



2020 Performance Audit & Asset Management System Review – EGL26

WIND PORTFOLIO PTY LTD

Audit Report	Authorisation	Name	Position	Date
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OCTOBER 2020
Audit Report No: ARWP1020_3

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GLOSSARY

AMS – Asset Management System

BRF - Badgingarra Renewables Facility

BSF - Badgingarra Solar Farm

BWF - Badgingarra Wind Farm

CMP – Compliance Monitoring Program

DSOC - Declared Sent Out Capacity

EGL26 – The generation licence for Wind Portfolio Pty Ltd

ERA – Economic Regulation Authority

ETAC – Electricity Transfer Access Contract

GES – Geographe Environmental Services

kV – KiloVolts

MW – MegaWatt

SGRE – Siemens Gamesa Renewable Energy, windfarm operators

SLA – Service Level Agreement

SWIN – South West Integrated Network

UGL – Solar Farm operators

WTGs - Wind Turbine Generators

WPN – Western Power Networks

This report was prepared by representatives of GES Pty Ltd in relation to the above named client's conformance to the nominated audit standard(s). Audits were undertaken using a sampling process and the report and its recommendations were reflective only of activities and records sighted during this audit process. GES Pty Ltd shall not be liable for loss or damage caused to or actions taken by third parties as a consequence of reliance on the information contained within this report or its accompanying documentation. The client had the opportunity for review to ensure no commercially sensitive information was disclosed.

1. EXECUTIVE SUMMARY

The Licensee is Wind Portfolio Pty Ltd and the premise is known as Badgingarra Renewables Facility (BRF).

The Badgingarra Renewables Facility (BRF) is owned by Wind Portfolio Pty Ltd whom is in turn owned by the APA Group (APA).

Asset Overview

Badgingarra Renewables Facility (BRF) was located approximately 200km North of Perth and includes the Badgingarra Wind Farm (BWF) and the Badgingarra Solar Farm (BSF). The BWF was made up of 37 Siemens SWT-3.6-130 Wind Turbine Generators (WTGs) with a total rating of 133.2MW. The BSF was made up of 7SMA Inverters with a total rating of 19.3MW. The Declared Sent Out Capacity (DSOC) for BRF is 130MW. The BRF substation is connected to the South West Interconnected Network (SWIN) via one 132kV Generation line. An Electricity Transfer Access Contract (ETAC) between Western Power Corporation and the Principal set out the terms of BRF's connection to the SWIN.

Commissioned in early 2019, construction of the project took approximately 16 months to complete. The \$355 million APA development was underpinned by an agreement with Alinta Energy for the purchase of all the energy, and the Large Scale Renewable Generation Certificates generated by the wind and solar farm through to December 2035. The wind farm was owned and operated by APA with site based services provided under a long term service agreement with SGRE and 2 year agreement with UGL for the solar farm.

Wind Portfolio holds an Electricity Generation Licence (EGL26) issued by the Economic Regulation Authority under the Electricity Industry Act 2004. This performance audit and asset management review was conducted in accordance with the guidelines issued by the Economic Regulation Authority (ERA) to assess Wind Portfolio's level of compliance with the licence conditions.

APA Group issued a Consultancy Brief to undertake its first Performance Audit and Asset Management System Review as required by the Economic Regulation Authority (ERA/the Authority).

Sections 13 and 14 of the Electricity Industry Act 2004 require as a condition of every licence that the licensee must, not less than once in every period of 24 months (or any longer period that the Authority allows) calculated from the grant of the licence, provide the Authority with a performance audit and an asset management system review report by an independent expert acceptable to the Authority. Geographe Environmental Services has been approved by the Authority (Ref: D217200 Date: 30/07/2020) to undertake the works subject to the development of an audit plan.

The period for the audit and review is 23 June 2017 to 30 June 2020, and the draft report is due to be submitted to the Authority on or before 30 November 2020.

It is confirmed that the licensee facilitated the audit and review process by providing the audit team;

- Access to the facilities and business premises identified in the audit and review plan.
- Access to materials and information sources that the auditors needed to conduct the audit or review, including data, reports, records and any other relevant information that were available.
- Access to the relevant personnel at each of the BRF sites that were audited.
- An introduction to persons, other than employees of the licensee, who are relevant to the audit and review, such as contractors.

Performance Audit and Asset Management Review Objectives

The Asset Management System Review and the Performance Audit have been conducted in order to assess the effectiveness of the Wind Portfolio's Asset Management Systems and level of compliance with the conditions of its Electricity Generation Licence EGL26.

Through the execution of the Audit Plan, field work, assessment and testing of the control environment, the information system, control procedures and compliance attitude, the audit team members have gained reasonable assurance that Wind Portfolio Pty Ltd has an effective asset management system and has complied with its Generation Licence.

It is the auditors' opinion that compliance and integrity of reporting by the Licensee is considered well managed and is comprehensively detailed in Appendix 1. This is the first audit and as such issues arising from the previous audit and review report are not applicable.

The site audit was conducted on the 21st and 22nd October 2020. This audit report is an accurate representation of the audit team's findings and opinions. The Auditors confirm that the Licensee provided assistance to the Auditors, as required by Section 4.1 of the Audit Guidelines (2019).

1.1 Performance Audit Summary of Findings

Two licence obligations reviewed were found to be non-compliant during the audit (refer Table 2 and Appendix 1). During the audit period, the organisation has established processes to address these non-compliances and as such, compliance requirements were met in subsequent years. However, a further suggestion to improve the effectiveness of the actions taken has been detailed in Table 7.

A two-dimensional rating scale (refer Section 5.1.6.1 of the Audit Guidelines and Table 1 below) was used in the Audit report to summarise the compliance rating for each licence condition. Each obligation was rated for both the adequacy of existing controls and the compliance with the relevant licence obligation. The methodology for the Audit has been clearly defined in the Audit Plan.

Table 1 Audit Compliant and Control Rating Scales

Performance Audit Compliance & Controls Rating Scales			
Adequacy of Controls Rating		Compliance Rating	
Rating	Description	Rating	Description
A	Adequate controls – no improvement needed	1	Compliant
B	Generally adequate controls – improvement needed	2	Non-Compliant – minor impact on customers or third parties
C	Inadequate controls – significant improvement needed	3	Non-Compliant – moderate impact on customers or third parties
D	No controls evident	4	Non-Compliant – major impact on customers or third parties
NP	Not Performed	NR	Not rated – Determined Not Applicable during the audit period

A comprehensive report of the audit findings is included in Appendix 1.

1.2 Performance Audit Excluded Conditions

There were some reporting obligations for EGL26 that have been excluded from the audit because they are not applicable to Wind Portfolio Pty Ltd. There are no Type 1 reporting requirements applicable to EGL26. Excluded compliance obligations were detailed in the Audit Plan.

The performance audit was conducted in October involving one visit to site and inspection of both the BWF and BSF. The audit required 60 hours of Nicole Davies time.

The Generation Licence compliance elements that were included in the scope of this audit and as defined in Table 2, are further detailed in Appendix 1.

Table 2 Performance Audit Compliance Summary

Compliance Obligation Reference No.	Licence Reference	Audit Priority	Adequacy of Controls Rating					Compliance Rating				
			A	B	C	D	NP	1	2	3	4	NR
SECTION 8: TYPE 1 REPORTING REQUIREMENTS												
THERE ARE NO TYPE 1 REPORTING REQUIREMENTS APPLICABLE TO EGL26												
SECTION 12: ELECTRICITY INDUSTRY ACT - LICENCE CONDITIONS AND OBLIGATIONS												
102	Electricity Industry Act section 14(1)(a) Generation Licence, condition 5.1.1	5	A					1				
103	Electricity Industry Act section 14(1)(b) Generation Licence, condition 5.1.2 and 5.1.3	5	A					1				
105	Electricity Industry Act section 17(1) Generation Licence, condition 4.2.1	3		B						3		
106	Electricity Industry Act section 31(3) Generation Licence, condition 4.1.1	5	A					1				
107	Electricity Industry Act section 41(6) Generation Licence, condition 4.1.1	4	A					1				
SECTION 13: ELECTRICITY LICENCES - LICENCE CONDITIONS AND OBLIGATIONS												
119	Electricity Industry Act section 11 Generation Licence, condition 4.3.1	4	A					1				
121	Electricity Industry Act section 11 Generation Licence, condition 5.3.2	4	A					1				
122	Electricity Industry Act section 11 Generation Licence, condition 5.1.5	4	A					1				
123	Electricity Industry Act section 11 Generation Licence, condition 4.4.1	4					NP					NR
124	Electricity Industry Act section 11 Generation Licence, condition 4.5.1	3		B					2			
125	Electricity Industry Act section 11 Generation Licence, condition 3.8.1 and 3.8.2	4					NP					NR
126	Electricity Industry Act section 11 Generation Licence, condition 3.7.1	4	A					1				
SECTION 14: ELECTRICITY INDUSTRY METERING CODE - LICENCE CONDITIONS AND OBLIGATIONS												
324	Electricity Industry Metering Code Cl 4.4(1) Generation Licence, condition 4.1.1	5					NP					NR
339	Electricity Industry Metering Code Cl Generation Licence, condition 4.1.1	5	A									NR
371	Electricity Industry Metering Code Cl Generation Licence, condition 4.1.1	5					NP					NR
372	Electricity Industry Metering Code Cl Generation Licence, condition 4.1.1	5					NP					NR
373	Electricity Industry Metering Code Cl Generation Licence, condition 4.1.1	5					NP					NR
388	Electricity Industry Metering Code Cl Generation Licence, condition 4.1.1	5					NP					NR

402	Electricity Industry Metering Code CI Generation Licence, condition 4.1.1	5					NP					NR
406	Electricity Industry Metering Code CI Generation Licence, condition 4.1.1	5					NP					NR
410	Electricity Industry Metering Code CI Generation Licence, condition 4.1.1	5					NP					NR
416	Electricity Industry Metering Code CI Generation Licence, condition 4.1.1	5					NP					NR
417	Electricity Industry Metering Code CI Generation Licence, condition 4.1.1	5					NP					NR
435	Electricity Industry Metering Code CI Generation Licence, condition 4.1.1	5					NP					NR
448	Electricity Industry Metering Code CI Generation Licence, condition 4.1.1	5	A					1				
451	Electricity Industry Metering Code CI 7.2(1) Generation Licence, condition 4.1.1	5	A					1				
453	Electricity Industry Metering Code CI Generation Licence, condition 4.1.1	5					NP					NR
454	Electricity Industry Metering Code CI Generation Licence, condition 4.1.1	5					NP					NR
455	Electricity Industry Metering Code CI 7.5 Generation Licence, condition 4.1.1	4					NP					NR
456	Electricity Industry Metering Code CI 7.6(1) Generation Licence, condition 4.1.1	4					NP					NR
457	Electricity Industry Metering Code CI 8.1(1) Generation Licence, condition 4.1.1	5					NP					NR
458	Electricity Industry Metering Code CI 8.1(2) Generation Licence, condition 4.1.1	5					NP					NR
459	Electricity Industry Metering Code CI 8.1(3) Generation Licence, condition 4.1.1	5					NP					NR
460	Electricity Industry Metering Code CI 8.1(4) Generation Licence, condition 4.1.1	4					NP					NR
461	Electricity Industry Metering Code CI 8.3(2) Generation Licence, condition 4.1.1	5					NP					NR

Table 3 Compliance and controls ratings summary table

		Compliance Rating					
		1	2	3	4	N/R	TOTAL
Controls Rating	A	10	-	-	-	1	11
	B	-	1	1	-	-	2
	C	-	-	-	-	-	-
	D	-	-	-	-	-	-
	N/P	-	-	-	-	21	21
	TOTAL	10	1	1	-	22	34

1.3 Asset Management System Review Summary

During the audit period Wind Portfolio Pty Ltd generation licence EGL26 was operated by its subsidiary APA and covered the generation from Badgingarra Renewable Facility (BRF). The Badgingarra Renewable Facility incorporated the Badgingarra Wind Farm, (BWF) and Badgingarra Solar Farm (BSF). The wind and solar farms were operated and maintained by Siemens Gamesa Renewable Energy (SGRE) and UGL respectively. The BRF operations were overseen and managed by Powerplan Engineers, who also managed the adjacent APA owned Emu Downs Renewable Facility. As such, all parties had significant experience in this area and asset management processes were well established and were well documented.

Power generated was fed into the Western Power SWIN at 132kV with all generated sold to one customer together with associated Renewable Energy Certificates, RECs.

Contract packaging transferred a lot of the operational risk including planned and forced maintenance to the operators with the remainder balance of plant (BoP) resting with APA.

There was only one purchaser of power, with a long term contract that underwrote the project to purchase, taking all energy produced.

Installed equipment was of reputable manufacturers with global networks and support systems

The asset management system was found to be appropriate and meets the requirements of the Audit and Review Guidelines – Electricity and Gas Licences (2019).

As required by section 5.1.6.2 of the Audit & Review Guidelines (March 2019) Table 5 summarises the auditor's assessment of both the process and policy definition rating and the performance rating for each key process in the licensee's asset management system, using the scales described in Table 9 and Table 10 (refer Section 3.3, Methodology for Asset Management Review).

