

## 2023 ASSET MANAGEMENT SYTEM REVIEW - POST AUDIT IMPLEMENTATION PLAN

Recommendation Reference	<ul style="list-style-type: none"> <li>Area Rating</li> <li>Asset Management Process</li> <li>AMP Effectiveness Criteria</li> </ul>	Review Recommendation	Action proposed to be taken by the licensee	Responsible Person(s)	Target completion date
01/2023 (2023-1.9/1)	<ul style="list-style-type: none"> <li>B3</li> <li>1.9</li> <li>Plans are regularly reviewed and updated.</li> </ul>	AGA should update the controlled document procedure register review frequency to align with practice, or vice versa. i.e. business and risk driver based rather than broad document classes, and bolster controls to these ensure review and update objectives are satisfied (See also <b>Error! Reference source not found.</b> )	<p><b>Note:</b> Section 4.6.2 of the ATCO Controlled Document Procedure (AA-GRC-PR02) states: “The Document Owner may specify a different review cycle for an individual or class of documents, and must advise the Document Controller so that this information can captured in the Controlled Document Register”.</p> <p><b>Action:</b> The Manager, Asset Services, will assess the review frequency of key AMS documentation (AMP, ALSs, etc.) to align with apparent risk and business need and adjust the review cycle for each as appropriate</p>	Manager: Asset Services	31/07/2023
02/2023 (2023-2.4/1)	<ul style="list-style-type: none"> <li>A3</li> <li>2.4</li> <li>Commissioning tests are documented and completed.</li> </ul>	AGA should conduct a technical compliance audit and review into ITP sign-off (by AGA and its contractors), and AGA MDR contents sign-off as deficiencies in these areas were observed for the reference project (Curtin University Exchange Precinct Development) sampled for this review.	<p><b>Action:</b> ATCO Gas Australia Pty Ltd has a Project Management Audit (to be conducted by our Canadian Internal Audit function) commencing in Q1 2024. The scope of this audit will include assessment of project MDRs including ITP signoff.</p>	Risk & Compliance Advisor	30/06/2024

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03/2023 (2023-8.1/1)	<ul style="list-style-type: none"> <li>B3</li> <li>8.1</li> <li>Risk management policies and procedures exist and are being applied to minimise internal and external risks associated with the asset management system.</li> </ul>	<p>AGA should conduct a system wide status review of outstanding E-Safe Action closure, especially where Progress states 100% and in some cases appears to be implemented in practise, however Action Owner Acceptance and subsequent workflow appears incomplete. e.g. ACT-002568 due 31/8/2021, ACT-0002281 due 31/08/2020, ACT-0002282 due 31/08/2020.</p> <p>This recommendation also follows from the further action requirement identified in Table 5 2: Action Status from Previous Reviews [02/2020].</p>	<p><b>Note:</b> Actions ACT-002568, ACT-0002281, and ACT-0002282 have been reviewed and closed appropriately prior to eSafe implementation as per previous processes. As this information was ported to eSafe in a “Closed” state, it only exists as a historical reference point.</p> <p><b>Action:</b> ATCO Gas Australia Pty Ltd will conduct a review of all open eSafe actions for accuracy and applicability.</p>	<p>Manager, Technical Compliance</p> <p>Risk &amp; Compliance Advisor</p>	30/09/2023
04/2023 (2023-8.1/2)	<ul style="list-style-type: none"> <li>B3</li> <li>8.1</li> <li>Risk management policies and procedures exist and are being applied to minimise internal and external risks associated with the asset management system.</li> </ul>	<p>AGA should review outstanding action close out ACT-0004033 and ACT-0004034 due 30/06/2022 arising from 2022 PTW internal audit (TCO RP 0511 IR1 and IR2).</p> <p>This recommendation also follows from the further action requirement identified in Table 5 2: Action Status from Previous Reviews [01/2020 and 02/2020].</p>	<p><b>Action:</b> These low risk/priority Improvement Requests will be assessed for applicability as the eSafe Permit To Work system is tested and eventually implemented.</p>	<p>Manager, Technical Compliance</p>	30/09/2023
05/2023 (2023-9.1/1)	<ul style="list-style-type: none"> <li>C2</li> <li>9.1</li> <li>Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks.</li> </ul>	<p>AGA should review and update the AMS contingency planning documents, ensure its testing schedule, reporting, references and improvement updates are kept current i.e. review controls to prevent recurrence. Including but not limited to:</p> <ul style="list-style-type: none"> <li>Emergency Response Management Plan (ERMP) AGA-R&amp;R-PL01</li> <li>Emergency and Operational Contacts (register) AGA-R&amp;R-PL01-FM04</li> </ul>	<p><b>Note:</b> AGA does note that the listed contingency planning documents could benefit from being updated, the key documents listed (Emergency Response Management Plan (ERMP) AGA-R&amp;R-PL01, Business Continuity Plan (BCP) AGA-GRC-PL01) are well within their stated document review timeframes.</p>	<p>Manager: Technical Compliance</p> <p>Senior Manager Risk &amp; Compliance</p> <p>Manager: Network Control</p>	30/11/2023

