



Economic Regulation Authority

Report to the Minister for Energy on the Economic Regulation Authority's compliance 2021/22

Wholesale Electricity Market Rules

15 November 2022

Economic Regulation Authority

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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.

The ERA engaged Assurance Advisory Group Pty Ltd to independently audit the ERA's compliance with the WEM Rules and WEM Procedures for the audit period 1 July 2021 to 30 June 2022.

The audit found that the ERA complied with the WEM Rules and WEM Procedures during this audit period, except for two minor matters. The first matter concerned the ERA's failure to review the Relevant Level Methodology, to be applied in setting certified reserve capacity, by 1 April 2022.

The second matter concerned an inadvertent disclosure of confidential information on 26 August 2021, which was previously reported in the 2020/21 audit report.¹ Due to the timing of this matter, it must also be reported in the 2021/22 audit report.

The audit concluded that no adverse consequences arose from these two non-compliance matters. The ERA has implemented additional controls to mitigate the risk of future non-compliance as discussed in this report.

¹ Economic Regulation Authority, 2021, *Report to the Minister for Energy on the Economic Regulation Authority's compliance 2020/2021*, p. 3, ([online](#))

2. Audit scope

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

- Monitoring the WEM, including identifying market behaviour that has resulted in the market not functioning effectively and identifying market design problems and inefficiencies.
- Monitoring rule participants' compliance with the WEM Rules, investigating alleged breaches of the WEM Rules, providing compliance reporting to the WEM and where appropriate, taking enforcement action.
- Undertaking market reviews and approvals, including:
 - Approving the Australian Energy Market Operator's (AEMO) allowable revenue and forecast capital expenditure.
 - Approving AEMO's ancillary services requirements and costs for certain ancillary services.
 - Determining the maximum short-term energy market (STEM) price, alternative maximum STEM price and the benchmark reserve capacity price.
 - Reviewing the minimum STEM price.
 - Undertaking methodology reviews when required by the WEM Rules.

The 2021/22 audit assessed the ERA's compliance with the WEM Rules and WEM Procedures for the above functions.

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 2021 to 30 June 2022.²

The exception matters referred to by the auditor concerned two non-compliances.

The first non-compliance matter concerned the requirement for the ERA to conduct a review of the Relevant Level Methodology (RLM), used in assigning reserve capacity, by 1 April 2022 (clause 4.11.3C of the WEM Rules). The RLM is the methodology used by AEMO to determine the quantity of capacity credits to be allocated to intermittent generators, such as wind and solar farms.

The ERA did not complete the 2022 RLM review because the changes proposed following the ERA's 2019 review are on hold and the Coordinator of Energy is currently conducting a review of the Reserve Capacity Mechanism (RCM) which will, among other things, consider the RLM.³ The deferment of the 2022 RLM review is reflected in the Consolidated 'Companion' Version of the Wholesale Electricity Market Rules approved by the Minister for Energy for the new market design published on 1 February 2022 which states:⁴

Clause 4.11.3C is amended to reflect that the next review of the Relevant Level Methodology by the ERA is to be postponed until after the completion of the Coordinator's RCM Review.

However, the amendment to rule 4.11.3C while approved by the Minister, has not commenced which has caused this breach.

While the WEM is transitioning to the new market design there is a heightened risk of non-compliance in the ERA undertaking its functions. This risk arises due to the significant volume of changes to the WEM Rules that have been and continue to be developed for the new market design. Although this risk is temporary until the new market design commences, the ERA is taking action to prevent future breaches of this kind, as detailed in section 4.

The second non-compliance concerned a matter where the ERA inadvertently sent an email to a market participant who was not authorised to receive the email, in breach of clause 10.2.2 of the WEM Rules. This non-compliance occurred in August 2021 and was identified by the ERA while last year's audit was underway. Following the non-compliance, the ERA implemented improved controls to mitigate the risk of similar non-compliances, including educating personnel and improving the review steps for outgoing correspondence.⁵ No further non-compliances of this type have occurred. The non-compliance was proactively reported in the 2020/21 compliance audit and is also included in this year's report as it occurred during the 2021/22 audit period.

² Assurance Advisory Group, 2022, *The Economic Regulation Authority Wholesale Electricity Market Rules and Wholesale Electricity Market Procedures 2021/22 Compliance Audit*, p. 4.

³ Following completion of the 2019 RLM review, the ERA submitted a rule change proposal to make improvements to the RLM. This rule change is currently on hold while EPWA undertakes the RCM review.