Table 4 Rating Scale Reviews - Process & Policy and Performance

Process And Policy Rating Scale		Performance Rating Scale	
Rating	Description	Rating	Description
A	Adequately defined	1	Performing effectively
B	Requires some improvement	2	Improvement required
C	Requires substantial improvement	3	Corrective action required
D	Inadequate	4	Serious action required
NR	Not rated	NR	Not rated

The process and policy and asset management system adequacy ratings are summarised below;

Table 5 Asset Management System: Effectiveness Summary

Asset Management System	Process & Policy Rating	Performance Rating
1. Asset planning	A	1
1.1 Asset management plan covers the processes in this table	A	1
1.2 Planning processes and objectives reflect the needs of all stakeholders and are integrated with business planning	A	1
1.3 Service levels are defined in the asset management plan	A	1
1.4 Non-asset options (e.g. demand management) are considered	NR	NR
1.5 Lifecycle costs of owning and operating assets are assessed	A	1
1.6 Funding options are evaluated	A	1
1.7 Costs are justified and cost drivers identified	A	1
1.8 Likelihood and consequences of asset failure are predicted	A	1
1.9 Asset management plan is regularly reviewed and updated	A	1
2. Asset creation and acquisition	A	1
2.1 Full project evaluations are undertaken for new assets, including comparative assessment of non- asset options	A	1
2.2 Evaluations include all life-cycle costs	A	1
2.3 Projects reflect sound engineering and business decisions	A	1
2.4 Commissioning tests are documented and completed	A	1
2.5 Ongoing legal / environmental / safety obligations of the asset owner are assigned and understood	A	1
3. Asset disposal	A	1
3.1 Under-utilised and under-performing assets are identified as part of a regular systematic review process	A	1
3.2 The reasons for under-utilisation or poor performance are critically examined and corrective action or disposal undertaken	A	1
3.3 Disposal alternatives are evaluated	A	1
3.4 There is a replacement strategy for assets	A	1
4. Environmental analysis	A	2
4.1 Opportunities and threats in the asset management system environment are assessed	A	1
4.2 Performance standards (availability of service Capacity, continuity, emergency response, etc.) are measured and achieved	A	2
4.3 Compliance with statutory and regulatory requirements	A	2
4.4 Service standard (customer service levels etc) are measured and achieved.	A	1
5. Asset operations	A	1
5.1 Operational policies and procedures are documented and linked to service levels required	A	1
5.2 Risk management is applied to prioritise operations tasks	A	1

Asset Management System	Process & Policy Rating	Performance Rating
5.3 Assets are documented in an asset register including asset type, location, material, plans of components and an assessment of assets' physical/structural condition	A	1
5.4 Accounting data is documented for assets	A	1
5.5 Operational costs are measured and monitored	A	1
5.6 Staff resources are adequate and staff receive training commensurate with their responsibilities.	A	1
6. Asset maintenance	A	1
6.1 Maintenance policies and procedures are documented and linked to service levels required	A	1
6.2 Regular inspections are undertaken of asset performance and condition	A	1
6.3 Maintenance plans (emergency, corrective and preventative) are documented and completed on schedule	A	1
6.4 Failures are analysed and operational / maintenance plans adjusted where necessary	A	1
6.5 Risk management is applied to prioritise maintenance tasks	A	1
6.6 Maintenance costs are measured and monitored	A	1
7. Asset Management Information System	A	2
7.1 Adequate system documentation for users and IT operators	A	2
7.2 Input controls include suitable verification and validation of data entered into the system	A	1
7.3 Security access controls appear adequate such as passwords	A	1
7.4 Physical security access controls appear adequate	A	1
7.5 Data backup procedures appear adequate and backups are tested	A	1
7.6 Computations for licensee performance reporting are accurate	A	1
7.7 Management reports appear adequate for the licensee to monitor licence obligations	A	1
7.8 Adequate measures to protect asset management data from unauthorised access or theft by persons outside the organisation	A	1
8. Risk management	A	1
8.1 Risk management policies and procedures exist and are applied to minimise internal and external risks	A	1
8.2 Risks are documented in a risk register and treatment plans are implemented and monitored	A	1
8.3 Probability and consequences of asset failure are regularly assessed	A	1
9. Contingency planning	A	1
9.1 Contingency plans are documented understood and tested to confirm their operability and to cover higher	A	1
10. Financial planning	A	1
10.1 The financial plan states the financial objectives and identifies strategies and actions to achieve those	A	1

Asset Management System	Process & Policy Rating	Performance Rating
10.2 The financial plan identifies the source of funds for capital expenditure and recurrent costs	A	1
10.3 The financial plan provides projections of operating statements (profit and loss) and statement of financial position (balance sheets)	A	1
10.4 The financial plan provides firm predictions on income for the next five years and reasonable predictions beyond this period	A	1
10.5 The financial plan provides for the operations and maintenance, administration and capital expenditure requirements of the services	A	1
10.6 Large variances in actual/budget income and expenses are identified and corrective action taken where necessary	A	1
11. Capital expenditure planning	A	1
11.1 There is a capital expenditure plan covering works to be undertaken, actions proposed, responsibilities and dates	A	1
11.2 The capital expenditure plan provides reasons for capital expenditure and timing of expenditure	A	1
11.3 The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan	A	1
11.4 There is an adequate process to ensure the capital expenditure plan is regularly updated and implemented	A	1
12. Review of AMS	A	1
12.1 A review process is in place to ensure the asset management plan and the asset management system described in it remain current	A	1
12.2 Independent reviews (e.g. internal audit) are performed of the asset management system	A	NR

The Audit & Review Guidelines (March 2019) required that auditors who have rated the adequacy of the process and policy definition process as C or D or the asset management performance as 3 or 4 also make recommendations to address the issue(s). No specific recommendations were made as result of the review.

1.3.1 Summary of Recommendations

No specific recommendations were made.

2. PERFORMANCE AUDIT

2.1 Performance Audit Scope

In executing the Audit Plan and in line with the Audit & Review Guidelines (March 2019) the auditors, when assessing if the licensee has complied with its licence obligations, applied a level of scrutiny that corresponds to a “reasonable assurance engagement”. This was further detailed within the audit plan (refer Paragraph 12(a)(i)(a) of ASAE 3000, June 2014).

This was the first audit of EGL26. As such, recommendations from the previous audit and as required by Section 11.3 of the Audit Guidelines (March 2019) were not applicable.

Table 6 Status of recommendations addressing non-compliances from the previous audit

A Resolved during current audit period				
Recommendation Reference (no./year)	Licence Obligation Reference Number	Auditors' Recommendation	Date Resolved	Further Action Required (Yes/No/Not Applicable)
	Controls and Compliance Rating			
	Legislative Obligation			Details of Further Action Required (Including Current Recommendation Reference, if Applicable)
	Details of Inadequate Controls and/or Non-Compliance			

This is the first audit for EGL26 as such there were no previous audit recommendations that were resolved during the current audit period

B Unresolved at end of current audit period

Details of Inadequate Controls and/or Non-Compliance

This is the first audit for EGL26 as such there were no previous audit recommendations that were unresolved at the end of the current audit period

2.2 Performance Audit Recommendations and Action Plans

Recommendations made within the report are detailed below and will be reviewed and included in the post audit implementation plan by the licensee to ensure compliance with requirements.

Table 7 Recommendations to address current non-compliances and control deficiencies

A Resolved during the current audit period

Recommendation Reference (no./year)	Licence Obligation Reference Number	Auditors' Recommendation	Date Resolved & Action Taken by the Licensee	Auditors Comments
	Controls and Compliance Rating			
	Legislative Obligation			
	Details of Inadequate Controls and/or Non-Compliance			

There were no audit recommendations that were resolved during the current audit period

B Unresolved during the current audit period

Recommendation Reference (no./year)	Licence Obligation Reference Number	Auditors' Recommendation	Auditors Comments
	Controls and Compliance Rating		
	Legislative Obligation		
	Details of Inadequate Controls and/or Non-Compliance		
1/2020	<ul style="list-style-type: none"> 105 B 3 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. Standing Data Charges were paid outside the required payment terms on 2 occasions during the audit period. 	APA corporate systems have been implemented, however, further actions could be considered to embed operational controls at a site level for the payment of licence fees i.e. Include item as a standing agenda for June and July APA/SGRE -Operation & Maintenance Meeting (Refer Item no 5 Commercial & Compliance) to ensure compliance is achieved.	Refer Post Audit Action Plan
2/2020	<ul style="list-style-type: none"> 124 B 2 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 Late submission of Annual Compliance Report 2017-2018 reporting year. Failure to submit standing data by due date. 	APA corporate systems have been implemented in response and compliance since was noted. However, further actions at a site level could be considered to embed operational controls for the submission of compliance reporting requirements i.e. Include item as a standing agenda for July and September APA/SGRE - Operation & Maintenance Meeting (Refer Item no 5 Commercial & Compliance) to ensure compliance is achieved. The development of strategically timed internal audits to verify compliance could also be considered. i.e. July to ensure licence payments, reporting is in progress, etc	Refer Audit Action Plan

3. ASSET MANAGEMENT SYSTEM EFFECTIVENESS REVIEW

3.1 AMS Review Scope

The scope of the AMS review included an assessment of adequacy and effectiveness of the Wind Portfolio's Asset Management System by evaluating during the audit period 23 June 2017 to 30 June 2020 the following;

1. Asset Planning
2. Asset creation/acquisition
3. Asset disposal
4. Environmental analysis
5. Asset operations
6. Asset maintenance
7. Asset management information system
8. Risk management
9. Contingency planning
10. Financial planning
11. Capital expenditure planning
12. Review of asset management system

The review was established as a requirement of the current Generation Licence issued by the Economic Regulation Authority to Wind Portfolio Pty Ltd.

The asset management review followed the ERA approved audit plan and used;

- a risk based approach to auditing using the risk evaluation model set out in ISO31000:2018
- an overall effectiveness rating for an asset management process, based on a combination of the process and policy adequacy rating and the performance rating,
- the format and content of the reviewer's report; and post- review plan as described in the Guidelines.
- the Asset Management System Review has been carried out as a 'reasonable assurance engagement'.

Table 8 List of Personnel who Participated in Audit & Review

Item	Name	Company	Title
1	Stuart Dodds	APA Group	Asset Manager Renewables and Transmission
2	Naomi Donohue	APA Group	Risk & Compliance Manager
3	Aidan Kenny	APA Group	Senior Asset Management Specialist
4	Luisa Thorburn	APA Group	Commercial Specialist

Item	Name	Company	Title
5	Paul McLagan	Powerplan Engineers	Operations Manager
6	Matt Checksfield	Powerplan Engineers	Senior Engineer
7	Darryl Fraser	Siemens Gamesa Renewable Energy	Site Manager
8	Thomas Ray	UGL	Site Manager
9	Nicole Davies	GES	Lead Auditor
10	Simon Ashby	Power & Energy	Auditor/Technical Specialist

The review was conducted in conjunction with the Performance Audit during July – October 2020 and included desktop review and two day's audit on site to execute review plan, interview sessions and report writing. In total the review required 60 hours of Simon Ashby's time.

3.2 Objective of the Asset Management System Review

The objective of the review was to examine the effectiveness of the processes used by the APA to deliver asset management, the information systems supporting asset management activities and the data and knowledge used to make decisions about asset management. These elements were examined from a life cycle perspective i.e. planning, construction, operation, maintenance, renewal, replacement and disposal using the guidelines developed by the Economic Regulation Authority.

3.3 Methodology for Asset Management System Review

The audit methodology detailed in the Audit and Review Guidelines – Electricity and Gas Licences (March 2019) was used in the execution of the Asset Management System Review and was further detailed in the Audit Plan.

3.4 Asset Management System Effectiveness Rating

The Audit and Review Guidelines – Electricity and Gas Licences (March 2019) (section 5.1.6.2) states that the asset management review report must provide a table that summarises the auditor's assessment of both the process and policy definition rating and the performance rating for each key process in the licensee's asset management system using the scales described in Table 9 and Table 10. It is left to the judgement of the auditor to determine the most appropriate rating for each asset management process.

Table 10 Asset Management Process and Policy Definition Adequacy Ratings

Rating	Description	Criteria
A	Adequately defined	<ul style="list-style-type: none"> Processes and policies are documented. Processes and policies adequately document the required performance of the assets. Processes and policies are subject to regular reviews and updated where necessary. The asset management information system(s) are adequate in relation to the assets being managed.
B	Requires some improvement	<ul style="list-style-type: none"> Processes and policies require improvement. Processes and policies do not adequately document the required performance of the assets. Reviews of processes and policies are not conducted regularly enough. The asset management information system(s) requires minor improvements (taking into consideration the assets being managed).
C	Requires substantial improvement	<ul style="list-style-type: none"> Processes and policies require improvement. Processes and policies do not adequately document the required performance of the assets. Reviews of processes and policies are not conducted regularly enough. The asset management information system(s) requires minor improvements (taking into consideration the assets being managed)
D	Inadequate	<ul style="list-style-type: none"> Processes and policies are not documented. The asset management information system(s) is not fit for purpose (taking into consideration the assets being managed).

Table 11 Asset Management Performance Ratings

Rating	Description	Criteria
1	Performing effectively	<ul style="list-style-type: none"> The performance of the process meets or exceeds the required levels of performance. Process effectiveness is regularly assessed and corrective action taken where necessary.
2	Improvement required	<ul style="list-style-type: none"> The performance of the process requires some improvement to meet the required level. Process effectiveness reviews are not performed regularly enough. Recommended process improvements are not implemented
3	Corrective action required	<ul style="list-style-type: none"> The performance of the process requires substantial improvement to meet the required level. Process effectiveness reviews are performed irregularly or not at all. Recommended process improvements are not implemented
4	Serious action required	<ul style="list-style-type: none"> Process is not performed or the performance is so poor the process is considered to be ineffective.

3.5 Follow-Up from Previous Review Findings

This was the first Review and as such no recommendations of the previous review were applicable.

Table 12 Ineffective components recommendations, previous Review Implementation Plan

A Resolved during current review period				
Recommendation Reference (no./year)	Rating	Auditors' Recommendation	Date Resolved	Further Action Required (Yes/No/Not Applicable)
	Asset Management Process and Effectiveness Criterion			
	Details of Deficiency Details of Inadequate Controls and/or Non-Compliance			Details of Further Action Required (Including Current Recommendation Reference, if Applicable)
This is the first review for EGL26 as such there were no previous review recommendations that were unresolved at the end of the current audit period				
B Unresolved at end of current review period				
This is the first review for EGL26 as such there were no previous review recommendations that were unresolved at the end of the current audit period				

3.6 Asset Management System Recommendations and Action Plans

As stipulated in section 5.3 of the Audit and Review Guidelines – Electricity and Gas Licences (March 2019), the Audit Team noted that the Asset Management Review Post Implementation Plan does not form part of the Audit Opinion. There were no recommendations made from the current review that required post implementation plans.

3.7 Review Asset System Deficiencies/Recommendations

Table 13 Recommendations to address Current Asset System Deficiencies

A Resolved during current review period				
Recommendation Reference (no./year)	Rating	Action Taken by Licensee	Date Resolved	Auditor's Comments
	Asset Management Process and Effectiveness Criterion			
	Details of Deficiency Details of Inadequate Controls and/or Non-Compliance			
There were no recommendations from the current review that were resolved during the current review period.				
B Unresolved during current review period				
There were no recommendations from the current review that were unresolved during the current review period.				

