

# Report to the Minister for Energy on the Economic Regulation Authority's compliance 2020/21

Wholesale Electricity Market Rules

9 November 2021

**Economic Regulation Authority**

WESTERN AUSTRALIA

D240322

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# 1. Summary

The Economic Regulation Authority is responsible for the compliance and enforcement functions in the Wholesale Electricity Market (WEM) Rules.

As part of these responsibilities, clause 2.14.5A of the WEM Rules requires the ERA to report to the Minister for Energy on its own compliance. Clause 2.14.5A states:

- 2.14.5A. The Economic Regulation Authority must annually provide to the Minister a report on the Economic Regulation Authority's compliance with the WEM Rules and WEM Procedures.

The ERA engaged Assurance Advisory Group Pty Ltd to independently audit the ERA's compliance with the WEM Rules and WEM Procedures for the period 1 July 2020 to 30 June 2021.

The audit found that the ERA complied with the WEM Rules and WEM Procedures, other than for two matters. The first matter concerned a delay in providing annual budget information to the Australian Energy Market Operator (AEMO). The second matter concerned the inadvertent disclosure of confidential information. The auditor concluded that no adverse consequences arose from these two non-compliance matters.

While the auditor concluded that there were no adverse consequences from the non-compliances, the ERA acknowledges that the second matter concerned information confidentiality obligations. The ERA's compliance with the information confidentiality obligations is important to prevent any detriment arising to participants from the disclosure of sensitive information.<sup>1</sup> Further, participants must have confidence in the ERA's management of their confidential information in the course of the ERA carrying out its functions.

The ERA has therefore implemented additional controls and strengthened its existing processes to mitigate the risk of future non-compliance.

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<sup>1</sup> In this case, the auditor concluded that the information was not materially sensitive.

## 2. Audit scope

The ERA's functions under the WEM Rules during the audit period included:

- Monitoring the effectiveness of the market in meeting the WEM objectives.
- Monitoring rule participants' compliance with the WEM Rules, investigating alleged breaches of the WEM Rules and where appropriate, taking enforcement action.
- Undertaking market reviews and approvals, including:
  - Approving the AEMO's allowable revenue and forecast capital expenditure.
  - Approving AEMO's ancillary services requirements and costs for certain ancillary services.
  - Approving the maximum short-term energy market (STEM) price, alternative maximum STEM price and the benchmark reserve capacity price.
  - Reviewing the minimum STEM price.

The 2020/21 audit assessed the ERA's compliance with the WEM Rules and WEM Procedures for the above functions.

The 2020/21 audit also considered how effectively the ERA's compliance monitoring database assisted the ERA to comply with its obligations to record compliance and investigation information under section 2.13 of the WEM Rules.

### 3. Audit findings

The independent auditor's report is provided at Appendix 1.

The auditor concluded that:

In our opinion, based on the procedures we have performed and the evidence we have obtained, except for the effects of the matters described under the basis for modified opinion paragraph below, the ERA has complied, in all material aspects, with the relevant requirements of the WEM Rules and WEM Procedures, for the year 1 July 2020 to 30 June 2021.<sup>2</sup>

The exception matters referred to by the auditor concerned the following non-compliances:

- Non-compliance with clause 2.24.6 of the WEM Rules, when the ERA was late in notifying AEMO of the dollar amount of its budget that the ERA may recover from participants for its WEM functions. AEMO uses the budget information to determine the regulator fee rate to be charged to participants. The ERA was required to provide the budget information to AEMO by 24 June 2021 but provided the information to AEMO on 29 June 2021. The non-compliance occurred due to the need to obtain advice on the treatment of certain costs for changed functions prior to providing the budget information to AEMO.<sup>3</sup> The ERA has since implemented additional controls to ensure this obligation is met.<sup>4</sup> The auditor found that there were no material consequences from this non-compliance.
- Non-compliance with clause 10.2.2 of the WEM Rules, when the ERA inadvertently sent an email to a market participant who was not authorised to receive the email. The market participant promptly deleted the email. The auditor found that no material consequences arose from this non-compliance. This non-compliance occurred outside of the audit period and was due to a combination of human and process errors. The ERA has since implemented actions to prevent future errors, including educating personnel and improving the review steps for outgoing correspondence.<sup>5</sup> The auditor agreed these actions will mitigate the risk of non-compliance but made a recommendation concerning general procedures for the ERA to manage confidentiality breaches after they happen, discussed in section 4.