⁴ Consolidated 'Companion' Version of the Wholesale Electricity Market Rules, 1 February 2022, Rule 4.11.3C, ([online](#))

⁵ 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

To mitigate the risk of similar non-compliances to that of the RLM matter, the ERA is reviewing the ERA's current WEM Rule obligations that may be affected by the transition to the rules for the new market design. This is to ensure that appropriate transitional arrangements are reflected in the rules, including the effective date of those transitional arrangements. Should the ERA identify any gaps in these arrangements, the ERA will work with Energy Policy WA to resolve these matters. The auditor was satisfied with this action and did not recommend any further action.

At the time of the 2020/21 audit, the auditor considered the actions implemented by the ERA to mitigate the risk of information confidentiality breaches (discussed in section 3). While the auditor concluded that the additional controls referred to in section 3 mitigate the risk of future non-compliances, the auditor recommended the ERA develop a procedure for managing confidentiality breaches after they occur to ensure that these matters are appropriately managed. During the 2021/22 audit period, the ERA finalised the development of an internal data breach management procedure in response to the 2020/21 audit recommendation. The auditor concluded that the 2020/21 recommendation has been appropriately actioned.

Appendix 1 – Independent Assurance Report

The Economic Regulation Authority

Wholesale Electricity Market Rules and Wholesale
Electricity Market Procedures

2021/22 Compliance Audit

Final Report

12 October 2022



ASSURANCE
ADVISORY
GROUP

Level 11, 251 Adelaide Terrace
PERTH WA 6000

12 October 2022

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 2021 to 30 June 2022

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 2021 to 30 June 2022 and are pleased to submit our report to you.

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

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

Yours sincerely

Assurance Advisory Group



Stephen Linden

Director

www.assuranceadvisory.com.au

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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's) compliance, in all material respects, with the relevant requirements of the Wholesale Electricity Market (WEM) Rules and WEM Procedures for the year 1 July 2021 to 30 June 2022.

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 2021 to 30 June 2022.

Basis for modified opinion

During the audit we noted one non-compliance (detailed at Item 1 below) that occurred during the audit period 1 July 2021 to 30 June 2022.

During last year's audit for the period 1 July 2020 to 30 June 2021, the ERA self-reported one non-compliance (detailed at Item 2 below). This non-compliance occurred shortly after the 2020/21 audit period and falls in the current audit period 1 July 2021 to 30 June 2022. While this non-compliance was reported in the 2020/21 Compliance Audit report, it is appropriate for it to be included in the 2021/22 Compliance Audit report as the matter falls within this audit period.¹

Item	Non-compliance description	Risk rating
1	<p>Clause 4.11.3C required the ERA to conduct a review of the Relevant Level Methodology (RLM), to be applied in Setting Certified Reserve Capacity, by 1 April 2022.</p> <p>However, the Rule Change Proposal submitted by the ERA following the last RLM review is on hold and coinciding with this is the Coordinator of Energy's review of the Reserve Capacity Mechanism (RCM). In these circumstances, any subsequent review would be repetitive and not be of any value. In recognition of these factors, the rules for the new market design state that the next RLM review is to be postponed until after the completion of the Coordinator's RCM review but because that rule amendment has not commenced as yet, this has caused the breach.</p>	<p>This matter is rated minor.</p> <p>It is unlikely any detriment arose.</p>

¹ Item 2 was previously disclosed in the ERA's 2020/21 report to the Minister. Refer to *Economic Regulation Authority, Report to the Minister for Energy on the Economic Regulation Authority's compliance 2020/21* ([online](#))

Item	Non-compliance description	Risk rating
2	<p>On 26 August 2021 the ERA inadvertently disclosed confidential information to the wrong participant, in breach of Clause 10.2 of the WEM Rules. This non-compliance was proactively reported in the 2020/21 Compliance Audit but occurred during this audit period.</p> <p>ERA staff acted as soon as the breach was realised to notify impacted parties and to request the relevant information be deleted. A review of internal procedures was then undertaken to strengthen existing procedures.</p>	<p>This matter is rated minor.</p> <p>It is unlikely any detriment arose.</p>

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

- To monitor the WEM, including identifying market behaviour that has resulted in the market not functioning effectively, market design problems and inefficiencies.

Market compliance

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

Market reviews and approvals

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

- Approving the Australian Energy Market Operator's (AEMO) allowable revenue and forecast capital expenditure
- Approving AEMO's ancillary services requirements and costs for certain ancillary services
- Determining 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 2021 to 30 June 2022
- 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 requirements of the WEM Rules and WEM Procedures, for the year 1 July 2021 to 30 June 2022.

