



Quantum
Assurance



2025 Performance Audit
Electricity Distribution Licence (EDL07)
Electricity Retail Licence (ERL28)

Report

Economic Regulation Authority
June 2025

TABLE OF CONTENTS

Independent Auditor's Report.....	1
Executive Summary	4
1. Introduction	5
1.1 Background	5
1.2 Objectives and Scope	5
1.3 Audit Compliance and Controls Rating Scale	6
2. Summary of Audit Ratings of Controls and Compliance	7
3. Status of Previous Audit Recommendations	17
4. Detailed Audit Results and Recommendations	19
5. Audit Recommendations.....	76
Appendix A – Audit Methodology	77
A1. Audit Approach	77
A2. Licensee's Representatives Participating in the Audit	78
A3. Key Documents Examined	78
A4. Consultants.....	79

Quantum Assurance

ABN 83 083 848 168 Liability limited by a scheme approved under Professional Services Legislation

Level 28 AMP Tower, 140 St Georges Terrace, Perth **M.** PO Box 6882, East Perth WA 6892

T. 08 9278 2570 **F.** 08 9278 2571

E. mail@quantumassurance.com.au **W.** www.quantumassurance.com.au

Limitations of this Report

This report was prepared for distribution to the Economic Regulation Authority and Peel Renewable Energy Pty Ltd (PRE) for the purpose of fulfilling PRE's performance audit obligations under its Electricity Distribution Licence and Electricity Retail Licence. We disclaim any assumption of responsibility for any reliance on this report to any persons or users other than the Economic Regulation Authority and PRE or for any purpose other than that for which it was prepared.

Because of the inherent limitations of any internal control environment, it is possible that fraud, error or non-compliance may occur and not be detected. An audit is not designed to detect all instances of non-compliance with the procedures and controls over the licence obligations of the Electricity Distribution Licence and Electricity Retail Licence, since we do not examine all evidence and every transaction. The audit conclusions expressed in this report have been formed on this basis.

This page left blank.

Independent Auditor's Report

Scope

Peel Renewable Energy Pty Ltd (PRE), a subsidiary of Zenith Connected Energy (ZCE), is the licensee of the Economic Regulation Authority (ERA) for the electricity distribution licence (EDL7) and the retail trading licence (ERL28) under the provisions contained in the *Electricity Industry Act 2004*.

We have performed a reasonable assurance engagement on PRE's compliance, in all material respects, with the conditions of EDL7 and ERL28 and the *Electricity Industry Act 2004* for the period of three years from 1 April 2022 to 31 March 2025.

Our evaluation was made against the licence obligations listed in the Electricity Compliance Reporting Manual (February 2023 and previous versions January 2023 and February 2022) and in accordance with the ERA's 2019 Audit and Review Guidelines: Electricity and Gas Licences (updated August 2022).

The scope of this assurance work relates to assessing PRE's systems and effectiveness of processes and regulatory controls to ensure compliance with the obligations, standards, outputs and outcomes required by the Licence issued under the Act.

Modified Opinion

In our opinion, based on the procedures performed as outlined in the Audit Plan approved by the Economic Regulation Authority and the evidence we have obtained, except for the effects of the matters described in the Basis for Modified Opinion paragraph below, Peel Renewable Energy has complied, in all material respects, with its licence conditions and relevant legislative obligations for the period 1 April 2022 to 31 March 2025.

Basis for Modified Opinion

During the period from 1 April 2022 to 31 March 2025, out of 184 applicable licence obligations, there were 3 non-compliances with minor impact on customers.

Reporting Manual number and Licence condition		Issue
<i>The following obligations were assessed as "Non-Compliant – Minor Impact".</i>		
102	<i>A licensee must provide for an asset management system.</i>	<p>The review of the Asset Management System reported in July 2024 to the ERA that the performance of the Asset Management System was found to require improvement across most effectiveness criteria. While there is a small number of relatively new assets these appear to have been managed without safety or major availability concerns over the past 4 years. However, it was observed that the policies and procedures comprising the Asset Management System have a significant opportunity for improvement. With specific focus on maturing a risk management framework and embedding it within the wider business functions. This is considered a minor non-compliance with no impact on customers in this audit period.</p> <p>This asset management system is documented in the Asset Management Plan (December 2024).</p>
448B	<i>A network operator must publish the document within 10 business days after notification of the ERA's approval under subclauses 6.13(1)(a)(i), 6.16 or 6.17.</i>	<p>PRE is compliant with this requirement as confirmed at the PRE website. The ERA approved the Meterology procedure on 4 April 2022. The previous owner of PRE did not publish the procedure within 10 business days of approval.</p> <p>The previous audit report dated 22 June 2022 confirmed the procedure has been published on the website and noted this as a minor non-compliance. As this has been resolved, no further recommendation is made.</p> <p>The Licence Compliance Obligations Register includes this obligation.</p>

Reporting Manual number and Licence condition	Issue
<p>448C <i>A network operator must publish its communication rules as soon as practicable, and in any event within 6 months after the date this Code applies to it.</i></p>	<p>PRE does not have a published communication rules document at this stage.</p> <p>The content of the communication rules are file formats, protocol, timeframes for data transfer, sufficient for users to design and commission their IT systems for b2b communication and to be compatible with communication rules as defined in the Transfer Code</p> <p>The definition of user was originally defined as parties who have an access contract under the access code. Via a footnote it was extended in the Metering Code to include every customer who has any contract, including a service contract. None of PRE's customers will design and commission an IT system to transfer data with PRE.</p> <p>The Transfer Code does not currently apply to PRE until another retailer serves customers on the Peel network. PRE will develop communication rules once another retailer is about to enter the Peel network. This is considered a minor non-compliance.</p> <p>The Licence Compliance Obligations Register includes this obligation.</p>

We conducted our engagement in accordance with Australian Standard on Assurance Engagements ASAE 3100 Compliance Engagements (ASAE 3100). We believe that the assurance evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

In accordance with ASAE 3100 we have:

- Used our professional judgement to plan our procedures and assess the risks that may cause material non-compliance with each of the compliance requirements to be concluded upon;
- Considered internal controls implemented to meet the compliance requirements; however, we do not express a conclusion on their effectiveness; and
- Ensured that the engagement team possess the appropriate knowledge, skills and professional competencies.

Summary of Procedures

Our procedures consisted primarily of:

- Utilising ERA's 2019 Audit and Review Guidelines: Electricity and Gas Licences ('the Guidelines') to develop a risk assessment.
- Developing an Audit Plan and an associated work program, approved by the ERA on 10 April 2025.
- Interviewing relevant PRE staff to gain an understanding of process controls.
- Onsite visit to the Peel Business Park on 22 April 2025 and conducted various meetings online with key contacts up to 22 May 2025, to determine the effectiveness of systems and procedures in place and to compare actual performance against the licence standards.
- Assessing documents and performing walkthroughs of processes and controls to support the assessment of compliance and the effectiveness of the control environment in accordance with Licence obligations;
- Performing procedures and testing based on the procedures listed in the approved Audit Plan;
- Reviewing the status of the recommendations in the previous audit report dated June 2022; and
- Updating the risk assessment with any new information obtained in the course of the audit and, in instances of significant non-compliance, assessing the licensee's plan to ensure compliance and recommend any further improvements to achieve compliance.

How We Define Reasonable Assurance and Material Non-Compliance

Reasonable assurance is a high level of assurance but is not a guarantee that it will always detect a material non-compliance with the compliance requirements.

Instances of non-compliance are considered material if, individually or in the aggregate, they could reasonably be expected to influence relevant decisions of the intended users taken on the basis of the Licensee's compliance with the compliance requirements.

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 the compliance requirements may occur and not be detected.

A reasonable assurance engagement throughout the specified period does not provide assurance on whether compliance with the compliance requirements will continue in the future.

Use of this Assurance Report

This report has been prepared for PRE and the ERA for the purpose of assessing compliance with the requirements of the License and may not be suitable for another purpose.

We understand that a copy of this report will be provided to the ERA for the purpose of reporting on the reasonable assurance engagement for the Licensee. We agree that a copy of this report may be provided to the ERA in connection with this purpose, but only on the basis that we accept no duty, liability or responsibility to the ERA in relation to the report.

We disclaim any assumption of responsibility for any reliance on this report, to any person other than the Licensee and the ERA, or for any other purpose other than that for which it was prepared.

Management's responsibility

PRE's management are responsible for:

- The compliance activities undertaken to meet the requirements of the Licence;
- Identifying risks that threaten the compliance requirements identified above being met and identifying, designing and implementing controls to enable the compliance requirements to be met and, monitoring ongoing compliance;
- Ensuring that it has complied in all material respects with the requirements of the Licence;
- Establishing and maintaining an effective system of internal control over its systems designed to achieve its compliance with the Licence requirements;
- Implementing processes for assessing its compliance requirements and for reporting its level of compliance to the ERA; and
- Implementing corrective actions for instances of non-compliance (if any).

Our responsibility

Our responsibility is to perform a reasonable assurance engagement in relation to PRE's compliance with its License requirements throughout the period and to issue an assurance report that includes our conclusion.

Our Independence and Quality Control

We have complied with our independence and other relevant ethical requirements of the *Code of Ethics for Professional Accountants* issued by the Australian Professional and Ethical Standards Board and complied with the applicable requirements of the *Australian Auditing Standard ASQC 1 Quality Control for Firms that Perform Audits and Reviews of Financial Reports and Other Financial Information, Other Assurance Engagements and Related Services Engagements* to maintain a comprehensive system of quality control.

We confirm that the ERA's 2019 Audit and Review Guidelines: Electricity and Gas Licenses (updated August 2022) have been complied with in the conduct of this audit and the preparation of the report, and that the audit findings reflect our professional opinion.