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<sup>2</sup> Refer to page 4 of the Independent Assurance Report on Compliance with the Wholesale Electricity Market Rules and Wholesale Electricity Market Procedures in Appendix 1.

<sup>3</sup> The changed functions concerned the transfer of the Rule Change Panel function to Energy Policy WA. The budget information was provided to AEMO once advice regarding the treatment of costs for the Rule Change Panel function had been received. Despite the late provision of the budget information, AEMO was able to determine the relevant fees in time.

<sup>4</sup> The additional controls capture key submission dates and obligations under the WEM Rules, together with weekly meetings to monitor upcoming obligations.

<sup>5</sup> The improvements include revisions to the ERA's checklist process for compliance investigations, which now requires a mandatory review step to be completed in the checklist for outgoing correspondence.

## 4. Recommendations and action plan

The ERA acknowledges the importance of the information confidentiality obligations and has therefore implemented the additional controls referred to in section 3 to prevent future breaches. The ERA also implemented additional controls for providing budget information to AEMO to prevent a future breach of this obligation.

While the auditor concluded that the additional controls mitigate the risk of future non-compliances, the auditor recommended that the ERA develop a procedure for managing confidentiality breaches after they occur to ensure that these matters are appropriately managed. In response to this recommendation, the ERA is developing an internal procedure specifying the processes to manage any improper disclosures of confidential information should any such disclosures occur in the future.

The auditor also found that the ERA's compliance monitoring database could be refined to further assist the ERA to comply with its obligations under section 2.13 of the WEM Rules for recording non-compliance information.<sup>6</sup> To address this finding, the ERA will update its compliance monitoring database as part of its implementation of the revised compliance framework that is required for the new market design scheduled to commence in October 2023.

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<sup>6</sup> For example, non-mandatory database fields should be reviewed to assess whether they are still required.

## Appendix 1 – Independent Assurance Report



# **The Economic Regulation Authority**

Wholesale Electricity Market Rules and Wholesale  
Electricity Market Procedures

2020/21 Compliance Audit

Final Report

15 October 2021



ASSURANCE  
ADVISORY  
GROUP

Level 11, 251 Adelaide Terrace  
PERTH WA 6000

15 October 2021

Mrs Pam Herbener  
Director Corporate Services  
Economic Regulation Authority  
Level 4, Albert Facey House  
469 Wellington Street  
Perth WA 6000

Dear Pam

**Independent Assurance Report on Compliance with the Wholesale Electricity Market Rules and Wholesale Electricity Market Procedures for the year 1 July 2020 to 30 June 2021**

We have completed the Wholesale Electricity Market Rules and Wholesale Electricity Market Procedures compliance audit for the Economic Regulation Authority for the year 1 July 2020 to 30 June 2021 and are pleased to submit our report to you.

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

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

Yours sincerely

**Assurance Advisory Group**

**Stephen Linden**

**Director**

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# 1. Independent assurance practitioner's report

## Modified opinion

We have undertaken a reasonable assurance engagement on the Economic Regulation Authority's (ERA) compliance, in all material respects, with the relevant requirements of the Wholesale Electricity Market (WEM) Rules and WEM Procedures for the year 1 July 2020 to 30 June 2021.

Our evaluation was made against the relevant requirements of the WEM Rules and WEM Procedures detailed in Appendix A.

In our opinion, based on the procedures we have performed and the evidence we have obtained, except for the effects of the matters described under the basis for modified opinion paragraph below, the ERA has complied, in all material respects, with the relevant requirements of the WEM Rules and WEM Procedures, for the year 1 July 2020 to 30 June 2021.