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 2021 to 30 June 2022.

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 2021 to 30 June 2022. 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 2021 to 30 June 2022
- 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
- Reviewing the Internal Operations Manual - Energy Markets Division setting out key functions, tasks, and processes to ensure relevant requirements are met
- Reviewing the market monitoring processes 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.

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 2021 to 30 June 2022 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

12 October 2022

2. ERA action to address non-compliances

2.1 Action to address 2021-22 non-compliance with clause 4.11.3C (Item 1 above)

The Independent assurance practitioner's report above includes a minor non-compliance relating to the ERA not completing a review of the Relevant Level Methodology (RLM), to be applied in Setting Certified Reserve Capacity, by 1 April 2022 as required by Clause 4.11.3C.

Although the ERA recognised this requirement, the Rule Change Proposal submitted following the last RLM review is on hold and, any subsequent review would be repetitive and not be of any value.

Coinciding with this is that the Coordinator of Energy is currently conducting a review of the Reserve Capacity Mechanism (RCM) which will, among other things, consider the matters in the ERA's Rule Change Proposal.

In recognition of this, the rules for the new market design state:

Clause 4.11.3C is amended to reflect that the next review of the Relevant Level Methodology by the ERA is to be postponed until after the completion of the Coordinator's RCM Review.²

However, the amendment to rule 4.11.3C to reflect the above has not commenced as yet which has caused this breach.

The ERA has recognised that there is a risk of similar non-compliances occurring during such periods of transition or reform and plans to implement mitigating actions to support its ongoing compliance with WEM Rules.

No further action is recommended in relation to this matter.

2.2 Action to address 2021/22 non-compliance with clause 10.2 (Item 2 above)

The Independent assurance practitioner's report above includes a minor non-compliance with clause 10.2, relating to the inadvertent disclosure of confidential information to the wrong participant. This non-compliance was self-reported by the Compliance and Enforcement Team and proactively reported in the 2020/21 Compliance Audit report, however as it occurred during this audit period, it is appropriate to recognise the non-compliance in this audit report.

The 2020/21 Compliance Audit reported that shortly after this non-compliance was recognised, the ERA took proportionate action to respond to the potential impact of the breach and reinforced the need to correctly follow internal procedures. The recommendation of the 2020/21 Compliance Audit report was for the ERA to *further develop protocols and procedures for sufficiently managing improper disclosures of confidential information*.

Since the submission of the 2020/21 Compliance Audit report, the ERA's Compliance and Enforcement Team has undertaken the following actions to further strengthen the ERA's processes:

- The requirement to correctly complete the ERA's Investigation Finalisation Checklist has been reinforced with Compliance staff. We sighted evidence of investigation finalisation checklists in use during the audit period
- An ERA Data Breach Management Procedure has been developed.

We consider this matter to be closed, with no further action recommended.

² Wholesale Electricity Market Rules (WA) – Companion Version, 1 February 2022, page 470 explanatory note to Rule 4.11.3C, ([online](#))

Appendix A - summary of relevant rules and procedures

Table 1: WEM Rules that were applicable to the ERA and tested for compliance for the audit period 1 July 2021 to 30 June 2022

WEM Rule number and title	Clause	Compliant?	Exception (rating)
1.7 Publication	1.7.3	Yes	-
1.36C General Transitional Provisions – Staging of Tranches 2 and 3 Amendments	1.36C.2	Yes	-
2.2A The ERA	2.2A.1	Yes	-
2.9 Market Procedures	2.9.2B, 2.9.3, 2.9.7B	Yes	-
2.13 Market Rule Compliance Monitoring and Enforcement	2.13.2, 2.13.3, 2.13.3B, 2.13.10, 2.13.15, 2.13.26, 2.13.27, 2.13.30, 2.13.31	Yes	-
2.14 Audit	2.14.5A, 2.14.5B, 2.14.5C, 2.14.5D	Yes	-
2.15 Monitoring and Reporting Requirements	2.15.1, 2.15.2, 2.15.3, 2.15.4	Yes	-
2.16 Monitoring the Effectiveness of the Market	2.16.9, 2.16.9A, 2.16.14, 2.16.15, 2.16.16	Yes	-
2.21 Market Consultation	2.21.1, 2.21.2	Yes	-
2.22A Determination of AEMOs budget	2.22A.2B, 2.22A.5	Yes	-
2.24 Determination of Market Fees	2.24.5, 2.24.6	Yes	-
3.11 Determining & Procuring Ancillary Service Requirements	3.11.6, 3.11.12	Yes	-
3.13 Payment for Ancillary Services	3.13.3A, 3.13.3B	Yes	-
3A.3 Exempt Transmission Connected Generating Systems	3A.3.6	Yes	-
4.11 Setting Certified Reserve Capacity	4.11.3C	No	Item 1 (minor)
4.16 The Benchmark Reserve Capacity Price	4.16.1, 4.16.3, 4.16.5, 4.16.6, 4.16.7	Yes	-
6.20 Energy Price Limits	6.20.6, 6.20.7, 6.20.9, 6.20.10, 6.20.13, 6.20.14, 6.20.15, 6.20.17, 6.20.18, 6.20.19, 6.20.20, 6.20.26, 6.20.27, 6.20.29	Yes	-
7.10 Compliance with Dispatch Instructions and Operating Instructions	7.10.8	Yes	-
7.12 Status Reports	7.12.2	Yes	-
10.2 Information Confidentiality Status	10.2.2	No	Item 2 (minor)