Quantum Assurance



Geoff White CA
Director

30 June 2025

Executive Summary

Peel Renewable Energy Pty Ltd (PRE), a subsidiary of Zenith Connected Energy (ZCE), is the licensee of the Economic Regulation Authority (ERA) for two licences, the Electricity Distribution Licence (EDL7) and the Electricity Retail Licence (ERL28) under the provisions contained in the *Electricity Industry Act 2004*. The licences' area is the Peel Business Park as shown in plan ERA-EL-156(A). The licences EDL7 Version 2 and ERL28 Version 2 are applicable from September 2020.

PRE became a subsidiary of Zenith Energy Pty Ltd in August 2022 and is the operator of the Peel Microgrid, a microgrid in the Peel Business Park located in Western Australia's Peel region. PRE has a physical connection to Western Power's 22 kV distribution network.

PRE is required to comply with the terms and conditions of their licence, including applicable legislative provisions and performance reporting as set out in the Electricity Compliance Reporting Manual (February 2023 and previous versions January 2023 and February 2022).

Not less than once in every period of 24 months unless extended by the ERA, PRE is required to engage an independent expert, acceptable to the ERA, to undertake a Performance Audit of compliance with the licence conditions. This is the second audit of the licence and covers three years from 1 April 2022 to 31 March 2025.

Quantum Assurance was engaged by PRE to complete this Performance Audit ('Audit') which is consistent with the requirements of the *Australian Standard on Assurance Engagement ASAE3000 – Assurance Engagements Other than Audits or Reviews of Historical Financial Information* and the ERA 2019 Audit and Review Guidelines – Electricity and Gas Licences (updated August 2022) ('ERA Guidelines').

This Performance Audit has been conducted to assess the licensee's level of compliance with the conditions of its distribution licence EDL7 and retail licence ERL28.

Conclusion

Through the execution of the Audit Plan and assessment and testing of the control environment, the information system, control procedures and compliance attitude, the audit team members have gained reasonable assurance that Peel Renewable Energy has fully complied with its Electricity Distribution Licence and Retail Licence performance and quality standards and obligations during the audit period from 1 April 2022 to 31 March 2025.

Out of 184 applicable compliance obligations, the audit found:

- 105 obligations were rated compliant (72 with adequate controls and 33 with controls not reviewed).
- 3 were rated non-compliant - minor impact (2 with adequate controls and 1 with generally adequate controls – improvement needed).
- 76 were not rated for compliance, as no relevant activity took place during the audit period (9 with adequate controls and 67 with controls not reviewed).

The audit confirmed that PRE has fully complied with its information reporting obligations for the period 1 April 2022 to 31 March 2025.

The control environment is considered to be well-designed and effective with no recommendations for improvements.

1. Introduction

1.1 Background

Peel Renewable Energy Pty Ltd (PRE), a subsidiary of Zenith Connected Energy (ZCE), is the licensee of the Economic Regulation Authority (ERA) for two licences, the Electricity Distribution Licence (EDL7) and the Electricity Retail Licence (ERL28) under the provisions contained in the *Electricity Industry Act 2004*. The licences' area is the Peel Business Park as shown in plan ERA-EL-156(A). The licences EDL7 Version 2 and ERL28 Version 2 are applicable from September 2020.

PRE became a subsidiary of Zenith Energy Pty Ltd in August 2022 and is the operator of the Peel Microgrid, a microgrid in the Peel Business Park located in Western Australia's Peel region. PRE has a physical connection to Western Power's 22 kV distribution network.

Electricity is procured by PRE from Synergy under an electricity supply agreement. Electricity is then retailed to PRE customers inside the PBP. Electricity is also generated by the behind-the-meter microgrid which feeds into the main 22 kV switchboard; which offsets the electricity supply from the network. The generation assets are owned by Peel Renewable Energy Genco Pty Ltd, a separate Parent Company subsidiary.

The customer metering arrangement is under a service agreement with Synergy (to mid-2024) and Intellihub (since mid-2024) whereby the customer meters are supplied, installed, and commissioned by Synergy/Intellihub on behalf of PRE. Metering data is sent from Synergy/Intellihub to PRE's billing agent, WINconnect (subsidiary of Origin Energy).

PRE oversees and provides new customer connections following advice and design from external consultants. Key operations are monitored by Jarrah Solutions; maintenance activities are conducted by Nilsen; and customer account management and billing are carried out by WINconnect.

PRE retails electricity to only 10 commercial/industrial customers under ERL28 in the audit period. There are no small use customers or residential customers on the Peel microgrid. There are no special conditions attached to either of the two licences.

Not less than once in every period of 24 months unless extended by the ERA, PRE is required to engage an independent expert, acceptable to the ERA, to undertake a Performance Audit of compliance with the licence conditions. PRE engaged Quantum Assurance, with the approval of the ERA, to perform this audit of PRE's electricity distribution licence and retail licence services, to comply with the licensing requirements of the ERA.

The Performance Audit approach is based on the compliance obligations set out in the Electricity Distribution Licence (EDL7) and the Electricity Retail Licence (ERL28) for the audit period from 1 April 2022 to 31 March 2025. This is the second audit of these licences.

The evaluation was made against the licence obligations listed in the Electricity Compliance Reporting Manual (February 2023 and previous versions January 2023 and February 2022) and in accordance with the ERA's 2019 Audit and Review Guidelines: Electricity and Gas Licences (updated August 2022).

1.2 Objectives and Scope

The objective was to provide the ERA with an independent assessment of the Licensee's compliance with relevant obligations under the licence.

The scope of the audit included the adequacy and effectiveness of performance against the requirements of the licence by considering the following:

Scope	Description
Control Environment	The licensee's management philosophy and operating style, organisational structure, assignment of authority and responsibilities, the use of internal audit, the use of information technology and the skills and experience of the relevant staff members.
Information Systems	The suitability of the licensee's information systems to record the information needed to comply with the licence, accuracy of data, security of data and documentation describing the information system.

Scope	Description
Control Procedures	The presence of systems and procedures to monitor compliance with the licence or the effectiveness of the licensee's asset management system, and to detect or prevent instances of non-compliance or under-performance.
Compliance Attitude	The action taken by the licensee in response to any previous audit or review recommendations, and an assessment of the licensee's attitude towards compliance.
Outcome Compliance	The actual performance against standards prescribed in the licence throughout the audit or review period.
Integrity of Reporting	The completeness and accuracy of the compliance and performance reports provided to the ERA.
Compliance with individual licence conditions	The requirements imposed on the specific licensee by the ERA or specific issues that are advised by the ERA.

When assessing if a licensee has complied with its licence obligations, the auditor must apply a level of scrutiny that corresponds to a 'reasonable assurance engagement'. A reasonable assurance engagement is:

"An assurance engagement in which the assurance practitioner reduces engagement risk to an acceptably low level in the circumstances of the engagement as the basis for the assurance practitioner's conclusion. The assurance practitioner's conclusion is expressed in a form that conveys the assurance practitioner's opinion on the outcome of the measurement or evaluation of the underlying subject matter against criteria." (ASAE3000)

The highest priority areas (priority 1, 2 or 3) based on inherent risk, the previous audit's assessed controls/processes and the reported non-compliances for this audit period were:

Priority 2

- **Obligations 127 to 128** – Maintain a Preserved Supply Register

The audit was designed to identify any areas where improvement was required and to recommend corrective action as necessary. In accordance with the ERA Guidelines, recommendations are included in the report only for obligations rated as inadequate controls (C), no controls (D), non-compliant – moderate impact (3) or non-compliant – major impact (4). Any other improvements identified in the audit are provided direct to the Licensee. (refer Ratings Table in section 1.3).

1.3 Audit Compliance and Controls Rating Scale

The adequacy of controls and compliance with the legislative obligations was assessed using the following ratings.

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 required	3	Non-compliant – moderate impact on customers or third parties
D	No controls evident	4	Non-compliant – major impact on customers or third parties
NP	Not performed – controls not assessed in the audit.	NR	Not rated – no activity in current period

The preliminary risk assessment included in the Audit Plan was reviewed and updated in the course of the audit and a compliance rating using the above scale was assigned to each obligation under the licence, as shown in Section 2.

Section 3 provides details of the current status of the previous audit recommendations.

Section 4 provides further details of the systems and the compliance assessment for each obligation.

2. Summary of Audit Ratings of Controls and Compliance

The current audit assessment of the ratings for the adequacy of controls and compliance with the 187 applicable legislative obligations is shown below in the summary table and detailed obligations table.

Summary of Audit Ratings of Control and Compliance

Controls rating	Compliance Rating						Total
	Rating	1 Compliant	2 Non-compliant (minor impact)	3 Non-compliant (moderate impact)	4 Non-compliant (major impact)	NR Not rated	
	A -Adequate	72	2	-	-	9	83
	B – Generally adequate	-	1	-	-	-	1
	C - Inadequate	-	-	-	-	-	-
	D – No controls	-	-	-	-	-	-
	NP – Not performed	33	-	-	-	67	100
	Total	105	3	-	-	76	184

Detailed Audit Ratings of Control and Compliance by Obligation

The current audit assessment of the ratings for the adequacy of controls and compliance with the legislative obligations is shown below.

No. ¹	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating ²					Compliance Rating ³				
				(A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					(1=Compliant 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)				
				A	B	C	D	NP	1	2	3	4	NR
Electricity Industry Act 2004													
101	Provide ERA with performance audit	Section 13(1)	4	✓					✓				
102	Asset Management System	Section 14(1)(a)	4		✓					✓			
103	Notify ERA of Asset Management System and major changes	Section 14(1)(b)	4	✓					✓				
104	Report on Asset Management System to ERA	Section 14(1)(c)	4	✓					✓				
105	Payment of license fees to ERA	ERA (Licencing Funding) Regulations 2014	4	✓					✓				
106	Minimisation of unforeseen effects on electricity supply	Section 31(3)	4	✓					✓				
Licence Conditions and Obligations													
119	Maintaining accounting records	Section 11	4	✓					✓				
121	Comply with ERA's standard audit guidelines	Section 11	4	✓					✓				
122	Comply with ERA's standard audit guidelines for an asset management system review.	Section 11	4	✓					✓				
123	Notify ERA of external administration or changes in license circumstances	Section 11	4					✓					✓
124	Providing ERA with any other information	Section 11	4	✓					✓				
125	Timeframe to publish information	Section 11	4	✓					✓				
126	Notices in writing	Section 11	4					✓	✓				
127	Maintain Priority Restoration Register	Section 11	2	✓					✓				
128	Priority Restoration Register to comply with criteria	Section 11	2	✓					✓				

¹ The number refers to the Obligation reference in the Electricity Compliance Reporting Manual (February 2023 and previous versions January 2023 and February 2022). (Note: Only obligations applicable to this Electricity Distribution Licence and the Electricity Retail Licence are shown)

² Refer Controls and Compliance Rating Scales in Section 1.3.