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		<ul style="list-style-type: none"> <li>Emergency Planning Response Checklist AGA-R&amp;R-PL01-FM16</li> <li>Emergency Response Exercises AGA-R&amp;R-PL01-WI02</li> <li>Business Continuity Plan (BCP) AGA-GRC-PL01</li> <li>Responding to a Loss of Phone Operation at Gas Distribution Jandakot AGA-O&amp;M-PR01-WI02</li> <li>Responding to a High Influx of Customer Calls at Gas Distribution Jandakot CCT PR0001 WI001.</li> </ul>	<b>Action:</b> Update of AGA Contingency planning materials, listed under this finding, is currently underway in parallel with the development and submission of Access Arrangement 6 documentation.		
06/2023 (2023-9.1/2)	<ul style="list-style-type: none"> <li>C2</li> <li>9.1</li> <li>Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks.</li> </ul>	AGA should expedite update of the Equipment Calibration and Servicing Guideline (AGA-ENG-GL16) and SAP with regular periodic inspection requirements for squeeze-off equipment, to satisfy ACT-0004023 (CAR) which is significantly overdue (raised following 2021 ERE).	<b>Action:</b> The servicing requirements of squeeze off equipment will be reviewed, and if applicable, updated in SAP and the Equipment Calibration and Servicing Guideline (AGA-ENG-GL16).	Manager, Asset Services	31/07/2023
07/2023 (2023-12.1/1)	<ul style="list-style-type: none"> <li>B3</li> <li>12.1</li> <li>A review process is in place to ensure that the asset management plan and the asset management system described therein are kept current.</li> </ul>	AGA should conduct a review to ensure appropriate corrective action is made for alignment of the review cycle commitment between and within the SAMP (AGA-S&P-PL01), Controlled Document Register (AGA-GRC-PR02-RG01), Document Control Procedure (AGA-GRC-PR02), and practice (i.e. actual revision cycles of the AMP, ALSs, SWIs, WIs etc.).	<b>Note:</b> Section 4.6.2 of the ATCO Controlled Document Procedure (AA-GRC-PR02) states: "The Document Owner may specify a different review cycle for an individual or class of documents, and must advise the Document Controller so that this information can captured in the Controlled Document Register".	Manager, Asset Services	31/07/2023

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			<b>Action:</b> The Manager, Asset Services, will assess the review frequency of key AMS documentation (AMP, ALSs, etc.) to align with apparent risk and business need and adjust the review cycle for each as appropriate		
08/2023 (2023-12.1/2)	<ul style="list-style-type: none"> <li>B3</li> <li>12.1</li> <li>A review process is in place to ensure that the asset management plan and the asset management system described therein are kept current.</li> </ul>	AGA should review the effectiveness of controls and processes in place to ensure the AMS remains current. AGA should focus this review on escalation processes for overdue reviews. AGA should ensure processes include requirements for clear notification and reporting to upper management and direct managers of document owners where rolling document review targets are missed and pervasively outstanding - especially for documents with last revision dates more than 5 years old.	Action: Risk & Compliance will work in conjunction with Document Control to produce twice yearly reporting to Senior Management, via our Risk Management & Compliance Committee, in regards to outstanding reviews of specific key documents.	Risk & Compliance Advisor	30/09/2023
09/2023 (2023-12.1/3)	<ul style="list-style-type: none"> <li>B3</li> <li>12.1</li> <li>A review process is in place to ensure that the asset management plan and the asset management system described therein are kept current.</li> </ul>	AGA should conduct a review of MOC processes and an audit into MOC implementation compliance, which was observed as deficient for examples of significant change sampled in this review e.g. changes to maintenance schedules for Regulator Sets and MGL ILI (See 7.6.1.5). Ensure update of key AMS documents is a lead (instead of lag) indicator for significant changes, and that MOC processes are applied to all changes that directly impact the AMS, including IT and critical risk management systems e.g. IT service provider, Lantis GIS and E-Safe (See 7.7.2).	Action: Technical Compliance will conduct a review into MOC implementation compliance, as part of our ongoing program of Critical Controls audits. This audit would be tentatively scheduled for Q2 2024	Manager, Technical Compliance	30/06/2024

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10/2023 (2023-12.2/1)	<ul style="list-style-type: none"> <li>C3</li> <li>12.2</li> <li>Independent reviews (e.g. internal audit) are performed of the asset management system.</li> </ul>	AGA should escalate outstanding audit actions relating to AMS updates, review tracking and reporting of such actions to prevent recurrence of overdue actions; and conduct regular follow up internal audit into Asset Creation (CAPEX) projects to confirm effectiveness of corrective action controls. Audit scope should target Asset Handover records e.g. MDRs, with a focus on inspection test records (e.g. ITP execution).	<p><b>Action:</b> Closeout of this recommendation will comprised the proposed actions for recommendations:</p> <ul style="list-style-type: none"> <li>02/2023 A Project Management Audit (to be conducted by our Canadian Internal Audit function) commencing in Q1 2024.</li> <li>03/2023 ATCO Gas Australia Pty Ltd will conduct a review of all open eSAfe actions for accuracy and applicability.</li> </ul>	<p>Risk &amp; Compliance Advisor</p> <p>Manager, Technical Compliance</p>	<p>30/06/2024</p> <p>30/09/2023</p>