## Basis for modified opinion

The ERA did not self-report any breaches during the period 1 July 2020 to 30 June 2021.<sup>1</sup>

During the audit we noted the following non-compliance that occurred during the audit period 1 July 2020 to 30 June 2021.

Item	Non-compliance description	Risk rating
1	<p>The ERA is required under clause 2.24.6 to notify the Australian Energy Market Operator (AEMO) of the amount of its budget that the ERA may recover for its WEM functions under clauses 2.24.5 and 2.24.5B. This amount must be provided to AEMO by the date which is five business days prior to 30 June each year.</p> <p>The ERA did not notify AEMO of this amount until 29 June 2021, which was three business days late.</p>	<p>This matter is rated <b>minor</b>.</p> <p>It is unlikely any detriment arose.</p>

## Non-compliance falling outside of the current audit period

The following matter falls outside the current audit period, however was brought to our attention by the ERA prior to the completion of the audit:

- On 26 August 2021 the ERA inadvertently disclosed confidential information to the wrong participant, in breach of Section 10.2 of the WEM Rules.
- ERA staff acted as soon as the breach was realised to notify impacted parties and to request the relevant information be deleted. This matter is rated as a minor breach as it is unlikely any detriment arose.
- A review of internal procedures has commenced (including obtaining legal advice) to strengthen existing procedures and to ensure the confidentiality of information is secured in the event of any future incidents of this nature.

Further details of the above non-compliances, plus related recommendations are discussed in section 2 of this report.

<sup>1</sup> Prior to the completion of this audit, the ERA self-reported a matter that occurred after the audit period  
**ERA 2020/21 WEM Compliance Audit Report**

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

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

### **The ERA's responsibility for compliance with the WEM Rules and WEM Procedures**

In accordance with Market Rule 2.14.5A the ERA must annually provide to the Minister for Energy a report on its compliance with the WEM Rules and WEM Procedures applicable to the Wholesale Electricity Market.

The ERA's functions under the WEM Rules during the audit period included:

#### *Market effectiveness*

- To monitor the effectiveness of the market in meeting the WEM Objectives

#### *Market compliance*

- To monitor Rule Participants' compliance with the WEM Rules
- To investigate alleged breaches of the WEM Rules
- Where appropriate, take enforcement action.

#### *Market reviews and approvals*

To perform a range of review and approval functions, including:

- Approving AEMO's allowable revenue and forecast capital expenditure
- Approving AEMO's ancillary services requirements and costs for certain ancillary services
- Approving the Maximum Short Term Energy Market (STEM) Price, Alternative Maximum STEM Price and Benchmark Reserve Capacity Price
- Reviewing the Minimum STEM Price
- Undertaking methodology reviews when required by the WEM Rules.

The ERA has acknowledged that it is responsible for:

- Identifying, designing, and implementing controls to enable the requirements of the WEM Rules and WEM Procedures to be met
- The activities undertaken to meet the WEM Rules and WEM Procedures
- Compliance with the WEM Rules and WEM Procedures, for the audit period 1 July 2020 to 30 June 2021
- Identifying risks that threaten the ERA's ability to comply with the WEM Rules and WEM Procedures, and the establishment of sufficient controls which mitigate those risks.

### **Our independence and quality control**

We have complied with the independence and other relevant ethical requirements relating to assurance engagements, which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality, and professional behaviour.

We applied Auditing Standard ASQC 1 *Quality Control for Firms that Perform Audits and Reviews of Financial Reports and Other Financial Information, and Other Assurance Engagements* in undertaking this assurance engagement.

## **Our responsibilities**

Our responsibility is to express an opinion on the ERA's compliance, in all material respects, with the compliance requirements of the WEM Rules and WEM Procedures, for the year 1 July 2020 to 30 June 2021.

ASAE 3100 requires that we plan and perform our procedures to obtain reasonable assurance about whether, the ERA has complied, in all material respects, with the relevant requirements of the WEM Rules and WEM Procedures, for the year 1 July 2020 to 30 June 2021.