³ Refer Controls and Compliance Rating Scales in Section 1.3.

No. ¹	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating ²					Compliance Rating ³				
				(A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					(1=Compliant 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)				
				A	B	C	D	NP	1	2	3	4	NR
Electricity Industry (Metering) Code													
317	Treat all Code participants that are associates on an arms-length basis.	Clause 2.2(1)(a)	4					✓	✓				
318	No special benefits for Code participants that are associates	Clause 2.2(1)(b)	4	✓					✓				
319	Meters comply with metrology procedure and NMA.	Clause 3.1	4	✓					✓				
320	Accumulation meter display	Clause 3.2(1)	4	✓					✓				
320A	Remove accumulation meter in connection point for contestable customer	Clause 3.2(2B)	4					✓	✓				
321	Interval meter to be downloadable	Clause 3.3(1)	4	✓					✓				
322	Communications link approved modem and isolation device	Clause 3.3(3)	4	✓					✓				
323	Bidirectional flow must be recorded	Clause 3.3A(1)	4					✓	✓				
324	User becomes aware of bi-directional electricity flow	Clause 3.3B	4					✓	✓				
325	Measurement of bi-directional flow	Clause 3.3C	4					✓	✓				
326	Metering installation at every connection point	Clause 3.5(1) and (2)	4	✓					✓				
327	Maintain metering installation	Clause 3.5(3)	4	✓					✓				
328	Metering point close to connection point	Clause 3.5(4)	4	✓					✓				
329	Charges only as per service level agreement	Clause 3.5(6)	4	✓					✓				
330	Non-compliant meters	Clause 3.5(9)	4					✓	✓				
331	Devices to be compatible with telecommunications network	Clause 3.7	4	✓					✓				
332	Restrict unauthorised access to meters	Clause 3.8	4					✓	✓				
333	Metering installation compliance	Clause 3.9(3)	4	✓					✓				
334	Type 3 metering installation for supply above 1000 volts	Clause 3.9(7)	4	✓					✓				
335	Metering compensation to be close to zero	Clause 3.9(9)	4	✓					✓				
336	Metering programable settings	Clause 3.10	4	✓					✓				
337	Consistent operation of metering	Clause 3.11(1)	4					✓	✓				
338	Repair metering for any outage	Clause 3.11(2)	4					✓					✓
339	Code participant to advise operator of outage or malfunction of metering installation	Clause 3.11(3)	4					✓					✓
340	Meters to be sampled and tested	Clause 3.11A(1)	4					✓					✓

No. ¹	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating ²					Compliance Rating ³				
				(A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					(1=Compliant 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)				
				A	B	C	D	NP	1	2	3	4	NR
341	Population of “failed” meters to be replaced within 3 years	Clause 3.11A(2)	4					✓					✓
342	Compliance with prescribed design requirements	Clause 3.12(1)	4	✓					✓				
343	Compliance of instrument transformers	Clause 3.12(2)	4	✓					✓				
344	Isolation facilities for meter testing	Clause 3.12(3)	4					✓	✓				
345	Maintain drawings of metering installations	Clause 3.12(4)	4	✓					✓				
346	Install check metering installation	Clause 3.13(1)	4					✓					✓
347	Partial check metering installation	Clause 3.13(3c)	4					✓					✓
348	Check metering compliance	Clause 3.13(4)	4					✓					✓
349	Non-compliant metering installations	Clause 3.14(3)	4					✓	✓				
350	Type 1 to Type 5 metering installations	Clause 3.16(1)	4	✓					✓				
350A	Interval meter not 5MS meter must store 5 minute interval data	Clause 3.16(1A)	4	✓					✓				
351	Type 1 to 4 metering installation to include communications link.	Clause 3.16(1A)	4	✓					✓				
352	Data logger collation	Clause 3.16(3)	4	✓					✓				
353	Collation of energy data	Clause 3.16(3A)	4	✓					✓				
353A	No Type 5 or 6 metering installation after 1 January 2022	Clause 3.16(3B)	4					✓					✓
353B	Type 5 and 6 metering compliance prior to 1 January 2022	Clause 3.16(3C)	4					✓					✓
354	Supply under a non-regulated contract to contestable customer	Clause 3.18(1)	4	✓					✓				
354A	5MS meter to comply with 5 minute settlement commencement	Clause 3.18(A)	4					✓					✓
355	Request for enhanced technology features	Clause 3.20(1)	4					✓					✓
356	Any charge to be in accordance with service level agreement	Clause 3.20(3)	4					✓					✓
357	Accuracy of internal real time clock	Clause 3.21(1)	4					✓	✓				
358	Storage onsite of interval energy data for periods prescribed	Clause 3.21(2)	4					✓	✓				
359	Metering software licence	Clause 3.22	4					✓	✓				
360	Isolation of signals from meter	Clause 3.23(a)	4					✓	✓				
361	Provide user with signal specification	Clause 3.23(b)	4	✓					✓				

No. ¹	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating ²					Compliance Rating ³				
				(A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					(1=Compliant 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)				
				A	B	C	D	NP	1	2	3	4	NR
362	Prepayment meter	Clause 3.24(A1)	4					✓					✓
363	Replacement of prepayment meter	Clause 3.24(B1)	4					✓					✓
364	Meter installation by registered metering installation provider	Clause 3.27	4	✓					✓				
365	Publish annual list of registered metering installation providers	Clause 3.29	4					✓					✓
366	Maintain metering database	Clause 4.1(1)	4	✓					✓				
367	Metering database to be secure from unauthorised access	Clause 4.1(2)	4	✓					✓				
368	Disaster recovery plan to rebuild metering database within 2 days	Clause 4.1(3)	4	✓					✓				
369	Metering registry to comply with Code and market rules	Clause 4.2(1)	4	✓					✓				
370	Standing data content	Clause 4.3(1)	4	✓					✓				
371	Discrepancy between data in meter and database	Clause 4.4(1)	4	✓					✓				
372	Not knowingly permit the registry to be materially inaccurate.	Clause 4.5(1)	4	✓									✓
373	Notify network operator of any inaccuracy in standing data	Clause 4.5(2)	4	✓					✓				
374	Update registry for any inaccuracy of standing data	Clause 4.6(1)	4	✓					✓				
375	Other notifications of any inaccuracy of standing data	Clause 4.6(2)	4					✓					✓
376	Notify user within 2 business days of standing data update	Clause 4.7(1)	4					✓					✓
377	Read only remote access to energy data for retailer or generator	Clause 4.8(3)	4					✓	✓				
378	Read only remote access to data held in metering database	Clause 4.8(3A)	4					✓	✓				
379	Energy data secured from unauthorised access	Clause 4.8(4)(a)	4					✓	✓				
380	Metering database data to be secure from unauthorised access	Clause 4.8(4)(b)	4					✓	✓				
381	Passwords and security controls	Clause 4.8(5)	4					✓	✓				
382	Retain energy data for prescribed periods	Clause 4.9	4					✓	✓				
383	Accommodate Code participant's metering service request	Clause 5.1(1)	4					✓					✓
384	Process request for a service level agreement	Clause 5.1(2)	4	✓					✓				
385	Transfer energy data to metering database within 2 business days	Clause 5.3(1)	4					✓	✓				

No. ¹	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating ²					Compliance Rating ³				
				(A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					(1=Compliant, 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)				
				A	B	C	D	NP	1	2	3	4	NR
385A	For 5MS meters, bi-directional data if applicable and 5 minute interval data	Clause 5.3(2)	4	✓					✓				
385B	Scheduled meter reading to be no more than one week apart	Clause 5.3(3)	4	✓					✓				
386	Validation of actual meter reading at least every 12 months	Clause 5.4(1)	4					✓					✓
387	Meter reading validation by skilled operator	Clause 5.4(1A)	4					✓					✓
388	Assist network operator to comply with their obligations	Clause 5.4(2)	4					✓					✓
389	Charge for the provision of energy data	Clause 5.5(2)	4	✓									✓
390	Restrictions on charges for standing data or energy data	Clause 5.5(2A)	4	✓									✓
391	Provide energy data within prescribed timeframes	Clause 5.6(1)	4	✓					✓				
391A	Provide energy data to AEMO before 5pm on first business day	Clause 5.6(3)	4					✓					✓
391B	For 5MS meters, bi-directional data if applicable and 5 minute interval data	Clause 5.6(5)	4	✓					✓				
392	Replacement energy data	Clause 5.7	4					✓					✓
393	Provide user with any data to comply with the Code of Conduct	Clause 5.8	4					✓					✓
394	Provide standing data to users	Clause 5.9	4					✓					✓
395	Provide subset of standing data to a retailer	Clause 5.10	4					✓					✓
396	Provide standing data to incoming retailer within 2 business days	Clause 5.11	4					✓					✓
397	Energy data request from user	Clause 5.12(1)	4					✓					✓
398	Standing data request to be provided within 2 business days	Clause 5.13	4					✓					✓
399	Bulk standing data request	Clause 5.14(3)	4					✓					✓
400	Provide date of meter reading for any energy data	Clause 5.15	4	✓									✓
401	Provide energy data to network operator within timeframe	Clause 5.16	4					✓					✓
402	Provide standing data or energy data to customers as required	Clause 5.17(1)	4	✓					✓				
403	Provide data from a metering point	Clause 5.17A(1)	4					✓					✓
404	Comply with timeframe for data request	Clause 5.17(1)	4					✓					✓
405	Change in the energisation status of a metering point	Clause 5.18	4					✓					✓

