all acts or omissions, Western Power compensates customers directly through the wrongful disconnections process, in line with clause 14.5 of the Code.</p>	
	Priority 4		
311	Subject to clause 14.6, if a retailer is liable to and makes a payment under subclause 14.2(1) due to an act or omission of a distributor, the distributor must compensate the payment to the retailer. <i>Code of Conduct clause 14.2(2)</i>		
	Priority 4		
313	Subject to clause 14.6, a distributor must pay the customer \$20 where the distributor has failed to acknowledge or respond to a written query or complaint within the timeframes prescribed in subclause 12.1(4). <i>Code of Conduct clause 14.4(1)</i>	<p>Through discussion with the Complaints and Resolution Team Leader, and consideration of Western Power's processes for managing service standard payments, we determined that:</p> <ul style="list-style-type: none"> The Complaints and Resolution Team is adequately aware of the requirements prescribed under clause 14.6 of the Code, which is triggered upon a valid application from a customer During the period 1 July 2017 to 30 June 2020, there were no applications by customers to receive the \$20 payment related to Western Power's failure to acknowledge or respond to a written query or complaint within the 10 and 20 day timeframes prescribed in subclause 12.1(4). 	
	Priority 4		
314	Subject to subclause 14.6, if a distributor disconnects a customer's supply address other than as authorised by this Code or otherwise by law, or as authorised by a retailer, then the distributor must pay the customer \$100 for each day that the customer was wrongfully disconnected. <i>Code of Conduct clause 14.5</i>	<p>Through discussion with the Reading Operations Team Leader and consideration of Western Power's processes for managing wrongful de-energisations, we determined that:</p> <ul style="list-style-type: none"> Western Power continued to apply the following processes during the audit period: <ul style="list-style-type: none"> Wrongful de-energisations (equivalent to the Code's reference to disconnection) are identified either via customer complaints or as reported by Field Officers All customer complaints in relation to wrongful de-energisations are to be verified with relevant field officers to confirm the validity and timing of disconnection Details of wrongful de-energisations are registered in a designated log Payments made to customers are recorded in the designated log A standard letter is used to advise the customer of the details of the payment. Staff undergo regular on-line training/refreshers (Itra) on de-energisation compliance obligations 	
	Priority 4		
316	A distributor who is required to make a compensation payment for failing to satisfy a service standard under clauses 14.4 or 14.5, must do so in the manner specified in subclause 14.7(2). <i>Code of Conduct clause 14.7(2)</i>	<p>Through discussion with the Reading Operations Team Leader and consideration of Western Power's processes for managing service standard payments, we determined that Western Power has appropriate processes in place to capture, manage and process payments for service standard breaches as per the requirements of clause 14.7 of the Code.</p>	
	Priority 4		

4.7 Electricity Industry Metering Code – Licence Conditions and Obligations

No	Obligation under Condition	Findings		
Part 2 Code objectives and arms-length treatment				
317	A network operator must treat all Code participants that are its associates on an arms-length basis. <i>Electricity Industry Metering Code clause 2.2(1)(a)</i>	<p><i>Obligations 317 and 318</i></p> <p>During the period 1 July 2017 to 30 June 2020, no code participants were considered as Western Power's associates.</p>		
	Priority 5			Controls rating: N/P
318	A network operator must ensure that no Code participant that is its associate receives a benefit in respect of the Code unless the benefit is attributable to an arm's length application of the Code or is also made available to all other Code participants on the same terms and conditions. <i>Electricity Industry Metering Code clause 2.2(1)(b)</i>			
	Priority 5			Controls rating: N/P
Part 3 Meters and metering installations				
319	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. <i>Electricity Industry Metering Code clause 3.1</i>	<p>Through discussion with the Metering Technical Services Team and examination of relevant metering documentation, we determined that Western Power has:</p> <ul style="list-style-type: none"> Developed tender documents that contain technical specifications for the purchase of meters, which align with the Metrology Procedure, National Measurement Act and Tender Specifications Guidelines Performed testing to confirm whether the meter meets specifications provided in the tender documentation Performed acceptance testing on each batch of meters received from the supplier prior to the tender evaluation stage. Sample testing is increased when failures are identified to determine the extent of the failure. All failures are raised with the supplier and recorded on the supplier's register. Performed ongoing compliance auditing to confirm meters on the network comply with the relevant specifications. 		
	Priority 4			Controls rating: N/P

No	Obligation under Condition	Findings	
320	<p>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.</p> <p><i>Electricity Industry Metering Code clause 3.2(1)</i></p>	<p>Through discussion with the Metering Technical Services Team, examination of relevant metering documentation and observation of meters within the Western Power laboratory (via online platform) we determined that:</p> <ul style="list-style-type: none"> All tender documentation is prepared using Western Power’s Revenue Meters Technical Specifications Meters obtained from the potential supplier are tested in the Western Power laboratory during the tender evaluation phase to ensure they comply with the Metrology Procedure for Metering Installations on the Western Power Network All meters installed by Western Power display, or permit access to a display of the measurements specified in subclauses 3.2(1)(a)(b) through the use of dials, a cyclometer or an illuminated display panel. 	
	Priority 4	Controls rating: N/P	Compliance rating: 1
321	<p>An interval meter must at least have an interface to allow the interval energy data to be downloaded in the manner prescribed using an interface compatible with the requirements specified in the applicable metrology procedure.</p> <p><i>Electricity Industry Metering Code clause 3.3(1)</i></p>	<p>Through discussion with the Metering Technical Services Team and examination of meters in the Western Power laboratory (via online platform), we determined that all of Western Power’s interval meters have an ‘infra-red’ interface that allows interval data to be downloaded.</p> <p>The Metering Technical Services Team Leader confirmed that during the audit period, all type 1-5 meters had an appropriate interface compatible with the requirements specified in the Metrology Procedure, which allows data to be downloaded remotely through MV90 via a communication link.</p>	
	Priority 4	Controls rating: N/P	Compliance rating: 1
322	<p>If a metering installation is required to include a communications link, the link must, where necessary, include a modem and isolation device approved under the relevant telecommunications regulations, to allow the interval energy data to be downloaded in the manner prescribed.</p> <p><i>Electricity Industry Metering Code clause 3.3(3)</i></p>	<p>Through discussion with the Metering Technical Services Team and examination of relevant documents, we determined that:</p> <ul style="list-style-type: none"> Type 1-5 meters have a corresponding modem device installed that allows data to be downloaded remotely through MV90 Modem devices utilised by Western Power hold Certificates of Conformance with relevant telecommunications regulations. 	
	Priority 4	Controls rating: N/P	Compliance rating: 1
323	<p>A network operator must ensure that bidirectional electricity flows do not occur at a metering point unless the metering installation for the metering point is capable of separately measuring and recording electricity flows in each direction.</p> <p><i>Electricity Industry Metering Code clause 3.3A(1)</i></p>	<p>Through discussion with the Metering Technical Services Team we determined that:</p> <ul style="list-style-type: none"> All new meter installations have four-quadrant recording capability which enables bi-directional flow recording, should it be required and programmed accordingly On request by a retailer, Western Power will replace any meter which is not capable of recording bidirectional flows, to allow for bidirectional flows 	
	Priority 4	Controls rating: N/P	Compliance rating: 1

No	Obligation under Condition	Findings
325	<p>An accumulation meter or an interval meter that separately measures and records bi-directional electricity flows at the metering point must record:</p> <ul style="list-style-type: none"> the net electricity production transferred into the network that exceeds electricity consumption; and the net electricity consumption transferred out of the network that exceeds electricity production. <p><i>Electricity Industry Metering Code clause 3.3C</i></p>	<p>Through discussion with the Metering Technical Services Team, and examination of relevant documents we determined that:</p> <ul style="list-style-type: none"> Currently there are both accumulation and interval meters installed on Western Power’s network for small use customers, which separately measure and record bi-directional electricity flows and the net electricity production transferred All new meters installed by Western Power have the capability of measuring bi-directional flows (once programmed) All meters unable to record bi-directional flows, which are required to record such flows, are to be replaced with a new meter capable of complying with clause 3.3 of the <i>Electricity Industry Metering Code</i>.
	Priority 4	
326	<p>A network operator must ensure that there is a metering installation at every connection point on its network which is not a Type 7 connection point. Unless it is a Type 7 metering installation, the metering installation must meet the functionality requirements prescribed.</p> <p><i>Electricity Industry Metering Code clause 3.5(1) and (2)</i></p>	<p>Through discussion with the Metering Technical Services Team, consideration of Western Power’s management of metering installations and its application of MBS, and examination of relevant documents we determined that Western Power’s established policies and procedures provide for the following:</p> <ul style="list-style-type: none"> Once Western Power is advised of a completed metering installation by an electrical contractor, the meter is matched with the NMI to facilitate identification of the connection point MBS allocates all metering points against a relevant type 1-6 connection point Functionality requirements are ensured and maintained per the Western Australian Distribution Connections Manual. <p>We observed that data maintained in MBS includes records of metering installations located at each connection point on the network, apart from Type 7 connection points.</p>
	Priority 4	
327	<p>For each metering installation on its network, a network operator must provide, install, operate and, subject to clause 3.5(7), maintain the metering installation in the manner prescribed, unless otherwise agreed.</p> <p><i>Electricity Industry Metering Code clause 3.5(3)</i></p>	<p>Through discussion with the Metering Technical Services Team and examination of relevant documentation, we determined that Western Power utilises the processes and procedures outlined in:</p> <ul style="list-style-type: none"> Revenue Electric Meters Technical Specification The Western Australian Distributions Connections Manual Metering Asset Management Plan 2019 Model SLA <p>The above documents assist to confirm that metering installations are provided for, installed, operated and maintained in the manner prescribed in the Metering Code.</p>
	Priority 4	

No	Obligation under Condition	Findings	
328	<p>Except for a Type 7 metering installation, a network operator must ensure that 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.</p> <p><i>Electricity Industry Metering Code clause 3.5(4)</i></p>	<p>Through discussion with the Metering Technical Services Team and examination of Western Power’s Metrology Procedure, we determined that Western Power’s procedures maintained during the audit period provided for:</p> <ul style="list-style-type: none"> • Submissions received for installing meters that do not meet the requirements of clause 3.5(4) to be returned to the customer for redesign • No new meters to be installed that are not located as close as practicable to the connection point. 	
	Priority 4		
329	<p>A network operator may only impose a charge for providing, installing, operating or maintaining a metering installation in accordance with the applicable service level agreement that it has with the user.</p> <p><i>Electricity Industry Metering Code clause 3.5(6)</i></p>	<p>Through discussion with the Commercial Services Team and consideration of Western Power’s processes for charging customers for metering installations, we determined that throughout the audit period:</p> <ul style="list-style-type: none"> • Western Power imposed charges for applicable metering services, based on fixed charge codes • Transactions were subject to validation on a monthly basis, to confirm that transactions requiring manual intervention to impose or not impose a charge are correct. 	
	Priority 4		
330	<p>If a network operator becomes aware that a metering installation does not comply with the Code, it must advise affected parties of the non-compliance and arrange for the non-compliance to be corrected as soon as practicable.</p> <p><i>Electricity Industry Metering Code clause 3.5(9)</i></p>	<p>Through discussion with the Metering Technical Services Team, examination of the Model SLA and consideration of instances where Western Power became aware of metering installations not complying with the Code, we determined that Western Power’s procedures provide for:</p> <ul style="list-style-type: none"> • In instances where the retailer requested a meter performance test, the retailer to be notified of the reason for the non-compliance and the relevant activities to address the issue • Meter installation repairs to be performed within a five-day period for metropolitan customers and 10 days for country customers. <p>We observed the application of those procedures through Western Power’s management of two non-compliant meters in 2019 and 2020. In both instances the affected parties (retailers) were advised of the non-compliance and the non-compliant meters were replaced within the SLA.</p> <p>Note that this audit discussed a potential procedural improvement opportunity with the Metering Technical Services Team, however makes no further recommendation for control improvement.</p>	
	Priority 4		
331	<p>All devices that may be connected to a telecommunications network must be compatible with the telecommunications network and comply with all applicable State and Commonwealth enactments</p> <p><i>Electricity Industry Metering Code clause 3.7</i></p>	<p>The Metering Technical Services Team Leader confirmed that all modem devices utilised by Western Power during the audit period held appropriate Certificates of Conformance.</p>	
	Priority 4		

No	Obligation under Condition			Findings
332	<p>Subject to clause 3.27, a network operator must ensure that each metering installation on its network is secured by devices or methods that hinder unauthorized access and enable unauthorized access to be detected, consistent with the standards of good electricity industry practice.</p> <p><i>Electricity Industry Metering Code clause 3.8</i></p>			<p>Through discussion with the Metering Technical Services Team and examination of relevant metering documents we determined that Western Power’s procedures provided for:</p> <ul style="list-style-type: none"> • All meters installed by Western Power to be designed to be fitted with a security seal. The security seal aims to hinder access to the meter and identify instances where unauthorised access has occurred • Inspection processes provided for new seals to be fitted once work has been completed • Newer meters to be fitted with tamper alarms • Should a customer, field officer, contractor or retailer believe a seal has been compromised, a ‘suspected tamper’ service order is to be raised through MBS for further investigation.
Priority 4		Controls rating: N/P	Compliance rating: 1	
333	<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><i>Electricity Industry Metering Code clause 3.9(3)</i></p>			<p>Through discussion with the Metering Technical Services Team and consideration of Western Power’s management of metering installations, we determined that Western Power’s established policies and procedures provided for the following:</p> <ul style="list-style-type: none"> • All meters to be sourced through a tender process, with Western Power’s Meter Technical Specification Guidelines to be used in the preparation of tender documentation. Potential suppliers are required to demonstrate that the proposed meters meet the required specifications and to provide a sample meter for Western Power to conduct quality testing to confirm its technical requirements will be met • Each batch of meters received is to be tested for compliance with the required specifications • Once meters are installed, systematic sample testing is to be performed in accordance with Western Power’s Compliance Testing Plan to ensure the accuracy of meters is maintained • The Western Australian Distributions Connection Manual is used as a reference to the Australian Standards and to ensure each meter complies with Table 3 of Appendix 1 of the Code. <p>Western Power’s systematic sample testing throughout the audit period identified a number of meters that failed the Code’s accuracy requirements. Those breaches were recorded in Western Power’s breach register and reported in its 2017/18 and 2018/19 Compliance Reports to the ERA. In each instance, meters were replaced upon being identified as non-compliant.</p> <p>We observed that the compliance test plan involves more than one million meters, with 1,200 meters scheduled for testing each year. Throughout the audit period, the test plan was on schedule and completed as expected.</p> <p>We also observed that there were no further instances of non-compliance during this audit period similar to the instance in 2016 where the removal of metering infrastructure (due to safety failure) impacted on the configuration of the metering installation and rendered it non-compliant.</p> <p>Western Power has continued to recognise that the volume of its meters presents a significant challenge for maintaining full compliance at all times, and that it will continue to systematically test its meters in accordance with its defined testing program.</p> <p>This audit makes no further recommendation in relation to this matter.</p>
Priority 2		Controls rating: A	Compliance rating: 2	

No	Obligation under Condition	Findings
334	<p>A metering installation used to supply a customer with requirements above 1000 volts that requires a VT and whose annual consumption is below 750MWh must meet the relevant accuracy requirements of Type 3 metering installation for active energy only.</p> <p><i>Electricity Industry Metering Code clause 3.9(7)</i></p>	<p>The Metering Technical Services Team Leader confirmed that during the audit period, in all instances where a meter was used to supply a customer with requirements above 1000 volts that require a VT and had consumption of less than 750MWh, the meter met the relevant accuracy requirements of Type 3 metering installation for active energy.</p>
	<p>Priority 4</p> <p>Controls rating: N/P</p> <p>Compliance rating: 1</p>	
335	<p>If compensation is carried out within the meter then the resultant metering system error must be as close as practicable to zero.</p> <p><i>Electricity Industry Metering Code clause 3.9(9)</i></p>	<p>The Metering Technical Services Team Leader confirmed that, although Western Power's meter Types 1-4 have the capability for compensation errors to be programmed in should the need for compensation arise, no such compensation was carried out by Western Power during the audit period.</p>
	<p>Priority 4</p> <p>Controls rating: N/P</p> <p>Compliance rating: N/R</p>	
336	<p>A network operator must ensure that any programmable settings within any of its metering installations, data loggers or peripheral devices, that may affect the resolution of displayed or stored data, meet the relevant requirements specified in the applicable metrology procedure and comply with any applicable specifications or guidelines specified by the National Measurement Institute under the National Measurement Act.</p> <p><i>Electricity Industry Metering Code clause 3.10</i></p>	<p>Through discussions with the Metering Technical Services Team and consideration of Western Power's documents we determined that:</p> <ul style="list-style-type: none"> • All meters installed by Western Power are approved in accordance with the National Measurement Act and Australian Standards • Meters are tested during the tender evaluation phase to ensure that all programmable functions in relation to the resolution of displayed or stored data are in accordance with the prescribed requirements under Western Power's Metrology Procedure
	<p>Priority 4</p> <p>Controls rating: N/P</p> <p>Compliance rating: 1</p>	
337	<p>A network operator must ensure that a metering installation on its network is operating consistently with good electricity industry practice to measure and record data, and permits the collection of data within the time specified in the applicable service level agreement, for at least the percentages of the year specified.</p> <p><i>Electricity Industry Metering Code clause 3.11(1)</i></p>	<p>Clause 3.11(1) of the Metering Code specifies the requirement for Western Power to ensure that its meters permit the collection of data at a level of availability of at least:</p> <p>(a) If the metering installation does not have a communications link – 99% of the year; and</p> <p>(b) If the metering installation has a communications link:</p> <p>(i) For the communications link – 95% of the year; and</p> <p>(ii) For the rest of the metering installation – 99% of the year.</p> <p>Through discussion with the Commercial Services Team, and walkthrough of Western Power's compliance monitoring and reporting activities, we determined that throughout the audit period, Western Power reported on a monthly basis that its fleet of meters continuously achieved the availability requirements of the Code to enable the measurement, record of and timely collection of data.</p>
	<p>Priority 4</p> <p>Controls rating: N/P</p> <p>Compliance rating: 1</p>	

No	Obligation under Condition	Findings		
338	<p>If an outage or malfunction occurs to a metering installation, the network operator must repair the metering installation in accordance with the applicable service level agreement.</p> <p><i>Electricity Industry Metering Code clause 3.11 (2)</i></p>	<p>Through discussion with the Commercial Services Team and the Meter Installations Team Leader, consideration of Western Power's processes and practices for making repairs to meters in accordance with the Model SLA and walkthrough of its compliance monitoring and reporting activities, we determined that:</p> <ul style="list-style-type: none"> • The Commercial Services Team uses a weekly MBS report and Access Database to generate a range of queries, which identify whether service orders for repairing meters are completed within the service standard timeframes defined in the Model SLA. • For the duration of the audit period, Western Power has achieved full compliance with its obligation to repair meters in accordance with the Model SLA service standards. 		
	Priority 4	Controls rating: N/P	Compliance rating: 1	
340	<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><i>Electricity Industry Metering Code clause 3.11A(1)</i></p>	<p>Through discussion with the Metering Technical Services Team and examination of Western Power's metering management documentation, we determined that:</p> <ul style="list-style-type: none"> • Western Power's Meter Compliance Testing and Sampling Plan is contained in the Metrology Procedure and has been approved by the ERA • The Plan is designed to systematically sample and test meters installed on Western Power's network for accuracy in accordance with AS 1284.13 • Compliance programs are ongoing and conducted over various periods depending on the Meter Accuracy Class and results are published in the 'In-Service Compliance' Report. To ensure that meters register within the margin of error referred to in section 41 (3) of the Electricity Act 1945, the Plan includes <ul style="list-style-type: none"> ○ Determination of populations ○ Determination of sample size ○ Sampling accuracy method ○ Sample testing ○ Performance characteristics ○ Assessment of results ○ Redefining populations ○ On-going compliance testing ○ Determining population failure <p>Based on examination of the In-Service Compliance Reports for the four quarters ending December 2019, we determined that Western Power had sampled and tested meters on its network for accuracy in accordance with AS 1284.13.</p>		
	Priority 4	Controls rating: N/P	Compliance rating: 1	