## **Our procedures**

An assurance engagement to report on the ERA's compliance with the relevant requirements of the WEM Rules and WEM Procedures involves performing procedures to obtain evidence about the compliance activities and controls implemented to meet the relevant requirements.

The procedures selected depend on our judgement, including procedures designed to identify and assess the risks of material non-compliance with the relevant requirements of the WEM Rules and WEM Procedures, for the year 1 July 2020 to 30 June 2021. The relevant requirements of the WEM Rules and WEM Procedures tested by our procedures are detailed in Appendix A.

Our procedures consisted primarily of discussion with, and enquiries of, ERA management and staff, observation and walk throughs, sample testing of controls and procedures, and evaluation of the evidence obtained.

Our procedures included:

- Reviews of internal policies, procedures, practices, and documents current at the time of the audit
- Reviews of WEM Rules and WEM Procedures applicable to the ERA at the time of the audit and during the year 1 July 2020 to 30 June 2021
- Interviews and discussions with, and representations from relevant ERA staff to gain an understanding of policies, procedures, and practices
- Reviews of documents supplied by ERA officers, and walkthroughs of procedures and practices to support the assessment of compliance and the effectiveness of the control environment
- Completion of sample testing to assess the ERA's compliance with procedures and practices that support the control environment
- Examination of the ERA's use of its Compliance Monitoring Database for recording potential breaches and associated investigations, and consideration of evidence of the established investigation process being applied throughout the year<sup>2</sup>
- Reviewing the use of the Internal Operations Manual - Energy Markets Division setting out key functions, tasks, and processes to ensure relevant requirements are met
- Reviewing the Market Monitoring Process as documented by the ERA
- Reviews of the ERA's compliance activities and the alignment of those activities with the ERA's Compliance Framework and Strategy applicable at the time of the audit
- Sighting evidence of investigation checklists continuing to be used during the audit period.

The above procedures were undertaken to form our opinion as to whether the ERA has complied, in all material respects, with the requirements of the WEM Rules and WEM Procedures.

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<sup>2</sup> Further consideration of the effectiveness of the ERA's Compliance Monitoring Database used to record breaches is discussed in section 3.

### **Inherent Limitations**

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

An audit is not designed to detect all instances of non-compliance with the WEM Rules and WEM Procedures as an audit is not performed continuously throughout the scope period and the audit procedures performed in respect of assessing the ERA's compliance with the WEM Rules and WEM Procedures were undertaken on a test basis.

A reasonable assurance engagement relating to the period from 1 July 2020 to 30 June 2021 does not provide assurance on whether compliance with the WEM Rules and WEM Procedures will continue in the future.

### **Use of this report**

This report has been prepared for use by the ERA for the purpose of satisfying its obligation under WEM Rule 2.14.5A, which requires the ERA to annually provide to the Minister for Energy a report on its compliance with the WEM Rules and WEM Procedures. We disclaim any assumption of responsibility for any reliance on this report to any person other than the ERA or the Minister, or for any other purpose other than that for which it was prepared.

### **Assurance Advisory Group**



**Stephen Linden**  
**Director**

15 October 2021

## 2. ERA action to address non-compliances

### 2.1 Action to address 2020-21 non-compliance with clause 2.24.6 (Item 1 above)

The Independent assurance practitioner's report above includes a minor non-compliance relating to the timeliness of a notification required by clause 2.24.6 of the WEM Rules. Clause 2.24.6 requires the ERA to notify AEMO of the amount of its budget that the ERA may recover for its WEM functions. AEMO uses this amount to determine the regulator fee rate to be charged to its participants.

The ERA's Corporate Services Division (who is responsible for this obligation) advised that since this non-compliance occurred, the following actions have been taken to strengthen compliance processes:

- A work plan has been established to capture key submission dates and obligations under the WEM Rules.
- The Finance Manager and Corporate Services Director meet on a weekly basis to keep track of upcoming obligations to ensure they are completed in a timely manner.