No. ¹	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating ²					Compliance Rating ³				
				(A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					(1=Compliant 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)				
				A	B	C	D	NP	1	2	3	4	NR
406	Act with network operator in accordance with good electricity industry practice	Clause 5.19(1)	4					✓					✓
407	Record prescribed information in relation to the site of each connection point	Clause 5.19(2)	4	✓					✓				
408	Notify network operator of any changes within 1 day	Clause 5.19(3)	4	✓					✓				
409	Notify user acknowledging receipt of address attributes	Clause 5.19(5)	4					✓					✓
410	Do not notify network operator if change due to information provided by network operator	Clause 5.19(6)	4					✓	✓				
411	Develop Energy Data Verification Request Form	Clause 5.20(1)	4	✓					✓				
412	Energy Data Verification Request Form to require information from Code participant	Clause 5.20(2)	4					✓	✓				
413	Inform result and verified energy data to Code participant	Clause 5.20(4)	4					✓					✓
414	Network operator must comply	Clause 5.21(2)	4					✓					✓
415	Test in accordance with metrology procedure and Service Level Agreement (SLA).	Clause 5.21(4)	4					✓					✓
416	Request for meter test or audit only if licensee was the user at the time	Clause 5.21(5)	4					✓					✓
417	Any request must be consistent with any access arrangement or agreement.	Clause 5.21(6)	4					✓	✓				
418	Charge for test only if in accordance with SLA.	Clause 5.21(8)	4	✓									✓
419	SLA to include no charge for test if non-compliance with this Code	Clause 5.21(9)	4	✓									✓
420	Advise customer if accuracy of meter does not comply and restore meter accuracy	Clause 5.21(11)	4	✓									✓
421	Original meter data not to be altered except during testing	Clause 5.21(12)	4	✓									✓
422	Validate energy data in accordance with this Code	Clause 5.22(1)	4	✓									✓
423	Use check metering data	Clause 5.22(2)	4					✓					✓
424	If data not available, substitute values in approved method	Clause 5.22(3)	4	✓					✓				
425	Notify any loss of metering data to participants within 24 hours	Clause 5.22(4)	4					✓					✓
426	Substitute or estimate energy data	Clause 5.22(5)	4	✓					✓				
427	Review all validation failures before substitution	Clause 5.22(6)	4					✓					✓

No. ¹	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating ²					Compliance Rating ³				
				(A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					(1=Compliant 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)				
				A	B	C	D	NP	1	2	3	4	NR
428	If no actual value, designate estimated value for metering point	Clause 5.23(1)	4	✓					✓				
429	If designated value, repair or replace the meter or components	Clause 5.23(3)	4					✓					✓
430	Substitute actual energy data value if a better value becomes available	Clause 5.24(1)	4					✓					✓
431	Substitute deemed energy data value if a better value becomes available	Clause 5.24(2)	4					✓					✓
432	Substitute estimated energy data value if a better value becomes available	Clause 5.24(3)	4					✓					✓
433	Consider request for estimated or substituted value	Clause 5.24(4)	4					✓					✓
434	Accuracy of energy data is in accordance with metrology procedure	Clause 5.25	4					✓					✓
435	Provide network operator with customer attribute information that is missing or incorrect within the timeframes.	Clause 5.27	4					✓					✓
436	Election under sub-clause 5.28 in respect of network	Clause 5.29	4					✓					✓
437	Enter into agreement with participant	Clause 5.30(1)	4					✓					✓
439	Electricity networks corporation must undertake upgrade	Clause 5.31(2)	4					✓	✓				
440	Limitation on cost recovery by electricity networks corporation	Clause 5.34(2)	4					✓					✓
447	Compliance by network operator with agreements, procedures etc.	Clause 6.1(1)	4	✓					✓				
448	User with access contract must comply with rules, procedures, agreements.	Clause 6.1(2)	4	✓					✓				
448A	Network operator to submit prescribed documents to ERA	Clause 6.2	4	✓					✓				
448B	Network operator must publish documents within 10 business days of approval	Clause 6.18	4	✓						✓			
448C	Network operator must publish its communication rules	Clause 6.19A(1)	4	✓						✓			
448D	Amendment of communication rules	Clause 6.19B(1)	4					✓					✓
449	Amend any document as recommended by ERA	Clause 6.20(4)	4					✓	✓				
450	Publish any amended document	Clause 6.20(5)	4					✓	✓				
451	Ensure Code participant can send and receive a notice by post, facsimile and electronic	Clause 7.2(1)	4					✓	✓				

No. ¹	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating ²					Compliance Rating ³				
				(A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					(1=Compliant 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)				
				A	B	C	D	NP	1	2	3	4	NR
	communication and must notify the network operator of a telephone number.												
452	Notify Code participant of contact details at least 3 business days before change	Clause 7.2(2)	4					✓					✓
453	Notify contact details to a network operator within 3 business days after the request.	Clause 7.2(4)	4					✓	✓				
454	Notify network operator of any change to the contact details at least 3 business days before the change.	Clause 7.2(5)	4					✓	✓				
455	Protection of confidential information	Clause 7.5	4	✓					✓				
456	Comply with any disclosure required by the Code.	Clause 7.6(1)	4	✓					✓				
457	Aim to resolve any dispute with Code Participants within 5 business days.	Clause 8.1(1)	4	✓					✓				
458	If a dispute is not resolved within 10 business days, refer dispute to senior management to meet and resolve	Clause 8.1(2)	4					✓					✓
459	If the dispute is not resolved within a further 10 business days, refer to senior executive officer of each party to meet and resolve.	Clause 8.1(3)	4					✓					✓
460	If resolved, prepare a written and signed record of the resolution and adhere to the resolution.	Clause 8.1(4)	4					✓	✓				
461	The disputing parties must at all times conduct themselves in a manner which is directed towards achieving the objective in subclause 8.3(1).	Clause 8.3(2)	4					✓	✓				
Electricity Industry (Network Quality and Reliability of Supply) Code 2005													
462	Ensure that electricity supply to a customer's installations complies with prescribed standards.	Clause 5.1	4	✓					✓				
463	Disconnect the supply of electricity in specified circumstances, unless in interest of customer to maintain supply.	Clause 8	4	✓					✓				
464	Maintain supply and minimise disruptions	Clause 9	4	✓					✓				
465	Reduce the effect of any interruption on a customer.	Clause 10(1)	4	✓					✓				
466	Consider whether, in specified circumstances, supply electricity by alternative means to a	Clause 10(2)	4	✓					✓				

No. ¹	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating ²					Compliance Rating ³				
				(A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					(1=Compliant, 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)				
				A	B	C	D	NP	1	2	3	4	NR
	customer who will be affected by a proposed interruption.												
468	Ensure that customers in specified areas do not have average total lengths of interruptions of supply greater than specified durations	Clause 13(2)	4	✓					✓				
469	The average total length of interruptions of supply is to be calculated using specified method.	Clause 13(3)	4	✓					✓				
470	On request, provide to an affected customer a free copy of an instrument issued by the Minister and of any notice given under section 14(7) of the Code.	Clause 14(8)	4					✓					✓
471	If a distributor or transmitter agrees with a customer to exclude or modify certain provisions, set out the advantages and disadvantages to the customer in their agreement.	Clause 15(2)	4					✓					✓
472	Make a payment to a customer within a specific timeframe for a failure to give required notice of planned interruption.	Clause 18	4					✓					✓
473	Make a payment to a customer within specific timeframe if supply interruption exceeds 12 hours.	Clause 19	4					✓					✓
474	Provide eligible customers with information about applying for payments for failure to meet the requirements in sections 18 and 19 of Code.	Clause 21(1)	4					✓					✓
475	Provide written notice to customers about payments for failure to meet the requirements in sections 18 and 19 of the Code.	Clause 21(2)	4					✓					✓
476	Provide written notice to eligible customers about payments for failure to meet the requirements in sections 18 and 19 of the Code not less than once in each financial year.	Clause 21(3)	4					✓					✓
477	Take all such steps as are reasonably necessary to monitor the operation of network to ensure compliance with requirements.	Clause 23(1)	4	✓					✓				
478	Keep records of information regarding compliance with specific requirements for period specified.	Clause 23(2)	4	✓					✓				
479	Complete a quality investigation requested by a customer in accordance with requirements.	Clause 24(3)	4					✓					✓
480	Report the results of investigation to customer concerned.	Clause 24(4)	4					✓					✓

3. Status of Previous Audit Recommendations

The previous audit recommendations as reported in June 2022 have been completed as shown below.