No	Obligation under Condition	Findings	
341	<p>Subject to clause 3.11A(3), if a “population” of meters is deemed to have failed under AS 1284.13, the network operator must ensure that all of the meters in that population are removed and replaced with new meters within 3 years of the testing of the population.</p> <p><i>Electricity Industry Metering Code clause 3.11A(2)</i></p>	<p>Since Western Power first recognised that there were approximately 320,000 non-compliant direct connect meters on its network, it developed an action plan (approved by the EnergySafety division of the Department of Commerce) to replace the non-compliant meters by 1 December 2015. An amendment to the Code confirmed that only approximately 54,000 of the 320,000 meters were non-compliant.</p> <p>Through discussion with the Metering Installation Team Leader, examination of Western Power’s Annual Compliance reports and consideration of the Management Plan for replacing or removing the remaining meters as soon as practicable, we determined that:</p> <ul style="list-style-type: none"> • In accordance with Action Plan 3/2017 from the 2017 Performance Audit, Western Power has continued to implement its Management Plan for replacing or removing the remaining meters as soon as practicable, taking into account safety concerns or access constraints. • During the audit period, Western Power reduced the number of non-compliant meters from 1,813 to 20 (as at 30 June 2020). <p>Recommendation 1/2020 (carried forward from recommendation 3/2017)</p> <p><i>Western Power close-out the Management Plan to address the remaining non-compliant meters by determining the likelihood of those meters being replaced or removed, and any relevant timeframe for replacement or removal.</i></p>	
	Priority 2	Controls rating: A	Compliance rating: 2
342	<p>A network operator must ensure that each metering installation complies with at least the prescribed design requirements.</p> <p><i>Electricity Industry Metering Code clause 3.12(1)</i></p>	<p>Through discussion with the Metering Technical Services Team and examination of documentation relating to the design and specification of meters used by Western Power, we determined that:</p> <ul style="list-style-type: none"> • Western Power utilises the Western Australian Distribution Connection Manual as a guide for installing all high and low-voltage meters • In respect of all high voltage metering installations, the High Voltage (HV) Design Technical Requirements document is to be completed and signed off by the Metering Technical Services Team Leader prior to installation. <p>We examined two instances for metering installation on the HV distribution network and verify they had been completed and signed off in accordance with Western Power’s procedures. Commissioning sheets were approved by the Senior Metering Technician. Both metering units were tested for accuracy by Western Powers HV Laboratory. The HV Laboratory has traceability for their test instruments to the National Measurement Institute.</p>	
	Priority 4	Controls rating: N/P	Compliance rating: 1

No	Obligation under Condition			Findings
343	<p>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.</p> <p><i>Electricity Industry Metering Code clause 3.12(2)</i></p>			<p>Through discussion with the Metering Technical Services Team and examination of relevant documentation, we determined that:</p> <ul style="list-style-type: none"> • Western Power utilises the following to ensure that all CT/VT instrument transformer installations are performed in accordance with the relevant requirements of the Metrology Procedure and Australian Standard: <ul style="list-style-type: none"> ○ Western Australian Distributions Connections Manual ○ Western Australian Electricity Requirements ○ HV Commissioning Sheet. • Prior to installation of an instrument transformer for a HV meter installation, Western Power’s processes require: <ul style="list-style-type: none"> ○ A NATA accredited ‘Report of Test’ to be received to report on the accuracy of the metering equipment ○ Testing to be performed to ensure that the metering equipment specifications remained compliant post-transportation <p>We examined Metering Transformer Test Reports in two instances to observe this process being undertaken.</p>
	Priority 4	Controls rating: N/P	Compliance rating: 1	
344	<p>A network operator must provide isolation facilities of a standard consistent with good electricity industry practice, to facilitate testing and calibration of the metering installation.</p> <p><i>Electricity Industry Metering Code clause 3.12(3)</i></p>			<p>Through discussion with the Metering Technical Services Team and examination of Western Power’s high and low voltage metering technical specifications, we determined that throughout the audit period, Western Power:</p> <ul style="list-style-type: none"> • Provided isolation facilities in the form of SPD and Fuse Isolation Switches • Utilised the following metering design considerations to ensure that isolation facilities are provided in accordance with the Australian Standard: <ul style="list-style-type: none"> ○ Western Australian Electrical Requirements Manual ○ Western Australian Distribution Connections Manual ○ HV Transmission and Generation Metering Guidelines.
	Priority 4	Controls rating: N/P	Compliance rating: 1	
345	<p>A network operator must maintain drawings and supporting information, of a standard consistent with good electricity industry practice, to detail the metering installation for maintenance and auditing purposes.</p> <p><i>Electricity Industry Metering Code clause 3.12(4)</i></p>			<p>Through discussion with the Metering Technical Services Team, examination of relevant documentation, and a tour of the Western Power Metering laboratory (via online platform) we determined that Western Power maintains drawings in relation to metering installation arrangements in hard copy files in the:</p> <ul style="list-style-type: none"> • Metering laboratory • Western Power corporate filing system (EDM).
	Priority 4	Controls rating: N/P	Compliance rating: 1	
346	<p>A network operator must procure the user or the user’s customer to install, or arrange for the installation of, a full check metering installation or partial check metering installation in accordance with the prescribed requirements.</p> <p><i>Electricity Industry Metering Code clause 3.13(1)</i></p>			<p><i>Obligations 346 to 348</i></p> <p>Through discussion with the Metering Technical Services Team Leader and examination of relevant documentation, we determined that:</p> <ul style="list-style-type: none"> • Full check meters are installed, where a Type 1 or 2 meter is required for a HV user
	Priority 4	Controls rating: N/P	Compliance rating: 1	

No	Obligation under Condition	Findings	
347	A partial check metering installation must be physically arranged in a manner determined by the network operator, acting in accordance with good electricity industry practice. <i>Electricity Industry Metering Code clause 3.13(3)(c)</i>	<ul style="list-style-type: none"> Western Power does not utilise partial check meters HV Transmission and Generation Metering Guidelines are utilised as a guide to ensure that check meters are installed in accordance with the Metrology Procedure and Australian Standard 	
	Priority 4	Controls rating: N/P	Compliance rating: N/R
348	A check metering installation for a metering point must comply with the prescribed requirements. <i>Electricity Industry Metering Code clause 3.13(4)</i>	<ul style="list-style-type: none"> All HV metering installations are required to be approved by the Metering Technical Services Team Leader on a project basis All meters utilised by Western Power are sourced through a tender process, with the tender documentation reflecting the relevant Meter Technical Specifications Guidelines Meters are tested during the tender evaluation stage to ensure they meet the required specifications 	
	Priority 4	Controls rating: N/P	Compliance rating: 1
349	If, under clause 3.14(2), a metering installation uses metering class CTs and VTs that do not comply with the Table 3 in Appendix 1, then the network operator must take the actions specified in order to achieve the accuracy requirements in Table 3 in Appendix 1. <i>Electricity Industry Metering Code clause 3.14(3)</i>	The Metering Technical Service Team Leader confirmed that, during the audit period, Western Power was not required to adjust a metering installation, with class CT and VT, to ensure achievement of accuracy requirements in Table 3 in Appendix 1 of the Metering Code.	
	Priority 4	Controls rating: N/P	Compliance rating: N/R
350	The network operator must ensure that a Type 1 metering installation to Type 5 metering installation on the network has the facilities and functionality prescribed. <i>Electricity Industry Metering Code clause 3.16(1)</i>	<p>Through discussion with the Metering Technical Services Team, we determined that:</p> <ul style="list-style-type: none"> All type 1 to 5 meters are sourced through a tender process, with tender documentation reflecting the required meter technical specifications Meters are tested during the tender evaluation phase to ensure that they have the facilities and functionality requirements prescribed by the Metering Code Meters are checked in line with the Compliance Testing Plan to ensure they continue to comply with the requirements of the Metering Code. 	
	Priority 4	Controls rating: N/P	Compliance rating: 1
351	The network operator must ensure that a Type 1 metering installation to Type 4 metering installation on the network includes a communications link. <i>Electricity Industry Metering Code clause 3.16(2)</i>	<p>Through discussion with the Metering Technical Services Team and consideration of Western Power's documents we determined that:</p> <ul style="list-style-type: none"> Relevant tender documentation for sourcing meters requires a communications link for Type 1-4 metering installations Prior to installing a Type 1-4 metering installation, a completion advice that includes the remote mobile phone number assigned to all communications link devices is forwarded to the Metering Services Team for upload into MBS Data is extracted using the communications link on a regular basis through the MV90 system, to monitor instances where communication links for such metering installations are not operational. 	
	Priority 4	Controls rating: N/P	Compliance rating: 1

No	Obligation under Condition	Findings	
352	If a device is used as a data logger, the energy data for a metering point on the network must be collated in trading intervals or sub-multiples of a trading interval within the metering installation. <i>Electricity Industry Metering Code clause 3.16(3)</i>	Through discussion with the Metering Technical Services Team and examination of the technical specifications for all revenue meters, we determined that Western Power's meters installed with data loggers are used to log and collate data in sub-multiples of a trading interval.	
	Priority 4	Controls rating: N/P	Compliance rating: 1
353	If, under subclause 3.16(3), energy data for a metering point on the network is collated in sub-multiples of a trading interval, then the network operator must aggregate the energy data into trading intervals before providing it to a Code participant unless the Code participant agrees otherwise. <i>Electricity Industry Metering Code clause 3.16(3A)</i>	Through discussion with the Metering Technical Services Team and examination of Western Power's Meter Technical Specifications documentation, we determined that: <ul style="list-style-type: none"> Western Power's metering installations collate data in sub-multiples of a trading interval Where the energy data is provided to a Code participant, Western Power aggregates it into trading intervals. 	
	Priority 4	Controls rating: N/P	Compliance rating: 1
354	The metering installation for the connection point must comply with the prescribed wholesale market metering installation requirements if the Electricity Retail Corporation supplies electricity to a contestable customer at a connection point under a non-regulated contract and in circumstances when, immediately before entering into the contract, the electricity retail corporation supplied electricity to the contestable customer under a regulated contract. <i>Electricity Industry Metering Code clause 3.18(1)</i>	Through discussion with the Metering Technical Services Team and examination of relevant metering management documentation, we determined that for all instances where Synergy supplied electricity to contestable customers under a non-standard contract, meters installed by Western Power at the relevant connection points complied with the prescribed wholesale market metering installation requirements, as described at obligations 350 to 353 above.	
	Priority 4	Controls rating: N/P	Compliance rating: 1
355	If reasonably requested by a Code participant, a network operator must provide enhanced technology features in a metering installation. <i>Electricity Industry Metering Code clause 3.20(1)</i>	Through discussion with the Metering Technical Services Team and examination of Western Power's metering management arrangements, we determined that: <ul style="list-style-type: none"> Requests for enhanced technology features (e.g. signal outputs, bi-directional recording facilities and communications links) are received from a retailer through MBS MBS creates a service order, which can only be closed off once a completion advice is received from a metering officer. 	
	Priority 4	Controls rating: N/P	Compliance rating: 1
356	A network operator may only impose a charge for the provision of metering installations with enhanced technology features in accordance with the applicable service level agreement between it and the user. <i>Electricity Industry Metering Code clause 3.20(3)</i>	The Commercial Services Team Leader confirmed that Western Power has not charged (under the Model SLA) Code participants for the provision of metering installations with enhanced technology features.	
	Priority 4	Controls rating: N/P	Compliance rating: N/R

No	Obligation under Condition	Findings	
357	<p>Meters containing an internal real time clock must maintain time accuracy as prescribed. Time drift must be measured over a period of 1 month.</p> <p><i>Electricity Industry Metering Code clause 3.21(1)</i></p>	<p>Through discussion with the Reading Management Team and examination of a sample of monthly compliance reports, we determined that:</p> <ul style="list-style-type: none"> • Effective monthly compliance monitoring and reporting was applied throughout the audit period to identify meters not maintaining the prescribed time accuracy and for any breaches to be assessed and resolved through the correction of time drift • Time drift is measured through Western Power’s MV90 system, which is housed on dedicated servers and utilises the system clock to measure and report on time drift over a period of one month. The time accuracy for Type 1 to 5 meters is contingent on the MV90 and MVRS servers maintaining time within the timeframes prescribed • Western Power reported an average annual non-compliance of 1.25% during the audit period, where meters containing an internal real time clock did not maintain the prescribed accuracy requirements. Time drift has been measured over a period of 1 month and in accordance with Table 3 - Overall Accuracy Requirements of Metering Installation Components. These non-compliances were primarily due to: <ul style="list-style-type: none"> ○ Degraded batteries in interval meters preventing the maintenance of time accuracy during power outages ○ Change or fluctuation of network frequency caused time drift on meters • For meters that have repeatedly failed time accuracy, Western Power has investigated in the field. Where feasible, degraded batteries have been replaced and in certain circumstances depending on the meter type, the meter itself has been replaced. <p>Western Power has continued to recognise that the volume of its current fleet of interval meters presents a significant challenge for maintaining full compliance at all times, and that it will continue to monitor the time accuracy of its interval meters and correct the time drift in meters where inaccuracies are identified.</p>	
	Priority 2	Controls rating: B	Compliance rating: 2
358	<p>If a metering installation includes measurement elements and an internal data logger at the same site, it must include facilities on site for storing the interval energy data for the periods prescribed.</p> <p><i>Electricity Industry Metering Code clause 3.21(2)</i></p>	<p>Through discussion with the Metering Technical Services Team and examination of Western Power’s Revenue Meters Technical Specifications Guidelines, we determined that:</p> <ul style="list-style-type: none"> • For meters with data loggers installed, information is stored as per the timeframes prescribed by clause 3.21(2) • For meters with communication links installed, information is stored for at least 35 days • For meters with no communication links installed, information is stored for at least 200 days. 	
	Priority 4	Controls rating: N/P	Compliance rating: 1

No	Obligation under Condition	Findings			
359	<p>A network operator providing one or more metering installations with enhanced technology features must be licensed to use and access the metering software applicable to all devices being installed and be able to program the devices and set parameters.</p> <p><i>Electricity Industry Metering Code clause 3.22</i></p>	<p>Through discussion with the Metering Technical Services Team and examination of relevant documentation, we determined that:</p> <ul style="list-style-type: none"> All meters purchased are accompanied by the relevant software and licenses, which allows Western Power to program the devices and set parameters based on an individual user's needs Access to metering software is provided on a need-to-have basis, in line with the authorisation matrix Generally, read-only access is provided to staff, unless a technical member requires full access to program the device and set parameters. 			
	<table border="1"> <tr> <td data-bbox="271 504 539 552">Priority 4</td> <td data-bbox="539 504 808 552">Controls rating: N/P</td> <td data-bbox="808 504 1077 552">Compliance rating: 1</td> </tr> </table>	Priority 4	Controls rating: N/P	Compliance rating: 1	
Priority 4	Controls rating: N/P	Compliance rating: 1			
360	<p>Where signals are provided from the meter for the user or the user's customer use, a network operator must ensure that signals are isolated by relays or electronic buffers to prevent accidental or malicious damage to the meter.</p> <p><i>Electricity Industry Metering Code clause 3.23(a)</i></p>	<p><i>Obligations 360 and 361</i></p> <p>Through discussion with the Metering Technical Services Team and examination of Western Power's documents we determined that:</p> <ul style="list-style-type: none"> Western Power's meters are installed with electronic buffers and relays to ensure that signals are isolated to prevent any accidental or malicious damage to the meter The presence of effective electronic buffers and relays is verified through testing performed during the tender evaluation process Procedures ensure signal technical data is made available to the customer. 			
	<table border="1"> <tr> <td data-bbox="271 695 539 743">Priority 4</td> <td data-bbox="539 695 808 743">Controls rating: N/P</td> <td data-bbox="808 695 1077 743">Compliance rating: 1</td> </tr> </table>	Priority 4	Controls rating: N/P	Compliance rating: 1	
Priority 4	Controls rating: N/P	Compliance rating: 1			
361	<p>Where signals are provided from the meter for the user or the user's customer use, a network operator must provide the user or the user's customer with sufficient details of the signal specification to enable compliance with clause 3.23(c) of the Code.</p> <p><i>Electricity Industry Metering Code clause 3.23(b)</i></p>	<p>The Metering Technical Services Team Leader confirmed that during the audit period, Western Power did not identify any instances where accidental or malicious damage (via tampering of the signal unit) had occurred to a meter.</p>			
	<table border="1"> <tr> <td data-bbox="271 919 539 967">Priority 4</td> <td data-bbox="539 919 808 967">Controls rating: N/P</td> <td data-bbox="808 919 1077 967">Compliance rating: 1</td> </tr> </table>	Priority 4	Controls rating: N/P	Compliance rating: 1	
Priority 4	Controls rating: N/P	Compliance rating: 1			
362	<p>If a retailer requests a network operator to install a pre-payment meter at a connection point, then the pre-payment meter must be sufficient to enable the retailer to comply with the retailer's obligations under the Code of Conduct.</p> <p><i>Electricity Industry Metering Code clause 3.24A(1)</i></p>	<p><i>Obligations 362 and 363</i></p> <p>The Meter Installations Team Leader confirmed that during the audit period, Western Power was not requested by a retailer to install or replace a pre-payment meter.</p>			
	<table border="1"> <tr> <td data-bbox="271 1110 539 1158">Priority 4</td> <td data-bbox="539 1110 808 1158">Controls rating: N/P</td> <td data-bbox="808 1110 1077 1158">Compliance rating: N/R</td> </tr> </table>	Priority 4	Controls rating: N/P	Compliance rating: N/R	
Priority 4	Controls rating: N/P	Compliance rating: N/R			
363	<p>If a retailer requests a network operator to replace a pre-payment meter at a connection point with a meter that is not a pre-payment meter then the network operator must do so in accordance with this Code and the Code of Conduct.</p> <p><i>Electricity Industry Metering Code clause 3.24B(1)</i></p>				
	<table border="1"> <tr> <td data-bbox="271 1318 539 1366">Priority 4</td> <td data-bbox="539 1318 808 1366">Controls rating: N/P</td> <td data-bbox="808 1318 1077 1366">Compliance rating: N/R</td> </tr> </table>	Priority 4	Controls rating: N/P	Compliance rating: N/R	
Priority 4	Controls rating: N/P	Compliance rating: N/R			

No	Obligation under Condition	Findings	
364	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. <i>Electricity Industry Metering Code clause 3.27</i>	Through discussion with the Meter Installations Team Leader, consideration of Western Power's meter installation procedures and examination of Western Power's list of registered metering installation providers, we determined that Western Power takes all reasonable steps to ensure meters installed on its network are installed by authorised persons.	
	Priority 4	Controls rating: N/P	Compliance rating: 1
365	A network operator must publish a list of registered metering installation providers, including the prescribed details, and update the list at least annually. <i>Electricity Industry Metering Code clause 3.29</i>	Through discussion with the Meter Installations Team Leader and examination of Western Power's website, we determined that: <ul style="list-style-type: none"> Western Power maintains a list of registered metering installation providers, including the type of work each provider is authorised to carry out The list is live and updated frequently and at least once per annum, as required by the Metering Code. 	
	Priority 4	Controls rating: N/P	Compliance rating: 1
Part 4 Metering database			
366	A network operator must establish, maintain and administer a metering database containing standing data and energy data for each metering point on its network. <i>Electricity Industry Metering Code clause 4.1(1)</i>	Through discussion with the Meter Data Manager and examination of relevant data contained in MBS, we determined that Western Power maintains and administers standing data and energy data within MBS for each metering point on its network.	
	Priority 4	Controls rating: N/P	Compliance rating: 1
367	A network operator must ensure that its metering database with its associated links, circuits, information storage and processing systems are secured by devices or methods consistent with a good industry practice (to hinder unauthorised access and enable unauthorised access to be detected). <i>Electricity Industry Metering Code clause 4.1(2)</i>	Through discussion with the Functional Support Specialist, Information Communication and Technology, and examination of relevant documentation, we determined that Western Power has the following processes in place to manage its metering database: <ul style="list-style-type: none"> Access request forms are required to be completed and approved by a relevant Team Leader prior to being granted access to MBS System access audits are performed by the ICT team every 60 days, which aims to reconcile terminated employees with current employees registered in MBS All employees are required to provide annual confirmation that they still require access to MBS A password authority level matrix has been maintained, which includes a signature authority list for MBS access request approvals Passwords are required to be changed every three months and MBS locks a user out if an incorrect password is attempted three times ICT monitors failed login attempts as well as attempted logins by users who do not have access to the system. 	
	Priority 4	Controls rating: N/P	Compliance rating: 1