APPENDIX 1

WIND PORTFLIO PTY LTD

PERFORMANCE AUDIT

OCTOBER 2020

Table 14 Performance Audit

12. Electricity Industry Act – Licence conditions and obligations			
No.	AUDIT REPORT EVIDENCE/ /VERIFICATION/FINDING/ACTION		
102 Type [NR]	OBLIGATION: <i>Generation Licence, condition 5.1.1 / Electricity Industry Act, section 14(1)(a)</i> A licensee must provide for an asset management system.	Controls Rating:	Compliance Rating:
		A	1
	Finding – The licensee has provided for and has developed and implemented an Asset Management System for BWF and BSF, as described in the BRF AMS Manual. The AMS Manual clearly defined the aspects of Asset Management as they related to the Licensee and the Contractors of both the BSF and the BWF (i.e UGL and SGRE respectively). The Licensee ensured compliance with regards to the AMS elements which were within their defined responsibility through the EDRF & BRF: Wind & Solar Farms - Compliance Manual. Each contractor subsequently developed the required operational and maintenance documentation to ensure adherence to the BRF AMS Manual. The AMS consisted of various Licensee and Contractor documentation and was comprehensive and incorporated the AMP.		
	Documents/Evidence – 1, 2 Observations: <ul style="list-style-type: none"> BRF AMS Manual defined UGL and SGRE as the contractors responsibilities as Asset Operation, Asset Maintenance, Asset Information System, Risk Management associated with asset operation and maintenance, contingency planning associated with operation and maintenance BRF AMS Manual defined APA Groups responsibilities as Asset Planning, Asset Creation an Acquisition, Asset Disposal, Environmental Analysis, Risk Management and Contingency Planning associated with the conducted business other than risk associated operational and maintenance, Financial Planning, Capital Expenditure Planning, Review of AMS. 330-MAN-CMP-8000 EDRF & BRF: Wind & Solar Farms - Compliance Manual – defined the business compliance and the Contractor Contract Documentation defined the compliance requirements. Contractors were interviewed during the site audit and their processes in regards to asset operation, maintenance, risk management and contingency management were verified. 		
103 Type	OBLIGATION: <i>Generation Licence, condition 5.1.2 and 5.1.3 / Electricity Industry Act, section 14(1)(b)</i> A licensee must notify details of the asset management system and any substantial changes to it to the ERA.	Recommendation: <ul style="list-style-type: none"> Nil 	
		Action: <ul style="list-style-type: none"> Nil 	
103 Type	OBLIGATION: <i>Generation Licence, condition 5.1.2 and 5.1.3 / Electricity Industry Act, section 14(1)(b)</i> A licensee must notify details of the asset management system and any substantial changes to it to the ERA.	Controls Rating:	Compliance Rating:
		A	1

[2]	<p>Finding – The Licensee has a Generation Licence for the BWF and BSF and was required to notify ERA of any substantial changes to the AMS within 10 business days. Practical completion for BWF was 1st April 2019 and for BSF practical completion was 2nd September 2019. The licensee notified the ERA of the change to AMS to incorporate the solar farm on the 10/9/2019 and received acknowledgment of compliance with clause 5.1.3 of EGL26.</p> <p>Evidence –</p> <ul style="list-style-type: none"> Email from APA Group to ERA 10/9/2019 detailing the change in AMS as required by Clause 5.1.3 of EGL26 Email from ERA to APA Group on 10/9/2019 acknowledging the revised AMS and compliance with 10 business days stipulated in clause 5.1.3 of the licence. <p>Observations:</p> <ul style="list-style-type: none"> Compliance processes were managed by APA Group. <p>Recommendation:</p> <ul style="list-style-type: none"> Nil 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	
105 Type [2]	<p>OBLIGATION: <i>Generation Licence, condition 4.2.1/ Economic Regulation Authority (Licensing Funding) Regulations 2014</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.</p> <p>Finding – During the audit period there were 2 instances where the prescribe licence fees in relations to standing data charges were not paid in accordance with required timeframes.</p> <p>A licensee is liable to pay an annual licence charge, for each licence held by the licensee, in connection with the performance of the Authority's licensing functions under the Act under which the licence is held. Clause 6(2)(b) of the <i>Economic Regulation Authority (Licensing Funding) Regulations 2014</i> prescribes the fee for Generation Licences at \$2406 annually. The annual licence charge was payable to the Authority within one month after the day on which the licence was granted; and within one month after each anniversary of that day. The licence commencement date for EGL26 was 23 June 2017. As such, the annual licence charge for EGL26 was required to be paid by the 22nd July annually. It was expected 3 annual licence charge payments would have fallen within the audit period and all were paid in compliance of requirements.</p> <p>Documents/Evidence – 9, 10</p> <p>Observations:</p> <ul style="list-style-type: none"> Noted Vigilant has OBL_000508 rated as a negligible risk with no controls required. Review Date set for 22/4/2021 Noted Vigilant has OBL_000514 rated as a negligible risk with no controls required (CPL Status not active) Review Date set for 22/4/2021 APA/SGRE -Operation & Maintenance Meeting 18/6/20 noted Commercial & Compliance obligations (Item No.5). 	<p>Controls Rating:</p> <p>B</p>	<p>Compliance Rating:</p> <p>3</p>

- Vigilant – Compliance Schedule – Obligation Ref No. OBL_000508 & OBL_000514 (CPL Status not active)

During the Audit period (23 June 2017 to 30 June 2020) the annual licence charge for EGL26 paid;

LICENCE PERIOD	ERA INVOICE REF	DATE PAID	DUE DATE	COMPLIANT	COMMENTS
On grant of licence (23 June 2017 to 22 June 2018)	ERA101218	19/7/2017	22 nd July 2017	Yes	Cl 6(3)(a) payable to the Authority within one month after the day on which the licence was granted
23 June 2018 to 22 June 2019	ERA101563	18/7/2018	22 nd July 2018	Yes	<u>Note:</u> Invoice Date 18/6/2018. Entry Date to Accounts 10/7/2018. Cheque Date 18/7/2018
23 June 2019 to 22 June 2020	ERA102051	3/07/2018	22 nd July 2019	Yes	<u>Note:</u> Invoice Date 14/6/2019. Entry Date to Accounts 1/7/2019. Cheque Date 3/7/2019
23 June 2020 to 22 June 2021	ERA102526	NA	22 nd July 2020	NA	<u>Note:</u> Outside audit scope. Note payment paid late.

During the Audit period (23 June 2017 to 30 June 2020) the standing data charges for EGL26 were paid;

CHARGE PERIOD	ERA INVOICE REF	DATE PAID	DUE DATE	COMPLIANT	COMMENTS
Quarter commencing 1 July 2018	ERA101837	06/02/2019	18/01/2019	No	Invoice Date: 19/12/2018
Quarter commencing 1 October 2018	ERA101927	17/04/2019	21/4/2019	Yes	Invoice Date: 22/03/2019
Quarter commencing 1 January 2019	ERA102028	19/06/2019	28/6/2019	Yes	Invoice Date: 29/05/2019
Quarter commencing 1 April 2019	ERA102156	23/10/2019	16/10/2019	No	Invoice Date: 16/09/2019
Quarter commencing 1 July 2019	ERA102262	04/12/2019	13/12/2019	Yes	Invoice Date: 13/11/2019
Quarter commencing 1 October 2019	ERA102386	11/03/2020	19/3/20	Yes	Invoice Date: 18/02/2020
Quarter commencing 1 January 2020	ERA102497	17/06/2020	20/07/20	Yes	Invoice Date: 21/05/2020

- Note Terms Date entered as 21 days for invoices in accounts system.

Recommendation:

Action:

- Refer Post Audit Action Plan

	<ul style="list-style-type: none"> 1/2020 – APA corporate systems have been implemented, however, further actions at a site level could be considered to embed operational controls at a site level for the payment of licence fees i.e. Include item as a standing agenda for June and July APA/SGRE -Operation & Maintenance Meeting (Refer Item no 5 Commercial & Compliance) to ensure compliance is achieved. 		
106 Type [NR]	OBLIGATION: <i>Generation Licence, condition 4.1.1 / Electricity Industry Act, section 31(3)</i> A licensee must take reasonable steps to minimise the extent, or duration, of any interruption, suspension or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause.	Controls Rating:	Compliance Rating:
		A	1
	<p>Finding – The Licensee and its contractors have undertaken risk assessment and the Licensee has taken significant measures to ensure the plant performance both contractually and operationally. Well established accident and emergency procedures have been developed and implemented.</p> <p>Evidence – 1, 3, 7, 8, 9, 68, 73, 74, 82, 106, 113, 115</p> <p>Observations:</p> <ul style="list-style-type: none"> Asset failure risk was spread over 37 wind turbines and 60,000+ PV panels with some shared modes of failure. High availability has been achieved. Faulty plant has been replaced under warranty and in future the risk lies mainly with the operators and performance is incentivised. Apart from a Covid-19 driven supply chain issue reinstatement of equipment has been prompt. APA and both contractors have risk management policies in place and applied. Lack of spare RMU deemed an acceptable risk due to their normal reliability, impact made greater by delays in delivery of replacement due to Covid-19 		
	Recommendation: <ul style="list-style-type: none"> Nil 	Action: <ul style="list-style-type: none"> Nil 	
107 Type [2]	OBLIGATION: <i>Generation Licence, condition 4.1.1 / Electricity Industry Act, section 41(6)</i> A licensee must pay the costs of taking an interest in land or an easement over land.	Controls Rating:	Compliance Rating:
		A	1
	<p>Finding – The BRF was located on six private adjoining farms approximately 200km north of Perth and included the Badgingarra Wind Farm (BWF) and the Badgingarra Solar Farm (BSF). The BRF leased land from the owners of these farms. The lease agreements were private and confidential. The Operations Manager confirmed lease payments have been made and access to lease holders land was readily available during the site visit.</p> <p>Evidence – 5</p>		

	Observations: <ul style="list-style-type: none">Licensee email communication confirming lease payments and showing distribution of turbines on land owners.No leases or lease payments were made available to the auditors as confidential in nature.Budgets sighted with lease provision and confirmed by Licensee.		
	Recommendation: <ul style="list-style-type: none">None	Action: <ul style="list-style-type: none">Nil	
13 Electricity Licences – Licence Conditions and Obligations			
119 Type [2]	OBLIGATION: <i>Generation Licence, condition 4.3.1 / Electricity Industry Act, section 11</i> 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.	Adequacy Rating:	Performance Rating:
		A	1
	Finding – The Wind Portfolio Pty Ltd financial reports have been prepared by third party accountants during the audit period. The Financial Reports contain statement of compliance that the statements have been prepared in accordance with all Australian Accounting Standards and Interpretations.		
	All audits were completed by Deloitte, declarations of independence and compliance with Australian Accounting Standards were verified.		
	Evidence – FY 2017-2018 APT Audit Report		
	Observations: <ul style="list-style-type: none">Annual reports for APA Group		
	Recommendation: <ul style="list-style-type: none">Nil	Action: <ul style="list-style-type: none">Nil	
121 Type [2]	OBLIGATION: <i>Generation Licence, condition 5.3.2 / Electricity Industry Act, section 11</i> A licensee must comply, and require its auditor to comply, with the ERA's standard audit guidelines for a performance audit	Controls Rating:	Compliance Rating:
		A	1
	Finding – Direct instructions from Licensee to Auditor to comply with the Economic Regulation Authority's guidelines.		

	Copies of communications received from the Authority relating to audit requirements sent by Licensee through to Auditor to convey requirements specifically the undertaking of audits in compliance with the Audit & Review Guidelines: Electricity Gas and Water Licences.		
	Documents/Evidence – ERA and Licensee communication		
	Observations:		
	<ul style="list-style-type: none"> Nil 		
	Recommendation:	Action:	
	<ul style="list-style-type: none"> Nil 	<ul style="list-style-type: none"> Nil 	
122 Type [2]	OBLIGATION: Generation Licence, condition 5.1.5 / Electricity Industry Act, section 11	Controls Rating:	Compliance Rating:
	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.	A	1
	Finding – Direct instructions from Licensee to Auditor to comply with the Economic Regulation Authority's guidelines.		
	Copies of communications received from the Authority relating to audit requirements sent by Licensee through to Auditor to convey requirements specifically the undertaking of review in compliance with the Audit & Review Guidelines: Electricity Gas and Water Licences.		
	Documents/Evidence – ERA and Licensee communication		
	Observations:		
	<ul style="list-style-type: none"> Nil 		
	Recommendation:	Action:	
	<ul style="list-style-type: none"> Nil 	<ul style="list-style-type: none"> Nil 	
123 Type	OBLIGATION: Generation Licence, condition 4.4.1 / Electricity Industry Act, section 11	Controls Rating:	Compliance Rating:
	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.	NP	NR

[2]	<p>Finding – Under Licence clause 15.1 the licensee is required to report relevant information to the Authority in the event that it:</p> <ul style="list-style-type: none"> (a) Is under external administration (b) Experiences a change in its corporate financial or technical circumstances upon which this license was granted; and that change may materially affect the licensee's ability to perform its obligations under this license (c) Changes its name, ABN or address. <p>Confirmed that for the period 23 June 2017 to 30 June 2020 no such changes arose.</p> <p>Evidence – 9, 10</p> <p>Observations:</p> <ul style="list-style-type: none"> • Noted VigilantOBL_000515 No Controls Active risk Negligible 	<p>Action:</p> <ul style="list-style-type: none"> • Nil 	
124** Type [2]	<p>OBLIGATION: Generation Licence, condition 4.5.1 / Electricity Industry Act, section 11</p> <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>Controls Rating:</p> <p>B</p>	<p>Compliance Rating:</p> <p>2</p>
	<p>Finding – During the Audit Period the Licensee has provided the Authority with information it required in connection with its functions under the Act. With the exception of the late submission of the Annual Compliance Report for the 2017-2018 reporting year. The Annual Compliance Reports are required to be submitted by the 31st August annually and the 2017-2018 report was submitted on the 13/9/2018. Further the Standing Data was not submitted to the ERA as required in 2018.</p> <p>Evidence – Annual Compliance Reports 2017-2018, 2018-2019, 2019 2020, email communications from ERA</p> <p>Observations:</p> <ul style="list-style-type: none"> • Noted failure to provide standing data and annual compliance report was due to misunderstanding by Licensee of requirements as the site was not operational • Obligation was due 1st October 2018 and following communication from the ERA the data was provide 15th October 2018. 	<p>Action:</p> <ul style="list-style-type: none"> • Refer Post Audit Action Plan 	
	<p>Recommendation:</p> <ul style="list-style-type: none"> • 2/2020 - APA corporate systems have been implemented, however, further actions at a site level could be considered to embed operational controls at a site level for the submission of compliance reporting requirements i.e. Include item as a 		

	standing agenda for July and September APA/SGRE -Operation & Maintenance Meeting (Refer Item no 5 Commercial & Compliance) to ensure compliance is achieved.		
125 Type [2]	OBLIGATION: Generation Licence, condition 3.8.1 and 3.8.2 / Electricity Industry Act, section 11 A licensee must publish any information as directed by the ERA to publish, within the timeframes specified.	Controls Rating:	Compliance Rating:
		NP	NR
	Finding – The ERA have not directed the Licensee to publish any information within the audit period.		
	Evidence – Review of ERA website and confirmation during interview with Operations Manager		
	Observations: <ul style="list-style-type: none">• Nil		
	Recommendation: <ul style="list-style-type: none">• Nil	Action: <ul style="list-style-type: none">• Nil	
126 Type [2]	OBLIGATION: Generation Licence, condition 3.7.1 / Electricity Industry Act, section 11 <i>All notices must be in writing, unless otherwise specified.</i>	Controls Rating:	Compliance Rating:
		A	1
	Finding – During the audit period the Licensee maintained records of communication with the Authority, primarily via mail or email communication. All responses were in writing and specific notices in relation to the Generation Licence were reviewed as part of the audit.		
	Evidence – Communications with ERA, Interview with Risk and Compliance Manager Power		
	Observations: <ul style="list-style-type: none">• Nil		
	Recommendation: <ul style="list-style-type: none">• Nil	Action: <ul style="list-style-type: none">• Nil	
15 Electricity Industry Metering Code – Licence Conditions and Obligations			
324	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 3.3B	Controls Rating:	Compliance Rating:

Type [2]	<p>If a user is aware of bi-directional electricity flows at a metering point that was not previously subject to a bi-directional flows or any changes in a customer's or user's circumstances in a metering point that will result in bi-directional flows, the user must notify the network operator within 2 business days.</p> <p>Finding – There has been no change with respect to bi-directional flows during the audit period. The Licensee continues to import power from Synergy as required. Normal operating conditions requires this only occurs when the plant is not generating sufficient electricity for site consumption.</p> <p>Evidence – Interview with Operations Manager</p> <p>Observations:</p> <ul style="list-style-type: none"> Nil <p>Recommendation:</p> <ul style="list-style-type: none"> Nil 	NP	NR
339 Type [NR]	<p>OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 3.11(3)</p> <p>A Code participant who becomes aware of an outage or malfunction of a metering installation must advise the network operator as soon as practicable.</p> <p>Finding – WPN has primary responsibility for the management and monitoring of meters. There were no outages or malfunctions identified during the audit period. Operations management monitor usage through production calculations and can generally identify an error.</p> <p>Evidence – Interview with Operations Manager</p> <p>Observations:</p> <ul style="list-style-type: none"> Nil <p>Recommendation:</p> <ul style="list-style-type: none"> Nil 	<p>Controls Rating:</p> <p>A</p>	<p>Compliance Rating:</p> <p>NR</p>
371 Type	<p>OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 4.4(1)</p> <p>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.</p>	<p>Controls Rating:</p> <p>NP</p>	<p>Compliance Rating:</p> <p>NR</p>

[NR]	<p>Finding – There have been no discrepancies between energy data held in metering installation and in the metering database. As such compliance with this requirement cannot be made. Discussions with the Operations Manager.</p> <p>Evidence – Interview with Operations Manager</p> <p>Observations:</p> <ul style="list-style-type: none"> • Nil 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> • Nil 	<p>Action:</p> <ul style="list-style-type: none"> • Nil 	
372 Type [NR]	<p>OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 4.5(1) A Code participant must not knowingly permit the registry to be materially inaccurate.</p> <p>Finding – Wind Portfolio did not maintain any standing data or energy data in relation to the metering installations captured under the Metering Code. These activities were managed by the Network Operator and are outside the control of the Licensee. As the Network operator maintained sole responsibility for the management of standing data within the registry and/or metering database these obligations were not relevant to the Licensee's operations for the period 23 June 2017 to 30 June 2020.</p> <p>Evidence – Interview with Operations Manager</p> <p>Observations:</p> <ul style="list-style-type: none"> • Nil 	<p>Controls Rating:</p> <p>NP</p>	<p>Compliance Rating:</p> <p>NR</p>
373 Type [NR]	<p>OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 4.5(2) Subject to subclause 5.19(6), if a Code participant, other than a network operator, becomes aware of a change to, or inaccuracy in, an item of standing data in the registry, then it must notify the network operator and provide details of the change or inaccuracy within the timeframes prescribed.</p> <p>As per finding against obligation 372</p>	<p>Controls Rating:</p> <p>NP</p>	<p>Compliance Rating:</p> <p>NR</p>

	Recommendation: <ul style="list-style-type: none"> Nil 	Action: <ul style="list-style-type: none"> Nil 	
388 Type [2]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 5.4(2) A user must, when reasonably requested by a network operator, assist the network operator to comply with the network operator's obligation under subclause 5.4(1).	Controls Rating:	Compliance Rating:
		NP	NR
	Finding – The network operator has not requested the assistance of Wind Portfolio with respect to their metering installation during the audit period. Note: The Licensee has no meters and Western Power owns the meters at BRF Terminal substation and was responsible for their quality control. Evidence – Interview with Operations Manager Observations: <ul style="list-style-type: none"> Nil 		
	Recommendation: <ul style="list-style-type: none"> Nil 	Action: <ul style="list-style-type: none"> Nil 	
402 Type [2]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 5.17(1) A user must provide standing data and validated, and where necessary substituted or estimated, energy data to the user's customer to which that information relates where the user is required by an enactment or an agreement to do so for billing purposes or for the purpose of providing metering services to the customer.	Controls Rating:	Compliance Rating:
		NP	NR
	Finding – There are no meters maintained by the Licensee to collect information or data from billing. The Network Operator is responsible for metering installations. Evidence – Interview with Operations Manager Observations: <ul style="list-style-type: none"> Nil 		
	Recommendation: <ul style="list-style-type: none"> Nil 	Action: <ul style="list-style-type: none"> Nil 	

406 Type [NR]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 5.19(1)	Controls Rating:	Compliance Rating:
	A user must, when requested by the network operator acting in accordance with good electricity industry practice, use reasonable endeavours to collect information from customers, if any, that assists the network operator in meeting its obligations described in the Code and elsewhere, and provide that information to the network operator.	NP	NR
	<p>Finding – There have been no requests to any user to collect information during the audit period. Therefore, this obligation has not been rated.</p> <p>Evidence – Interview with Operations Manager</p> <p>Observations: Nil</p>		
	<p>Recommendation:</p> <ul style="list-style-type: none"> Nil 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	
410 Type [NR]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 5.19(6)	Controls Rating:	Compliance Rating:
	The user must use reasonable endeavours to ensure that it does not notify the network operator of a change in an attribute described in subclause 5.19(2) that results from the provision of standing data by the network operator to the user	NP	NR
	<p>Finding – During the audit period there was no provision of standing data by the network operator to the user that resulted in the user notifying the network operator of a change in attributes.</p> <p>Evidence – Interview with Operations Manager, site visit</p> <p>Observations:</p> <ul style="list-style-type: none"> Nil 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> Nil 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	
416 Type [2]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 5.21(5)	Controls Rating:	Compliance Rating:
	A Code participant must not request a test or audit under subclause 5.21(1) unless the Code participant is a user and the test or audit relates to a time or times at which the user was the current user or the Code participant is the IMO.	NP	NR
	<p>Finding – No tests were requested during the audit period 23 June 2017 to 30 June 2020</p>		

	<p>Evidence – Interview with Operations Manager, site visit</p> <p>Observations:</p> <ul style="list-style-type: none"> Nil <p>Recommendation:</p> <ul style="list-style-type: none"> Nil 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	
417 Type [2]	<p>OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 5.21(6)</p> <p>A Code participant must not make a request under subclause 5.21(1) that is inconsistent with any access arrangement or agreement.</p>	Controls Rating:	Compliance Rating:
		NP	NR
	As per finding against obligation 416		
	<p>Recommendation:</p> <ul style="list-style-type: none"> Nil 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	
435 Type [2]	<p>OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 5.27</p> <p>Upon request from a network operator, the current user for a connection point must provide the network operator with customer attribute information that it reasonably believes are missing or incorrect within the timeframes prescribed.</p>	Controls Rating:	Compliance Rating:
		NP	NR
	<p>Finding – The network operator did not make any requests for customer attributes information during the audit period.</p> <p>Evidence – Interview with Operations Manager, site visit</p> <p>Observations:</p> <ul style="list-style-type: none"> Nil 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> Nil 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	
448 Type	<p>OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 6.1(2)</p> <p>A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed.</p>	Controls Rating:	Compliance Rating:
		A	1

[2]	<p>Finding – The Licensee had an ETAC and communication regarding compliance was reviewed. Generator Compliance Monitoring Program developed to identify applicable Technical Rules and other requirements agreed with Western Power. There were no breaches of the rules, procedures, agreements and criteria during the audit period.</p> <p>Evidence – 4, 117, 163</p> <p>Observations:</p> <ul style="list-style-type: none"> Some exemptions of technical rules sighted Performance against Compliance Monitoring Program monitored through the monthly BRF O&M Reports <p>Recommendation:</p> <ul style="list-style-type: none"> Nil 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	
451 Type [NR]	<p>OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 7.2(1)</p> <p>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.</p> <p>Finding – The BRF site had well established communication processes such as a main telephone line & facsimile, mobile telephone coverage, remote system monitoring, and wireless internet access. During the audit period there were no communication issues arising.</p> <p>Evidence – Interview with Operations Manager, site visit</p> <p>Observations:</p> <ul style="list-style-type: none"> Internet was available although speeds were not optimal. <p>Recommendation:</p> <ul style="list-style-type: none"> Nil 	<p>Controls Rating:</p> <p>A</p>	<p>Compliance Rating:</p> <p>1</p>
453 Type [2]	<p>OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 7.2(4)</p> <p>If requested by a network operator with whom it has entered into an access contract, the Code participant must notify its contact details to a network operator within 3 business days after the request.</p> <p>Finding – During the period 23 June 2017 to 30 June 2020 the network operator did not request the licensee to provide its contact details. There were no changes made to Licensee's contact details.</p>	<p>Controls Rating:</p> <p>NP</p>	<p>Compliance Rating:</p> <p>NR</p>

	<p>Evidence – Nil</p> <p>Observations:</p> <ul style="list-style-type: none"> Nil 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> Nil 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	
454 Type [2]	<p>OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 7.2(5)</p> <p>A Code participant must notify any affected network operator of any change to the contact details it notified to the network operator under subclause 7.2(4) at least 3 business days before the change takes effect.</p>	<p>Controls Rating:</p> <p>NP</p>	<p>Compliance Rating:</p> <p>NR</p>
	<p>Finding – There were no changes in contact details for the Licensee during the audit period.</p> <p>Evidence – Nil</p> <p>Observations:</p> <ul style="list-style-type: none"> Nil 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> Nil 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	
455 Type [2]	<p>OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 7.5</p> <p>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</p>	<p>Controls Rating:</p> <p>NP</p>	<p>Compliance Rating:</p> <p>NR</p>
	<p>Finding – During the period 23 June 2017 to 30 June 2020 the Licensee was not required to disclose or permit the disclosure of confidential information in connection to the Code.</p> <p>Evidence – Nil</p> <p>Observations:</p>		

	<ul style="list-style-type: none"> Nil 		
	Recommendation: <ul style="list-style-type: none"> Nil 	Action: <ul style="list-style-type: none"> Nil 	
456 Type [2]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 7.6(1) A Code participant must disclose or permit the disclosure of confidential information that is required to be disclosed by the Code.	Controls Rating: NP	Compliance Rating: NR
	As per finding against obligation 455		
	Recommendation: <ul style="list-style-type: none"> Nil 	Action: <ul style="list-style-type: none"> Nil 	
457 Type [NR]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 8.1(1) 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.	Controls Rating: NP	Compliance Rating: NR
	Finding – There were no disputes arising during the audit period. Evidence – Nil Observations: <ul style="list-style-type: none"> Nil 		
	Recommendation: <ul style="list-style-type: none"> Nil 	Action: <ul style="list-style-type: none"> Nil 	
458 Type [NR]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 8.1(2) 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.	Controls Rating: NP	Compliance Rating: NR

	As per finding against obligation 457		
	Recommendation: <ul style="list-style-type: none"> Nil 	Action: <ul style="list-style-type: none"> Nil 	
459 Type [NR]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 8.1(3) 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.	Controls Rating:	Compliance Rating:
		NP	NR
	As per finding against obligation 457		
	Recommendation: <ul style="list-style-type: none"> Nil 	Action: <ul style="list-style-type: none"> Nil 	
460 Type [NR]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 8.1(4) 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.	Controls Rating:	Compliance Rating:
		NP	NR
	As per finding against obligation 457		
	Recommendation: <ul style="list-style-type: none"> Nil 	Action: <ul style="list-style-type: none"> Nil 	
461 Type [NR]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 8.3(2) The disputing parties must at all times conduct themselves in a manner which is directed towards achieving the objective in subclause 8.3(1).	Controls Rating:	Compliance Rating:
		NP	NR
	As per finding against obligation 457		
	Recommendation: <ul style="list-style-type: none"> Nil 	Action: <ul style="list-style-type: none"> Nil 	

Note:

* indicates obligation was reclassified during the audit period from NR to Type 2 (Refer Amendment Record - Electricity Compliance Reporting Manual – June 2020). Prior to this period the rating was NR.