### 2.2 Action to address recent (August 2021) non-compliance with Section 10.2

The Independent assurance practitioner's report above references a minor non-compliance with Section 10.2, relating to the inadvertent disclosure of confidential information to the wrong participant. This breach occurred on 26 August 2021 (outside the 2020/21 audit period) and was self-reported by the Compliance and Enforcement Team. The cause of the breach was that internal procedures were not correctly followed. Since that breach, the ERA requested the receiving participant to delete the information, sought advice through the ERA's legal team and disclosed the breach to the impacted participant. This action appears to be proportionate to the low level of materiality of the confidential information that was disclosed in this instance.

We note that similar breaches have occurred in the past, at which time the ERA further improved its processes to avoid further breaches. In response to this most recent breach, the need to correctly follow internal procedures has been re-enforced.

These improved processes assist to minimise the occurrence of any such breaches. However, the ERA does not currently have formal procedures for managing confidentiality breaches. The ERA should consider developing a clear and consistent approach for managing confidentiality breaches. The procedures should include consideration of the level of materiality of the disclosed information and applying a proportionate response to that breach (including actions to ensure that information has been sufficiently secured e.g. obtaining sufficient assurance that the confidential information has not been and will not be accessed, used or distributed).

#### **Recommendation 1**

*Further develop protocols and procedures for sufficiently managing improper disclosures of confidential information.*



## 3. Other findings

### 3.1 Compliance Monitoring Database

We considered the effectiveness of (and potential opportunity for improvement in) the ERA's Compliance Monitoring Database for assisting the ERA to comply with its obligations under section 2.13 of the WEM Rules which include the requirement to record details of alleged breaches, the results of investigations and participants' responses. The database is maintained through the Dynamics Customer Relationship Management System.

As part of this task, we also considered the current review of the Compliance Risk Framework being undertaken in preparation for the new market design, plus the Compliance and Enforcement Team's considerations for improving the use of the database.

It is evident that the database's primary purpose is to serve as a record of key details of compliance breaches and the status of related investigations. While completeness and accuracy of information can always be a challenge, it appears that appropriate efforts (including allocation of resources) have been made to maintain the database to a consistent standard.

We found that certain aspects of the Compliance Monitoring Database could be further improved, such as:<sup>3</sup>

- Reviewing what non-mandatory information should be recorded by the database.
- Updating the risk assessment criteria in the database once the ERA has completed its review of the Compliance Risk Framework.
- Improving the use of the database's internal reporting functionality.

We understand the ERA will consider these findings as part of the implementation of the revised Compliance Risk Framework that is required for the new market design scheduled to commence in October 2023.

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<sup>3</sup> Details of these findings have been separately communicated to the Compliance and Enforcement Team.

## Appendix A - summary of rules and procedures tested

The table below lists all relevant requirements of the WEM Rules and WEM Procedures for the year 1 July 2020 to 30 June 2021.