No	Obligation under Condition	Findings
368	A network operator must prepare and, if applicable, implement a disaster recovery plan to ensure that it is able, to rebuild the metering database and provide energy data to Code participants within 2 business days after the day of any disaster. <i>Electricity Industry Metering Code clause 4.1(3)</i>	Through discussion with the Functional Support Specialist, Information Communication and Technology and examination of Western Power's disaster recover planning and testing documentation, we determined that: <ul style="list-style-type: none"> Western Power's disaster recover planning documentation specifically references the potential failure of MBS in the event of a disaster, and includes reference to: <ul style="list-style-type: none"> Western Power's use of a backup server, which is activated as soon as a failure of the primary server is identified. This backup server is updated simultaneously to ensure that the provision of data to Code participants is as accurate and up to date as possible Queuing applications in place to record information whilst the primary metering database is undergoing repairs In July 2019, Western Power undertook an MBS application failover test and concluded that the test was successful. MBS application failover tests are scheduled on an annual basis.
	Priority 4	Controls rating: N/P Compliance rating: 1
369	A network operator must ensure that its registry complies with the Code and the prescribed clause of the market rules. <i>Electricity Industry Metering Code clause 4.2(1)</i>	Through discussion with the Meter Data Manager and examination of relevant data maintained in MBS, we determined that the registry within MBS contains the minimum required information, as set out in 8.3.1 of the Market Rules.
	Priority 4	Controls rating: N/P Compliance rating: 1
370	The standing data for a metering point must comprise at least the items specified. <i>Electricity Industry Metering Code clause 4.3(1)</i>	Through discussion with the Meter Data Manager and examination of relevant data maintained in MBS, we determined that MBS contains the items specified under Table 2 of clause 4.3(1) of the Metering Code.
	Priority 4	Controls rating: N/P Compliance rating: 1
371	If there is a discrepancy between energy data held in a metering installation and in the metering database, the affected Code participants and the network operator must liaise to determine the most appropriate way to resolve the discrepancy. <i>Electricity Industry Metering Code clause 4.4(1)</i>	Through discussion with the Reading Management Team and consideration of Western Power's metering data management practices, we determined that during the audit period, Western Power's procedures provided for: <ul style="list-style-type: none"> For those instances where retailers raised a query relating to a discrepancy between energy data held in the metering database and data held a metering installation: <ul style="list-style-type: none"> Those queries to be submitted through Western Power's B2B system Meter Data Verifier, which allows Code Participants to dispute or query data Once the query is received, Metering Services to investigate the discrepancy through field enquires and system interrogation, before relaying findings back to the retailer for consideration Where a retailer disputes the findings, Western Power to work together with the retailer to resolve the discrepancy.
	Priority 5	Controls rating: N/P Compliance rating: 1

No	Obligation under Condition	Findings	
372	<p>A Code participant must not knowingly permit the registry to be materially inaccurate.</p> <p><i>Electricity Industry Metering Code clause 4.5(1)</i></p>	<p>Through discussion with the Reading Management Team and consideration of Western Power’s metering data management practices and MBS exception reporting capabilities, we determined that during the audit period, Western Power maintained the following practices to ensure MBS remains materially accurate:</p> <ul style="list-style-type: none"> • Exception reporting is run within MBS on a daily basis to identify instances where data quality and accuracy parameters have not been met • Exceptions identified are followed up and investigated further • Audit logging functionality (as part of the MBS toolset) has been maintained to identify any unauthorised changes to the registry. 	
	Priority 5		
374	<p>If the network operator is notified of a change to, or inaccuracy in, an item of standing data by a Code participant that is the designated source for the item of standing data under Table 2 in clause 4.3(1) then the network operator must update the registry to address the issue.</p> <p><i>Electricity Industry Metering Code clause 4.6(1)</i></p>	<p><i>Obligations 374 and 375</i></p> <p>Through discussion with the Reading Management Team and consideration of Western Power’s metering data management practices, we determined that Western Power’s practices provide for:</p> <ul style="list-style-type: none"> • Code participants to notify Western Power of a change to or inaccuracy in an item of standing data via a Site Access Notification service order in MBS or via email from the Code participant’s designated liaison • Once notified, Western Power to update the information in MBS and immediately publish that update to the Market. 	
	Priority 4		
375	<p>If a network operator is notified of a change to, or inaccuracy in, an item of standing data by a Code participant which is not the designated source for the item of standing data, or otherwise becomes aware of a change to or inaccuracy in an item of standing data, then the network operator must determine whether the registry should be updated, and update the registry as required.</p> <p><i>Electricity Industry Metering Code clause 4.6(2)</i></p>		
	Priority 4		

No	Obligation under Condition	Findings
376	<p>If standing data for a metering point is updated in the registry, the network operator must, within 2 business days after the update (or such other time as is specified in the applicable service level agreement) notify the update to the current user and each previous user, if the updated standing data relates to a period or periods when the previous user was the current user.</p> <p><i>Electricity Industry Metering Code clause 4.7</i></p>	<p>Through discussion with the Reading Management Team, consideration of Western Power's metering data management practices and examination of a sample of monthly compliance reports, we determined that:</p> <ul style="list-style-type: none"> • During the audit period, Western Power: <ul style="list-style-type: none"> ○ Utilised an automated process for updating standing data within MBS ○ On a monthly basis, monitored its level of compliance with its obligation to publish full sets of standing data (for approximately 100,000 sets of standing data provided) • Over the three-year period, Western Power consistently reported full compliance, With the exception of November 2019, where notification was not provided in the required timeframe for updates to 28 sets of standing data • The cause of the failures was attributed to the impact of an MBS system upgrade, which temporarily impacted the NEM file and the timeliness of notifications. Subsequent monitoring indicated the issue was not systematic, with 100% compliance achieved since November 2019. <p>Western Power has committed to continue to monitor its performance on a monthly basis, and to identify, investigate and address any potential further impact of MBS system upgrades or changes impacting NEM files used to publish standing data.</p> <p>This audit makes no further recommendation in relation to this matter.</p>
377	<p>A network operator must allow a user who is a retailer or a generator to have local and, where a suitable communications link is installed, remote access to the energy data for metering points at its associated connection points, using a password provided by the network operator which provides 'read only' access.</p> <p><i>Electricity Industry Metering Code clause 4.8(3)</i></p>	<p><i>Obligations 377 and 378</i></p> <p>Through discussion with the Metering Technical Services Team and Reading Management Team, and consideration of Western Power's procedures and work instructions relating to data access, we determined that Western Power maintained the following procedures throughout the audit period:</p> <ul style="list-style-type: none"> • Prior to processing requests for remote access to energy data, the metering administration team establishes whether the requesting party has the right to request the data • Third party authorisation letters are required to be approved, where a third party is requesting the energy data on a user's behalf • The requesting party will be provided with a username and password, which allows them read-only access to the data. • Retailers and generators utilise the Metering Web Portal to access Western Power's metering database • For large retailers, a B2B gateway is used to provide direct access to MBS, via the portal • Access to the B2B gateway and MBS Web Portal for retailers and generators is provided on a read-only basis • If a read-only password is used, a security error will be generated if any write functions are performed (for example, auto-timeset, manual timeset, or initialisation).
378	<p>A network operator must allow a user who is a retailer or a generator to have access to data held in its metering database for metering points at its associated connection points, by the prescribed methods, using a password provided by the network operator which provides 'read only' access.</p> <p><i>Electricity Industry Metering Code clause 4.8(3A)</i></p>	

No	Obligation under Condition	Findings	
379	<p>A network operator must have devices and methods in place that ensure that energy data held in its metering installation is secured from unauthorised local or remote access using the methods prescribed.</p> <p><i>Electricity Industry Metering Code clause 4.8(4)(a)</i></p>	<p><i>Obligations 379 and 380</i></p> <p>Through discussion with the Metering Technical Services Team and Reading Management Team, consideration of Western Power’s metering management arrangements and examination of Western Power’s Authorisation Matrix, we determined that:</p> <ul style="list-style-type: none"> • Energy data held in a metering installation is secure from unauthorised local access or remote access by electronic passwords and security controls 	
	Priority 4	Controls rating: N/P	Compliance rating: 1
380	<p>A network operator must have devices and methods in place to ensure that the data held in its metering database is secured from unauthorised local, or remote, access using the methods prescribed.</p> <p><i>Electricity Industry Metering Code clause 4.8(4)(b)</i></p>	<ul style="list-style-type: none"> • Electronic passwords are required to access metering software and every time the meter is probed • Each meter is secured with a seal that protects the meter from unauthorised access • Each of these protection methods are sufficient to the standard of good electricity practice • Energy data held in the metering database has been appropriately secured through access controls and passwords. 	
	Priority 4	Controls rating: N/P	Compliance rating: 1
381	<p>Without limiting subclause 4.8(4), a network operator must ensure that electronic passwords and other electronic security controls are only issued to the specified authorised personnel and otherwise keep its records of electronic passwords and other electronic security controls secure from unauthorised access.</p> <p><i>Electricity Industry Metering Code clause 4.8(5)</i></p>	<p>Through discussion with the Metering Technical Services Team and Functional Support Specialist, Information Communication and Technology, we determined that:</p> <ul style="list-style-type: none"> • Where necessary, relevant Western Power personnel are provided with a network login by ICT, which allows them to access the metering database • A password authority level matrix has been maintained, which includes a signature authority list for MBS access request approvals • Network login records are securely maintained by ICT to prevent unauthorised access • Passwords are required to be changed every three months and users are locked out after three failed login attempts • ICT monitors failed login attempts as well as attempted logins by users who do not have access to the system. 	
	Priority 4	Controls rating: N/P	Compliance rating: 1
382	<p>A network operator must retain energy data in its metering database for each metering point on its network (including any energy data that has been replaced under subclause 5.24) for at least the periods, and with the level of accessibility, prescribed.</p> <p><i>Electricity Industry Metering Code clause 4.9</i></p>	<p>Through discussion with Reading Management Team and consideration of Western Power’s metering data management practices, we determined that during the audit period, all required energy data was recorded within MBS, retained for the required seven-year period and readily available.</p>	
	Priority 4	Controls rating: N/P	Compliance rating: 1
Part 5 Metering services			
383	<p>A network operator must use all reasonable endeavours to accommodate another Code participant’s requirement to obtain a metering service and requirements in connection with the negotiation of a service level agreement.</p> <p><i>Electricity Industry Metering Code clause 5.1(1)</i></p>	<p><i>Obligations 383 and 384</i></p> <p>Through discussion with the Commercial Services Team and examination of records of service level agreements and communications with retailers, we determined that:</p> <ul style="list-style-type: none"> • Western Power continued to hold service level agreements with Synergy and other retailers to capture any additional negotiated services that are not include in the Model SLA 	
	Priority 5	Controls rating: N/P	Compliance rating: 1

No	Obligation under Condition	Findings	
384	<p>Without limiting subclause 5.1(1), a network operator must:</p> <ul style="list-style-type: none"> expeditiously and diligently process all requests for a service level agreement; negotiate in good faith with a Code participant regarding the terms for an agreement; and to the extent reasonably practicable in accordance with good electricity industry practice, permit a Code participant to acquire a metering service containing only those elements of the metering service which the Code participant wishes to acquire. <p><i>Electricity Industry Metering Code clause 5.1(2)</i></p>	<ul style="list-style-type: none"> Throughout the audit period, Western Power held monthly B2B meetings with Synergy (other retailers on a less frequent or ad hoc basis) to discuss issues in relation to services provided and identify any additional metering services required. 	
Priority 5		Controls rating: N/P	Compliance rating: 1
385	<p>A network operator must, for each metering point on its network, obtain energy data from the metering installation and transfer the energy data into its metering database by no later than 2 business days after the date for the scheduled meter reading for the metering point (or such other time as is specified in the applicable service level agreement).</p> <p><i>Electricity Industry Metering Code clause 5.3</i></p>	<p>Through discussion with the Reading Operations Team, consideration of Western Power’s meter reading processes, testing of Western Power’s On-Cycle Compliance reporting process and examination of Western Power’s Breach Register, we determined that:</p> <ul style="list-style-type: none"> During the audit period, Western Power continued to: <ul style="list-style-type: none"> Utilise a structured process for transferring energy data from meter reading devices into MBS Consistently maintained exception reporting via its On-Cycle Compliance reporting process, which identifies instances of non-compliance with the requirements to transfer energy data into MBS within two business days of the scheduled meter read Record varying compliance levels between months and also between the type of meter read (basic scheduled meter reads, interval meter reads and self-reads) Western Power: <ul style="list-style-type: none"> Disclosed its non-compliance in its Annual Compliance reports to the ERA (and its 2019/20 breach report), including annual compliance rates of between approximately 98.92% and 99.36% for accumulation meters and 98.86% and 98.74% for interval meters Determined that delays in receiving and transferring energy data into the metering database are largely due to meter reads not being carried out in accordance with the scheduled read plan due to technical faults and/or resource, access or safety constraints, or delays in receiving energy data partly due to unreliable data network coverage in remote areas (for which mobile broadband modems were subsequently issued to field staff to minimise such delays) Continues to recognise that the extent and volume of meter reading activity presents a significant challenge for maintaining full compliance at all times, and that it will continue to monitor its level of compliance, self-report relevant breaches and consider opportunities for improving performance. <p>This audit makes no further recommendation in relation to this matter.</p>	
Priority 2		Controls rating: B	Compliance rating: 2

No	Obligation under Condition	Findings		
386	<p>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.</p> <p><i>Electricity Industry Metering Code clause 5.4(1)</i></p>	<p>Through discussion with the Reading Operations Team, consideration of Western Power’s meter reading processes and examination of Western Power’s exception reporting and Breach Register we determined that:</p> <ul style="list-style-type: none"> • During the audit period, Western Power maintained the following key processes and controls: <ul style="list-style-type: none"> ○ Western Power’s Annual Read Obligation (ARO) process acts as a structured, preventative control for identifying meters that reach 300 days without being read and for directing communication with the customer to facilitate a meter read. An Access Database is utilised to program contact with the customer in a sequence of steps within a predetermined length of time, including: <ul style="list-style-type: none"> ▪ An initial email and/or SMS requesting the customer to contact Western Power ▪ If the actual read has still not been obtained, the Reading Operations Team will attempt to phone the customer ▪ If this process is also unsuccessful, a first and second letter is mailed to the customer’s address ○ On a monthly basis, the Network Support Officer prepares an ARO Performance Report, which is presented to management. The report records the number of non-compliant meters for the month and provides a description of the cause of the meter not being read. • Western Power: <ul style="list-style-type: none"> ○ Disclosed its non-compliance in its Annual Compliance reports to the ERA (and its 2019/20 breach report), including annual compliance rates of between 98.57% and 98.82% for its approximately 1.2 million meters ○ Determined that the primary cause of meters not being read at least once in every 12-month period is owing to restricted access to meters resulting from direct customer refusal, physical access issues and coordination with retailers ○ Continues to recognise that the extent and volume of meter reading activity presents a significant challenge for maintaining full compliance at all times, and that it will continue to monitor its level of compliance, self-report relevant breaches and consider opportunities for improving performance, including working with retailers to seek process improvements. 		
	Priority 2	Controls rating: B	Compliance rating: 2	This audit makes no further recommendation in relation to this matter.

No	Obligation under Condition			Findings
387	<p>The meter reading referred to in clause 5.4(1) must not be undertaken by the customer associated with the meter, and must be undertaken by a person who is employed or appointed by the network operator and who is suitably skilled in accordance with good electricity industry practice to carry out meter readings.</p> <p><i>Electricity Industry Metering Code clause 5.4(1A)</i></p>			<p>Through discussion with Reading Operations Team and consideration of Western Power’s meter reading arrangements, we determined that for the duration of the audit period, Western Power’s processes provided for:</p> <ul style="list-style-type: none"> • Registration of self-read customer prior to acceptance of self-reads (only customers who have met relevant registration requirements) • Self-reads not to be accepted to meet its obligations under clause 5.4(1) • All meter readers employed or appointed by Western Power to undergo training prior to independent fieldwork. Training included: <ul style="list-style-type: none"> ○ One day supervised office and field-based work ○ Review and approval of the meter reader on-cycle training checklist and field protocols acknowledgement form
	Priority 4	Controls rating: N/P	Compliance rating: 1	<ul style="list-style-type: none"> • Meter reads to be uploaded from field officers’ hand-held devices.
389	<p>Subject to subclause 5.5(2A)(b), a network operator may impose a charge for the provision of data, but only if</p> <ul style="list-style-type: none"> • a user has requested the energy data to the extent permitted by, and in accordance with the applicable service level agreement between it and the user; and • if a customer has given a direction under subclause 5.17A(1), in accordance with the prescribed conditions. <p><i>Electricity Industry Metering Code clause 5.5(2)</i></p> 			<p>Through discussion with Reading Management Team and consideration of Western Power’s billing procedures, we determined that during the audit period:</p> <ul style="list-style-type: none"> • For the instances where users requested historical consumption data for a period of greater than 12 months, Western Power imposed charges in line with the Model SLA • For requests for standing or historical consumption data that relates to a period of up to 12 months, no fee was applied.
	Priority 4	Controls rating: N/P	Compliance rating: 1	
390	<p>A network operator must not impose a charge for the provision of standing data and for the provision of energy data if another enactment prohibits it doing so.</p> <p><i>Electricity Industry Metering Code clause 5.5(2A)</i></p>			<p>The Reading Management Team Leader confirmed that, for the period 1 July 2014 to 30 June 2017, Western Power had not imposed a charge for the provision of standing data or energy data if another enactment prohibits it.</p>
	Priority 4	Controls rating: N/P	Compliance rating: 1	