** indicates identified as non-compliant in previous audit

*** indicates identified as non-compliant in previous audit, included in post audit action plan and non-compliance during current audit period

NP - not possible to provide a controls rating because no activity has taken place to exercise the obligation during the audit period

NR - Not applicable to audit period and as such compliance was not assessed

APPENDIX 2

WIND PORTFOLIO PTY LTD

ASSET MANAGEMENT REVIEW

OCTOBER 2020

Table 15 Audit Review Ratings and Recommendations

Note: Process & Policy Rating* (reads abbreviated as P&P* Rating)

1. ASSET PLANNING		PROCESS & POLICY RATING*	PERFORMANCE RATING
<p> <input type="checkbox"/> Assess the adequacy of the asset planning process <input type="checkbox"/> Assess the adequacy of the asset management plan <input type="checkbox"/> Assess whether the asset management plan is up-to-date and implemented in practice <input type="checkbox"/> Assess whether the asset management plan clearly assigns responsibilities and whether these have been applied in practice </p> <p>Key Process – Asset planning strategies focuses on meeting customer needs in the most effective and efficient manner (delivering the right service at the right price).</p> <p>Outcome – Asset planning is integrated into operational or business plans, providing a framework for existing and new assets to be effectively utilised and their service optimised.</p>		A	1
No.	2020 AUDIT REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION	P&P* Rating:	Performance Rating:
1.1	<p>OBLIGATION: Asset management plan covers the processes in this table</p> <p>Findings – The Asset Management System (AMS) manual incorporates the Asset Management Plan (AMP) with associated documentation by SGRE and UGL. The AMP was comprehensive and addresses the Audit Guideline requirements. This document was revised to incorporate the solar farm when it came on-line.</p> <p>Documents/Evidence – 1, 6</p> <p>Observations:</p> <ul style="list-style-type: none"> AMS manual comprehensive covering all requirements in the Audit Guidelines Clear definition of responsibilities in AMS Contractors are obligated to operate and maintain and as such elements of AMP not applicable but the AMS defines the roles. <p>Recommendation:</p> <ul style="list-style-type: none"> None 	A	1
1.2	<p>OBLIGATION: Planning processes and objectives reflect the needs of all stakeholders and are integrated with business planning</p>	A	1

	<p>Findings – Asset Planning was incorporated into operational and business planning processes. The power station is now in operational mode with the emphasis on long term, sufficient, reliable generation which to date has been generally achieved by the Renewable Facility. However, the inverter OEM RMU issues have resulted in the solar farm underperforming to date and have been further exacerbated by Covid-19 disruption (i.e. shipping delays).</p> <p>Documents/Evidence – 1, 2, 6, 11, 12, 84,</p> <p>Observations:</p> <ul style="list-style-type: none"> Stakeholders including ERA, AEMO, WPC, landowners, power purchaser and sub-contractors are all included. 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> None 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	
1.3	<p>OBLIGATION: Service levels are defined in the Asset Management Plan</p> <p>Findings – Service levels were defined in the AMP and contractor/operator contracts and reported on.</p> <p>Documents/Evidence – 1, 2, 4, 5, 6, 10, 28, 30, 35, 45, 46, 47, 81, 83, 114, 116, 119, 121</p> <p>Observations:</p> <ul style="list-style-type: none"> Service levels are well defined in the contracts and reported on in monthly reports 	<p>P&P* Rating: A</p>	<p>Performance Rating: 1</p>
	<p>Recommendation:</p> <ul style="list-style-type: none"> None 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	
1.4	<p>OBLIGATION: Non-asset options (e.g. demand management) are considered</p> <p>Findings – NR</p> <p>Documents/Evidence – 1</p> <p>Observations:</p> <ul style="list-style-type: none"> APA are a generator and aim to sell all energy generated. They are only curtailed by third parties and reliability. 	<p>P&P* Rating: NR</p>	<p>Performance Rating: NR</p>

	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
1.5	OBLIGATION: Lifecycle costs of owning and operating assets are assessed	P&P* Rating: A	Performance Rating: 1
	Findings – Life cycle costs were included in their planning and their sub-contractor operators. Documents/Evidence – 1, 11, 12, 58, 59, 60, 61 Observations: <ul style="list-style-type: none"> Operators carry the maintenance and operating costs and are incentivised for energy sent out. Maintenance contracts ensure equipment is kept in good operating condition and long term contracts are in place for the wind farm. 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
1.6	OBLIGATION: Funding options are evaluated	P&P* Rating: A	Performance Rating: 1
	Findings – The AMP details the process it in principal. Funding is through APA's overall portfolio of which BRF is only a minor portion. BRF funding applications have to be approved by the parent company. Central funding is regularly reviewed. Documents/Evidence – 1, 64 Observations: <ul style="list-style-type: none"> Details are commercial in confidence. 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	

1.7	OBLIGATION: Costs are justified and cost drivers identified	P&P* Rating: A	Performance Rating: 1
	<p>Findings – Costs were justified with long term sales and operator contracts.</p> <p>Documents/Evidence – 1, 11, 12</p> <p>Observations:</p> <ul style="list-style-type: none"> Initial capital costs were high but operating costs low. The plant is new and contracts structured with the risk being with the operators. Contract performance incentives were established. 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> None 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	
1.8	OBLIGATION: Likelihood and consequences of asset failure are predicted	P&P* Rating: A	Performance Rating: 1
	<p>Findings – Asset failure risks were covered by the operator contracts and there were no penalties for failing to supply power. Risk of failure of balance of plant liable to APA has been considered. Risk registers were maintained at overall and project level and contingency plans were considered in planning.</p> <p>Documents/Evidence – 1, 3, 6, 28</p> <p>Observations:</p> <ul style="list-style-type: none"> Asset failure risk is spread over 37 wind turbines and 60,000+ PV panels with some shared modes of failure. High availability has been achieved. Faulty plant has been replaced under warranty and in future the risk lies mainly with the operators. Apart from a Covid-19 driven supply chain issue reinstatement of equipment has been prompt. 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> None 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	

1.9	OBLIGATION: Asset management plan is regularly reviewed and updated	P&P* Rating: A	Performance Rating: 1
	<p>Findings – The AMS was revised during the reporting period to incorporate the solar farm. Regular reviews of the AMP were planned.</p> <p>Documents/Evidence – 1</p> <p>Observations:</p> <ul style="list-style-type: none"> • BRF has not been operating for long enough but a review of the AMP is programmed. 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> • None 	<p>Action:</p> <ul style="list-style-type: none"> • Nil 	

2. ASSET CREATION AND ACQUISITION		PROCESS & POLICY RATING*	PERFORMANCE RATING
<input type="checkbox"/> Assess the adequacy of policies and procedures covering the creation and acquisition of assets <input type="checkbox"/> Select a sample of asset creations/ acquisitions over the review period and confirm adequate procedures have been followed and actual costs are as predicted Key Process – Asset creation/acquisition is the provision or improvement of assets. Outcome – The asset acquisition framework is economic, efficient and cost-effective; it reduces demand for new assets, lowers service costs and improves service delivery.		A	1
No.	2020 AUDIT REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION		
2.1	OBLIGATION: Full project evaluations are undertaken for new assets, including comparative assessment of non-asset options Findings – The Solar Farm was built and commissioned during the audit period. Full project evaluations were completed for CAPEX projects. Documents/Evidence – 1, 6 Observations: <ul style="list-style-type: none"> BRF Year Plan detailed individually CAPEX and OPEX for the BSF and the BWF. APA had established thorough evaluation processes. 	P&P* Rating: A	Performance Rating: 1
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
2.2	OBLIGATION: Evaluations include all life-cycle costs Findings – The Solar Farm was built and commissioned during the audit period. A detailed life-cycle cost model was maintained and used as part of the asset acquisition process and the maintenance management process. Documents/Evidence – 1, 11, 12 Observations: <ul style="list-style-type: none"> AMS Manual detailed life-cycle evaluations and consideration of stakeholders. The design life of the BWF was 25 years and the site is expected to operate for this period giving a nominal end of life date of 2044. The design life of the BSF is 25 years and the site is expected to operate for this period giving a nominal end of life date of 2044. 	P&P* Rating: A	Performance Rating: 1

	Recommendation: <ul style="list-style-type: none">None	Action: <ul style="list-style-type: none">Nil	
2.3	OBLIGATION: Projects reflect sound engineering and business decisions	P&P* Rating: A	Performance Rating: 1
	Findings – O&M contracts for wind farm and solar farm were performance based transferring risk to sub-contractors who are were also the suppliers and installers.		
	Documents/Evidence – 1, 11, 12		
	Observations: <ul style="list-style-type: none">APA have good engineering experience and procedures and BRF utilizes reputable quality equipment and uses the operators associated with the suppliers.Contractors have proven performance and are incentivised through performance.		
	Recommendation: <ul style="list-style-type: none">None	Action: <ul style="list-style-type: none">Nil	
2.4	OBLIGATION: Commissioning tests are documented and completed	P&P* Rating: A	Performance Rating: 1
	Findings – Windfarm commissioning was fully documented on site.		
	Documents/Evidence – 1, 11, 12, 120		
	Observations: <ul style="list-style-type: none">Siemens achieved practical completion of the EPC scope for BWF on April 1st 2019Practical completion of the EPC scope for BSF on September 2019Commissioning of the BRF appeared to be thorough prior to taking it over		
	Recommendation: <ul style="list-style-type: none">None	Action: <ul style="list-style-type: none">Nil	

2.5	OBLIGATION: Ongoing legal / environmental / safety obligations of the asset owner are assigned and understood	P&P* Rating: A	Performance Rating: 1
	<p>Findings – Compliance manual covers all obligations and these were reflected in procedures and reporting. The Licensee was aware of legal/environmental and safety obligations and proactively managed compliance tasks.</p> <p>Documents/Evidence – 1, 2, 4, 11, 12, 28, 30, 35, 45, 46, 47</p> <p>Observations:</p> <ul style="list-style-type: none"> Some minor late payments during the audit period, additional controls were implemented to avoid recurrence. Addressed as part of the Performance Audit. 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> None 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	

3. ASSET DISPOSAL		PROCESS & POLICY RATING*	PERFORMANCE RATING
<input type="checkbox"/> Assess the adequacy of policies and procedures covering the identification of under-performing assets, disposal of assets and replacement strategy <input type="checkbox"/> Determine whether a regular review of the performance of assets is undertaken <input type="checkbox"/> Select a sample of disposals over the review period and confirm adequate procedures have been followed Key Process – Asset disposal is the consideration of alternatives for the disposal of surplus, obsolete, under-performing or unserviceable assets. Outcome – The asset management framework minimises holdings of surplus and underperforming assets and lowers service costs. The cost-benefits of disposal options are evaluated.		A	1
No.	2020 AUDIT REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION		
3.1	OBLIGATION: Under-utilised and under-performing assets are identified as part of a regular systematic review process Findings – Systematic review of assets was documented process. Underperforming equipment was replaced under warranty. Documents/Evidence – 1, 28, 30, 75, 76, 102 Observations: <ul style="list-style-type: none"> Routine and forced maintenance for most of the equipment was the operator risk. 	P&P* Rating: A	Performance Rating: 1
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
3.2	OBLIGATION: The reasons for under-utilisation or poor performance are critically examined and corrective action or disposal undertaken Findings – Monthly reports document performance and actions. Faulty equipment was replaced. Documents/Evidence – 1, 28, 30, 75, 76, 102 Observations: <ul style="list-style-type: none"> Some delays due to Covid-19 of SF6 ring main unit replacement and global supply shortage due to faults in PV inverters. 	P&P* Rating: A	Performance Rating: 1

	<ul style="list-style-type: none"> Wind turbine contactors were replaced in a progressive manner under warranty 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
3.3	OBLIGATION: Disposal alternatives are evaluated	P&P* Rating: A	Performance Rating: 1
	Findings – AMP considered disposal and allows for site clearing of all above ground works. BRF is at start of operational life. Disposal was not a consideration during the audit period. Consumables were limited, used lubricants were taken off site, failed equipment was collected and taken off site for refurbishment or recycling Documents/Evidence – 1 Observations: <ul style="list-style-type: none"> Start of a long term 30+ years, project. 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
3.4	OBLIGATION: There is a replacement strategy for assets	P&P* Rating: A	Performance Rating: 1
	Findings – BWF & BSF farms were contracted to be kept in top condition and maintain performance levels. Documents/Evidence – 1, 28, 30, 75, 76, 102 Observations: <ul style="list-style-type: none"> Continuous maintenance with replacement and upgraded parts ensures farms kept availability and energy targets. 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	

4. ENVIRONMENTAL ANALYSIS		PROCESS & POLICY RATING*	PERFORMANCE RATING
<input type="checkbox"/> Review achievement of performance and service standards over the review period <input type="checkbox"/> Investigate any statutory or regulatory breaches and assess corrective action taken <input type="checkbox"/> Review the adequacy of reporting and monitoring tools Key Process – Environmental analysis examines the asset management system environment and assesses all external factors affecting the asset management system. Outcome – The asset management system regularly assesses external opportunities and threats and identifies corrective action to maintain performance requirements.		A	2
No.	2020 AUDIT REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION		
4.1	OBLIGATION: Opportunities and threats in the asset management system environment are assessed	P&P* Rating: A	Performance Rating: 1
	Findings – Risk analysis formed part of the annual Year Plan reports. Risk Management Policy and Risks Summary documentation established Documents/Evidence – 1, 3, 7, 11, 12 Observations: <ul style="list-style-type: none"> Long term sales and O&M contracts Good relations with stakeholders Land owners retain use of most of the land Clean renewable generation Good response to equipment failures by both O&M Contractors. Contract transfers a lot of risk to the O&M Contractors. 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	

4.2	OBLIGATION: Performance standards (availability of service, capacity, continuity, emergency response, etc.) are measured and achieved	P&P* Rating: A	Performance Rating: 2
	<p>Findings – Performance standards were monitored and reported in O&M monthly reports. Performance standards were met for the windfarm but equipment failure reduced solar farm output.</p> <p>Documents/Evidence – 1, 2, 4, 10, 11, 12, 28, 30, 35, 46, 47, 49, 50, 51, 53, 81, 83, 114, 116, 118, 119, 120, 121, 142</p> <p>Observations:</p> <ul style="list-style-type: none"> • Temporary exemptions to the Technical Rules expire during the next audit period. • Wind Farm has exceeded contracted availability. • Solar Farm production was 85% target because of faulty RMU taking out 6 of the 7 inverters, replacement delayed due to Covid-19 and shipping • Sales are energy and credit based with no reliability/availability requirement. 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> • None 	<p>Action:</p> <ul style="list-style-type: none"> • Nil 	
4.3	OBLIGATION: Compliance with statutory and regulatory requirements	P&P* Rating: A	Performance Rating: 2
	<p>Findings – Compliance was monitored and reported in the Compliance Monitoring Program. No major issues during audit period apart from late payment to ERA and late compliance report</p> <p>Documents/Evidence – 1, 2, 4, 5, 10, 28, 30, 35, 45, 46, 47, 81, 83, 85, 102, 114, 116, 118, 119, 120, 121, 124, 142</p> <p>Observations:</p> <ul style="list-style-type: none"> • Late submissions to the ERA, but the prompt system has been revised. • Good relations with WPC 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> • None 	<p>Action:</p> <ul style="list-style-type: none"> • Nil 	

4.4	OBLIGATION: Service standard (customer service levels etc.) are measured and achieved.	P&P* Rating: A	Performance Rating: 1
	<p>Findings – SCADA system recorded performance, as does WPC, no major issues. Customer service levels were mainly achieved and documented in the monthly and annual reports.</p> <p>Documents/Evidence – 1, 2, 4, 5, 10, 28, 30, 35, 45, 46, 47, 81, 83, 114, 116, 118, 124, 142</p> <p>Observations:</p> <ul style="list-style-type: none"> The single energy customer has raised no issues. 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> None 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	