Ref. (Manual Ref./Year)	Compliance Obligation	Previous Compliance Rating	Previous Finding and Recommended Corrective Action	Action Taken	Date Resolved	Further Action Required
A. Resolved before end of previous audit period						
N/A						
B. Resolved during current audit period						
9/2022	411	B2	Energy Data Verification Form We could not sight any evidence of Energy Data Verification Request Form within PRE documentation and in its website. The impact of this non-compliance is considered minor given the context of code participants within the Peel Business Park during the audit period and possibility of contacting PRE (and/or Synergy) with relative ease. <i>PRE to develop Energy Data Verification Request Form to facilitate its customer to request verification of energy data in accordance with the Metering Code clause 5.20. PRE may need to work together with WINconnect to develop this or delegate it to them.</i>	<u>Status: Completed</u> PRE has drafted and implemented the Energy Data Request Form. Confirmed in this audit.	July 2022	Nil
10/2022	412	B2	Energy Data Verification Form (NMI request) We could not sight any evidence of Energy Data Verification Request Form within PRE documentation and in its website. The impact of this non-compliance is considered minor given the context of code participants within the Peel Business Park during the audit period and possibility of contacting PRE (and/or Synergy) with relative ease.	<u>Status: Completed</u> PRE has drafted and implemented the Energy Data Request Form. Confirmed in this audit.	July 2022	Nil

Ref. (Manual Ref./Year)	Compliance Obligation	Previous Compliance Rating	Previous Finding and Recommended Corrective Action	Action Taken	Date Resolved	Further Action Required
			<i>PRE to develop Energy Data Verification Request Form to facilitate its customer to request verification of energy data in accordance with the Metering Code clause 5.20. PRE may need to work together with WINconnect to develop this or delegate it to them.</i>			
11/2022	448B	B2	<p>Publish Metering Code Documents</p> <p>Model service level agreement, metrology procedure, communication rules and reference that the mandatory link criteria is addressed due to the design and inbuilt characteristics of Type 4 metering installation which is an approved off-the-shelf product, constructed according to Australian standards and continues to remotely communicate with Synergy, could not be found in PRE's website during the audit. There is no evidence that these documents were available in its website during the audit period. There is also no evidence that they were made available in hardcopy (either for reference or for removal) in its office in WA during the audit period.</p> <p>Post audit questioning, we note that PRE has now published the documents as per the Metering Code clause 6.18. The existence of documents denotes relatively mature control environment vs. nonpublication of those documents denoting small improvement needed to control procedures. PRE uploaded its model service level agreement and metrology procedure in its website (i.e. post audit period). Given the context of code participants (only Synergy and WINConnect, and no 3rd party retailers or generators) and customer base (only 5 large customers) at Peel Business Park during the audit period, all of whom could easily contact PRE, this noncompliance is considered to have only minor effect on code participants and customers.</p> <p><i>Publish the documents as per the Metering Code clause 6.18. Refer to the definition and interpretation of words 'documents' and 'publish' in the Metering Code.</i></p>	<p><u>Status: Completed</u></p> <p>PRE has published its ERA approved Model Service Level Agreement and its Metrology Procedure.</p> <p>Confirmed in this audit.</p>	June 2022	Nil

4. Detailed Audit Results and Recommendations

SUMMARY OF COMPLIANCE OBLIGATIONS ⁴	
LEGISLATION:	
ELECTRICITY INDUSTRY ACT 2004	Refer Compliance Obligations 101 to 128 as applicable.
CODES:	
ELECTRICITY INDUSTRY (METERING CODE)	Refer Compliance Obligations 317 to 461 as applicable.
ELECTRICITY INDUSTRY (NETWORK QUALITY AND RELIABILITY OF SUPPLY) CODE	Refer Compliance Obligations 462 to 480 as applicable.

⁴ Number refers to the item reference in the Electricity Compliance Reporting Manual, ERA (February 2023 and previous versions January 2023 and February 2022)

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
Electricity Industry Act 2004							
101	Condition 5.3.1	Section 13(1)	A licensee must provide the ERA with a performance audit conducted by an independent expert acceptable to the ERA, not less than once every 24 months.	4	<p>The audit confirmed the previous Performance Audit report was provided to the ERA in June 2022 for the audit period of 24 months from 5 March 2020 to 31 March 2022.</p> <p>This performance audit for the period from 1 April 2022 to 31 March 2025 has been initiated in accordance with the ERA's standard audit guidelines. The auditor was approved by the ERA. The final report is due by 30 June 2025.</p> <p>This is documented in the Asset Management Plan (December 2024).</p>	A	1
102	Distribution Licence, condition 5.1.1	Section 14(1)(a)	A licensee must provide for an asset management system.	4	<p>The review of the Asset Management System reported in July 2024 that the performance of the Asset Management System was found to require improvement across most effectiveness criteria. While there is a small number of relatively new assets these appear to have been managed without safety or major availability concerns over the past 4 years. However, it was observed that the policies and procedures comprising the Asset Management System have a significant opportunity for improvement. With specific focus on maturing a risk management framework and embedding it within the wider business functions. This is considered a minor</p>	B	2

5 Number refers to the item reference in the Electricity Compliance Reporting Manual February 2023 (or previous versions January 2023 and February 2022).

6 Controls Rating Scale: A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, N/P=Not performed.

7 Compliance Rating Scale: 1=Compliant, 2=Non-compliant - minor impact, 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, N/R=Not rated.