No	Obligation under Condition	Findings			
391	<p>Subject to subclause 5.6(2), a network operator must provide validated, and where necessary, substituted or estimated energy data for a metering point to the user for the metering point and the IMO within the timeframes prescribed in subclause 5.6(1)(2).</p> <p><i>Electricity Industry Metering Code clause 5.6(1)</i></p>	<p>Through discussion with the Reading Management Team, testing of Western Power’s energy data validation processes and examination of Western Power’s compliance breach records, we determined that:</p> <ul style="list-style-type: none"> • During the audit period, Western Power applied daily processes for: <ul style="list-style-type: none"> ○ Validating and where necessary, substituting or estimating energy data, using automated exception reports and MBS tasks ○ Exception filtering to identify reads that require priority action ○ Manual intervention on any occasion where MBS was unable to perform the required validation process • Western Power’s monitoring processes have identified instances where it has not complied with the prescribed timeframes for providing validated, substituted or estimated meter reads. Those non-compliances have been reported in Western Power’s Annual Compliance Reports to the ERA, with results detailed for four categories of meter readings. Note that in excess of 5 billion interval readings were collected during the audit period • The causes of non-compliances are attributed to minor IT issues impacting MBS and delays caused by the time required to manually determine the substituted or estimated data for some metering points where data failed the validation process • In 2018, further automation was introduced through scripts for two common exception types enabling simple exceptions to be cleared and only the most complex exceptions to be addressed by Meter Data staff. <p>Our examination of Western Power’s records did not identify any further non-compliances.</p> <p>Western Power has continued to recognise that the volume of its reading collections and energy data validation processes presents a significant challenge for maintaining full compliance at all times (particularly where resource constraints may impact its ability to investigate exceptions and provide the required data), and that it will continue to monitor resource availability and prioritisation in order to further improve its compliance levels.</p> <p>This audit makes no further recommendation in relation to this matter.</p>			
392	<p>If a replacement energy data value is inserted in a metering database for a metering point, the network operator must provide replacement energy data to the user for the metering point and the IMO within the timeframes prescribed.</p> <p><i>Electricity Industry Metering Code clause 5.7</i></p>	<p>Through discussion with Reading Management Team, we determined that during the audit period, MBS was configured to automatically publish replacement energy data to the market following upload to MBS.</p>			
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%; background-color: #FFC0CB; text-align: center;">Priority 2</td> <td style="width: 33%; background-color: #FFFF00; text-align: center;">Controls rating: B</td> <td style="width: 33%; background-color: #FFFF00; text-align: center;">Compliance rating: 2</td> </tr> </table>	Priority 2	Controls rating: B	Compliance rating: 2	
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	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%; background-color: #FFFF00; text-align: center;">Priority 4</td> <td style="width: 33%; background-color: #D3D3D3; text-align: center;">Controls rating: N/P</td> <td style="width: 33%; background-color: #90EE90; text-align: center;">Compliance rating: 1</td> </tr> </table>	Priority 4	Controls rating: N/P	Compliance rating: 1	
Priority 4	Controls rating: N/P	Compliance rating: 1			

No	Obligation under Condition	Findings			
393	<p>A network operator must provide a user with whatever information the network operator has that is necessary to enable the user to comply with its obligations under the Code of Conduct, within the time necessary for the user to comply with the obligations.</p> <p><i>Electricity Industry Metering Code clause 5.8</i></p>	<p>Through discussion with Commercial Services Team, we determined that during the audit period, Western Power maintained the following mechanisms for enabling users to comply with their obligations under the Code of Conduct:</p> <ul style="list-style-type: none"> • Regular B2B meetings, where code participants can raise issues or concerns • Provision of information relating to: <ul style="list-style-type: none"> ○ B2B transactions and the Portal ○ Contact Call Centre Communications ○ Direct responses via email and telephone. 			
Priority 4	Controls rating: N/P			Compliance rating: 1	
394	<p>A network operator must provide standing data, provided to or obtained by it under this Code, to users where required to do so under any enactment.</p> <p><i>Electricity Industry Metering Code clause 5.9</i></p>			<p><i>Obligations 394 to 396</i></p> <p>Through discussion with the Reading Management Team, we determined that during the audit period:</p> <ul style="list-style-type: none"> • MBS was configured to automatically provide standing data, at no charge, following update, or additional on request • Standing data fields in MBS were designed in accordance with the provisions of Annex 4 of the Customer Transfer Code, samples provided correlated fields • Provision of standing data to incoming retailers was facilitated through MBS in accordance with the established Standing Data Procedure. 	
Priority 4	Controls rating: N/P				
395	<p>A network operator must provide a subset of the standing data to a retailer in accordance with the provisions of Annex 4 of the Customer Transfer Code.</p> <p><i>Electricity Industry Metering Code clause 5.10</i></p>				
Priority 4	Controls rating: N/P				
396	<p>If a transfer occurs at a connection point, then within 2 business days after the transfer date, as defined in the Customer Transfer Code, the a network operator must provide the incoming retailer with a copy of the standing data for each metering point associated with the connection point.</p> <p><i>Electricity Industry Metering Code clause 5.11</i></p>				
Priority 4	Controls rating: N/P				

No	Obligation under Condition	Findings	
397	<p>If a user gives a network operator an energy data request for a metering point in accordance with the communication rules, and the energy data request relates only to a time or times for which the user was the current user at the metering point, then the a network operator must provide a user with a complete set of energy data for the a metering point within the timeframes prescribed.</p> <p><i>Electricity Industry Metering Code clause 5.12(1)</i></p>	<p>Through discussion with the Reading Management Team, consideration of Western Power’s management of energy data requests through MBS, and examination of Western Power’s compliance breach records and monthly ‘Provide Data’ reports, we determined that during the audit period:</p> <ul style="list-style-type: none"> • Western Power’s management of energy data requests through MBS enabled energy data to be automatically provided upon request • Western Power consistently monitored exceptions via extraction of MBS data into monthly ‘Provide Data’ reports • In its 2018/19 Annual Compliance Report to the ERA Western Power disclosed 168 instances (0.31% of requests) where it did not comply with the requirements of clause 5.12(1) for providing energy data within two business days. Over the audit period, Western Power recorded annual compliance rates of 100%, 99.69% and 99.88% • The causes of non-compliances are attributed to MBS system issues following the November 2018 upgrade, which caused unexpected delays in processing requests in December 2018. The breaches in the December 2019 quarter were also attributed to system issues causing processing delays. <p>Our examination of Western Power’s records did not identify any further non-compliances.</p> <p>Western Power has continued to recognise that the volume of data validation and reporting activity poses a significant challenge for maintaining full compliance at all times, and that it will continue to maintain effective monitoring and reporting controls to identify non-compliances with the aim of further improving performance.</p> <p>This audit makes no further recommendation in relation to this matter.</p>	
398	<p>If the current user for a metering point gives the network operator a standing data request for the metering point in accordance with the communication rules then the network operator must:</p> <ul style="list-style-type: none"> • provide the current user with a complete current set of standing data for a metering point; and • advise whether there is a communications link for the metering point, within 2 business days after the receipt of the request. <p><i>Electricity Industry Metering Code clause 5.13</i></p>	<p>Through discussion with the Reading Management Team and consideration of Western Power’s data management arrangements, we determined that during the audit period, Western Power continued to provide users with a full set of standing data (including information on whether communications link for the metering point exists), within two business days of request, as prescribed by the Code.</p>	
	Priority 2	Controls rating: B	Compliance rating: 2
	Priority 4	Controls rating: N/P	Compliance rating: 1

No	Obligation under Condition	Findings	
399	<p>If a user makes a bulk standing data request, the network operator must in accordance with the communication rules, acknowledge receipt of the request and provide the requested standing data within the timeframes prescribed.</p> <p><i>Electricity Industry Metering Code clause 5.14(3)</i></p>	<p>Through discussion with the Western Power Information Communication and Technology Team, we determined that during the audit period, Western Power maintained the following procedures for acknowledging and meeting requests for bulk standing data:</p> <ul style="list-style-type: none"> Western Power receives all requests for bulk standing data through MBS or directly through the web portal Once the request is submitted, the requesting party receives an automated email acknowledging the request The ICT team compiles the information requested and provides that information to the requesting party within the two-business day service standard specified in Western Power's Model SLA (per the requirement of clause 5.14(3) of the Metering Code). 	
	Priority 4	Controls rating: N/P	Compliance rating: 1
400	<p>If a network operator provides energy data to a user or the IMO it must also provide the date of the meter reading in accordance with the requirements specified.</p> <p><i>Electricity Industry Metering Code clause 5.15</i></p>	<p>Through discussion with Reading Management Team and Information Communication and Technology Team, and consideration of Western Power's communications with the AEMO (via NEM files), we determined that during the audit period, Western Power's NEM files (NEM12 Interval Metering Data and NEM13 Accumulated Metering Data) were configured to contain the date of the meter reading, whether it be derived from an actual read or an estimated, substituted or deemed actual value.</p>	
	Priority 4	Controls rating: N/P	Compliance rating: 1
403	<p>A network operator must provide data for a metering point from its metering database to a person if (and to the extent that) the customer associated with the metering point gives the network operator a direction to do so that complies with subclause 5.17A(2).</p> <p><i>Electricity Industry Metering Code clause 5.17A(1)</i></p>	<p>Through discussion with the Reading Management Team and consideration of Western Power's metering data management practices, we determined that for those instances during the audit period where customers had directed Western Power to provide data to a third party:</p> <ul style="list-style-type: none"> Western Power's processes provided for the customer's verifiable consent to be obtained prior to the provision of data. This process was automated during the audit period and Western Power's procedure duly updated The Energy Data Authorisation Access System was applied to prevent data from being sent to a person other than the customer where verifiable consent was not recorded. 	
	Priority 4	Controls rating: N/P	Compliance rating: 1

No	Obligation under Condition	Findings
404	<p>A network operator must comply with a direction under subclause 5.17A(1) within the timeframes prescribed.</p> <p><i>Electricity Industry Metering Code clause 5.17A(3)</i></p>	<p>Through discussion with the Reading Management Team, consideration of Western Power's metering data management practices, examination of a sample of monthly compliance reports and examination of Western Power's Annual Compliance reports to the ERA, we determined that:</p> <ul style="list-style-type: none"> • During the audit period, Western Power: <ul style="list-style-type: none"> ○ Utilised an automated process for providing data to a third party upon receipt of a valid direction from a customer. Such directions could be one-off, or ongoing/periodic ○ On a monthly basis, monitored its level of compliance with its obligation to provide data to a third party within the 10-business day requirement. The timeframe commences from the date of acceptance of the verifiable consent (the direction) from the customer • In 130 instances during the audit period, Western Power did not provide data within 10 business days of receiving a valid direction. These instances occurred during the 2018/19 reporting year and comprised 3.91% of directions received. • Western Power identified the cause of the breaches as relating to: <ul style="list-style-type: none"> ○ A temporary impact from the implementation of an MBS system upgrade in November 2018 ○ Two manual data entry errors. Western Power subsequently reinforced the importance of correct data entry with its personnel. <p>This audit makes no further recommendation in relation to this matter.</p>
Priority 3	Controls rating: A	Compliance rating: 2
409	<p>A network operator must give notice to a user, or (if there is a different current user) the current user, acknowledging receipt of any customer, site or address attributes from the user within the timeframes prescribed.</p> <p><i>Electricity Industry Metering Code clause 5.19(5)</i></p>	<p>Through discussion with Reading Management Team and consideration of the MBS system's functionality, we determined that during the audit period, MBS provided automated (and almost immediate) notifications to acknowledge receipt of customer, site or address attributes from the user.</p>
Priority 4	Controls rating: N/P	Compliance rating: 1
411	<p>A network operator must, by not later than 6 months after the date this Code applies to the network operator, develop, in accordance with the communication rules, an Energy Data Verification Request Form.</p> <p><i>Electricity Industry Metering Code clause 5.20(1)</i></p>	<p><i>Obligations 411 and 412</i></p> <p>Through discussion with the Reading Management Team, we determined that:</p> <ul style="list-style-type: none"> • Western Power's Energy Data Verification Request form has been developed in accordance with the Communication Rules (in previous audit periods) and maintained during the current audit period. There was no further obligation on Western Power during the audit period
Priority 4	Controls rating: N/P	Compliance rating: N/R
412	<p>An Energy Data Verification Request Form must require a Code participant to provide the information prescribed.</p> <p><i>Electricity Industry Metering Code clause 5.20(2)</i></p>	<ul style="list-style-type: none"> • Throughout the audit period, Code participants had access to the Energy Data Verification Request form via the Metering Service Centre.
Priority 4	Controls rating: N/P	Compliance rating: 1

No	Obligation under Condition			Findings
413	<p>If a Code participant requests verification of energy data under subclause 5.20(3), the network operator must, in accordance with the metrology procedure:</p> <ul style="list-style-type: none"> subject to subclause 5.20(5), use reasonable endeavours to verify energy data; and inform the requesting Code participant of the result of the verification and provide the verified energy data to that Code participant within the timeframes prescribed. <p><i>Electricity Industry Metering Code clause 5.20(4)</i></p>			<p>Through discussion with the Reading Management Team and consideration of Western Power’s energy data verification and monthly compliance monitoring and reporting processes, we determined that during the audit period:</p> <ul style="list-style-type: none"> Western Power’s processes continued to provide for: <ul style="list-style-type: none"> Meter data verification requests to be received from Code participants via the Metering Service Centre Requests to be manually checked and, where necessary, a field officer to be dispatched to the site to conduct a manual meter read Verified energy data to be provided to the requesting Code participant within two business days per the Model SLA Service Standard for “Verify Meter Data”. Note that Clause 5.20(4)(b)(ii) sets the requirement for the data to be provided “...no later than 5 business days after receiving the <i>Energy Data Verification Request Form</i> (or such other time as is specified in the applicable <i>service level agreement</i>)” Its performance in providing verified energy data within two business days to be monitored on a monthly basis and reported on at least a quarterly basis. Note that the Model SLA also sets a quarterly service standard target of 98% of data to be verified within two business days of the request being received Western Power reported 60 instances where verified energy data was not provided within two business days, resulting in annual compliance rates of 99.79%, 99.96% and 99.87% against total Verify Meter Data requests of approximately 47,000 across those years. <p>Western Power had not recognised that result as a breach of the Metering Code as it had measured compliance against the Model SLA service standard target of 98%. Nevertheless, Western Power:</p> <ul style="list-style-type: none"> Identified the cause of the breaches as relating to verifications that required further investigation and testing, or where meters were in a remote location and higher volumes of retailer-driven work in those regions exceeded Western Power’s resourcing levels to deliver these services within the timeframe Has recognised that the volume of data validation and reporting activity poses a significant challenge for maintaining full compliance with the two business day timeframe Has committed to maintaining effective monitoring and reporting controls to identify future non-compliances any related issues and improvement opportunities. <p>We note that Western Power’s revised Model SLA, effective from 1 November 2020 reverts to the 5-business day timeframe and a service standard target of 100% (i.e. consistent with the Metering Code).</p> <p>This audit makes no further recommendation in relation to this matter.</p>
	Priority 4	Controls rating: B	Compliance rating: 2	
414	<p>A network operator must comply with any reasonable request under subclause 5.21(1).</p> <p><i>Electricity Industry Metering Code clause 5.21(2)</i></p>			<p>Through discussion with the Metering Technical Services Team and consideration of Western Power’s meter testing and auditing arrangements, we determined that Western Power’s processes provided for all requests received from retailers during the audit period for tests/audits of a metering installation to be uploaded into MBS and appropriately considered and actioned (via creation and completion of a service order).</p>
	Priority 4	Controls rating: N/P	Compliance rating: 1	

No	Obligation under Condition			Findings
415	<p>A test or audit under subclause 5.21(1) is to be conducted in accordance with the metrology procedure and the applicable service level agreement.</p> <p><i>Electricity Industry Metering Code clause 5.21(4)</i></p>			<p>Through discussion with the Metering Technical Services and Reading Management Teams, consideration of Western Power’s meter testing and auditing arrangements, examination of Western Power’s Metrology Procedure and Model SLA and examination of records of requests for meter tests made by retailers during the audit period, we determined that Western Power’s processes and procedures provide for:</p> <ul style="list-style-type: none"> • Meter test and audit procedures to be undertaken in accordance with its Metrology Procedure • Tests to be performed within the timeframes prescribed in the Model SLA Service Standards, for metropolitan and country locations • Records of timeframes achieved to be recorded, monitored and reported when they exceed the timeframes prescribed in the SLA Service Standards. <p>Western Power’s monitoring processes have identified instances where it has not complied with the prescribed timeframes. Those non-compliances have been reported in Western Power’s Annual Compliance Reports to the ERA. The causes of non-compliances are attributed to access/safety constraints, geographic isolation of sites or unavailability of specialist resources to perform the test.</p> <p>Western Power has committed to continue monitoring resource availability and prioritisation in order to improve its compliance levels, however recognises that 100% compliance with this obligation may not be achievable.</p> <p>Our examination of Western Power’s records did not identify any further non-compliances.</p> <p>This audit makes no further recommendation in relation to this matter.</p>
	Priority 2	Controls rating: B	Compliance rating: 2	
418	<p>A network operator may only impose a charge for the testing of the metering installations, or auditing of information from the meters associated with the metering installations, or both, in accordance with the applicable service level agreement between it and the user.</p> <p><i>Electricity Industry Metering Code clause 5.21(8)</i></p>			<p><i>Obligations 418 and 419</i></p> <p>Through discussion with the Commercial Services Team and examination of relevant documentation, we determined that:</p> <ul style="list-style-type: none"> • Western Power’s systems are configured to only charge for investigations following completion • If the meter is deemed to have failed, charges will not be applied • If the meter is deemed to have passed, the system is configured to apply the charge in line with the SLA • Clause 4.1(c) of Western Power’s Model SLA states that no charge is to be imposed if a test or audit reveals a non-compliance with the Metering Code.
	Priority 4	Controls rating: N/P	Compliance rating: 1	
419	<p>Any written service level agreement entered into under subclause 5.21(7), must include a provision that no charge is to be imposed if the test or audit reveals a non-compliance with this Code.</p> <p><i>Electricity Industry Metering Code clause 5.21(9)</i></p>			
	Priority 4	Controls rating: N/P	Compliance rating: 1	

No	Obligation under Condition	Findings	
420	<p>If a test or audit shows that the accuracy of the metering installation or information from the meter associated with the metering installation does not comply with the requirements under this Code, the network operator must:</p> <ul style="list-style-type: none"> advise the affected parties as soon as practicable of errors detected under a test or audit, the possible duration of the errors; and must restore the accuracy of the metering installation in accordance with the applicable service level agreement. <p>{Clause 5.21(11)(c) gives the network operator an option to make corrections to the energy data for a period up to 12 months before the date of the test or audit}.</p> <p><i>Electricity Industry Metering Code clause 5.21(11)</i></p>	<p>Through discussion with the Metering Technical Services Team Leader, consideration of Western Power’s metering processes and practices and examination of relevant meter testing documentation, we determined that during the audit period:</p> <ul style="list-style-type: none"> Where tests revealed that the accuracy of the metering installation did not meet the requirements of the Metering Code, the relevant retailer was responsible for notifying the customer (via an approved letter provided by Western Power) The letter includes details of the: <ul style="list-style-type: none"> Error detected Expected duration of the error Expected remediation of the error. Where meters were found to be non-compliant, Western Power replaced the meter in line with the SLA. <p>We sighted two email notifications of non-compliances to a retailer and note that they included the date of the tests, the errors with the meters and that the meters had been replaced within the SLA.</p>	
	Priority 4	Controls rating: N/P	Compliance rating: 1
421	<p>The original stored error correction data in a meter must not be altered except during accuracy testing and calibration of a metering installation.</p> <p><i>Electricity Industry Metering Code clause 5.21(12)</i></p>	<p>Through discussion with the Metering Technical Services Team we determined that as Western Power’s current meters do not have stored error correction data capabilities, Western Power maintains compliance with this obligation.</p>	
	Priority 4	Controls rating: N/P	Compliance rating: 1
422	<p>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.</p> <p><i>Electricity Industry Metering Code clause 5.22(1)</i></p>	<p>Through discussion with the Reading Management Team and consideration of Western Power’s energy data validation processes and metering data exception reporting procedures, we determined that during the audit period, Western Power maintained affective procedures that ensured it:</p> <ul style="list-style-type: none"> Validated energy data in accordance with the prescribed rules and procedures as set out in Appendix 2 of the Metering Code Substituted or estimated energy data in line with the rules and procedures set out in Appendix 3 of the Metering Code. 	
	Priority 4	Controls rating: N/P	Compliance rating: 1