5. ASSET OPERATIONS		PROCESS & POLICY RATING*	PERFORMANCE RATING
<input type="checkbox"/> Assess the adequacy of policies and procedures covering operations functions <input type="checkbox"/> Assess the adequacy of staff resourcing and training <input type="checkbox"/> Confirm the policies and procedures have been followed during the review period by examining the asset register, observing operational procedures, analysing costs, etc. <input type="checkbox"/> Assess the significance of exceptions identified and whether adequate corrective action has been taken Key Process – Asset operations is the day-to-day running of assets (where the asset is used for its intended purpose). Outcome – The asset operation plans adequately document the processes and knowledge of staff in the operation of assets so service levels can be consistently achieved.		A	1
No.	2020 AUDIT REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION		
5.1	OBLIGATION: Operational policies and procedures are documented and linked to service levels required	P&P* Rating: A	Performance Rating: 1
	Findings – Policies established by both O&M Contractors meet service levels required. Documents/Evidence – 1, 3, 5, 73, 78, 79, 80, 105, 106, 107, 108, 109, 110, 117 Observations: <ul style="list-style-type: none"> Windfarm achieved better availability than contracted. Solar farm restoration delayed RMU supplier in Europe and Covid-19 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
5.2	OBLIGATION: Risk management is applied to prioritise operations tasks	P&P* Rating: A	Performance Rating: 1
	Findings – Risk management is applied comprehensively Documents/Evidence – 1, 3, 7, 8, 9, 68, 73, 74, 82, 106, 113, 115		

	Observations: <ul style="list-style-type: none"> APA and both contractors had risk management policies in place and applied. Lack of spare RMU deemed an acceptable risk due to their normal reliability, impact made greater by delays in delivery of replacement due to Covid-19 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
5.3	OBLIGATION: Assets are documented in an asset register including asset type, location, material, plans of components, and an assessment of assets' physical/structural condition	P&P* Rating: A	Performance Rating: 1
	Findings – Asset register was mainly financial but detailed breakdown of components and location was also kept. The system was maintained in 'as new' condition through continuous maintenance and upgrades as required in the contracts. Documents/Evidence – 1, 62, 73, 77, 111 Observations: <ul style="list-style-type: none"> The 37 wind turbines were continuously maintained in rotation within a bandwidth and performance and availability monitored and above contract amounts. 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
5.4	OBLIGATION: Accounting data is documented for assets	P&P* Rating: A	Performance Rating: 1
	Findings – Assets were recorded and depreciated in the accounts. Documents/Evidence – 1, 6, 62, 73, 77, 111 Observations: <ul style="list-style-type: none"> Continuous maintenance and performance payments ensures assets were kept in good condition. Accounting depreciation was less than the project's lifetime. 		

5.5			
	Recommendation: <ul style="list-style-type: none"> None 		Action: <ul style="list-style-type: none"> Nil
	OBLIGATION: Operational costs are measured and monitored	P&P* Rating: A	Performance Rating: 1
	Findings – Costs were measured and recorded. Documents/Evidence – 1, 6, 49, 50, 51, 53, 58, 59, 60, 61, 62, 77, 85, 102, 111, 112 Observations: <ul style="list-style-type: none"> Fixed O&M costs were incorporated in the O&M Contracts Unscheduled O&M costs are monitored and reported in monthly and annual reports Initial capital investment costs were high Operational costs are low, mainly for contractors, there being no fuel as such. Small workforce required for operational and maintenance purposes. Most reporting is in performance terms rather than dollars. Financials are reported and budgeted in financial reports. 		
	Recommendation: <ul style="list-style-type: none"> None 		Action: <ul style="list-style-type: none"> Nil

5.6	OBLIGATION: Staff resources are adequate and staff receive training commensurate with their responsibilities	P&P* Rating: A	Performance Rating: 1
	<p>Findings – Staffing were competent and familiar with the plant. Training and resourcing considerations were evident.</p> <p>Documents/Evidence – 1, 73</p> <p>Observations:</p> <ul style="list-style-type: none"> • APA and operations staff were all familiar with other similar sites, in particular the adjacent Emu Downs Renewable Facility. • O&M Contractors were supported by large, experienced organisations and staff have worked on similar renewables elsewhere. • Owner contractor relationships appeared good and collaborative with a common goal; of optimising performance and safety. 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> • None 	<p>Action:</p> <ul style="list-style-type: none"> • Nil 	

6. ASSET MAINTENANCE		PROCESS & POLICY RATING*	PERFORMANCE RATING
<input type="checkbox"/> Assess the adequacy of policies and procedures covering maintenance functions <input type="checkbox"/> Confirm the policies and procedures have been followed during the review period by examining maintenance schedules, analysing costs, etc. <input type="checkbox"/> Assess the significance of exceptions identified and whether adequate corrective action has been taken Key Process – Asset maintenance is the upkeep of assets. Outcome – The asset maintenance plans cover the scheduling and resourcing of the maintenance tasks so work can be done on time and on cost.		A	1
No.	2020 AUDIT REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION		
6.1	OBLIGATION: Maintenance policies and procedures are documented and linked to service levels required	P&P* Rating: A	Performance Rating: 1
	Findings – Maintenance policies were documented and implemented. Monthly reports were comprehensive on performance. Documents/Evidence – 1, 79, 85, 102, 106, 108, 112 Observations: <ul style="list-style-type: none"> Both wind and solar maintenance was appropriate to the life of the plant and based on experience on similar facilities and backed up by global databases and support of reputable OEM suppliers. Maintenance was continuous and aimed at keeping plant as new. 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
6.2	OBLIGATION: Regular inspections are undertaken of asset performance and condition	P&P* Rating: A	Performance Rating: 1
	Findings – Regular inspections were undertaken and performance reported on in monthly reports. Wind farm servicing and inspection was an ongoing process with the intent to keep the system in “as new” condition. Solar farm was manned during working hours and inspected and maintained on an ongoing process. Asset performance was monitored with SCADA and reported upon in monthly reports.		

	Documents/Evidence – 1, 7, 35, 73, 79, 85, 102, 105, 108, 112 Observations: <ul style="list-style-type: none"> Regular on-site inspections and continuous condition and performance monitoring ensures performance. 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
6.3	OBLIGATION: Maintenance plans (emergency, corrective and preventative) are documented and completed on schedule	P&P* Rating: A	Performance Rating: 1
	Findings – Both wind and solar farms were well documented and were completed to schedule. Routine maintenance was on schedule as required in the contracts. Preventative maintenance was often the initiative of the contractor to minimise their exposure to penalties. All maintenance was reported to APA and entered in the SAP database. A full history of each WTG was available and the solar farm records were also available. Documents/Evidence – 1, 6, 30, 35, 73, 75, 76, 79, 105, 108 Observations: <ul style="list-style-type: none"> Wind turbine maintenance was kept on time with additional resources called upon once to keep to schedule. Solar farm maintenance has been impacted by the failure of the RMU and the short time the plant has been in service. 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
6.4	OBLIGATION: Failures are analysed and operational/maintenance plans adjusted where necessary	P&P* Rating: A	Performance Rating: 1
	Findings – Failures were replaced with new improved components when found faulty. Monthly Reports contained detailed history of failures and amendments to operational plans. Documents/Evidence – 1, 30, 35, 73, 75, 76, 105 Observations: <ul style="list-style-type: none"> WTG contactors replaced with vacuum ones. Faulty inverters in the solar farm replaced with new supplied by OEM as part of a global repair. 		

	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
6.5	OBLIGATION: Risk management is applied to prioritise maintenance tasks	P&P* Rating: A	Performance Rating: 1
	Findings – Risk management was applied by all the Licensee and contractors. Documents/Evidence – 1, 3, 6, 7, 8, 9, 68, 74, 113 Observations: <ul style="list-style-type: none"> Maintenance was a continuous process intended as preventive rather than responsive. Maintenance regime based on worldwide experience with similar installations. Additional resources were called upon when required. 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
6.6	OBLIGATION: Maintenance costs are measured and monitored	P&P* Rating: A	Performance Rating: 1
	Findings – Maintenance costs were included in the O&M Contracts apart from some BoP items. Documents/Evidence – 1, 6, 73, 102, 105, 112 Observations: <ul style="list-style-type: none"> Forced and unforced risk was transferred to the contractors with minor risk remaining with the owner. 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	

7. ASSET MANAGEMENT INFORMATION SYSTEM		PROCESS & POLICY RATING*	PERFORMANCE RATING
<p>□ Assess the adequacy of policies and procedures covering the general control and security of the computer systems used to provide management information on compliance with service standards / licence obligations</p> <p>□ Confirm management reports on service standards / licence obligations are reviewed and substantial exceptions to service standards / licence obligations are promptly followed up and implemented</p> <p>Key Process – An asset management information system is a combination of processes, data and software supporting the asset management functions.</p> <p>Outcome – The asset management information system provides authorised, complete and accurate information for the day-to-day running of the asset management system. The focus of the review is the accuracy of performance information used by the licensee to monitor and report on service standards.</p>		A	2
No.	2020 AUDIT REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION		
7.1	OBLIGATION: Adequate system documentation for users and IT operators	P&P* Rating: A	Performance Rating: 2
	<p>Findings – O&M Contractors had detailed well understood IT systems in place as does the Licensee</p> <p>Documents/Evidence – 1, 11, 12, 65, 66, 67, 68, 69, 70, 71</p> <p>Observations:</p> <ul style="list-style-type: none"> Staff appear conversant with systems in place SCADA was automated with little human input. Reporting was well prepared, brief with adequate detail. Noted document numbers 65, 66, 67 and 69 overdue for review date. 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> None 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	

7.2	OBLIGATION: Input controls include suitable verification and validation of data entered into the system	P&P* Rating: A	Performance Rating: 1
	Findings – Data acquisition was automated, cross checked by other parties. Documents/Evidence – 1, 65, 66, 67, 68, 69, 70 Observations: <ul style="list-style-type: none"> Reporting based on outputs from SCADA systems. WPC monitor system performance as well as operators. Check metering was in place 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
7.3	OBLIGATION: Security access controls appear adequate, such as passwords	P&P* Rating: A	Performance Rating: 1
	Findings – Security controls were adequate. Documents/Evidence – 1, 66, 67, 68 Observations: <ul style="list-style-type: none"> APA have limited “view only” access to BWF and BSF systems Firewall and password protections in place. Remote location limits bandwidth available. 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	

7.4	OBLIGATION: Physical security access controls appear adequate	P&P* Rating: A	Performance Rating: 1
	<p>Findings – Access was restricted and locked when unattended.</p> <p>Documents/Evidence – 1, 66, 67</p> <p>Observations:</p> <ul style="list-style-type: none"> • Remoteness reduces people accessing site. • Local landowners keep an eye on things. • WTG kept locked • Site security was in place 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> • None 	<p>Action:</p> <ul style="list-style-type: none"> • Nil 	
7.5	OBLIGATION: Data backup procedures appear adequate and backups are tested	P&P* Rating: A	Performance Rating: 1
	<p>Findings – Back ups were carried out and due to slow internet access initially stored on site until physical collection and storage off site.</p> <p>Documents/Evidence – 1, 65, 66</p> <p>Observations:</p> <ul style="list-style-type: none"> • Remoteness of site means slow access for large back ups so these are stored on site and then transferred off site and stored. • Real time data available on SCADA. 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> • None 	<p>Action:</p> <ul style="list-style-type: none"> • Nil 	

7.6	OBLIGATION: Computations for licensee performance reporting are accurate	P&P* Rating: A	Performance Rating: 1
	<p>Findings – Computations for licensee performance reporting were mainly automated and proven.</p> <p>Documents/Evidence – 1</p> <p>Observations:</p> <ul style="list-style-type: none"> Renewable Facility performance was reported in monthly reports. Data was cross checked with WPC metering data. 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> None 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	
7.7	OBLIGATION: Management reports appear adequate for the licensee to monitor licence obligations	P&P* Rating: A	Performance Rating: 1
	<p>Findings – Reporting is adequate with monthly contractor and APA reports for management. Exception reports are alarmed and investigated via SCADA.</p> <p>Documents/Evidence – 1, 71</p> <p>Observations:</p> <ul style="list-style-type: none"> Mainly based on SCADA. Intermittent supply so no obligation for availability to WPC 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> None 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	

7.8	OBLIGATION: Adequate measures to protect asset management data from unauthorised access or theft by persons outside the organisation	P&P* Rating: A	Performance Rating: 1
<p>Findings – APA corporate system had a high level of security. Firewalls were in place to prevent external access to computers.</p> <p>Documents/Evidence – 1, 66, 67</p> <p>Observations:</p> <ul style="list-style-type: none"> O&M Contractors and APA have firewalls in place. 			
<p>Recommendation:</p> <ul style="list-style-type: none"> None 		<p>Action:</p> <ul style="list-style-type: none"> Nil 	

8. RISK MANAGEMENT		PROCESS & POLICY RATING*	PERFORMANCE RATING
<input type="checkbox"/> Assess whether the risks that most affect the management and performance of the assets have been identified <input type="checkbox"/> Assess the adequacy of policies and procedures covering risk management <input type="checkbox"/> Assess whether the risk management policies and procedures have been applied in practice <input type="checkbox"/> Assess the adequacy of staff understanding and training on risk management Key Process – Risk management involves the identification of risks and their management within an acceptable level of risk. Outcome – The risk management framework effectively manages the risk that the licensee does not maintain effective service standards		A	1
No.	2020 AUDIT REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION		
8.1	OBLIGATION: Risk management policies and procedures exist and are applied to minimise internal and external risks Findings – Risk management policies and procedures were established by the Licensee and Contractors. Application of controls to mitigate risk was evident. Documents/Evidence – 1, 3, 6, 7, 8, 11, 12 Observations: <ul style="list-style-type: none"> Applied by all three parties, each having a risk register and applying it. Monthly reports comprehensive in reporting and management of failures and incidents. 	P&P* Rating: A	Performance Rating: 1
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
8.2	OBLIGATION: Risks are documented in a risk register and treatment plans are implemented and monitored Findings – Applied by all three parties, each having a risk register and applying it. Documents/Evidence – 1, 3, 6, 7, 8, 11, 12 Observations: <ul style="list-style-type: none"> Global experience of similar wind turbines available to assess risks. 	P&P* Rating: A	Performance Rating: 1