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
					<p>non-compliance with no impact on customers in this audit period. The improvements are being tracked via the Post Review Implementation Plan provided to the ERA.</p> <p>This asset management system is documented in the Asset Management Plan (December 2024).</p>		
103	Distribution Licence, condition 5.1.2 and 5.1.3	Section 14(1)(b)	A licensee must notify details of the asset management system and any substantial changes to it to the ERA.	4	<p>The audit confirmed with the Regulatory Compliance Officer and the site visit that there have been no changes to the asset management system since the Asset Management System review in July 2024.</p> <p>This is documented in the Asset Management Plan (December 2024).</p>	A	1
104	Distribution Licence, condition 5.1.4	Section 14(1)(c)	The licensee must provide the ERA with a report by an independent expert about the effectiveness of its asset management system every 24 months, or such longer period as determined by the ERA.	4	<p>The Asset Management System review reported in July 2024 confirmed that Peel Renewable Energy (PRE) has an asset management system.</p> <p>This is documented in the Asset Management Plan (December 2024).</p>	A	1
105	Condition 4.2.1	ERA (Licensing Funding) Regulations 2014	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.	4	<p>The audit reviewed payments to the ERA for the period 1 April 2022 to 31 March 2025 and confirmed that invoices for the annual licence fees, standing charges and other invoices were paid by the due dates of 30 days from invoice date (as required by the <i>Economic Regulation Authority (Licensing Funding) Regulations 2014</i>).</p> <p>This obligation is documented in the PRE Licence Compliance Process.</p>	A	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
106	Condition 4.1.1	Section 31(3)	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.	4	<p>The audit confirmed that PRE has taken reasonable steps to minimise the extent or duration of any interruption, suspension or restriction of the supply of electricity. There was one unplanned outage in the audit period per the Outage Register.</p> <p>No customer complaints have been received about interruptions to electricity supply.</p> <p>PRE has controls in place to ensure that they can communicate with their customers, and their customers can easily contact them and/or the network operator, Synergy.</p>	A	1
Licence Conditions and Obligations							
119	Condition 4.3.1	Section 11	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.	4	<p>PRE maintained its financial records in compliance with Public Practice Standards as it is a non-reporting entity. It is a private entity reporting to and on behalf of its directors and shareholders. Australian Accounting Standards Board Standards (AASBs) is required for reporting entities.</p> <p>This obligation is documented in the PRE Licence Obligations Table.</p>	A	1
121	Condition 5.3.2	Section 11	A licensee must comply, and require its auditor to comply, with the ERA's standard audit guidelines for a performance audit.	4	<p>The previous Performance Audit and Asset Management System Review report (June 2022) was accepted by the ERA. This audit will comply with the standard audit guidelines.</p> <p>This obligation is documented in the PRE Licence Compliance Process.</p>	A	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
122	Condition 5.3.2	Section 11	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.	4	The previous Performance Audit and Asset Management System Review report (June 2022) was accepted by the ERA. The report complied with the ERA guidelines. This obligation is documented in the PRE Licence Compliance Process.	A	1
123	Condition 4.4.1	Section 11	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.	4	The Regulatory Compliance Officer confirmed that during the audit period PRE was not under external administration and there were no significant changes affecting the Licensee's ability to meet its obligations.	NP	NR
124	Condition 4.5.1	Section 11	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.	4	The audit sighted the annual Compliance reports provided to the ERA for 2021/22, 2022/23 and 2023/24 and confirmed they were provided in the form required and by the due dates The 2021/22, 2022/23 and 2023/24 Performance data sheets were not required by the ERA as PRE had no small use customers. This obligation is documented in the PRE Licence Compliance Process.	A	1
125	Conditions 3.8.1 and 3.8.2	Section 11	A licensee must publish any information as directed by the ERA to publish, within the timeframes specified.	4	During the audit period, PRE was not required to publish the ERL and EDL Performance Reporting Datasheets for the reporting years 2021/22, 2022/23 and 2023/24 as there were no small use customers. There were no non-compliances for this obligation reported in the annual Compliance	A	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
					Reports accepted by the ERA for the audit period. This obligation is documented in the PRE Licence Compliance Process.		
126	Condition 3.7.1	Section 11	All notices must be in writing, unless otherwise specified.	4	The audit confirmed with Regulatory Compliance Officer that all notices are provided in writing. Notices viewed included the compliance reports and performance reporting datasheets.	NP	1
127	Distribution Licence, condition 6.9.1	Section 11	A distributor must create and maintain a Priority Restoration Register.	2	PRE has a Priority Restoration Register that includes the priority restoration order. The Department of Fire and Emergency Services (DFES) customer has the priority over all customers. Evidence of this showing Lot 37 (i.e. Department of Fire and Emergency Services and identified as 'essential services' has No. 1 priority. There are no customers on life support equipment. This register was sighted during the audit.	A	1
128	Distribution Licence, condition 6.9.3	Section 11	The Priority Restoration Register must comply with any criteria determined by the Minister.	2	No special criteria have been prescribed by the Minister to PRE with respect to its Priority Restoration Register.	A	1
Electricity Industry (Metering) Code							
317	Distribution Licence, condition 4.1.1	Clause 2.2(1)(a)	A network operator must treat all Code participants that are its associates on an arms-length basis.	4	PRE confirmed that with Synergy, Intellihub, AEMO, WINConnect and their current 10 customers, PRE have no existing or potential conflict of interest by doing business with them throughout the audit period	NP	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
318	Condition 4.1.1	Clause 2.2(1)(b)	A network operator must ensure that no Code participant that is its associate receives a benefit in respect of the Code, unless the benefit is attributable to an arm's length application of the Code or is also made available to all other Code participants on the same terms and conditions.	4	During the audit period, there were no existing or potential conflict of interest with respect to PRE and its relations with its customers, contractors, suppliers and utility service providers. PRE maintain a strict application process and has in place their Terms and Conditions that are issued to all customers, at the time of application or signing the contract. No evidence of anti-competition behaviour was noted during the audit period.	A	1
319	Condition 4.1.1	Clause 3.1	A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and comply with any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act.	4	During the audit period, PRE only installed and operated Type 4 meters that met the requirements specified in its metrology procedure, which includes all requirements of Australian Standards and International Standards. A visible display is provided to display the cumulative total Energy for each register measured by that Metering Installation. Details within the PRE's metrology procedure are aligned with the requirements specified by the Metering Code. This obligation is documented in the Metrology Procedure.	A	1
320	Condition 4.1.1	Clause 3.2(1)	An accumulation meter must at least conform to the requirements specified in the applicable metrology procedure and display, or permit access to a display of the measurements that are specified in subclauses 3.2(1)(a)(b) using dials, a	4	All of PRE's meters are Type 4 interval meters. A visible display is provided to display the cumulative total Energy for each register measured by that Metering Installation. This obligation is documented in the Metrology Procedure.	A	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			cyclometer, an illuminated display panel or some other visual means.				
320A	Condition 4.1.1	Clause 3.2(2B)	<p>If a meter declared to be an accumulation meter is in a metering installation for a connection point that becomes associated with a contestable customer:</p> <p>Distribution Transmission (SWIN only)</p> <ul style="list-style-type: none"> the declaration of that meter as an accumulation meter will be deemed to have ceased at the time the relevant connection point became associated with a contestable customer; and the network operator must promptly remove the meter from any declared accumulation meter list and record the meter as an interval meter in the registry. 	4	All of PRE's meters are Type 4 interval meters. PRE confirmed there were no contestable customers through the audit period. There were only three meters that were replaced through the audit period, which was due to 3G communication being shutdown end of last year.	NP	1
321	Condition 4.1.1	Clause 3.3(1)	An interval meter must at least have an interface to allow the interval energy data to be downloaded in the manner prescribed using an interface compatible with the requirements specified in the applicable metrology procedure.	4	All of PRE's meters are Type 4 interval meters with interface to allow interval energy data to be downloaded/ remotely recorded by Synergy as per the specification in its metrology procedure.	A	1
322	Condition 4.1.1	Clause 3.3(3)	If a metering installation is required to include a communications link, the link must, where necessary, include a modem and isolation device approved under the relevant	4	PRE meters have SIM card, can communicate remotely, are connected to Telstra (primary path) and Optus/Vodafone (secondary path). The modem and isolation device are in accordance to the	A	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			telecommunications regulations that allows the interval energy data to be downloaded in the manner prescribed.		telecommunication regulation. These are standard off-the-shelf approved Type 4 meters which are programmable by Synergy as any normal Type 4 meter in the NEM. This obligation is documented in the Metrology Procedure.		
323	Condition 4.1.1	Clause 3.3A(1)	A network operator must ensure that bi-directional electricity flows do not occur at a metering point unless the metering installation for the metering point is capable of separately measuring and recording electricity flows in each direction.	4	Provision for bi-directional electricity flow is driven by the customers application to install their own generation system. While the PRE meters have been pre-programmed to be bidirectional however during the audit period no customer registered or applied and no commercial agreement took place between the customer and PRE for such usage. However bi-directional metering installation does exist between PRE and Synergy with their connection to the grid.	NP	1
324	Condition 4.1.1	Clause 3.3B	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.	4	Provision for bi-directional electricity flow is driven by the customers application to install their own generation system. While the PRE meters have been pre-programmed to be bidirectional however during the audit period no customer register or applied and no commercial agreement took place between the customer and PRE for such usage. For new applications or transfers, any bi-directional flow is noted as a special condition in the contract.	NP	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
325	Condition 4.1.1	Clause 3.3C	An accumulation meter or an interval meter that separately measures and records bi-directional electricity flows at the metering point must record: <ul style="list-style-type: none"> the net electricity production transferred into the network; and the net electricity consumption transferred out of the network. 	4	All of PRE's meters are Type 4 interval meters, which has all the features to measure net electricity production transferred into and out of the network, if required to do so. This obligation is documented in the Metrology Procedure.	NP	1
326	Condition 4.1.1	Clause 3.5(1) and (2)	A network operator must ensure that there is a metering installation at every connection point on its network that is not an unmetered connection point. Unless it is a Type 7 metering installation, the metering installation must meet the functionality requirements prescribed.	4	All of PRE's meters are Type 4 interval meters as outlined in PRE's Metrology Procedure.	A	1
327	Condition 4.1.1	Clause 3.5(3)	For each metering installation on its network, a network operator must provide, install, operate and, subject to subclause 3.7(5), maintain the metering installation in the manner prescribed, unless otherwise agreed.	4	PRE has contracted the operation, maintenance, repair and replacement of its installed meters to Intellihub which is a licenced metering service provider in WA. All meters were installed in accordance to the Metering Code, following GEIP (Australian Standards), metrology procedure and model service agreement. Given the small customer base, PRE's General Manager was present on site in person at the commissioning of each metering installation. Evidence of independent safety checks prior to and in order to secure approval for metering installation commissioning were also carried out during the audit period. During the audit period, one meter (NMI ZCE0000005) installed 7/3/25 had issues with its modem	A	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
					port during commissioning and was subsequently replaced 24/3/25. This obligation is documented in the Metrology Procedure.		
328	Condition 4.1.1	Clause 3.5(4)	Except for a Type 7 metering installation, a network operator must ensure that the metering point for a revenue metering installation is located as close as practicable to the connection point in accordance with good electricity industry practice.	4	All of PRE's meters are located within customer premises or within their switchboard (i.e. as close to the load as possible). This obligation is documented in the Metrology Procedure.	A	1
329	Condition 4.1.1	Clause 3.5(6)	A network operator may only impose a charge for providing, installing, operating or maintaining a metering installation in accordance with the applicable service level agreement that it has with the user.	4	PRE's metering model service level agreement provides charges and also limits to those charges. It also identifies service types - standard service (charges of which are built into the tariff) and extended service (charges of which are optional and/or tailored to the service requested). The infrastructure service module and supply service module also detail the schedule of rates and fees for both standard service and extended service.	A	1
330	Condition 4.1.1	Clause 3.5(9)	If a network operator becomes aware that a metering installation does not comply with the Code, it must advise affected parties of the non-compliance and arrange for the non-compliance to be corrected as soon as practicable.	4	No such instance occurred during the audit period.	NP	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
331	Condition 4.1.1	Clause 3.7	All devices that may be connected to a telecommunications network must be compatible with the telecommunications network and comply with all applicable State and Commonwealth enactments.	4	All of PRE's meters are Type 4 interval meters connected to Telstra (primary path) and Optus/Vodafone (secondary path). The modem and isolation device are in accordance to the telecommunication regulation and WA and Commonwealth Acts. These are standard off-the-shelf approved Type 4 meters which are programmable by Synergy as any normal Type 4 meter in the NEM. This obligation is documented in the Metrology Procedure.	A	1
332	Condition 4.1.1	Clause 3.8	Subject to clause 3.27, a network operator must ensure that, consistent with the standards of good electricity industry practice, each metering installation on its network is secured by devices or methods that hinder unauthorized access and enable unauthorized access to be detected.	4	All of PRE's meters can detect fault and malfunction. For e.g. it can detect when an outage has occurred or an error in communications. These meters are installed within customer premises in their respective switchboard. Both physical and remote unauthorised access are hindered and/or detected.	NP	1
333	Condition 4.1.1	Clause 3.9(3)	Subject to subclauses 3.9(4), 3.9(5) and 3.9(7), each metering installation must meet at least the requirements for that type of metering installation as specified in Table 3 Appendix 1 of the Code for metering installations on the SWIN or in Table 3A in Appendix 1 for metering installations on a network other than the SWIN.	4	The accuracy requirements of metering installation component (in SWIN) as specified in Table 3 in the Metering Code are met. PRE has standard off-the-shelf approved Type 4 meters which are programmable by Synergy as any normal Type 4 meter in the NEM. This obligation is documented in the Metrology Procedure.	A	1
334	Condition 4.1.1	Clause 3.9(7)	A metering installation used to supply a customer with requirements above 1000 volts that requires a VT and whose annual consumption is below	4	All of PRE's meters are Type 4 interval meters. This obligation is documented in the Metrology Procedure.	A	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			750MWh must meet the relevant accuracy requirements of a Type 3 metering installation for active energy only.				
335	Condition 4.1.1	Clause 3.9(9)	If compensation is carried out within the meter, then the resultant metering system error must be as close as practicable to zero.	4	The accuracy requirements or the overall error (considering the VT wiring error, CT wiring error and meter error) of metering installation component is carried out within the meter and is as close as reasonably practicable to zero. PRE has standard off-the-shelf approved Type 4 meters which are programmable by Synergy as any normal Type 4 meter in the NEM. Review of the technical specification of the metering hardware, such as for accuracy class, meets the compliance standards for NMI M6-1, AS 62052.11, AS 62053.22, AS 62053.23, AS 62052.21. This obligation is documented in the Metrology Procedure.	A	1
336	Condition 4.1.1	Clause 3.10	A network operator must ensure that any programmable settings in any of its metering installations, data loggers or peripheral devices, which may affect the resolution of displayed or stored data, satisfy the relevant requirements specified in the applicable metrology procedure and comply with any applicable instructions by the National Measurement Institute under the National Measurement Act.	4	PRE has standard off-the-shelf approved Type 4 meters which are programmable by Synergy as any normal Type 4 meter in the NEM. It satisfies the requirements specified in PRE's metrology procedure and complies with National Measurement Act. This obligation is documented in the Metrology Procedure.	A	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
337	Condition 4.1.1	Clause 3.11(1)	A network operator must ensure that a metering installation on its network is operating consistently with good electricity industry practice to measure and record data, and permits the collection of data within the time specified in the applicable service level agreement, for at least the percentages of the year specified.	4	PRE has contracted the operation, maintenance, repair and replacement of its installed meters to Intellihub which is a licenced metering service provider in WA. During the audit period PRE meters measured and recorded energy interval data by Synergy as per the service level agreement (incorporated in the contract between PRE and Synergy). This energy data was then used to invoice tariff to PRE customers by WINconnect.	NP	1
338	Condition 4.1.1	Clause 3.11(2)	If an outage or malfunction occurs to a metering installation, the network operator must repair the metering installation in accordance with the applicable service level agreement.	4	No such instance occurred during the audit period	NP	NR
339	Condition 4.1.1	Clause 3.11(3)	A Code participant who becomes aware of an outage or malfunction of a metering installation must advise the network operator as soon as practicable.	4	The installed meters have remote monitoring functionality that can detect its own fault and malfunction. Two primary faults they detect is when an outage has occurred or an error in communications. No such event occurred during the audit period and hence not rating this compliance.	NP	NR
340	Condition 4.1.1	Clause 3.11A(1)	A network operator must ensure that the meters on its network are systematically sampled and tested for accuracy in accordance with AS 1284.13.	4	No meters have been tested during the audit period. Due to the age of the assets, they are not yet near their testing period of 5 years as set out in Schedule 7.6 of the National Electricity Rules issued by AEMO.	NP	NR