No	Obligation under Condition	Findings	
423	<p>The network operator must use check metering data, where available, to validate energy data provided that the check metering data has been appropriately adjusted for differences in metering installation accuracy in accordance with subclause 3.13.</p> <p><i>Electricity Industry Metering Code clause 5.22(2)</i></p>	<p>Through discussion with the Reading Management Team and consideration of Western Power's energy data validation processes, we determined that during the audit period:</p> <ul style="list-style-type: none"> Where available, check metering data was used to validate energy data within MBS Up until 6 April 2018, Western Power's processes were designed to publish energy data to the market prior to it being validated against check metering data, which did not meet the requirement of the Metering Code in instances when readings failed validation between a revenue and check meter From 6 April 2018, an effective solution was implemented to correct the sequence of reading check meters (i.e. enabling validation to occur) in the morning prior to publication of data in the evening. Accordingly, Western Power was able to demonstrate compliance with clause 5.22 (2) of the Metering Code for the remainder of the audit period, with all energy data appropriately validated prior to it being published to the market <p>This audit makes no further recommendation in relation to this matter.</p>	
424	<p>If a check meter is not available or energy data cannot be recovered from the metering installation within the time required under this Code, then the network operator must prepare substitute values using a method contained in Appendix 3 and agreed where necessary with the relevant Code participants.</p> <p><i>Electricity Industry Metering Code clause 5.22(3)</i></p>	<p>Through discussion with the Reading Management Team and consideration of Western Power's energy data validation and substitution processes and procedures, we determined that during the audit period, Western Power continued to apply processes and procedures which provided for:</p> <ul style="list-style-type: none"> MBS to automatically prepare substitute values using in-built substitution methods in instances where a check meter is not available or energy data cannot be recovered Each substitution method outlined in Appendix 3 (except for substitution method 13 as Western Power does not utilise data from an energy management system or SCADA data as check metering data) to be automatically applied by MBS. Substitution methods built into MBS are ordered in terms of hierarchy, which allows for the most appropriate form of substitution data to be applied in the first instance. 	
	Priority 3	Controls rating: A	Compliance rating: 2
	Priority 4	Controls rating: N/P	Compliance rating: 1

No	Obligation under Condition	Findings	
425	<p>If a network operator detects a loss of energy data or incorrect energy data from a metering installation, it must notify each affected Code participant of the loss or error within 24 hours after detection.</p> <p><i>Electricity Industry Metering Code clause 5.22(4)</i></p>	<p>Through discussion with the Reading Management Team and consideration of Western Power’s data validation processes and procedures, we determined that during the audit period:</p> <ul style="list-style-type: none"> • For instances where Western Power had detected a loss of energy data or incorrect energy data from a meter, its “Network Errors requiring retailer engagement” procedure provided for the matter to be analysed and affected Code participants to be notified within 24 hours after detection. A loss of energy data or incorrect energy data from a metering installation can be owing to: <ul style="list-style-type: none"> ○ Actual energy data not being cleared in time, in which case MBS is configured to automatically apply a substitute value and data to be published to the Code participants ○ A meter malfunctioning, in which case the exception is identified in an exception report (through either MBS or MV90) and any affected Code participants will be notified via email. • For instances where a customer had initiated a verification process, Western Power’s processes provided for the matter to be investigated and for affected Code participants to be notified within 24 hours from the time at which the loss of energy data or incorrect energy data was confirmed. 	
	Priority 4	Controls rating: N/P	Compliance rating: 1
426	<p>Substitution or estimation of energy data is required when energy data is missing, unavailable or corrupted, including in the circumstances described in this subclause.</p> <p><i>Electricity Industry Metering Code clause 5.22(5)</i></p>	<p><i>Obligations 426 and 427</i></p> <p>Through discussion with the Reading Management Team and consideration of Western Power’s metering data exception reporting procedures and procedures for managing metering data substitution, we determined that during the audit period, Western Power continued to maintain:</p> <ul style="list-style-type: none"> • Functionality within MBS that allows automatic estimation or substitution of energy data in the circumstances described in clause 5.22(5) of the Code • Daily exception reporting to identify instances where energy data is missing, unavailable or corrupt and has not been automatically substituted or estimated by MBS • Procedures requiring a member of the Reading Management Team to manually intervene to ensure exceptions are addressed in a timely manner • Functionality within MV90 that flags meter reads above the desired tolerance levels • Procedures requiring flagged meter reads to be validated by the Reading Management Team prior to substitution. 	
	Priority 4	Controls rating: N/P	Compliance rating: 1
427	<p>A network operator must review all validation failures before undertaking any substitution.</p> <p><i>Electricity Industry Metering Code clause 5.22(6)</i></p>	<p><i>Obligations 426 and 427</i></p> <p>Through discussion with the Reading Management Team and consideration of Western Power’s metering data exception reporting procedures and procedures for managing metering data substitution, we determined that during the audit period, Western Power continued to maintain:</p> <ul style="list-style-type: none"> • Functionality within MBS that allows automatic estimation or substitution of energy data in the circumstances described in clause 5.22(5) of the Code • Daily exception reporting to identify instances where energy data is missing, unavailable or corrupt and has not been automatically substituted or estimated by MBS • Procedures requiring a member of the Reading Management Team to manually intervene to ensure exceptions are addressed in a timely manner • Functionality within MV90 that flags meter reads above the desired tolerance levels • Procedures requiring flagged meter reads to be validated by the Reading Management Team prior to substitution. 	
	Priority 4	Controls rating: N/P	Compliance rating: 1

No	Obligation under Condition	Findings	
428	<p>If a network operator determines that there is no possibility of determining an actual value for a metering point, then the network operator must designate an estimated or substituted value for the metering point to be a deemed actual value for the metering point.</p> <p><i>Electricity Industry Metering Code clause 5.23(1)</i></p>	<p>Through discussion with the Reading Management Team and consideration of Western Power’s metering data exception reporting procedures, we determined that during the audit period, Western Power continued to maintain procedures for:</p> <ul style="list-style-type: none"> • Where there has been an issue with a meter and there is no possibility of determining an actual value for the metering point, designating an estimated or substituted value to be a deemed actual value for the metering point • Where an actual value is obtained after an estimated or substituted value is applied, replacing the estimated or substituted value with the actual value. 	
	Priority 4		
429	<p>If a network operator has designated a deemed actual value for a metering point then the network operator must:</p> <ul style="list-style-type: none"> • repair or replace the meter or one or more of components of metering equipment (as appropriate) at the metering point; and • subclauses 5.24(3(c) and 5.24(4) apply in respect of the estimated or substituted value which was designated to be the deemed actual value. <p><i>Electricity Industry Metering Code clause 5.23(3)</i></p>	<p>Through discussion with the Reading Management Team and Metering Technical Services Team, and consideration of Western Power’s metering data management and metering asset management procedures, we determined that for the instances during the audit period where a deemed actual value was designated for a metering point, Western Power continued to maintain procedures for:</p> <ul style="list-style-type: none"> • Metering equipment to be repaired or replaced in accordance Western Power’s Metering Asset Management Plan, Metering Technical Procedures Manual and HV technical design guidelines • Deemed actual values assigned to be substituted for estimated values that comply with sub-clauses 5.24(3) and 5.24(4). 	
	Priority 4		
430	<p>If a network operator uses an actual value (first value) for energy data for a metering point, and a better quality actual or deemed actual value is available (second value), the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice.</p> <p><i>Electricity Industry Metering Code clause 5.24(1)</i></p>	<p><i>Obligations 430 to 433</i></p> <p>Through discussion with the Reading Management Team and consideration of Western Power’s processes for replacement of energy data, we determined that during the audit period Western Power maintained processes for:</p> <ul style="list-style-type: none"> • Substituting, estimating or validating energy data in accordance with its Metrology Procedure, where: <ul style="list-style-type: none"> ○ An actual reading has not been obtained ○ The actual reading has failed validation ○ Better quality data is available (actual or deemed actual values) • Automatic detection of errors in deemed actual reads through a daily MBS exception report. Exceptions are investigated and, where relevant, replaced with a quality deemed actual value • For instances where a retailer requested a replacement of a substituted read, actioning the request in accordance with its Metrology Procedure and the Code. 	
	Priority 4		
431	<p>If a network operator uses a deemed actual value (first value) for energy data for a metering point, and a better quality deemed actual value is available (second value), then the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice.</p> <p><i>Electricity Industry Metering Code clause 5.24(2)</i></p>	<p><i>Obligations 430 to 433</i></p> <p>Through discussion with the Reading Management Team and consideration of Western Power’s processes for replacement of energy data, we determined that during the audit period Western Power maintained processes for:</p> <ul style="list-style-type: none"> • Substituting, estimating or validating energy data in accordance with its Metrology Procedure, where: <ul style="list-style-type: none"> ○ An actual reading has not been obtained ○ The actual reading has failed validation ○ Better quality data is available (actual or deemed actual values) • Automatic detection of errors in deemed actual reads through a daily MBS exception report. Exceptions are investigated and, where relevant, replaced with a quality deemed actual value • For instances where a retailer requested a replacement of a substituted read, actioning the request in accordance with its Metrology Procedure and the Code. 	
	Priority 4		

No	Obligation under Condition	Findings	
432	<p>If a network operator uses an estimated or substituted value (first value) for energy data for a metering point, and a better quality actual, deemed, estimated or substituted value is available (second value), then the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice or the user and its customer jointly request it to do so.</p> <p><i>Electricity Industry Metering Code clause 5.24(3)</i></p>		
	Priority 4		
433	<p>A network operator (acting in accordance with good electricity industry practice) must consider any reasonable request from a Code participant for an estimated or substituted value to be replaced under subclause 5.24.</p> <p><i>Electricity Industry Metering Code clause 5.24(4)</i></p>		
	Priority 4		
434	<p>A network operator must ensure the accuracy of estimated energy data in accordance with the methods in its metrology procedure and ensure that any transformation or processing of data preserves its accuracy in accordance with the metrology procedure.</p> <p><i>Electricity Industry Metering Code clause 5.25</i></p>	<p>Through discussion with the Reading Management Team, walkthrough of Western Power’s energy data quality/accuracy processes and procedures, and examination of Western Power’s breach records, we determined that during the audit period, Western Power:</p> <ul style="list-style-type: none"> • Maintained structured procedures for the management and maintenance of meters, including their accuracy • Substituted, estimated and/or validated energy data in accordance with its Metrology Procedure (section 3.5.2 and 5.3.2), where an actual reading had not been obtained, or the actual reading failed validation • Maintained daily exception reporting activities to confirm that when data is transformed or processed, the accuracy of that data is preserved in accordance with its Metrology Procedure. • Reported 296 instances (from more than 5 billion readings collected) where customer supplied readings were incorrectly published to market as actuals, which does not comply with the requirements of the Metering Code • The causes of non-compliances were attributed to: <ul style="list-style-type: none"> ○ An MBS system defect, which was rectified through a solution implemented in 2019 ○ Administrative errors, where staff incorrectly assign a reading status category. A new daily report has been established to identify inaccuracies requiring correction in a timely manner. <p>Western Power has continued to recognise that the volume of meter data activity poses a significant challenge for maintaining full compliance at all times, and that it will continue to maintain effective monitoring and reporting controls to identify non-compliances with the aim of further improving performance.</p> <p>We also recognise that Western Power’s initiation of its Advanced Metering Infrastructure network is expected to improve actual data collection and reduce errors.</p>	
	Priority 2	Controls rating: B	Compliance rating: 2

No	Obligation under Condition	Findings							
436	If a network operator makes an election under subclause 5.28 in respect of a network, then, (unless the election is terminated under the meter data agency agreement) the parties must undertake the activities prescribed, as applicable. <i>Electricity Industry Metering Code clause 5.29</i>	<p><i>Obligations 436 to 440</i></p> <p>The Meter Data Manager confirmed that since the Metering Code was gazetted in 2012, no other network operators' network was part of Western Power's network. Accordingly, there was no possibility of Western Power entering into a metering data agency agreement or acting as a metering data agent.</p>							
	Priority 4			Controls rating: N/P	Compliance rating: N/R				
437	If a network operator makes an election under subclause 5.28 in relation to the network, then the parties must enter into an agreement in relation to the network, which must deal with at least the matters prescribed. <i>Electricity Industry Metering Code clause 5.30(1)</i>			<p><i>Obligations 436 to 440</i></p> <p>The Meter Data Manager confirmed that since the Metering Code was gazetted in 2012, no other network operators' network was part of Western Power's network. Accordingly, there was no possibility of Western Power entering into a metering data agency agreement or acting as a metering data agent.</p>					
	Priority 4					Controls rating: N/P	Compliance rating: N/R		
438	If a network operator makes an election under subclause 5.28 in relation to a network, the electricity networks corporation must assess the compliance of each metering installation in the network with this Code and notify the electing network operator of each non-compliant metering installation. <i>Electricity Industry Metering Code clause 5.31(1)</i>					<p><i>Obligations 436 to 440</i></p> <p>The Meter Data Manager confirmed that since the Metering Code was gazetted in 2012, no other network operators' network was part of Western Power's network. Accordingly, there was no possibility of Western Power entering into a metering data agency agreement or acting as a metering data agent.</p>			
	Priority 4							Controls rating: N/P	Compliance rating: N/R
439	For each non-compliant metering installation notified under subclause 5.31(1)(b), the electing network operator may, by notice to the electricity networks corporation, require the electricity networks corporation to upgrade a non-compliant metering installation, in which case the electricity networks corporation must undertake the upgrade in accordance with the metering data agency agreement and good electricity industry practice. <i>Electricity Industry Metering Code clause 5.31(2)</i>							<p><i>Obligations 436 to 440</i></p> <p>The Meter Data Manager confirmed that since the Metering Code was gazetted in 2012, no other network operators' network was part of Western Power's network. Accordingly, there was no possibility of Western Power entering into a metering data agency agreement or acting as a metering data agent.</p>	
	Priority 4								
440	Except to the extent that the metering data agency agreement provides otherwise, the costs which may be recovered by the electricity networks corporation under subclause 5.34(1) must not exceed the amounts prescribed. <i>Electricity Industry Metering Code clause 5.34(2)</i>	<p><i>Obligations 436 to 440</i></p> <p>The Meter Data Manager confirmed that since the Metering Code was gazetted in 2012, no other network operators' network was part of Western Power's network. Accordingly, there was no possibility of Western Power entering into a metering data agency agreement or acting as a metering data agent.</p>							
	Priority 4								

No	Obligation under Condition	Findings						
441	A network operator must for the year ending on each 30 June, prepare a report setting out the information listed in subclause 5.37(2) for each metering service it was requested during the year to provide or scheduled during the year to carry out. <i>Electricity Industry Metering Code clause 5.37(1)(a)</i>	<p><i>Obligations 441 to 445</i></p> <p>Through discussion with the Regulatory Compliance Team and examination of records of Metering Code Annual Performance Reports and supporting references, we determined that Western Power:</p> <ul style="list-style-type: none"> Prepared its Metering Code Annual Performance Reports to include the information prescribed by Clause 5.37(2) Prepared and provided those reports to the Minister and the ERA in accordance with the timeframes specified under sub-clauses 5.37(1)(a), (b) & (c). Specifically, the reports were submitted as follows: <ul style="list-style-type: none"> For the period 2017/18 – on 19 September 2018 to the Minister and the ERA (published on 1 October 2018) For the period 2018/19 – on 19 September 2019 to the Minister and the ERA (published on 27 September 2019). 						
	Priority 4			Controls rating: N/P	Compliance rating: 1			
442	A network operator must provide a copy of the report described in subclause 5.37(1)(a) to the Minister and the ERA not less than 5 business days before it is published under subclause 5.37(3). <i>Electricity Industry Metering Code clause 5.37(1)(b)</i>			<p><i>Obligations 441 to 445</i></p> <p>Through discussion with the Regulatory Compliance Team and examination of records of Metering Code Annual Performance Reports and supporting references, we determined that Western Power:</p> <ul style="list-style-type: none"> Prepared its Metering Code Annual Performance Reports to include the information prescribed by Clause 5.37(2) Prepared and provided those reports to the Minister and the ERA in accordance with the timeframes specified under sub-clauses 5.37(1)(a), (b) & (c). Specifically, the reports were submitted as follows: <ul style="list-style-type: none"> For the period 2017/18 – on 19 September 2018 to the Minister and the ERA (published on 1 October 2018) For the period 2018/19 – on 19 September 2019 to the Minister and the ERA (published on 27 September 2019). 				
	Priority 4					Controls rating: N/P	Compliance rating: 1	
443	A network operator must publish the report described in subclause 5.37(1) within 3 months after the year ends. <i>Electricity Industry Metering Code clause 5.37(1)(b)</i>					<p><i>Obligations 441 to 445</i></p> <p>Through discussion with the Regulatory Compliance Team and examination of records of Metering Code Annual Performance Reports and supporting references, we determined that Western Power:</p> <ul style="list-style-type: none"> Prepared its Metering Code Annual Performance Reports to include the information prescribed by Clause 5.37(2) Prepared and provided those reports to the Minister and the ERA in accordance with the timeframes specified under sub-clauses 5.37(1)(a), (b) & (c). Specifically, the reports were submitted as follows: <ul style="list-style-type: none"> For the period 2017/18 – on 19 September 2018 to the Minister and the ERA (published on 1 October 2018) For the period 2018/19 – on 19 September 2019 to the Minister and the ERA (published on 27 September 2019). 		
	Priority 4							Controls rating: N/P
444	The report prepared by the network operator must include the information prescribed. <i>Electricity Industry Metering Code clause 5.37(2)</i>							<p><i>Obligations 441 to 445</i></p> <p>Through discussion with the Regulatory Compliance Team and examination of records of Metering Code Annual Performance Reports and supporting references, we determined that Western Power:</p> <ul style="list-style-type: none"> Prepared its Metering Code Annual Performance Reports to include the information prescribed by Clause 5.37(2) Prepared and provided those reports to the Minister and the ERA in accordance with the timeframes specified under sub-clauses 5.37(1)(a), (b) & (c). Specifically, the reports were submitted as follows: <ul style="list-style-type: none"> For the period 2017/18 – on 19 September 2018 to the Minister and the ERA (published on 1 October 2018) For the period 2018/19 – on 19 September 2019 to the Minister and the ERA (published on 27 September 2019).
	Priority 4	Controls rating: N/P	Compliance rating: 1					
445	For each relevant metering service, the information in subclause 5.37(2) must be reported separately for the specified classes of connection point. <i>Electricity Industry Metering Code clause 5.37(3)</i>	<p><i>Obligations 441 to 445</i></p> <p>Through discussion with the Regulatory Compliance Team and examination of records of Metering Code Annual Performance Reports and supporting references, we determined that Western Power:</p> <ul style="list-style-type: none"> Prepared its Metering Code Annual Performance Reports to include the information prescribed by Clause 5.37(2) Prepared and provided those reports to the Minister and the ERA in accordance with the timeframes specified under sub-clauses 5.37(1)(a), (b) & (c). Specifically, the reports were submitted as follows: <ul style="list-style-type: none"> For the period 2017/18 – on 19 September 2018 to the Minister and the ERA (published on 1 October 2018) For the period 2018/19 – on 19 September 2019 to the Minister and the ERA (published on 27 September 2019). 						
	Priority 4			Controls rating: N/P	Compliance rating: 1			
446	A network operator must keep such records of information as are required for the purposes of subclause 5.37, and must retain the information (in a format that is accessible within a reasonable period of time) for at least 7 years after the day on which a report containing the information is published under subclause 5.37(1)(c). <i>Electricity Industry Metering Code clause 5.38</i>			<p>Through discussion with the Regulatory Compliance Team and consideration of Western Power's corporate records management practices, we determined that during the audit period, Western Power continued to maintain:</p> <ul style="list-style-type: none"> Metering data and information indefinitely, within the MBS system Critical records in its electronic document management system (EDM) in accordance with its corporate document management controls, which meet the requirement for retention for at least 7 years after the day of the Metering Code Annual Performance Reports being published. 				
	Priority 4					Controls rating: N/P	Compliance rating: 1	