WEM rule number and title	Clause	Applicable in audit period?	Compliant?	Exception (rating)
1.7 Publication	1.7.3	Applicable	Yes	-
1.17 Transition of certain IMO functions to the ERA	1.17.1, 1.17.3, 1.17.5	Applicable	Yes	-
1.20A AEMO budget adjustment for DER Roadmap Implementation	1.20A.2, 1.20A.5, 1.20A.6, 1.20A.7	Applicable	Yes	-
1.35 Specific Transitional Provisions for the First Review of the Minimum STEM price	1.35.1, 1.35.2	Applicable	Yes	-
1.36C General Transitional Provisions – Staging of Tranches 2 and 3 Amendments	1.36C.2, 1.36C.3, 1.36C.4, 1.36C.5, 1.36C.6, 1.36C.7	Applicable	Yes	-
2.2A The ERA	2.2A.1	Applicable	Yes	-
2.3 Market Advisory Committee	2.3.7	Applicable	Yes	-
2.5 Rule Change Proposals	2.5.1B	Applicable	Yes	-
2.9 Market Procedures	2.9.2B, 2.9.3, 2.9.7B	Applicable	Yes	-
2.10 Procedure Change Process	2.10.1, 2.10.2A, 2.10.3, 2.10.5B, 2.10.10, 2.10.12B, 2.10.13, 2.10.17, 2.10.18	Applicable	Yes	-
2.11 Coming into Force of Procedure Amendments	2.11.4	Not applicable	-	-
2.13 Market Rule Compliance Monitoring and Enforcement	2.13.2, 2.13.3, 2.13.3B, 2.13.10, 2.13.13, 2.13.26, 2.13.27, 2.13.31	Applicable	Yes	-
	2.13.6H, 2.13.6I, 2.13.15, 2.13.18	Not applicable	-	-
2.14 Audit	2.14.5A, 2.14.5B, 2.14.5C	Applicable	Yes	-
	2.14.5D	Not applicable	-	-
2.15 Monitoring and Reporting Requirements	2.15.1, 2.15.2, 2.15.3, 2.15.4	Applicable	Yes	-
2.16 Monitoring the Effectiveness of the Market	2.16.9, 2.16.9A, 2.16.10, 2.16.11, 2.16.12, 2.16.13, 2.16.14, 2.16.15	Applicable	Yes	-
	2.16.6, 2.16.8, 2.16.9B, 2.16.9D, 2.16.9E, 2.16.9F, 2.16.9FA	Not applicable	-	-
2.21 Market Consultation	2.21.1, 2.21.2	Applicable	Yes	-
2.22A Determination of AEMOs budget	2.22A.2, 2.22A.11, 2.22A.14	Not applicable	-	-
2.24 Determination of Market Fees	2.24.5, 2.24.5B		Yes	-
	2.24.6	Applicable	No	Item 1 (minor)
2.25 Payment of Market Participant Fees	2.25.1B, 2.25.4A	Not applicable	-	-
2.26 ERA Review of Methodology for Setting Administered Prices	2.26.1, 2.26.2, 2.26.5	Applicable	Yes	-
	2.26.3, 2.26.3A, 2.26.4	Not applicable	-	-
2.27C ERA Review of Limit Advice and Constraint Equations	2.27C.1, 2.27C.2, 2.27C.3, 2.27C.4, 2.27C.5, 2.27C.6, 2.27C.7	Not applicable	-	-
2.32 Rule Participant Suspension and Deregistration	2.32.1, 2.32.7, 2.32.7A, 2.32.7B	Not applicable	-	-
2.44 Minister's Emergency Powers	2.44.1, 2.44.2, 2.44.3	Not applicable	-	-
3.8 Investigating Incidents in the SWIS	3.8.5A	Not applicable	-	-
3.11 Determining & Procuring Ancillary Service Requirements	3.11.6, 3.11.12	Applicable	Yes	-
	3.11.8C, 3.11.8D	Not applicable	-	-
3.13 Payment for Ancillary Services	3.13.3A, 3.13.3B, 3.13.3C	Applicable	Yes	-
3.15 Review of Ancillary Service Requirements Process and Standards	3.15.1, 3.15.2, 3.15.3	Not applicable	-	-
3.18 Outage Scheduling	3.18.3, 3.18.15, 3.18.18, 3.18.19, 3.18.20	Not applicable	-	-
3A.3 Exempt Transmission Connected Generating Systems	3A.3.6	Applicable	Yes	-
3A.12 Effect of a Rectification Plan	3A.12.3	Not applicable	-	-
4.5 Long Term Projected Assessment of System Adequacy	4.5.14, 4.5.16, 4.5.17, 4.5.18, 4.5.19, 4.5.20	Not applicable	-	-
	4.11.1F	Applicable	Yes	-
4.11 Setting Certified Reserve Capacity	4.11.1E, 4.11.3C, 4.11.3D, 4.11.3E	Not applicable	-	-
	4.16.3, 4.16.9, 4.16.10	Applicable	Yes	-
7.10 Compliance with Dispatch Instructions and operating instructions	7.10.8	Applicable	Yes	-
7.11 Dispatch Advisories	7.11.9	Not applicable	-	-
7.12 Status Reports	7.12.2	Applicable	Yes	-
10.2 Information Confidentiality Status	10.2.2	Applicable	Yes	-