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
341	Condition 4.1.1	Clause 3.11A(2)	Subject to clause 3.11A(3), if a “population” of meters is deemed to have failed under AS 1284.13, the network operator must ensure that all of the meters in that population are removed and replaced with new meters within 3 years of the testing of the population.	4	The audit confirmed with the site inspection that there has been no failure of any “population” of meters in the audit period.	NP	NR
342	Condition 4.1.1	Clause 3.12(1)	A network operator must ensure that each metering installation complies with at least the prescribed design requirements.	4	All PRE metering installations were delivered by Intellihub and constructed per the applicable Australian design standards. They were independently tested (for safety checks) by third party before commissioning or energising. Evidence of such safety checks during the audit period was sighted, wherein one meter (NMI ZCE0000005) installed 7/3/25 had issues with its modem port during commissioning and was subsequently replaced 24/3/25. This obligation is documented in the Metrology Procedure.	A	1
343	Condition 4.1.1	Clause 3.12(2)	A network operator must ensure that instrument transformers in its metering installations comply with the relevant requirements of any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act and any requirements specified in the applicable metrology procedure.	4	All PRE metering installations were delivered by Intellihub and constructed per the applicable Australian design standards. Section 2.2 of PRE's metrology procedure details the standards requirements met by the meters, CT, VT, connection point, display features and programmable settings. This obligation is documented in the Metrology Procedure.	A	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
344	Condition 4.1.1	Clause 3.12(3)	A network operator must provide isolation facilities of a standard consistent with good electricity industry practice, to facilitate testing and calibration of the metering installation.	4	The Renewable Systems & Technology Project Manager confirmed that the isolation facility installations are in line with good electrical industry practice, and match exactly that of other WEM and NEM distributors.	NP	1
345	Condition 4.1.1	Clause 3.12(4)	A network operator must maintain drawings and supporting information, of a standard consistent with good electricity industry practice, to detail the metering installation for maintenance and auditing purposes.	4	Such asset information is available with PRE database, along with meter identification number and its location clearly marked in their electrical network diagrams. This obligation is documented in the Metrology Procedure.	A	1
346	Condition 4.1.1	Clause 3.13(1)	A network operator must procure the user, or the user's customer, to install, or arrange for the installation of, a full check metering installation or partial check metering installation in accordance with the prescribed requirements.	4	During the audit period, no PRE customers annual consumption met the threshold for partial check meters. Hence there were none and there were no users needing check meter installations.	NP	NR
347	Condition 4.1.1	Clause 3.13(3c)	A partial check metering installation must be physically arranged in a manner determined by the network operator, acting in accordance with good electricity industry practice.	4	During the audit period no PRE customers annual consumption met the threshold for partial check meters. Hence there were none and there were no users needing check meter installations.	NP	NR
348	Condition 4.1.1	Clause 3.13(4)	A check metering installation for a metering point must comply with the prescribed requirements.	4	Not relevant as no check meters were installed	NP	NR
349	Condition 4.1.1	Clause 3.14(3)	If, under clause 3.14(2), a metering installation uses metering class CTs and VTs that do not comply with the Table 3 or Table 3A in Appendix 1 (as	4	The accuracy requirements of metering installation component (in SWIN) as specified in Table 3 in the Metering Code are met. PRE has standard off-the-shelf	NP	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			applicable), then the network operator must take the actions specified in order to achieve the accuracy requirements in Table 3 or Table 3A in Appendix 1 (as applicable).		approved Type 4 meters which are programmable by Synergy as any normal Type 4 meter in the NEM.		
350	Condition 4.1.1	Clause 3.16(1)	The network operator must ensure that a Type 1 metering installation to Type 5 metering installation on the network has the facilities and functionality prescribed.	4	PRE has standard off-the-shelf approved Type 4 meters which are programmable by Synergy as any normal Type 4 meter in the NEM. This obligation is documented in the Metrology Procedure.	A	1
350A	Condition 4.1.1	Clause 3.16(1A)	Any metering installation on the network that has an interval meter and is not a 5MS meter must have hardware that is capable of measuring and storing five-minute interval energy data. Note: The network operator is not required to have that capability enabled provided that the metering installation is capable of measuring and record 30-minute interval energy data.	4	PRE has standard off-the-shelf approved Type 4 meters which are programmable by Synergy as any normal Type 4 meter in the NEM. It includes communication link. This obligation is documented in the Metrology Procedure.	A	1
351	Condition 4.1.1	Clause 3.16(2)	Subject to clause 3.16(2A), the network operator must ensure that a Type 1 metering installation to Type 4 metering installation on the network includes a communications link.	4	PRE has standard off-the-shelf approved Type 4 meters which are programmable by Synergy as any normal Type 4 meter in the NEM. It includes a communication link. This obligation is documented in the Metrology Procedure.	A	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
352	Condition 4.1.1	Clause 3.16(3)	If a device is used as a data logger, the energy data for a metering point on the network must be collated in: <ul style="list-style-type: none"> for a 5MS meter on or after five-minute settlement commencement, five-minute metering intervals or sub-multiples of a five-minute metering interval; or otherwise, 30-minute metering intervals or submultiples of a 30-minute metering interval, within the metering installation. 	4	PRE has standard off-the-shelf approved Type 4 meters which are programmable by Synergy as any normal Type 4 meter in the NEM. It continuously captures energy data in 30 minute intervals and send this information via telecommunication (4G, 5G) networks to Synergy and WINconnect. This obligation is documented in the Metrology Procedure.	A	1
353	Condition 4.1.1	Clause 3.16(3A)	If, under subclause 3.16(3), energy data for a metering point on the network is collated in sub-multiples of a five minute Metering interval or 30-minute metering Interval (as applicable), then the network operator must aggregate the energy data into five-minute metering intervals (if clause 3.16(3)(a) applies) or 30-minute metering intervals (if clause 3.16(3)(b) applies) before providing it to a Code participant unless the Code participant agrees otherwise.	4	PRE has standard off-the-shelf approved Type 4 meters which are programmable by Synergy as any normal Type 4 meter in the NEM. It continuously captures energy data in 30 minute intervals and send this information via telecommunication (4G,5G) networks to Synergy. There is no need for aggregation of 30 minute energy data into wider interval duration. This obligation is documented in the Metrology Procedure.	A	1
353A	Condition 4.1.1	Clause 3.16(3B)	The network operator must not install a Type 5 metering installation or Type 6 metering installation on or after 1 January 2022. (SWIN only)	4	PRE only has standard off-the-shelf approved Type 4 meters which are programmable by Synergy as any normal Type 4 meter in the NEM.	NP	NR

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
353B	Condition 4.1.1	Clause 3.16(3C)	The network operator must continue to comply with all provisions of this Code applicable to Type 5 metering installations and Type 6 metering installations in respect of Type 5 and Type 6 metering installations installed prior to 1 January 2022. (SWIN only)	4	PRE only has standard off-the-shelf approved Type 4 meters which are programmable by Synergy as any normal Type 4 meter in the NEM.	NP	NR
354	Condition 4.1.1	Clause 3.18(1)	The metering installation for the connection point must comply with the prescribed wholesale market metering installation requirements if the Electricity Generation and Retail Corporation supplies electricity to a contestable customer at a connection point under a non-regulated contract and in circumstances when, immediately before entering into the contract, the Electricity Generation and Retail Corporation supplied electricity to the contestable customer under a regulated contract. (SWIN only)	4	Intellihub is appointed by PRE as their metering installation services contractor and are listed as the meter installation service providers for WA This obligation is documented in the Metrology Procedure.	A	1
354A	Condition 4.1.1	Clause 3.18(A)	Subject to clause 3.14, the network operator must ensure that each 5MS meter complies with clause 3.16 by five minute settlement commencement. Note: where a connection point associated with a contestable customer or generator has more than one metering installation, each metering installation at that connection point will be a 5MS meter	4	PRE only has standard off-the-shelf approved Type 4 meters which are programmable by Synergy as any normal Type 4 meter in the NEM.	NP	NR