No	Obligation under Condition	Findings	
Part 6 Documentation			
447	A network operator must, in relation to its network, comply with the agreements, rules, procedures, criteria and processes prescribed. <i>Electricity Industry Metering Code clause 6.1(1)</i>	<p>The Metering Code requires Western Power to comply with a number of key documents, which address the management and maintenance of its network and meters, including its Communication Rules, Metrology Procedure, Mandatory Link Criteria and Model SLA. As a result of Western Power’s failure to meet a number of the requirements of its Metrology Procedure and its Model SLA, as described above at obligations 77, 244, 415 and 434, Western Power was unable to demonstrate compliance with clause 6.1(1) of the Metering Code.</p> <p>This audit makes no further recommendation in relation to this matter.</p>	
	Priority 2		Controls rating: B
448A	A network operator must, as soon as practicable and in any event no later than 6 months after the date this Code applies to it, submit to the ERA for its approval the prescribed documents in subclauses 6.2(a)-(d). <i>Electricity Industry Metering Code clause 6.2</i>	<p><i>Obligations 448A to 450</i></p> <p>The Regulatory Compliance Team confirmed that:</p> <ul style="list-style-type: none"> Prior to this audit period, Western Power had submitted for approval and subsequently published its communication rules, metrology procedure, model service level agreement and mandatory link criteria (and any further versions of these documents) in compliance with the Code During the period 1 July 2017 to 30 June 2020 Western Power was not required to submit for approval or publish any further versions of these documents as the documents were not amended during the audit period. <p>We note that Western Power’s Model SLA is currently under review and an amended document is expected to be finalised outside of this audit period.</p>	
	Priority 5		Controls rating: N/P
448B	A network operator must publish the document within 10 business days after notification of the ERA’s approval under subclauses 6.13(1)(a)(i), 6.16 or 6.17. <i>Electricity Industry Metering Code clause 6.18</i>		
	Priority 5		Controls rating: N/P
448C	A network operator must publish its communication rules as soon as practicable, and in any event within 6 months after the date this Code applies to it. <i>Electricity Industry Metering Code clause 6.19A(1)</i>		
	Priority 5		Controls rating: N/P
448D	Once communication rules have been published for a network under clause 6.19A, or amended under clause 6.21(3), the communication rules may only be amended thereafter in accordance with the communication rules made under subclause 6.7(1)(k) or clause 6.19C. <i>Electricity Industry Metering Code clause 6.19B(1)</i>		
	Priority 5		Controls rating: N/P
449	A network operator must amend any document in accordance with the ERA’s final recommendation. <i>Electricity Industry Metering Code clause 6.20(4)</i>		
	Priority 5	Controls rating: N/P	Compliance rating: N/R

No	Obligation under Condition	Findings	
450	The network operator must publish any document that has been amended under subclause 6.20(4). <i>Electricity Industry Metering Code clause 6.20(5)</i>		
	Priority 4	Controls rating: N/P	Compliance rating: N/R
Part 7 Notes and confidential information			
451	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.7.2(1) <i>Electricity Industry Metering Code clause</i>	Based on examination of Western Power's website, official letterhead and other forms of communication (e.g. email signature) with Code participants, and consideration of Western Power's telephone system and corporate records management system, we determined that appropriate mechanisms are in place to comply with clause 7.2(1) of the Code.	
	Priority 5	Controls rating: N/P	Compliance rating: 1
452	A network operator must notify each Code participant of its initial contact details and of any change to its contact details at least 3 business days before the change takes effect. <i>Electricity Industry Metering Code clause 7.2(2)</i>	The Senior Customer Relations Consultant confirmed that during the audit period Western Power did not amend its contact details.	
	Priority 4	Controls rating: N/P	Compliance rating: N/R
455	A Code participant must subject to subclauses 5.17A and 7.6 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. <i>Electricity Industry Metering Code clause 7.5</i>	<p>Through discussions with the Meter Provision Manager and Metering staff, examination of Western Power's Code of Conduct and privacy and information management policies and procedures, and examination of compliance training records, we determined that:</p> <ul style="list-style-type: none"> Western Power's Code of Conduct, Privacy Policy and Information Management Guidelines set out expectations in relation to staff handling of confidential information Compulsory compliance training, provided to all staff who manage customer information or market related data, specifically addresses requirements relating to handling of confidential information Western Power maintains effective records of staff training activity, including training required and completed, <p>We observed that during the audit period, Western Power identified and reported one instance where confidential information was improperly disclosed (relating to customer email addresses in a group email). Western Power notified the relevant parties of the breach and corrected its group email procedures to prevent a recurrence.</p> <p>Through our examination of information published, or made available to requesting parties, we did not observe any wrongful disclosure of confidential information.</p> <p>This audit makes no further recommendation in relation to this matter.</p>	
	Priority 3	Controls rating: A	Compliance rating: 2

No	Obligation under Condition	Findings	
456	A Code participant must disclose or permit the disclosure of confidential information that is required to be disclosed by the Code. <i>Electricity Industry Metering Code clause 7.6(1)</i>	Through discussions with the Meter Provision Manager and consideration of Western Power’s Information Management guidelines and standards, we determined that: <ul style="list-style-type: none"> • During the audit period, Western Power was required by the Code to disclose confidential information to the Australian Energy Market Operator and Electricity Generation and Retail Corporation (Synergy) only • Western Power staff are trained in its Information Management requirements, including the confidentiality requirements prescribed by the Code. 	
	Priority 4		Controls rating: N/P
Part 8 Dispute resolution			
457	If any dispute arises between any Code participants then (subject to subclause 8.2(3)) 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 by negotiations in good faith. <i>Electricity Industry Metering Code clause 8.1(1)</i>	<i>Obligations 457 to 461</i> The Senior Customer Relations Consultant confirmed that during the audit period, Western Power did not enter into a dispute in connection with the Electricity Industry Metering Code.	
	Priority 5		Controls rating: N/P
458	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. <i>Electricity Industry Metering Code clause 8.1(2)</i>		
	Priority 5		Controls rating: N/P
459	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. <i>Electricity Industry Metering Code clause 8.1(3)</i>		
	Priority 5		Controls rating: N/P
460	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. <i>Electricity Industry Metering Code clause 8.1(4)</i>		
	Priority 4		Controls rating: N/P
461	The disputing parties must at all times conduct themselves in a manner which is directed towards achieving the objective in subclause 8.3(1). <i>Electricity Industry Metering Code clause 8.3(2)</i>		
	Priority 5	Controls rating: N/P	Compliance rating: N/R

4.8 Electricity Industry (Network Quality and Reliability of Supply) Code

No	Obligation under Condition	Findings
	<p><i>Overall observations</i></p> <p>Through discussions with the Principal Asset Planning Consultant, Grid Transformation, Network Operations Development Manager, Quality and Compliance Officer, Senior Customer Relations Consultant, Distribution Grid Strategy Manager, Transmission Grid Strategy Manager, Senior Standards and Technology Engineer and Senior Compliance Specialist, and examination of relevant documentation, we determined that during the audit period, Western Power maintained the following systems and processes to provide for compliance with the requirements of the NQRS Code, specifically relating to ensuring:</p> <ul style="list-style-type: none"> • Electricity supply complies with the following relevant standards <ul style="list-style-type: none"> ○ Table 3 of the NQRS Code ○ AS/NZS 61000.3.2:2007 for harmonic voltage and current distortion ○ TR IEC 61000.3.6:2012 for connecting large distorting loads (producing harmonics and/or inter harmonics) • Electricity supply is to be disconnected from a customer’s premise if supply quality is not according to the prescribed standards, particularly if it presents a safety issue or a potential to damage assets • Actions are taken to identify, act and reduce the length of unplanned outages, in accordance with the Service Standard Benchmarks in Western Power’s current Access Arrangement • Adequate monitoring and reporting mechanisms are in place to capture: <ul style="list-style-type: none"> ○ The number of outages and associated lengths of each outage ○ Occasions where small use customers have experienced significant disruptions (as defined by the NQRS Code) and Western Power has not met the requirements of sections 12(3) or 13(2) of the NQRS Code for remedying the cause of the disruption or entering into alternative arrangements with the customer ○ Causes for outages. For example, power quality performance of the transmission network has been continuously monitored by over 90 permanently installed Ametek recorders monitoring a significant sample of sites that represent the overall composition of the network. Also, ION mobile recorders are used for temporary monitoring of some transmission customers and investigation of suspected trouble spots. Results from permanently located power quality meters is analysed by the University of Wollongong as part of a Benchmarking project comparing all participating distribution network service providers ○ Analysis of investigation results of customer reported faults in regard to voltage level, voltage fluctuations and harmonics ○ Achievement of power quality requirements ○ Requests and associated processing of service standard payments ○ Relevant KPIs for the prescribed timeframes under the NQRS Code • Transmission Grid and Distribution Grid strategies have been established to mitigate the effect of interruption on customers <ul style="list-style-type: none"> ○ In March 2018, Western Power’s Network Planning function transitioned to a new Grid Transformation function to enable Western Power to develop centralised strategies in a time of rapid change ○ Western Power’s Near Term Plan contains programs of work which have a direct and indirect contribution to improving Reliability performance (i.e. Asset Replacement, Regulatory Compliance, Capacity Expansion & maintenance works) ○ Reliability strategies (supported by a community engagement strategy) are based on particular areas of focus across the SWIN and mitigate the effect of interruptions • Appropriate investigation is performed to identify the cause(s) of interruptions. If investigations fail to identify the cause, Western Power will enter into an alternative arrangement with the customer • Mechanisms are in place for receiving and sending notices, in accordance with the requirements of the NQRS Code • Appropriate mechanisms are in place for communication of information in the manner and form prescribed by the NQRS Code • Mechanisms are in place to monitor the operation of the network for compliance with the provisions of Part 2 of the NQRS Code. For example, Western Power uses Power-On Fusion, PI Historian database, Network Reliability Data Validator, permanent PQ recorders, ION mobile recorders and other monitoring systems. 	

No	Obligation under Condition	Findings	
462	A distributor or transmitter must, as far as reasonably practicable, ensure that electricity supply to a customer's electrical installations complies with prescribed standards. <i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 5(1)</i>	As described in the overall observations, we determined that during the audit period, Western Power maintained processes, systems and strategies to, as far as reasonably practicable, ensure that it complies with prescribed standards.	
	Priority 5	Controls rating: N/P	Compliance rating: 1
463	A distributor or transmitter must, so far as reasonably practicable, disconnect the supply of electricity to installations or property in specified circumstances, unless it is in the interest of the customer to maintain the supply. <i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 8</i>	As described in the overall observations, we determined that during the audit period, Western Power maintained processes and systems to, as far as reasonably practicable, ensure that it disconnects the supply of electricity to customers in the specified circumstances, unless it is in the interest of the customer to maintain supply.	
	Priority 5	Controls rating: N/P	Compliance rating: 1
464	A distributor or transmitter must, as far as reasonably practicable, ensure that the supply of electricity is maintained and the occurrence and duration of interruptions is kept to a minimum. <i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 9</i>	<p>Through discussion with the Principal Asset Planning Consultant, Grid Transformation and consideration of Western Power's management of its network operations, we determined that Western Power has:</p> <ul style="list-style-type: none"> Set internal KPIs to ensure customers' power is restored within 12 hours. KPIs are set at 90% with current performance being 95% Made up to date outage information available to customers through its website Provided options for customers to contact its customer service centre for advice on estimated restoration time. <p>As the requirements of section 9 of the NQRS Code are driven by the specific requirements of sections 11 and 11A, based on examination of Western Power's Reliability and Power Quality reports, we note that Western Power self-reported non-compliance with the NQRS Code requirements for the 2017/18 and 2018/19 financial years.</p> <p>Western Power has continued to recognise that it is a significant challenge to maintain full compliance with this requirement and will continue to report its performance in its Annual Reliability and Power Quality reports as required by the NQRS Code.</p> <p>This audit makes no further recommendation in relation to this matter.</p>	
	Priority 5	Controls rating: A	Compliance rating: 2
465	A distributor or transmitter must, so far as reasonably practicable, reduce the effect of any interruption on a customer. <i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 10(1)</i>	As described in the overall observations, we determined that during the audit period, Western Power maintained processes and systems to, as far as reasonably practicable, reduce the effect of interruption to customers.	
	Priority 5	Controls rating: N/P	Compliance rating: 1
466	A distributor or transmitter must consider whether, in specified circumstances, it should supply electricity by alternative means to a customer who will be affected by a proposed interruption. <i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 10(2)</i>	As described in the overall observations, we determined that during the audit period, Western Power maintained processes, systems and strategies to provide consideration of the circumstances where a customer, affected by an outage, should be supplied by alternative means.	
	Priority 5	Controls rating: N/P	Compliance rating: 1

No	Obligation under Condition	Findings		
467	<p>A distributor must take prescribed action in the event of a significant interruption to a small use customer.</p> <p><i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 12(3)</i></p>	Priority 2	Controls rating: A	Compliance rating: 2
468	<p>A distributor or transmitter must, so far as reasonably practicable, ensure that customers in specified areas do not have average total lengths of interruptions of supply greater than specified durations.</p> <p><i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 13(2)</i></p>	Priority 5	Controls rating: A	Compliance rating: 2
469	<p>The average total length of interruptions of supply is to be calculated using the specified method.</p> <p><i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 13(3)</i></p>	Priority 4	Controls rating: N/P	Compliance rating: 1

Obligation 467 and 468
 Through discussion with the Principal Asset Planning Consultant, Grid Transformation and Senior Customer Insight Analyst, Business Improvement and Data Analysis, and consideration of Western Power’s processes for managing, monitoring and reporting on its planned and unplanned outages, we determined that during the audit period, Western Power continued to:

- Use its best endeavours to identify, act and reduce the length of unplanned outages, in accordance with the Service Standard Benchmarks in its current Access Arrangement
- Report on the number of outages and associated lengths of each outage
- Monitor compliance performance and model / predict future performance
- Develop and implement reliability strategies (supported by a community engagement strategy) based on particular areas of focus across the SWIN and to mitigate the effect of interruption on customers
- Investigate and where appropriate at a localise level, remedy the cause(s) of interruption, or otherwise enter into an alternative arrangement with the customer
- Make decisions on network interventions based on a priority framework of investment outcomes. As the current priority setting is weighted towards public safety, the creation and tracking of investment decisions is a key element of Western Power’s efforts to demonstrate its "so far as reasonably practical" actions
- Monitor and report on occasions where small use customers have experienced significant disruptions (as defined by the NQRS Code) and Western Power had not met the requirements of sections 12(3) or 13(2) of the NQRS Code for remedying the cause of the disruption or entering into alternative arrangements with the customer.

Western Power continues to recognise that the Service Standard Benchmarks in its current Access Arrangement (which permit the calculation of significant interruptions to be normalised to exclude adverse climatic events and which recognises the focus for service is to maintain current average service levels, improving service only where it is valued by the customer and efficient to do so), does not align with the NQRS Code’s requirements. Accordingly, as Western Power considers a level of non-compliance to be unavoidable at times where customers experience adverse climatic events, it made a submission to the former Public Utilities Office (Energy Policy WA), for the Code to be amended to exclude severe weather-related events from the prescribed number of outages. At the time of this audit, Energy Policy WA had not approved such an amendment and as the NQRS Code requirements have remained unchanged, Western Power continues to be non-compliant with the requirements of sections 12(3) and 13(2) of the NQRS Code.

This audit makes no further recommendation in relation to this matter.

Through discussion with the Senior Customer Insight Analyst, Business Improvement and Data Analysis and examination of Western Power’s calculations of supply interruptions, we determined that Western Power’s method for calculating “average total length of interruptions of supply” meets the NQRS Code’s requirements.

No	Obligation under Condition	Findings
469 A	<p>Western Power must, so far as is reasonably practicable, have in place arrangements to:</p> <ul style="list-style-type: none"> restore and maintain at least 45 megawatts of supply to essential services loads and the majority of small use customers in the Eastern Goldfields as soon as is reasonably practicable following the occurrence of an unplanned outage of a transmission element supplying the Eastern Goldfields; and maintain at least 45 megawatts of supply to essential services loads and the majority of small use customers in the Eastern Goldfields during the occurrence of a planned outage of a transmission element supplying the Eastern Goldfields. <p>Note: These are temporary reliability standards that apply from 1 October 2018 to 30 September 2023</p> <p><i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 13B</i></p>	<p><i>Obligation 469A and 469B</i></p> <p>Through discussion with the Principal Asset Planning Consultant, Grid Transformation and Regulatory Compliance Team, and consideration of Western Power’s arrangements for managing supply to the Eastern Goldfields and North Country load areas, we determined that:</p> <ul style="list-style-type: none"> The formal business cases prepared by Western Power prior to the amendment of the NQRS Code to include these obligations: <ul style="list-style-type: none"> Demonstrated a full understanding of the requirements for maintaining reliability of supply to each of the Eastern Goldfields and North Country load areas (required due to the cessation of previous arrangements between AEMO and Synergy for Dispatch Support Services) Concluded that the most appropriate option for continuing to provide reliable supply to customers and to secure sufficient planned outages to manage associated reputation and operating risks in delivering customer and network driven works, was to: <ul style="list-style-type: none"> Enter into Network Control Services Contracts with Synergy Commission associated internal project management arrangements Implement ongoing quality assurance and testing of the relevant generation units During the period 1 October 2018 to 30 June 2020, Western Power maintained the following arrangements for complying with its obligations to restore and maintain supply to essential services loads and the majority of small use customers in the Eastern Goldfields and North Country load areas: <ul style="list-style-type: none"> Established and adhered to Network Control Services Contracts with Synergy, for each of the West Kalgoorlie power station (Eastern Goldfields load area) and Mungarra power station (North Country load area) Utilised its whole-of-network management and performance monitoring arrangements and tools to manage and monitor the reliability of the transmission elements supplying the Eastern Goldfields and North Country load areas.
469 B	<p>Western Power must, so far as is reasonably practicable, have in place arrangements to:</p> <ul style="list-style-type: none"> restore and maintain at least 50 megawatts of supply to essential services loads and the majority of small use customers in the North Country as soon as is reasonably practicable following the occurrence of an unplanned outage of a transmission element supplying the North Country; and maintain at least 50 megawatts of supply to essential services loads and the majority of small use customers in the North Country during the occurrence of a planned outage of a transmission element supplying the North Country. <p>Note: These are temporary reliability standards that apply from 1 October 2018 to 30 September 2023.</p> <p><i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 13C</i></p>	
470	<p>A distributor or transmitter must, on request, provide to an affected customer a free copy of an instrument issued by the Minister and of any notice given under section 14(7) of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.</p> <p><i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 14(8)</i></p>	<p>The Senior Customer Relations Consultant confirmed that, during the period 1 July 2017 to 30 June 2020, no relevant instrument has been issued by the Minister.</p>

No	Obligation under Condition			Findings
471	<p>A distributor or transmitter that agrees with a customer to exclude or modify certain provisions must set out the advantages and disadvantages to the customer of doing so in their agreement.</p> <p><i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 15(2)</i></p>			<p>The Senior Customer Relations Consultant confirmed that, during the period 1 July 2017 to 30 June 2020, no provisions of the NQRS Code 2005 have been excluded or modified by Western Power.</p>
	Priority 4	Controls rating: N/P	Compliance rating: N/R	
472	<p>A distributor operating a relevant distribution system must, in specified circumstances, make a payment to a customer within a specific timeframe for a failure to give required notice of planned interruption.</p> <p><i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 18</i></p>			<p>Through discussion with the Planned Outage Notification Team Leader, consideration of Western Power's Service Standard Payment – Non-Notification Planned Outage procedure, examination of Western Power's breach records and testing of service standard payments made, we determined that:</p> <ul style="list-style-type: none"> • During the audit period, Western Power maintained the following procedures: <ul style="list-style-type: none"> ○ Customer claims for service standard payments are made online ○ A Service Standard Payment Investigation and Payment Spreadsheet is maintained to track claims and to ensure payments are made within 30 days of the application ○ The status of service standard payments is monitored by the Planned Outage Notification Team Leader twice each week. • As disclosed in its breach records for 2019/20, in one instance during the audit period, Western Power did not make the required service standard payment within 30 days of application, as prescribed by the NQRS Code. The cause of the non-compliance was attributed to human error. Coaching and refresher training was provided to relevant staff: <p>Sample testing of service standard payments made during the audit period did not identify any additional non-compliances.</p> <p>This audit makes no further recommendation in relation to this matter.</p>
	Priority 3	Controls rating: A	Compliance rating: 2	