	<ul style="list-style-type: none"> Solar inverters and PV panels backed by reputable global manufacturers with extensive experience. Spare capacity provides for some risk. No significant safety incidents experienced with most incidents involve driving to and from site 		
	Recommendation: <ul style="list-style-type: none"> None – 	Action: <ul style="list-style-type: none"> Nil 	
8.3	OBLIGATION: Probability and consequences of asset failure are regularly assessed	P&P* Rating: A	Performance Rating: 1
	Findings – Applied by the Licensee and Contractors, each had established a risk register and application was evident. Documents/Evidence – 1, 3, 6, 7, 11, 12 Observations: <ul style="list-style-type: none"> Global experience of similar wind turbines available to assess risks. Solar inverters and PV panels backed by reputable global manufacturers with extensive experience. Spare capacity provides for some risk. 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	

9. CONTINGENCY PLANNING		PROCESS & POLICY RATING*	PERFORMANCE RATING
<input type="checkbox"/> Determine whether contingency plans have been developed and are current <input type="checkbox"/> Determine whether contingency plans have been tested. If so, review the results to confirm any improvements identified have been implemented.		A	1
Key Process – Contingency plans document the steps to deal with the unexpected failure of an asset.			
Outcome – Contingency plans have been developed and tested to minimise any major disruptions to service standards.			
No.	2020 AUDIT REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION		
9.1	OBLIGATION: Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks	P&P* Rating: A	Performance Rating: 1
	Findings – Plans were in place for emergencies and reinstatement. Documents/Evidence – 1, 2, 69, 70, 80, 107 Observations: <ul style="list-style-type: none"> With 37 WTG several can be out of service and output and availability still met. Curtailment by WPC or weather conditions is beyond their control Revenue was on income and apart from loss of earnings no penalty for outages. Emergency generator in substation to cover auxiliary loads with loss of connection to grid, routinely tested. 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	

10. FINANCIAL PLANNING		PROCESS & POLICY RATING*	PERFORMANCE RATING
<input type="checkbox"/> Obtain a copy of the financial planning, budgeting and reporting process and assess its effectiveness <input type="checkbox"/> Obtain a copy of the current financial plan (including budget/actual) and assess whether the process is followed Key Process – Financial brings together the financial elements of the service delivery to ensure its financial viability over the long term. Outcome – The financial plan is reliable and provides for the long-term financial viability of the services.		A	1
No.	2020 AUDIT REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION		
10.1	OBLIGATION: The financial plan states the financial objectives and identifies strategies and actions to achieve those Findings – The Licensee has established financial planning, budgeting and reporting processes. CAPEX and OPEX budgets for the BWF and BSF were reviewed and objectives confirmed as completed or indicated to be in process. Documents/Evidence – 1,6, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 64, 155, 164 Observations: <ul style="list-style-type: none"> Confidential information but performance to date has proved satisfactory. Financial plans were prepared each year and set budgets for future cash flow. BRF was an established operating generator with no major changes planned so forecasting was mainly revenue and O&M costs. Project was underwritten by the sales contract and approved by the Board after close scrutiny 	P&P* Rating: A	Performance Rating: 1
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	

10.2	OBLIGATION: The financial plan identifies the source of funds for capital expenditure and recurrent costs	P&P* Rating: A	Performance Rating: 1
	<p>Findings – AMP covers source of funds in principal, detail was commercial in confidence. BRF Year Plan further details capital and operating expenditure costs. Operating and revenue costs were well defined.</p> <p>Documents/Evidence – 1,6, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 64, 155, 164</p> <p>Observations:</p> <ul style="list-style-type: none"> No major new capital expenditure was planned. Year Plan detailed CAPEX and OPEX for BWF and BSF. 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> None 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	
10.3	OBLIGATION: The financial plan provides projections of operating statements (profit and loss) and statement of financial position (balance sheets)	P&P* Rating: A	Performance Rating: 1
	<p>Findings – P&L and Balance reported annually and budget forecast 5 years ahead. Due to the practical completion dates (i.e April and September 2019) of both the wind and solar farm the P&L accounts provided for the audit period were not extensive. Detailed Financial Modelling has been undertaken by the licensee.</p> <p>Documents/Evidence – 1, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 155, 164</p> <p>Observations:</p> <ul style="list-style-type: none"> Confirmed by Licensee that the financial plan budgeted for 5 year ahead, financial information was commercial in confidence. Annual Financial Reports prepared by independent third party. Projections are anticipated to be updated as the operations mature. Financials maintained by Projects division of APA during construction and responsibility transferred to Operations group following practical completion. 		

	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
10.4	OBLIGATION: The financial plan provides firm predictions on income for the next five years and reasonable predictions beyond this period	P&P* Rating: A	Performance Rating: 1
	Findings – P&L and Balance reported annually and budget forecast 5 years ahead Documents/Evidence – 1, 6, 49, 50, 51, 53, 54, 55, 56, 57, 58, 59, 60, 61, 164 Observations: <ul style="list-style-type: none"> Confirmed by Licensee that the financial plan budgeted for 5 year ahead, commercial in confidence. Modelling detailed in Badgingarra Wind Farm and Solar Farm P&L Model (ref 164).Noted modelling until December 2043 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
10.5	OBLIGATION: The financial plan provides for the operations and maintenance, administration and capital expenditure requirements of the services	P&P* Rating: A	Performance Rating: 1
	Findings – O&M, administration and capital expenditure included in financial plan Documents/Evidence – 1, 6, 49, 50, 51, 53, 54, 55, 56, 57, 58, 59, 60, 61 Observations: <ul style="list-style-type: none"> New plant and since practical completion no significant capital expenditure was planned No fuel costs 		

	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
10.6	OBLIGATION: Large variances in actual/budget income and expenses are identified and corrective action taken where necessary	P&P* Rating: A	Performance Rating: 1
	Findings – Financials identified variances and comparisons with previous year. Documents/Evidence – 1, 6, 58, 59, 60, 61 Observations: <ul style="list-style-type: none"> Windfarm performed well. Solar farm too new for comparison but RMU out of service will have an impact on future assessment. 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	

11. CAPITAL EXPENDITURE PLANNING		PROCESS & POLICY RATING*	PERFORMANCE RATING
<div><div><input type="checkbox"/> Understand the capital expenditure planning process and assess its effectiveness</div><div><input type="checkbox"/> Obtain a copy of the capital expenditure plan for the current year and assess whether the process is being followed</div></div> <div>Key Process – <i>The capital expenditure plan provides a schedule of new works, rehabilitation and replacement works, together with estimated annual expenditure for these works over the next five or more years. Since capital investments tend to be large and lumpy, projections would normally be expected to cover at least 10 years, preferably longer. Projections over the next five years would usually be based on firm estimates.</i></div> <div>Outcome – <i>The capital expenditure plan provides reliable forward estimates of capital expenditure and asset disposal income. Reasons for the decisions and for the evaluation of alternatives and options are documented.</i></div>		A	1
No.	2020 AUDIT REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION		
11.1	OBLIGATION: There is a capital expenditure plan covering works to be undertaken, actions proposed, responsibilities and dates	P&P* Rating: A	Performance Rating: 1
	<div>Findings – BWF & BSF were recently built and commissioned. The BRF Year Plan details CAPEX for each facility.</div> <div>Documents/Evidence – 1, 6, 84</div> <div>Observations:<ul style="list-style-type: none">BWF CAPEX notably included BWF Corporate Comms, BWF SCADA Access, Western Power Connection Work fees.BSF CAPEX notably included Cloud Monitoring and Forecasting System, BSF SCADA access, site facilities.The BRF is a newly constructed operational asset with high CAPEX construction costs and relatively low anticipated future CAPEX costs.It is noted that a construction group within APA was responsible for the oversight of the building and commissioning of the facilities prior to the handover to operational group within APA.</div>		

	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
11.2	OBLIGATION: The capital expenditure plan provides reasons for capital expenditure and timing of expenditure	P&P* Rating: A	Performance Rating: 1
	<p>Findings – The Year Plan detailed the CAPEX priorities and the monthly reports monitored progress and implementation. Only recently commissioned and no further capital spending planned</p> <p>Documents/Evidence – 1, 6, 16 - 43</p> <p>Observations:</p> <ul style="list-style-type: none"> All non-contractor capital spending required to be justified and approved by APA. The contractors sometimes undertook capital works at their expense, to ensure that the O&M contract availability and performance was met. APA were informed of these. 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
11.3	OBLIGATION: The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan	P&P* Rating: A	Performance Rating: 1
	<p>Findings – BRF recently achieved practical completion (April and September 2019 for BWF and BSF respectively) and as such significant CAPEX occurred during this audit period. CAPEX was detailed within the AMS Manual for both the BWF and BSF.</p> <p>Documents/Evidence – 1, 6, 16 - 43</p> <p>Observations:</p> <ul style="list-style-type: none"> All non-contractor capital spending required to be justified and approved by APA 		

	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
11.4	OBLIGATION: There is an adequate process to ensure the capital expenditure plan is regularly updated and implemented	P&P* Rating: A	Performance Rating: 1
	Findings – Capital expenditure processes were detailed in the AMS and updated in the year plans and monitored via the monthly reports. Documents/Evidence – 1, 6, 16 - 43 Observations: <ul style="list-style-type: none"> The Licensee indicated following commissioning and the defects liability period no further significant CAPEX was anticipated. 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	

12. REVIEW OF AMS		PROCESS & POLICY RATING*	PERFORMANCE RATING
<input type="checkbox"/> Determine when the asset management plan was last updated and assess whether any substantial changes have occurred <input type="checkbox"/> Determine whether any independent reviews have been performed. If so, review the results and action taken <input type="checkbox"/> Consider the need to update the asset management plan based on the results of this review <input type="checkbox"/> Determine when the asset management system was last reviewed.		A	1
Key Process – The asset management system is regularly reviewed and updated.			
Outcome – The asset management system is regularly reviewed and updated.			
No.	2020 AUDIT REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION		
12.1	OBLIGATION: A review process is in place to ensure the asset management plan and the asset management system described in it remain current	P&P* Rating: A	Performance Rating: 1
	Findings – New project and new AMP prepared. It was noted the AMS was updated to incorporate the solar farm achieving practical completion.		
	Documents/Evidence – 1, 84		
	Observations: <ul style="list-style-type: none"> New facility but updates on other documents were generally on time to confirm review processes. Review prompted at monthly meetings. 		
	Recommendation: <ul style="list-style-type: none"> None- 	Action: <ul style="list-style-type: none"> Nil 	
12.2	OBLIGATION: Independent reviews (e.g. internal audit) are performed of the asset management system	P&P* Rating: A	Performance Rating: NR
	Findings – The Licensee has not undertaken a full independent review of the AMS as the facility has recently been commissioned and this is the first licence Audit and Review.		
	Documents/Evidence – 1, 58, 59, 60, 61		
	Observations:		

	<ul style="list-style-type: none"> • BRF was only in operation for a short time • Future Audit Review was considered in budgets and compliance. • Experience with other WA facilities beneficial • Noted that APA undertook the obligation to develop the AMS; prior to exporting energy into the network; based on the ERA's Audit Guidelines; and in a format similar to Emu Downs. As such the AMS Revision 0 was the first AMS submitted to the ERA under the electricity generation license approved on 08/04/2019 • Noted Asset Management Specialist recently appointed to provide specialist support to the Asset Management for APA Group 		
	<table> <tr> <td data-bbox="275 454 1606 542"> Recommendation: <ul style="list-style-type: none"> • None </td><td data-bbox="1606 454 2072 542"> Action: <ul style="list-style-type: none"> • Nil </td></tr> </table>	Recommendation: <ul style="list-style-type: none"> • None 	Action: <ul style="list-style-type: none"> • Nil
Recommendation: <ul style="list-style-type: none"> • None 	Action: <ul style="list-style-type: none"> • Nil 		

APPENDIX 3

AUDIT PLAN ASSET REVIEW PRIORITIES

Table 16 Effectiveness Criteria Pre-audit Review..

Ref	Asset management system component	Consequence	Risk Likelihood	Inherent Risk low, medium, high	Adequacy of existing controls	Review Priority					
						1	2	3	4	5	N/A
1	ASSET PLANNING					0	0	0	8	1	0
1.1	Asset management plan covers the processes in this table	Moderate	Probable	Medium	Moderate				4		
1.2	Planning processes and objectives reflect the needs of all stakeholders and are integrated with business planning	Moderate	Unlikely	Medium	Moderate				4		
1.3	Service levels are defined in the asset management plan	Moderate	Unlikely	Medium	Moderate				4		
1.4	Non-asset options (e.g. demand management) are considered	Minor	Unlikely	Low	Moderate					5	
1.5	Lifecycle costs of owning and operating assets are assessed	Moderate	Unlikely	Medium	Moderate				4		
1.6	Funding options are evaluated	Moderate	Unlikely	Medium	Moderate				4		
1.7	Costs are justified and cost drivers identified	Moderate	Unlikely	Medium	Moderate				4		
1.8	Likelihood and consequences of asset failure are predicted	Moderate	Unlikely	Medium	Moderate				4		
1.9	Asset management plan is regularly reviewed and updated	Moderate	Probable	Medium	Moderate				4		
2	ASSET CREATION AND ACQUISITION					0	0	0	5	0	0
2.1	Full project evaluations are undertaken for new assets, including comparative assessment of non-asset options	Moderate	Unlikely	Medium	Moderate				4		
2.2	Evaluations include all life-cycle costs	Moderate	Unlikely	Medium	Moderate				4		

Ref	Asset management system component	Consequence	Risk Likelihood	Inherent Risk low, medium, high	Adequacy of existing controls	Review Priority					
						1	2	3	4	5	N/A
2.3	Projects reflect sound engineering and business decisions	Moderate	Unlikely	Medium	Moderate				4		
2.4	Commissioning tests are documented and completed	Moderate	Unlikely	Medium	Moderate				4		
2.5	Ongoing legal / environmental / safety obligations of the asset owner are assigned and understood	Moderate	Unlikely	Medium	Moderate				4		
3	ASSET DISPOSAL					0	0	0	3	1	0
3.1	Under-utilised and under-performing assets are identified as part of a regular systematic review process	Moderate	Unlikely	Medium	Moderate				4		
3.2	The reasons for under-utilisation or poor performance are critically examined and corrective action or disposal undertaken	Moderate	Unlikely	Medium	Moderate				4		
3.3	Disposal alternatives are evaluated	Minor	Probable	Low	Moderate					5	
3.4	There is a replacement strategy for assets	Moderate	Unlikely	Medium	Moderate				4		
4	ENVIRONMENTAL ANALYSIS					0	0	0	4	0	0
4.1	Opportunities and threats in the asset management system environment are assessed	Moderate	Unlikely	Medium	Moderate				4		
4.2	Performance standards (availability of service, capacity, continuity, emergency response, etc.) are measured and achieved	Moderate	Probable	Medium	Moderate				4		
4.3	Compliance with statutory and regulatory requirements	Moderate	Probable	Medium	Moderate				4		