Table 2: WEM Rules that were relevant to the ERA but did not trigger an obligation on the ERA during the audit period 1 July 2021 to 30 June 2022

The reasons for the obligation not being triggered include the obligation being transitional, no relevant activity occurring, or no action being required within the audit period

WEM Rule number and title	Clause	Explanation/reason
1.31 Transitional Provisions – Review of Reserve Capacity	1.31.1	Transitional
1.35 Specific Transitional Provisions for the First Review of the Minimum STEM price	1.35.1, 1.35.2	No action required
1.36C General Transitional Provisions –Staging of Tranches 2 and 3 Amendments	1.36C.3, 1.36C.4, 1.36C.5, 1.36C.6, 1.36C.7	Transitional
1.43 Specific Transitional Provisions – Procedures for Tranches 2 and 3 Amending Rules	1.43.2, 1.43.5, 1.43.6, 1.43.7	Transitional
2.5 Rule Change Proposals	2.5.1B	No relevant activity
2.10 Procedure Change Process	2.10.2A, 2.10.3, 2.10.5B, 2.10.10, 2.10.12B, 2.10.13, 2.10.17, 2.10.18	No relevant activity
2.11 Coming into Force of Procedure Amendments	2.11.4	No relevant activity
2.13 Market Rule Compliance Monitoring and Enforcement	2.13.6H, 2.13.6I, 2.13.18	No relevant activity
2.16 Monitoring the Effectiveness of the Market	2.16.6, 2.16.8, 2.16.9B, 2.16.9D, 2.16.9E, 2.16.9F, 2.16.9FA, 2.16.9FB, 2.16.11, 2.16.13	No relevant activity / No action required
2.22A Determination of AEMOs budget	2.22A.2, 2.22A.2A, 2.22A.9 2.22A.17	No action required
2.25 Payment of Mkt Participant Fees	2.25.1B	No relevant activity
2.26 ERA Review of Methodology for Setting Administered Prices	2.26.3, 2.26.3A, 2.26.4, 2.26.5	No action required
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,	No action required
2.32 Rule Participant Suspension and Deregistration	2.32.1, 2.32.7, 2.32.7B	No relevant activity
2.44 Minister’s Emergency Powers	2.44.1, 2.44.2, 2.44.3	No relevant activity
3.8 Investigating Incidents in the SWIS	3.8.5A	No relevant activity
3.11 Determining & Procuring Ancillary Service Requirements	3.11.8C, 3.11.8D	No relevant activity / Transitional
3.13 Payment for Ancillary Services	3.13.3C	No relevant activity
3.15 Review of Ancillary Service Requirements Process and Standards	3.15.1, 3.15.2, 3.15.3	No action required
3.18 Outage Scheduling	3.18.3, 3.18.15, 3.18.18, 3.18.19, 3.18.20	No relevant activity
3A.12 Effect of a Rectification Plan	3A.12.3	No relevant activity
4.11 Setting Certified Reserve Capacity	4.11.3D, 4.11.3E	No relevant activity
4.16 The Benchmark Reserve Capacity Price	4.16.9, 4.16.10	No relevant activity / No action required
6.20 Energy Price Limits	6.20.9A, 6.20.22, 6.20.24, 6.20.25, 6.20.28	No relevant activity / No action required
7.11 Dispatch Advisories	7.11.9	No relevant activity