No	Obligation under Condition	Findings	
473	<p>A distributor operating a relevant distribution system must, in specified circumstances, make a payment to a customer within a specific timeframe if a supply interruption exceeds 12 hours.</p> <p><i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 19</i></p>	<p>Through discussion with the designated Customer Service Team Leader, consideration of Western Power’s Extended Outage Payment Scheme (EOPS) Process and examination of the EOPS Fortnightly Checks spreadsheet, EOPS Manual Payments spreadsheet and Western Power’s breach records, we determined that:</p> <ul style="list-style-type: none"> • During the audit period, Western Power maintained the following procedures: <ul style="list-style-type: none"> ○ A spreadsheet of ‘manual payments’ is maintained to monitor payments made to customers ○ On a fortnightly basis, Ellipse system records of EOPS payments are reconciled to the actual payments made, enabling Western Power to monitor the timeliness of EOPS payments against the 30-day requirement of the NQRS Code ○ Online claims initiate an automated process that checks the customer details, duplicate claims and outage details prior to a payment being scheduled for processing • As disclosed in its breach records and 2017/18 and 2018/19 Annual Compliance reports to the ERA, in 19 instances during the audit period, Western Power did not pay a customer the required service standard payment within 30 days of the claim, as prescribed by the NQRS Code. The cause of the non-compliance was attributed to: <ul style="list-style-type: none"> ○ An error in the automated EFT payment process, which Western Power corrected in September 2017 ○ Account processing system errors. The implementation of the new Customer Management System in February 2019 included an improved process for lodging claims on behalf of customers. In June 2019, Western Power also implemented an additional step to the fortnightly reconciliation process. <p>Sample testing of service standard payments made during the audit period did not indicate any additional non-compliances.</p> <p>This audit discussed potential process improvement opportunities with the Customer Service Centre Team, however makes no further recommendation.</p>	
	Priority 2	Controls rating: B	Compliance rating: 2
474	<p>A distributor operating a relevant distribution system must provide eligible customers with information about applying for payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.</p> <p><i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 21(1)</i></p>	<p><i>Obligations 474 to 476</i></p> <p>Through discussion with the Senior Customer Relations Consultant and examination of information available on Western Power’s website, we determined that:</p> <ul style="list-style-type: none"> • Information is available on the Western Power website about applying for payments for failure to give required notice of planned interruption (section 18) and supply interruptions exceeding 12 hours (section 19) • Western Power provides Synergy with a Service Standard Payment information pamphlet, which is mailed to the customers address annually (note that Synergy is currently the only retailer supplying to eligible customers) • Western Power’s website provides information about the complaints handling process. 	
	Priority 4	Controls rating: N/P	Compliance rating: 1
475	<p>A distributor operating a relevant distribution system must provide written notice to customers about payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.</p> <p><i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 21(2)</i></p>	<p>Through discussion with the Senior Customer Relations Consultant and examination of information available on Western Power’s website, we determined that:</p> <ul style="list-style-type: none"> • Information is available on the Western Power website about applying for payments for failure to give required notice of planned interruption (section 18) and supply interruptions exceeding 12 hours (section 19) • Western Power provides Synergy with a Service Standard Payment information pamphlet, which is mailed to the customers address annually (note that Synergy is currently the only retailer supplying to eligible customers) • Western Power’s website provides information about the complaints handling process. 	

No	Obligation under Condition			Findings
	Priority 4	Controls rating: N/P	Compliance rating: 1	
476	A distributor operating a relevant distribution system must provide written notice to eligible customers about payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005 not less than once in each financial year. <i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 21(3)</i>			
	Priority 4	Controls rating: N/P	Compliance rating: 1	
477	A distributor or transmitter must take all such steps as are reasonably necessary to monitor the operation of its network to ensure compliance with specified requirements. <i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 23(1)</i>			As described in the overall observations, we determined that Western Power has implemented processes and systems to monitor its network operations.
	Priority 5	Controls rating: N/P	Compliance rating: 1	
478	A distributor or transmitter must keep records of information regarding its compliance with specific requirements for the period specified. <i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 23(2)</i>			The Principal Asset Planning Consultant, Grid Transformation confirmed that, during the period 1 July 2017 to 30 June 2020: <ul style="list-style-type: none"> • Network quality data and reports were stored on Western Power’s corporate PI Historian database, a dedicated server, and EDM and DQM systems • Network reliability data and reports were stored in Western Power’s Enterprise QVD Library, Oracle schemas and EDM system • Data and reports had been stored for more than the required five years.
	Priority 4	Controls rating: N/P	Compliance rating: 1	

No	Obligation under Condition	Findings
479	<p>A distributor or transmitter must complete a quality investigation requested by a customer in accordance with specified requirements.</p> <p><i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 24(3)</i></p>	<p>Section 24(3) of the NQRS Code requires Western Power to complete power quality investigations within 20 working days for qualifying requests by customers who consider that their supply of electricity did not comply with the voltage fluctuation and harmonic standards specified by the NQRS Code.</p> <p>In accordance with Action Plan 7/2017, Western Power amended its processes for managing and monitoring the completion of its power quality investigations to enable it to adequately distinguish between investigations per the NQRS Code requirements and service standard targets.</p> <p>Since approximately April 2018, Western Power had not effectively applied that component of its power quality investigation process and as a result, failed to identify and adequately track the progress of four written requests for investigation that triggered the NQRS Code’s requirement for power quality investigations to be completed within 20 working days. In all four cases, occurring between December 2018 and April 2020, the investigation was not completed within the required timeframe.</p> <p>This result was recognised by Western Power when preparing the requested information for this audit. However, the non-compliance was not recognised in time to include in the 2018/19 Annual Compliance report to the ERA.</p> <p>Recommendation 2/2020</p> <p><i>Western Power:</i></p> <ol style="list-style-type: none"> <i>Further expand on its design of processes for identifying and adequately tracking the progress of written requests for power quality investigations that trigger the NQRS Code’s requirement for investigations to be completed within 20 working days.</i> <i>Embed those processes into its regular (monthly, quarterly and/or annual) monitoring and reporting practices.</i> <i>Strengthen awareness of the relevance of this process and underlying NQRS Code obligations.</i>
Priority 4	Controls rating: C	Compliance rating: 2
480	<p>A distributor or transmitter must report the results of an investigation to the customer concerned.</p> <p><i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 24(4)</i></p>	<p>Through consideration of Western Power’s power quality investigation process and examination of the four written requests for investigation that triggered the NQRS Code’s requirement for power quality investigations to be completed, we determined that Western Power followed its power quality investigation process to the extent that the results of investigations were appropriately reported to the relevant customer.</p>
Priority 4	Controls rating: N/P	Compliance rating: 1
481	<p>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.</p> <p><i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 25(2)</i></p>	<p><i>Obligations 481 and 482</i></p> <p>Based on examination of Western Power’s website (via the ‘Contact Us’ page), we determined that Western Power’s complaints handling process has been documented, containing the information prescribed, and made available to customers at no charge.</p>
Priority 4	Controls rating: N/P	Compliance rating: 1

No	Obligation under Condition	Findings	
482	A document setting out a distributor's or transmitter's complaint handling process must contain the specified information. <i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 25(3)</i>		
	Priority 4	Controls rating: N/P	Compliance rating: 1
483	A distributor or transmitter must arrange for an independent audit and report on its systems for monitoring, and its compliance with specific requirements. This is to be carried out in respect of the operation of such systems during each reporting period of 3 years or as specified by the ERA. <i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 26</i>	<i>Obligations 483 to 483B</i> Note that on 1 October 2018, but effective from 1 July 2017, the requirement of NQRS Code clause 26 changed from requiring an annual independent audit and report, with the ERA subsequently providing notice of the three-year reporting period. Based on examination of evidence relating to the arrangement of, submission and publishing of the independent audit and report on Western Power's systems for monitoring, and its compliance with specific requirements of the NQRS Code for the year ending 30 June 2017, we determined that Western Power appropriately met the requirements of the NQRS Code for:	
	Priority 4	Controls rating: N/P	Compliance rating: 1
483 A	A distributor or transmitter must publish the audit report not later than 1 October following the reporting period. <i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 26(3), (4)</i>	<ul style="list-style-type: none"> • Arranging for an independent audit to be carried out by CutlerMerz to meet the specific requirements of the NQRS Code • Publishing the report by 1 October 2017 • Providing a copy of the report to the Minister and the ERA not less than 7 days before the report was published. 	
	Priority 4	Controls rating: N/P	Compliance rating: 1
483 B	A distributor or transmitter must give a copy of its audit report to the Minister and the ERA not less than 7 days before it is published. <i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 26(5)</i>		
	Priority 4	Controls rating: N/P	Compliance rating: 1
484	A distributor or transmitter must prepare and publish a report about its performance in accordance with specified requirements. <i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 27(1)</i>	<i>Obligations 484 and 485</i> Based on examination of evidence relating to the preparation, submission and publishing of its annual Reliability and Power Quality reports, we determined that for each of the 2016/17, 2017/18 and 2018/19 Western Power met the requirements of the NQRS Code for:	
	Priority 4	Controls rating: N/P	Compliance rating: 1
485	A distributor or transmitter must give a copy of its report about its performance to the Minister and the ERA not less than 7 days before it is published. <i>Electricity Industry (Network Quality and Reliability of Supply) Code clause 27(3)</i>	<ul style="list-style-type: none"> • Appropriately preparing and publishing the reports • Providing a copy of the report to the Minister and the ERA not less than 7 days before the reports were published. 	
	Priority 4	Controls rating: N/P	Compliance rating: 1

4.9 Licensee specific obligations

No	Obligation under Condition	Findings								
490	The licensee must submit to the Coordinator a draft extension and expansion policy within the specified timeframe. <i>Electricity Industry Act, sections 61 and 65</i>	<p><i>Obligations 490 to 492</i></p> <p>The Senior Compliance Specialist confirmed that during the audit period there had been no requirement for Western Power to supply a draft extension and expansion policy.</p>								
	Priority 4				Controls rating: N/P	Compliance rating: N/R				
491	The licensee must comply with a direction given by the Coordinator in relation to a draft extension and expansion policy or an amendment to an extension and expansion policy. <i>Electricity Industry Act sections 62, 64 and 65</i>				<p><i>Obligations 490 to 492</i></p> <p>The Senior Compliance Specialist confirmed that during the audit period there had been no requirement for Western Power to supply a draft extension and expansion policy.</p>					
	Priority 4							Controls rating: N/P	Compliance rating: N/R	
492	The licensee must implement arrangements set out in an approved extension and expansion policy. <i>Electricity Industry Act section 65</i>							<p><i>Obligations 490 to 492</i></p> <p>The Senior Compliance Specialist confirmed that during the audit period there had been no requirement for Western Power to supply a draft extension and expansion policy.</p>		
	Priority 4									
493	The licensee will operate and maintain a trouble call fault management system. <i>Electricity Industry Act section 11</i>	<p>Through discussion with the Network Operations Development Manager and observation of Western Power's core PowerOn Fusion distribution management system, we determined that during the period 1 July 2017 to 30 June 2020:</p> <ul style="list-style-type: none"> Western Power continued to operate and maintain its Trouble Call System (TCS) as a trouble call fault management system Western Power had arrangements and procedures in place for ensuring TCS operates 24/7, including restoration in instances of outage There were no outages in TCS which impacted its availability as a trouble call fault management system. 								
	Priority 4									
494	The licensee must provide prior notification to the ERA if it intends to outsource its trouble call fault management system. <i>Electricity Industry Act section 11</i>				<p>The Network Operations Development Manager confirmed that, during the period 1 July 2017 to 30 June 2020, Western Power did not outsource or have any intention to its trouble call fault management system.</p>					
	Priority 4									

4.10 Obligations removed during the audit period - applicable only for the period 1 July 2017 to 30 June 2018

No	Obligation under Condition	Findings			
112	<p>In relation to network infrastructure facilities covered by the Code, the network service provider or an associate of the network service provider, must not hinder or prevent:</p> <ul style="list-style-type: none"> • access by any person to services under the Code; • the making of access agreements or other agreement in respect of those facilities; or • the access to which a person is entitled under an access agreement or a determination made by way of arbitration. <p><i>Electricity Industry Act section 115(1)</i></p>	<p><i>Obligations 112 and 113</i></p> <p>The Senior Customer Relations Consultant confirmed that, during the period 1 July 2017 to 30 June 2018, Western Power did not:</p> <ul style="list-style-type: none"> • Engage in conduct for the purpose of hindering or prohibiting access • Receive a complaint that related to Western Power hindering or prohibiting access. 			
	<table border="1"> <tr> <td data-bbox="255 624 526 810">Priority 4</td> <td data-bbox="526 624 797 810">Controls rating: N/P</td> <td data-bbox="797 624 1077 810">Compliance rating: 1</td> </tr> </table>	Priority 4	Controls rating: N/P	Compliance rating: 1	
Priority 4	Controls rating: N/P	Compliance rating: 1			
113	<p>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.</p> <p><i>Electricity Industry Act section 115(2)</i></p>				
	<table border="1"> <tr> <td data-bbox="255 810 526 810">Priority 4</td> <td data-bbox="526 810 797 810">Controls rating: N/P</td> <td data-bbox="797 810 1077 810">Compliance rating: N/R</td> </tr> </table>	Priority 4	Controls rating: N/P	Compliance rating: N/R	
Priority 4	Controls rating: N/P	Compliance rating: N/R			

5. Status of recommendations addressing non-compliances from the previous audit

Reference (no./year)	Non-compliance / Controls improvement Rating / Licence obligation reference number and licence obligation / Details of noncompliance or inadequacy of controls)	Auditor's recommendation or action planned	Date resolved	Further action required (Yes/No/Not Applicable) Details of further action required
A. Resolved during current audit period				
1/2017	<p>Obligation 41 - Electricity Industry Customer Transfer Code clause 4.13 (B2)</p> <p>Obligation 77 - Electricity Industry (Obligation to Connect) Regulation 8 (A2)</p> <p>Obligations 244 and 301 - Code of Conduct clauses 8.2 and 12.1(4) (A2)</p> <p>Obligations 338, 357, 376, 385, 386, 391, 404, 415 and 447 - Electricity Industry Metering Code clauses 3.11(2), 3.21(1), 4.7, 5.3, 5.4(1), 5.6(1), 5.17A(1), 5.21(4) and 6(1) (B2)</p> <p>Obligations 464, 467 and 468 - Network Quality & Reliability of Supply Code sections 9, 12(3) and 13(2) (B2, A2 and A2)</p> <p>Western Power has a number of obligations under the relevant Codes, which have associated timeframes and require specified actions to be conducted. For these obligations, the nature, extent and volume of activity makes it difficult for Western Power to maintain compliance throughout the full audit period. Western Power continues to monitor its level of compliance (sometimes on a monthly basis) and self-reports relevant breaches every year, however no formal strategy has been developed to document Western Power's position in relation to each obligation.</p>	<p>Western Power seeks to comply with all of its operating licences' obligations. The auditor has identified a suite of recurrent non-compliances that are primarily associated with firm performance targets, which at times are difficult to achieve for the reasons outlined in the audit report. Western Power will continue to work towards achieving compliance and:</p> <ol style="list-style-type: none"> 1. Review each recurrent non-compliance to facilitate identification of the most appropriate treatment activity. Where practicable, a compliance plan will be developed to implement the remedial actions. 2. Engage with the regulators and other external stakeholders to seek changes to those instruments which, in Western Power's opinion, require amendments to reflect the nature and volume of transactions impacting Western Power's compliance with these obligations. <p>Responsible Person Regulatory Compliance Manager</p> <p>Target date</p> <ol style="list-style-type: none"> 1. 31 December 2017 2. 31 December 2018 	<ol style="list-style-type: none"> 1. December 2017 2. December 2018 (also ongoing) 	No

Reference (no./year)	Non-compliance / Controls improvement Rating / Licence obligation reference number and licence obligation / Details of noncompliance or inadequacy of controls)	Auditor's recommendation or action planned	Date resolved	Further action required (Yes/No/Not Applicable) Details of further action required
A. Resolved during current audit period				
2/2017	<p>Obligation 35 - Electricity Industry Customer Transfer Code clause 4.10(1) (B2) A network operator must take certain action in accordance with a defined timetable following the receipt of a valid customer transfer request, subject to clauses 4.10(2) and 4.10(3) of the Electricity Industry Customer Transfer Code and using all reasonable endeavours to affect the transfer.</p> <p>Obligation 39 - Electricity Industry Customer Transfer Code clause 4.11(2) (B2) In response to recommendation 1/2014 of the 2014 Performance Audit relating to obligation 39 (Customer Transfer Code clause 4.11(3)), Western Power improved its processes for ensuring Type 5 meters are read on the original nominated transfer date. However, of our sample of 20 instances (out of a population of 135 over the audit period) where Western Power amended a nominated customer transfer date, eight customer transfer requests were not performed on the nominated transfer date (because the meter had not been read on that day). As a result, Western Power did not comply with the requirements of Customer Transfer Code clause 4.10(1)(c) for the meter read to be conducted on the nominated transfer date (obligation 35). In addition, in relation to obligation 39, of the 20 customer transfer requests tested:</p> <ul style="list-style-type: none"> • In 18 instances, no evidence could be provided of Western Power's communication with the incoming retailer in relation to "working together" to set a new date in accordance with the requirement of Customer Transfer Code clause 4.11(3)(a) • Western Power was unable to demonstrate that it had notified the current retailer of the meter not being read and of the new transfer date, within one business day in accordance with the requirements of Customer Transfer Code clause 4.11(3)(b). 	<ol style="list-style-type: none"> 1. Western Power will review its internal processes to ensure compliance obligations, which have an interdependency with other obligations, are linked to enable appropriate monitoring and reporting of non-compliances. Responsible person Revenue Manager Target date 31 December 2017 2. Where meters cannot be read on the nominated appointment date, implement process changes to work with incoming retailers to set a new transfer date, and maintain appropriate supporting evidence of associated communications for rescheduling the appointment. Responsible person Revenue Manager Target date 31 March 2018 	<ol style="list-style-type: none"> 1. December 2017 2. March 2018 	No

Status of recommendations addressing non-compliances from the previous audit

Reference (no./year)	Non-compliance / Controls improvement Rating / Licence obligation reference number and licence obligation / Details of noncompliance or inadequacy of controls)	Auditor's recommendation or action planned	Date resolved	Further action required (Yes/No/Not Applicable) Details of further action required
A. Resolved during current audit period				
4/2017	<p>Obligation 399 - Electricity Industry Metering Code clause 5.14(3) (A2)</p> <p>Testing of the eight requests for bulk standing data made in the 2016/17 financial year determined that in one instance, Western Power provided the data three business days after the request, which did not meet the two business day service standard specified in Western Power's Metering Code Model Service Level Agreement (SLA) and therefore, the requirement of clause 5.14(3) of the Metering Code. Although Western Power had reached agreement with the user for the data to be provided after the two-business day timeframe, the SLA does not provide for an extension of time for provision of the requested data.</p>	<p>As identified by the auditor, this was an exception as the requested data was large. Western Power engaged the user and agreed a method for providing the requested data, however this data was provided outside of the prescribed two business days. As this instance was an exception, Western Power does not consider a need to amend the Model SLA.</p> <p>The Model SLA provision of bulk standing data timing requirements have been reinforced with the relevant teams (Metering Applications Support, Metering Functional Support and Billing Networks).</p> <p>Responsible person Business Relationship Manager – IT</p> <p>Target date Completed</p>	October 2017	No