Ref	Asset management system component	Consequence	Risk Likelihood	Inherent Risk low, medium, high	Adequacy of existing controls	Review Priority					
						1	2	3	4	5	N/A
4.4	Service standard (customer service levels etc) are measured and achieved.	Moderate	Probable	Medium	Moderate				4		
5	ASSET OPERATIONS					0	0	0	6	0	0
5.1	Operational policies and procedures are documented and linked to service levels required	Moderate	Probable	Medium	Moderate				4		
5.2	Risk management is applied to prioritise operations tasks	Moderate	Probable	Medium	Moderate				4		
5.3	Assets are documented in an asset register including asset type, location, material, plans of components, and an assessment of assets' physical/structural condition	Moderate	Probable	Medium	Moderate				4		
5.4	Accounting data is documented for assets	Moderate	Unlikely	Medium	Moderate				4		
5.5	Operational costs are measured and monitored	Moderate	Unlikely	Medium	Moderate				4		
5.6	Staff resources are adequate and staff receive training commensurate with their responsibilities.	Moderate	Probable	Medium	Moderate				4		
6	ASSET MAINTENANCE					0	0	0	6	0	0
6.1	Maintenance policies and procedures are documented and linked to service levels required	Moderate	Probable	Medium	Moderate				4		

Ref	Asset management system component	Consequence	Risk Likelihood	Inherent Risk low, medium, high	Adequacy of existing controls	Review Priority					
						1	2	3	4	5	N/A
6.2	Regular inspections are undertaken of asset performance and condition	Moderate	Probable	Medium	Moderate				4		
6.3	Maintenance plans (emergency, corrective and preventative) are documented and completed on schedule	Moderate	Probable	Medium	Moderate				4		
6.4	Failures are analysed and operational/maintenance plans adjusted where necessary	Moderate	Probable	Medium	Moderate				4		
6.5	Risk management is applied to prioritise maintenance tasks	Moderate	Probable	Medium	Moderate				4		
6.6	Maintenance costs are measured and monitored	Moderate	Unlikely	Medium	Moderate				4		
7	ASSET MANAGEMENT INFORMATION SYSTEM					0	0	0	8	0	0
7.1	Adequate system documentation for users and IT operators	Moderate	Probable	Medium	Moderate				4		
7.2	Input controls include suitable verification and validation of data entered into the system	Moderate	Probable	Medium	Moderate				4		

Ref	Asset management system component	Consequence	Risk Likelihood	Inherent Risk low, medium, high	Adequacy of existing controls	Review Priority					
						1	2	3	4	5	N/A
7.3	Security access controls appear adequate, such as passwords	Moderate	Probable	Medium	Moderate				4		
7.4	Physical security access controls appear adequate	Moderate	Probable	Medium	Moderate				4		
7.5	Data backup procedures appear adequate and backups are tested	Moderate	Unlikely	Medium	Moderate				4		
7.6	Computations for licensee performance reporting are accurate	Moderate	Probable	Medium	Moderate				4		
7.7	Management reports appear adequate for the licensee to monitor licence obligations	Moderate	Unlikely	Medium	Moderate				4		
7.8	Adequate measures to protect asset management data from unauthorised access or theft by persons outside the organisation	Moderate	Unlikely	Medium	Moderate				4		
8	RISK MANAGEMENT					0	0	0	3	0	0
8.1	Risk management policies and procedures exist and are applied to minimise internal and external risks	Moderate	Probable	Medium	Moderate				4		
8.2	Risks are documented in a risk register and treatment plans are implemented and monitored	Moderate	Probable	Medium	Moderate				4		
8.3	Probability and consequences of asset failure are regularly assessed	Moderate	Probable	Medium	Moderate				4		

Ref	Asset management system component	Consequence	Risk Likelihood	Inherent Risk low, medium, high	Adequacy of existing controls	Review Priority					
						1	2	3	4	5	N/A
9	CONTINGENCY PLANNING					0	0	0	1	0	0
9.1	Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks	Moderate	Probable	Medium	Moderate				4		
10	FINANCIAL PLANNING					0	0	0	6	0	0
10.1	The financial plan states the financial objectives and identifies strategies and actions to achieve those	Moderate	Probable	Medium	Moderate				4		
10.2	The financial plan identifies the source of funds for capital expenditure and recurrent costs	Moderate	Unlikely	Medium	Moderate				4		
10.3	The financial plan provides projections of operating statements (profit and loss) and statement of financial position (balance sheets)	Moderate	Unlikely	Medium	Moderate				4		
10.4	The financial plan provides firm predictions on income for the next five years and reasonable predictions beyond this period	Moderate	Unlikely	Medium	Moderate				4		

Ref	Asset management system component	Consequence	Risk Likelihood	Inherent Risk low, medium, high	Adequacy of existing controls	Review Priority					
						1	2	3	4	5	N/A
10.5	The financial plan provides for the operations and maintenance, administration and capital expenditure requirements of the services	Moderate	Probable	Medium	Moderate				4		
10.6	Large variances in actual/budget income and expenses are identified and corrective action taken where necessary	Moderate	Unlikely	Medium	Moderate				4		
11	CAPITAL EXPENDITURE PLANNING					0	0	0	4	0	0
11.1	There is a capital expenditure plan covering works to be undertaken, actions proposed, responsibilities and dates	Moderate	Unlikely	Medium	Moderate				4		
11.2	The capital expenditure plan provides reasons for capital expenditure and timing of expenditure	Moderate	Unlikely	Medium	Moderate				4		
11.3	The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan	Moderate	Unlikely	Medium	Moderate				4		
11.4	There is an adequate process to ensure the capital expenditure plan is regularly updated and implemented	Moderate	Probable	Medium	Moderate				4		
12	REVIEW OF AMS					0	0	0	2	0	0

Ref	Asset management system component	Consequence	Risk Likelihood	Inherent Risk low, medium, high	Adequacy of existing controls	Review Priority					
						1	2	3	4	5	N/A
12.1	A review process is in place to ensure the asset management plan and the asset management system described in it remain current	Moderate	Probable	Medium	Moderate				4		
12.2	Independent reviews (e.g. internal audit) are performed of the asset management system	Moderate	Probable	Medium	Moderate				4		
						0	0	0	56	2	0

APPENDIX 4

AUDIT PLAN ASSET REVIEW PRIORITIES

#	Document
1	330-MAN-AMS-8000 - BRF AMS Rev 1 Asset Management Plan
2	330-MAN-CMP-8000 - EDRF BRF Compliance Manual Rev 3
3	2017 11 29 Risk Management Policy
4	33100301R0 - BRF CMP Rev 0 Generator Compliance Monitoring
5	33100302R BRF Farm Rules - Rev 0
6	33100303R0 BRF Year Plan 2020-2021
7	APA CGR Badgingarra Risk Register
8	Appendix 3. 2019-2020 Liability CoC - 20m inc Bushfire
9	BRF Compliance Register
10	Vigilant BRF.xlsx
11	500-PR-0004 Infrastructure Development Delivery Procedure
12	500-PR-0005 Infrastructure Development Management Procedure
16	2019-08-28 BWF Monthly Meeting
17	2019-09-18 BWF Monthly Meeting
18	2019-10-29 BWF Monthly Meeting
19	2019-11-14 BWF Monthly Meeting
20	2019-12-19 BWF Monthly Meeting
21	2020-01-20 BWF Monthly Meeting
22	2020-02-21 BWF Monthly Meeting
23	2020-03-19 BWF Monthly Meeting
24	2020-04-16 BWF Monthly Meeting
25	2020-05-21 BWF Monthly Meeting
26	2020-06-18 BWF Monthly Meeting
27	2020-07-16 BWF Monthly Meeting
28	2020-08-20 ALL BWF Monthly Meeting
30	1907 BRF OM Report ALL - July 2019
31	1909 BRF OM Report - September 2019
32	1910 BRF OM Report - October 2019
33	1911 BRF OM Report - November 2019
34	1912 BRF OM Report - December 2019
35	1920 BRF OM Report - July 2019 to June 2020
36	2001 BRF OM Report - January 2020
37	2002 BRF OM Report - February 2020
38	2003 BRF OM Report - March 2020

#	Document
39	2004 BRF OM Report - April 2020
40	2005 BRF OM Report - May 2020
41	2006 BRF OM Report - June 2020
42	2007 BRF OM Report - July 2020
43	2008 BRF OM Report - August 2019
45	Compliance report template - Electricity - 1920 BRF Signed
46	EGL26 Annual Compliance Report 1819
47	Wind Portfolio Annual Compliance Report 2018
49	3.1 BSF BM13 Profit or Loss (FY).xlsx
50	3.1 BWF BM13 Profit or Loss (FY).xlsx
51	3.1 Profit & Loss - BSF.xlsx
53	3.1 Profit & Loss - BWF.xlsx
54	3.2 Balance Sheet - BSF.xlsx
55	3.2 Balance Sheet - BWF.xlsx
56	3.2 BSF BM10 Balance Sheet.xlsx
57	3.2 BWF BM10 Balance Sheet.xlsx
58	3.3 FY2020 BSF Budget FINAL (P90).xlsx
59	3.3 FY2020 BWF Budget FINAL(P75).xlsx
60	3.3 FY2021 BSF Budget DRAFT v2.xlsx
61	3.3 FY2021 BWF Budget DRAFT v3.xlsx
62	12 BRF Fixed Asset Register.xlsx
64	RE EXT RE MSG2203857 SRNC0092739.msg
65	IT Backup Standard v1.2
66	IT Security Architecture Standard
67	IT Security Policy
68	IT Security Risk Management Standard
69	IT Service Continuity Management Plan
70	IT Service Continuity Management Standard
71	Linux Environment and Oracle Database_SRD
73	<i>Siemens\2020-2021 Annual Operating and Maintenance Plan BWF V1.0</i>
74	<i>Siemens\Badgingarra - OM Risk Register Rev.3 - August 2020.xlsx</i>
75	Siemens\Badgingarra Incident Report-02_230120.docx
76	Siemens\Badgingarra Incident Report-04_230620.docx
77	Siemens\BWF-REG-A-1004_0.1_IFR Asset Reg.xlsx
78	Siemens\INS-19676.Ap1.en - HSE Plans - Badgingarra - Rev2.0
79	Siemens\INS-35776 Ap1 Project Quality Plan - Badgingarra

#	Document
80	Siemens\PRO-31716 Ap3 Emergency Response Plan Badgingarra
81	Siemens\Siemens Badgingarra WF R2 Test Compliance Report RevB
82	Siemens\Siemens BWF Insurance.xlsx
83	Siemens\Siemens Contract Licence
84	FY21 Budget timetable - key dates Gantt chart_Final.xlsx
85	Siemens\Annual Reports\BWF - 2019-2020 Annual Report V1.2
102	Siemens\Monthly Reports\BWF - ALL
105	3200-0574-OP-001 - BSF Operating Protocol Rev 0.2
106	3200-0574-PLN-001 - BSF Operation and Maintenance Plan Rev 0
107	3200-0574-PLN-002 - BSF OM Emergency Response Plan Rev 0
108	3200-0574-PLN-004 - BSF OM Quality Plan Rev 0
109	3200-0574-PLN-006_R1_HS OM Plan_ Badgingarra Solar Farm
110	3200-0574-PLN-008 -BSF OM Environmental Management Plan Rev 0
111	BGN.1255-BOM-E-0001_1_IFU Equipment List
112	BGN.1255-MAN-OM-0001_1_IFU O&M Manual
113	BGN.1255-REG-HSE-0001_3_IFU Risk Register
114	BGN.1255-RP-E-0026.1.IFU Tech Compliance
115	UGL BSF Insurance 2020.xlsx
116	UGL Contract Licence
117	NOP 005 Badgingarra Wind Farm v2 - WP draft 29072019.pdf
118	Western Power\33100301R0 - BRF CMP Rev 0
119	Western Power\APA (Wind Portfolio Pty Ltd) Badgingarra Wind Farm ETAC - Deed of variation No2 (Executed)
120	Western Power\Badgingarra IWC - Certificate of Practical Completion
121	Western Power\Badgingarra WF - Technical Rules exemption cl. 3.3.4.4 f2 - signed letter
124	Current Oct 2020- technical rules 1st august 2016 version .pdf
137	ERA request for standing charges data BWF 1819.pdf
138	ERA request for standing charges data BWF 1920.pdf
139	ERA request for standing charges data BWF.pdf
140	_EXT Copy of original addressee - 2018 Electricity Licence Standing Charge Data - EGL026 - Wind Portfolio Pty Ltd.msg
141	Compliance report template - Electricity - 1920 BRF Signed.pdf
142	EGL26 Annual Compliance Report 1819.pdf
143	RE EXT Reminder Overdue - 2018 Electricity Licence Standing Charge Data - EGL026 - Wind Portfolio Pty Ltd.msg
144	Copy of ERA supplier #120102 - BRF Invoice and Payments for a Period - Invoice Totals.xlsx

#	Document
145	ERA Annual Fee 1819 #101563_BWF.pdf
146	ERA Annual Fee 1920 #102051_BWF.pdf
147	ERA Annual Fee 2021 #102526_BWF.pdf
148	ERA FY19 1 #101837_BWF.pdf
149	ERA FY19 2 #101927_BWF.pdf
150	ERA FY19 3 #ERA 102028_BWF.pdf
151	ERA FY19 4 #102156_BWF.pdf
152	ERA FY20 1 # 102262_BWF.pdf
153	ERA FY20 2 #102386_BWF.pdf
154	ERA FY20 3 # 102497 BWF.pdf
155	Alinta PPA at BRF.msg
156	Asset Management Integrated Assurance.docx
157	BRF - Audit Review attendee names.msg
158	BRF - Audit Team.xlsx
159	BRF Leases & Payments.msg
160	Document list.docx
161	DRAFT BRF Asset Lifecycle Management Dashboard V7.pptx
162	Lifecycle Stay In Business (SIB) Project Development Management - Asset Management.pdf
163	ETAC
164	Detailed Model Badgingarra Wind Solar 0.61 22/04/2020