Reference (no./year)	Non-compliance / Controls improvement Rating / Licence obligation reference number and licence obligation / Details of noncompliance or inadequacy of controls)	Auditor's recommendation or action planned	Date resolved	Further action required (Yes/No/Not Applicable) Details of further action required
A. Resolved during current audit period				
5/2017	<p>Obligation 423 - Electricity Industry Metering Code clause 5.22(2) (B2)</p> <p>Western Power:</p> <ul style="list-style-type: none"> Currently publishes energy data to the market via the Metering Business System (MBS), prior to being validated against "check metering data", which does not meet the requirement of the Metering Code Has identified a solution, which requires an MBS upgrade to enable energy data to be validated against "check metering data" prior to it being published to the market. 	<p>Western Power has further explored the proposed MBS functionality upgrade required to perform the validation process. The required upgrade is complex and the initial solution has since been de-scoped from the suite of items to be upgraded within MBS. However:</p> <ol style="list-style-type: none"> Western Power will explore opportunities with ICT for a cost-effective, compliant process. This could include a process to withhold failed energy data and check meter readings for review before the publication of the meter data from MBS. If the ICT solution is practicable, Western Power will define a plan and work schedule for the solution to be implemented. Until a system solution has been identified and implemented, Western Power will, where practicable, develop and implement a manual process to validate meter readings before they are published to the market. <p>Responsible person Revenue Manager</p> <p>Target date</p> <ol style="list-style-type: none"> 30 June 2018 31 March 2018. 	April 2018	No

Reference (no./year)	Non-compliance / Controls improvement Rating / Licence obligation reference number and licence obligation / Details of noncompliance or inadequacy of controls)	Auditor's recommendation or action planned	Date resolved	Further action required (Yes/No/Not Applicable) Details of further action required
A. Resolved during current audit period				
6/2017	<p>Obligation 434 - Electricity Industry Metering Code clause 5.25 (B2)</p> <p>In 2014/15, Western Power self-reported its non-compliance with clause 5.25, relating to a small number of instances where substituted data, used to correct actual data that failed validation (therefore becoming estimated data), was incorrectly published as actual data. In these instances, Western Power failed to preserve the accuracy of data in accordance with section 8.3.2 of its Metrology procedure, which requires Western Power to accurately advise all Code participants of the source of data published to the market.</p> <p>In its 2014/15 Annual Compliance report, Western Power reported that it had initiated an investigation into the MBS error and that it had implemented an exception report to monitor and manually correct substitute readings in MBS. In 2015, the MBS error was corrected, however a subsequent upgrade to MBS resulted in the default settings causing the error to revert. As a result, Western Power continued to breach the requirements of section 8.3.2 of its Metrology procedure and clause 5.25 of the Metering Code.</p> <p>We understand Western Power has recognised the need to implement an MBS solution to address the issue relating to substitute energy data being published to the market as actual energy data.</p>	<ol style="list-style-type: none"> The cause for the MBS defect has been identified and is currently being worked through. Once completed, when a user substitutes energy data via the user interface of MBS, the data quality will be labelled as a "substitute" reading. Until the MBS solution is implemented, Western Power will, where practicable, develop and implement a manual process to preserve the accuracy of data that is published to the market. <p>Responsible person Revenue Manager</p> <p>Target date</p> <ol style="list-style-type: none"> 31 July 2018 31 March 2018. 	<ol style="list-style-type: none"> September 2019 February 2018 	No

Reference (no./year)	Non-compliance / Controls improvement Rating / Licence obligation reference number and licence obligation / Details of noncompliance or inadequacy of controls)	Auditor's recommendation or action planned	Date resolved	Further action required (Yes/No/Not Applicable) Details of further action required
A. Resolved during current audit period				
7/2017	<p>Obligation 479 - Network Quality & Reliability of Supply Code section 24(3) (B NR)</p> <p>Section 24(3) of the NQRS Code requires Western Power to complete power quality investigations within 20 working days for qualifying requests by customers who consider that their supply of electricity did not comply with the voltage fluctuation and harmonic standards specified by the NQRS Code. Section 24 of the NQRS Code states that a customer “may in writing request the transmitter or distributor to investigate whether the supply of electricity complies with...” those standards and Western Power has applied the NQRS Code’s 20 working day requirement to requests made by a customer in writing.</p> <p>Examination of the one request made via email that Western Power had recorded as not meeting the 20 working day timeframe concluded that the customer’s request related to high voltage and therefore was not specifically covered by the NQRS Code’s requirement for power quality investigations, which refers to voltage fluctuations.</p> <p>Further investigation by Western Power concluded that there were no written requests made by customers during the audit period, which related to the NQRS Code’s requirement for power quality investigations.</p> <p>Although Western Power effectively manages its power quality investigations in accordance with its internal service standards, further clarity is required to ensure it adequately distinguishes between investigations per the NQRS Code requirements and service standard targets.</p>	<p>Western Power acknowledges the opportunity to improve its approach for the management of investigations required under the NQRS Code. With this, Western Power will:</p> <ol style="list-style-type: none"> 1. Amend its Power Quality flowchart to ensure that staff are able to draw the connection between investigations, which are subject to the NQRS Code, and the corresponding prescribed timeframe. 2. Improve its power quality investigation and monitoring processes to ensure that, where a customer makes a written request for an investigation under the NQRS Code, the request is readily identifiable. <p>Responsible person Engineering Team Leader</p> <p>Target date 31 December 2017.</p>	December 2017	No

Reference (no./year)	Non-compliance / Controls improvement Rating / Licence obligation reference number and licence obligation / Details of noncompliance or inadequacy of controls)	Auditor's recommendation or action planned	Further action required (Yes/No/Not Applicable) Details of further action required (including current recommendation reference, if applicable)
B. Unresolved at end of current audit period			
3/2017	<p>Obligation 341 - Electricity Industry Metering Code clause 3.11A(2) (A2)</p> <p>As disclosed in the 2009 and 2014 Performance Audit Reports, Western Power recognised that there were approximately 320,000 non-compliant direct connect meters on its network. Western Power developed an action plan (approved by the EnergySafety division of the Department of Commerce) to replace the non-compliant meters by 1 December 2015 and subsequently addressed approximately 85,000 of those meters.</p> <p>An amendment to the Code confirmed that only approximately 54,000 of the 320,000 meters were non-compliant, resulting in a total of 1,813 meters remaining non-compliant as at 30 June 2017. Of the non-compliant meters as at 30 June 2017:</p> <ul style="list-style-type: none"> • 750 meters were prioritised to be replaced between 1 July and 31 August 2017 • Western Power determined that it is currently unable to replace 1,063 meters due to safety concerns or access constraints. A Management Plan to address these meters has been prepared. 	<p>Western Power will undertake the activities detailed within the Management Plan and annually report its progress to the ERA.</p> <p>Responsible person Metering Services Manager</p> <p>Target date Ongoing</p>	<p>Yes.</p> <p>This action plan will remain ongoing until the completion or close-out of the Management Plan to replace or remove the remaining meters (20 meters as at 30 June 2020) as soon as practicable.</p> <p>Refer to Recommendation 1/2020.</p>

Appendix A - Audit Plan

Appendix B - References

Western Power staff participating in the audit:

- Regulatory Compliance Manager
- Senior Compliance Specialist
- Meter Provision Manager
- Meter Data Manager
- Customer Service Centre Manager
- Customer Relations Manager
- Senior Customer Relations Consultant
- Customer Service Team Leaders
- Customer Support Analyst
- Complaints and Resolutions Team Leader
- Functional Support Specialist, ICT
- Fixed Price Team Leader
- Planned Outage Notification Team Leader
- Engineering Team Leader
- Senior Standards and Technology Engineer
- Application and Finance Team Leader, Connection and Initiation
- Transmission Grid Strategy Manager
- Principal Asset Planning Consultant, Grid Transformation
- Field Operations Team Leader, North Region
- Network Support Officer, North Region
- Field Supervisor, North Region
- Head of Property and Fleet
- Network Operations Development Manager
- Planning and Strategy Manager
- Acting Financial Accounting Manager
- Customer Support Manager
- Quality and Compliance Officer
- Reading Management Team Leader
- Reading Operations Team Leader
- Meter Installations Team Leader
- Metering Technical Services Team Leader
- Electricity Metering Specialist
- Metering Data Analyst
- Commercial Services Team Leader
- Commercial Officer
- Revenue Compliance Officer
- Compliance Business Analyst, Network Operations
- Distribution Grid Strategy Manager
- Senior Customer Insight Analyst, Business Improvement and Data Analysis
- Senior Network Investigation Technician, North Region
- Metering Technician, North Region
- Project Network Officer, North Region

AAG staff participating in the audit

		Hrs
• Andrew Baldwin	Executive Director	365.5
• Margaret-Mary Gauci	Consultant	178
• Natasha Pulford	Executive Director	40
• Nicole Davies	Senior Consultant	71
• Stephen Linden	Director (QA review)	5

Key documents and other information sources examined:General

- 2017/18, 2018/19 Annual Compliance Reports
- Licence Obligation Breaches reports
- Performance Audit 2020 - Obligations Register
- 2017 Performance Audit – Overview of Action Items
- Correspondence with the ERA re status of 2017 Audit Post Audit Implementation Plan
- Corporate Document Framework
- Procedures to update/amend Policies, Frameworks, Management Standards, Guidelines and Procedures
- Organisation Chart
- Compliance Failure Reporting Procedure
- Regulatory Compliance Standard
- Function Compliance Plan and Quarterly Compliance Assurance Reporting Procedure

Customer Transfer Code

- Exception Management MBS Procedure
- Customer Transfer Request Process
- Meter Data Management EMS Process
- CTR Nominate New Date and Non-Compliance Details Procedure
- Network Billing CTR Controls
- Sample Health Checks/ERRATA Reports
- Example NEM Files
- CTR Transactions & History spreadsheet
- SWIS Communication Rules
- MBS Build Pack
- MBS functional specification
- Metering Service Centre User Task Manual document
- Web portal functional specifications
- Standing Data Process
- Bulk Standing Data Process
- Example of standing data provided in response to a retailer's request
- Metering Service Centre User Task Manual document
- Cognos NMI discovery report
- CTC Dispute Resolution Process
- Western Australian Distributions Connections Manual 2015
- Example verifiable consent for access to energy data

Obligation to Connect Code

- O2C Standard Operating Procedure
- O2C Admin Process
- O2C tracking spreadsheets

- Part 16.21 Design Instruction Manual
- New Connections Non-Compliance Reporting Instructions
- Example New Connections Compliance Reports
- 2019/20 Annual record keeping report data list

Electricity Industry Act and Electricity Licences Obligations

- ERA Approval advice - Quotation WS2313855855 - Performance Audit 2020
- Asset Management System Description document
- Evidence of ERA Invoice and Payment
- Annual Financial Statements – 2017/18, 2018/19
- Email exchange re compliance with accounting standards
- Letters from ERA – Approvals of Audit Plan and Review Plan
- 2017-18 & 2018-19 Annual Compliance Report Signed Cover Letters
- Performance Audit and AMSR Review Flowchart
- Electricity Licence Reporting Datasheets 2017/18 to 2018/19
- Supporting data used to calculate 2018 and 2019 Electricity Standing Data Charges
- Publishing of ERA datasheets emails
- Prioritising Network Restoration Guidelines
- Power on Fusion Incident Management Standard Operating Procedure
- RO12 Audit Schedule
- eNAR Data Quality Checklist
- Functional Plan FY20-FY21.doc

Code of Conduct

- Compliance Failure Management Type 1 Obligations Procedure
- Type 1 Breach Register
- Type 1 Obligations Compliance Framework – Reviewing and Implementing Internal Controls – Process Flow
- Type 1 Obligations Compliance Framework – Risk and Control Matrix – updated with ONE system changes
- Type 1 Refresher Training 2020 (Depot Visits)
- Western Power website references
 - Faults & Emergencies line
 - FaultCast showing ETR in first instance
 - Power outages map showing estimated time of restoration
 - ACMA charges for calls to 13 numbers
 - Notice of additional charges incurred by mobile phone caller
 - How does Western Power Prioritise Restoration Work Guideline
 - Call centre 13 10 87 hours
 - New connections
 - Link to Corporate Templates
 - Using Telephone Interpreter Services
 - National Relay Service 1800 13 13 51

- Complaints handling process
- Complaint acknowledgement and response
- Planned Outage Life Support Equipment Customer Telephone Contact Process
- LSE customer Opt-Out phone call instructions
- Planned Outage Audit Working Instructions
- Planned Outage Manual Notification Process
- Template invoice example
- Induction Manual for New Starters
- Sample eNAR notification letters
- Evidence of call attempts regarding receipt of outage notification
- eNAR Data Quality Checklist
- Sample planned outage checklists
- Example email - confirmation of generator deployment
- Daily compliance audit for telephone calls
- Team role training and sign off sheet
- Quarterly compliance plan review
- Planned Outage Customer Notification and Compliance Procedure
- Manual Notifications Process
- Telephone call template during Fault or Emergency situation
- Customer Service Centre Training Manual and User Guides
- Annual compliance plan review
- Access to WP Life Support AutoMailbox Database prohibit user changing LSW status Procedure
- Administrator Guide - Life Support Notification Autoloader
- LSE Register
- Record of LSE customers in Waroona Fire Zone
- Customer Detail Notification Messages
- LSE Customer Statistics Report
- Retailer LSE Registration Reconciliation
- Processing Life Support Customers Standard Operating Procedure
- Emergency Response Generators Standard Operating Procedure
- Type 1 Breach Life Support Customer Standard Operating Procedure
- Managing Life Support Customer Geospatial Corrections Standard Operating Procedure
- Life Support Customer Data Access Standard Operating Procedure
- Restoration of Lines, Feeders, Reclosures and Fuses Standard Operating Procedure
- Customer Service Officer Learning Plan to achieve first call resolution
- CMS Instructions
- CMS Case Subject Checklist
- CSC User Guides General Training - MBS (Hub) Reference
- NetCIS case creation CSC Training Manual - General Calls
- Writing Style guide 2019

- Disability, Access and Inclusion Plan
- Complaints Matrix
- Complaint Management, Reporting and Dispute Resolution & CSC Complaints Process Flowchart
- Telephone Etiquette and Complaints Process
- Complaints and Resolution Work Instructions
- Complaints relating to a disconnection Procedure
- Example email correspondence regarding planned outages, acknowledgement of customer complaints, complaints resolution
- Western Power’s Distribution Datasheets 2017/18 and 2018/19
- Electricity Licence Reporting Datasheets 2018/18
- Electricity Licence Reporting Datasheets 2018/19
- Publishing of ERA datasheets email

Metering Code:

- Revenue Electric Meters Technical Specification
- Inspection and Acceptance Testing Procedure
- In Service Meter Testing Progress and Results Reports Q3-4 FY19, Q1-2 FY20
- Metering Asset Management Plan
- Sample of seven year read history HUB export
- Sample IDE Gaps Report
- Sample Time Drift reports
- Readings Management Standard Operating Procedures re multiple exception reports
- Readings Management Supply of Historical Consumption Data Procedure
- Interval Data Reports Checklist
- Invalid Self Read Cards Procedure
- Metering end-to-end process
- Network Errors Requiring Retailer Engagement Procedure
- No Reads Report Procedure
- Password Authority Level Matrix on Metering Database
- Monthly MDV Compliance Statistics Report
- Readings Management Interval Data Management Processes
- Readings Management Interval Data Management Exception Management Standard Operating Procedures
- Metrology Procedure for Metering installations on the Western Power Network, May 2015
- Metering Technical Confirmations correspondence
- Specification for Metering Modems 3G Modem Upgrade Project
- Modem Certificates
- Contractor Connect & Service Apparatus Connection Schemes
- Metering Services Model Service Level Agreement
- High Voltage Metering Technical Design Guideline
- Email to Retailer – Meter Test Results

- MBS Screenshots – Adds and Alts
- Metering Technical Procedure Manual
- Sample tech drawings and approvals
- Metering Transformer Test Reports
- Meter Completion Advice Form
- Retailer Requested SO for Enhanced Technology Features FY 2019-20
- Meter Pamphlets
- Meter Performance Testing Process
- Meter Performance Testing – Retailer Request Flow Diagram
- Requests for Meter Tests listing
- Meter Test Results x 2
- Work Instruction – Minor Installation Repairs
- Solar PV Application Process Fact Sheet
- Revenue Electric Meter – Technical Specification
- Specification for Metering Modems 3G Modem Upgrade Project
- Technical Rules – December 2016
- SLA – Additional Metering Services
- Work Procedure – Completing Exchange Meter Services Orders in MBS
- Licence Agreement with Meter Supplier
- EMS Billing SLA – Pricing and Checklist
- Exception Report Procedure
- Communications with ITC re MBS Reading Exceptions Filter and Age Priority
- Notification of Affected Parties for Non-compliant Metering Installation Procedure
- Metering Code Annual Performance Reports – 2017/18 and 2018/19
- Correspondence relating to provision and publishing of Metering Code Annual Performance Reports
- Supporting data and calculations for Metering Code Annual Performance Reports
- Information Classifications Standard
- Information Management – Change Process Guidelines
- Information Management – Provisioning Guidelines
- Records of meetings and communications with retailers
- MBS DR Failover instructions and run sheet
- MBS 60-day audit instructions
- MBS user access audit report
- Pre-payment Meter Register
- Pre-payment Meter Reversion Process
- Pre-payment Meter Communication Protocol
- Pre-payment Meter Service Level Contract – Horizon Power
- Work Procedure – Pre-payment Meters
- Extended Metering Services Invoicing Procedure
- Example EMS Billing data supporting invoices sent to retailers

- Annual Request to Read Meter Procedure
- ARO and MR reports
- ARO Flow Chart
- ARO Work Procedure
- Sample monthly ARO reports
- Sample monthly compliance and performance reports
- De-en Work Procedure
- Re-en Work Procedure
- Meter reading service provider Contract Management Report
- Meter reading service provider employee list
- Energisation and De-energisation service order data
- Template letters – wrongful De-en
- Field Protocols – Off-cycle Procedure
- ITRA Training User Course Status report
- Mandatory – Annual country reads schedule

Network Quality and Reliability of Supply Code:

- Grid Transformation Function Restructure – March 2018
- Reliability – Transmission Strategy
- NCS contract extract – West Kalgoorlie
- Eastern Goldfields NCS Business Case
- NCS contract extract – Mungarra
- North Country NCS Business Case
- Annual Reliability and Power Quality Reports – 2017/18 and 2018/19
- Correspondence relating to provision and publishing of Annual Reliability and Power Quality Reports
- Written PQ Complaints Process
- Power Quality Strategy
- 2018-19 PQCA Utility Report
- PQ KPI Performance Report
- LV Network Planning and Power Quality Business Case FY 20 and 21
- Power Quality (Harmonics and Flicker) Limit Allocation Process
- Reliability validation and reporting instruction manual
- 2017/18 data – interruptions exceeding 12 hours, outages more than prescribed number
- NQRS reliability and service standard dashboards – Qlik
- Planned Interruptions in Hot Weather Management Guideline
- DNP3 Pre-Commissioning Procedures audit
- Prioritising Network Restoration Guideline
- Function Plan FY20-FY21 – Network Operations
- Planned Outage SSP Investigation and Payment Spreadsheets
- Service Standard Payments – Non-notification Planned Outage Procedure

- EOPS Fortnightly check spreadsheet
- EOPS reconciliation spreadsheets
- EOPS Manual Payments spreadsheet
- EOPS Processes and Procedures
- Ellipse payment data for SSP Reconciliation spreadsheets
- Correspondence with Synergy re SSP application inserts
- Claims forms (EOPS, Non-notification of Planned Work, Damages Claim)
- Evidence of SSP refresher training

Geraldton Depot:

- Evidence of completion of new connections, energisation, de-energisation service orders
- Evidence of eNAR planning and notification activity
- PQ investigation reports
- Staff training records
- North Region Structure.