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			and will be required to comply with clause 3.16 from five-minute settlement commencement. (SWIN only)				
355	Condition 4.1.1	Clause 3.20(1)	If reasonably requested by a Code participant, a network operator must provide enhanced technology features in a metering installation.	4	No such request was received by PRE during the audit period	NP	NR
356	Condition 4.1.1	Clause 3.20(3)	A network operator may only impose a charge for the provision of metering installations with enhanced technology features in accordance with its applicable service level agreement with the user.	4	No such request was received by PRE during the audit period	NP	NR
357	Condition 4.1.1	Clause 3.21(1)	Meters containing an internal real time clock must maintain time accuracy as prescribed. Time drift must be measured over a period of 1 month.	4	<p>Review of the metering hardware technical specification shows that the internal time clock is of crystal or main-synchronised type, with main supplied power and 15 years life lithium battery as backup source. It is compliant to AS 62054.21. The installed meters are remotely read at 30 minute intervals and the energy data are provided daily from Synergy to WINconnect (PRE's billing service provider).</p> <p>Two meters were upgraded on-site using Storm Mobile during the audit period. As part of the upgrade process, meters automatically initiate time synchronization step. Typically, during the midnight daily read schedule, the meter's time is checked. This automatically occurs at midnight every day. The metering reading software performs this task at the</p>	NP	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
					same time and is Business As Usual (BAU) process.		
358	Condition 4.1.1	Clause 3.21(2)	If a metering installation includes measurement elements and an internal data logger at the same site, it must include facilities on-site for storing the interval energy data for the periods prescribed.	4	The metering device itself can store 30 minutes interval energy data for 90 days as per the infrastructure service module of the master service deed. During the audit period this was the case with the meter internal storage capacity.	NP	1
359	Condition 4.1.1	Clause 3.22	A network operator providing one or more metering installations with enhanced technology features must be licensed to use, and access, the metering software applicable to all devices being installed and be able to program the devices and set parameters.	4	PRE has contracted this function to Synergy initially and has now transitioned to Intellihub during this audit period. Intellihub can use and access the metering software and can program and set parameters in the Type 4 meters.	NP	1
360	Condition 4.1.1	Clause 3.23(a)	Where signals are provided from the meter for the user or the user's customer, a network operator must ensure that signals are isolated by relays or electronic buffers to prevent accidental or malicious damage to the meter.	4	PRE has standard off-the-shelf approved Type 4 meters which are programmable by Intellihub as any normal Type 4 meter in the NEM. It continuously captures energy data in 30 minute intervals and send this information via telecommunication (4G,5G) networks to Synergy. It does not interfere with customer signals for load management. Three older customers who had meters with 3G network were upgraded with new meters at the end of last year 2024 when 3G network was phased out.	NP	1
361	Condition 4.1.1	Clause 3.23(b)	Where signals are provided from the meter for the user or the user's customer, a network operator must provide the user, or the user's customer, with sufficient details of the	4	The metrology procedure and model service level agreement makes the provision of signal specification information to customer to facilitate load management and	A	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			signal specification to enable compliance with clause 3.23(c) of the Code.		compliance with Metering Code clauses 3.23(b) and 3.23(c). This obligation is documented in the Metrology Procedure.		
362	Condition 4.1.1	Clause 3.24(A1)	If a retailer requests a network operator to install a prepayment meter at a connection point, then the prepayment meter must be sufficient to enable the retailer to comply with the retailer's obligations under the Code of Conduct.	4	No prepayment meters were installed by PRE during the audit period.	NP	NR
363	Condition 4.1.1	Clause 3.24(B1)	If a retailer requests a network operator to replace a prepayment meter at a connection point with a meter that is not a pre-payment meter, then the network operator must do so in accordance with this Code and the Code of Conduct.	4	No prepayment meters were installed by PRE during the audit period.	NP	NR
364	Condition 4.1.1	Clause 3.27	A person must not install a metering installation on a network unless the person is the network operator or a registered metering installation provider for the network operator doing the type of work authorised by its registration.	4	Intellihub is a registered entity contracted by PRE to install meter. Safety checks are undertaken and approval by WA regulator is sought before commissioning of any metering installation. This obligation is documented in the Metrology Procedure.	A	1
365	Condition 4.1.1	Clause 3.29	A network operator must publish a list of registered metering installation providers, including the prescribed details, and update the list at least annually.	4	In the case of PRE during the audit period, it only contracted this service to Intellihub. Not relevant in PRE case for annual publication.	NP	NR

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
366	Condition 4.1.1	Clause 4.1(1)	A network operator must establish, maintain and administer a metering database containing standing data and energy data for each metering point on its network.	4	PRE has contracted this function to WINconnect who are an authorised Licensed Retailer. It has an established database/tool/system to house standing and energy data for all PRE metering installation points.	A	1
367	Condition 4.1.1	Clause 4.1(2)	A network operator must ensure that its metering database with its associated links, circuits, information storage and processing systems are secured by devices or methods consistent with a good industry practice (to hinder unauthorised access and enable unauthorised access to be detected).	4	WINconnect metering database securely stores and process the customers information confidentially. Their governance is based on systems access controls, access privileges, user education and commitment, and authorised information recipients.	A	1
368	Condition 4.1.1	Clause 4.1(3)	A network operator must prepare and, if applicable, implement a disaster recovery plan to ensure that it is able, to rebuild the metering database and provide energy data to Code participants within 2 business days after the day of any disaster.	4	Both Synergy and WINConnect have their respective disaster recovery plans. Synergy's business continuity plan involves retaining the energy data in its SAP platform, in addition to the meter's ability to store 395 days' worth of 30 minutes interval energy data within its memory. All metering data service providers in the NEM are required to have their own Disaster Recovery Plan for them to be accredited by the AEMO. WINconnect's IT disaster recovery plan involves hosting the energy data in cloud servers/data centres. IT firewalls and safeguards are in place to prevent unauthorised access.	A	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
369	Condition 4.1.1	Clause 4.2(1)	A network operator must ensure that its registry complies with the Code and the prescribed clause of the market rules.	4	PRE has contracted this function to WINconnect who has retail authorisation under the National Energy Customer Framework. They are also registered as a market participant with AEMO. Its systems/tools and business processes comply with the Metering Code. It maintains a separate account/meter registry for PRE and fulfils Clause 8.3.1 of the Market Rules.	A	1
370	Condition 4.1.1	Clause 4.3(1)	The standing data for a metering point must comprise at least the items specified.	4	Each PRE metering installation standing data includes the item or information listed in Table 2 of the Metering Code. This obligation is documented in the Metrology Procedure.	A	1
371	Condition 4.1.1	Clause 4.4(1)	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.	4	PRE had one bill discrepancy during the audit period with one customer with a history of bill discrepancy where PRE used estimated meter data for historical billing whilst the meter data was rectified. After being notified of this mistake by the customer, PRE corrected the mistake, invoiced for the applicable time period and waived the costs relating to the excluded period. This was completed in accordance with the timeframe specified in its Service Agreement.	A	1
372	Condition 4.1.1	Clause 4.5(1)	A Code participant must not knowingly permit the registry to be materially inaccurate.	4	Given only 10 customers were being supplied by PRE during the entire audit period, all standing data is accurate. This obligation is documented in the Metrology Procedure.	A	NR

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
373	Condition 4.1.1	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.	4	PRE has both retailing and distribution licences. During the audit period, PRE had one bill discrepancy that was resolved in agreeance with the customer within the timeframe specified in its Service Agreement.	A	1
374	Condition 4.1.1	Clause 4.6(1)	If the network operator is notified of a change to, or inaccuracy in, an item of standing data by a Code participant that is the designated source for the item of standing data under Table 2 in clause 4.3(1) then the network operator must update the registry to address the issue.	4	During the audit period, PRE had one bill discrepancy that was resolved in agreeance with the customer within the timeframe specified in its Service Level Agreement	A	1
375	Condition 4.1.1	Clause 4.6(2)	If a network operator is notified of a change to, or inaccuracy in, an item of standing data by a Code participant which is not the designated source for the item of standing data, or otherwise becomes aware of a change to or inaccuracy in an item of standing data, then the network operator must determine whether the registry should be updated, and update the registry as required.	4	The Renewable Systems & Technology Project Manager confirmed that no such instance occurred during the audit period.	NP	NR
376	Condition 4.1.1	Clause 4.7(1)	If standing data for a metering point is updated in the registry, the network operator must, within 2 business days after the update (or such other time as is specified in the applicable	4	As per obligation 375.	NP	NR

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			service level agreement) notify the update to the current user and each previous user, if the updated standing data relates to a period or periods when the previous user was the current user.				
377	Condition 4.1.1	Clause 4.8(3)	A network operator must allow a user who is a retailer or a generator to have local and, where a suitable communications link is installed, remote access to the energy data for metering points at its associated connection points, using a password provided by the network operator that provides 'read only' access.	4	PRE has standard off-the-shelf approved Type 4 meters which are programmable by Synergy as any normal Type 4 meter in the NEM. It continuously captures energy data in 30 minute intervals and send this information via telecommunication (4G, 5G) networks to Synergy. This is a read only access.	NP	1
378	Condition 4.1.1	Clause 4.8(3A)	A network operator must allow a user who is a retailer or a generator to have access to data held in its metering database for metering points at its associated connection points, by the prescribed methods, using a password provided by the network operator which provides 'read only' access.	4	PRE provides access to information held in WINconnect metering database, upon request, to the relevant parties.	NP	1
379	Condition 4.1.1	Clause 4.8(4)(a)	A network operator must have devices and methods in place to ensure that energy data held in its metering installation is secured from unauthorised local or remote access using the methods prescribed	4	All of PRE's meters can detect fault and malfunction. For e.g. it can detect when an outage has occurred or an error in communications. These meters are installed within customer premises in their respective switchboard. Both physical and remote unauthorised access are hindered and/or detected.	NP	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
380	Condition 4.1.1	Clause 4.8(4)(b)	A network operator must have devices and methods in place to ensure that the data held in its metering database is secured from unauthorised local, or remote, access using the methods prescribed.	4	Similarly, WINConnect metering database is secured from unauthorised local and remote access. There are a limited amount of privilege accounts and need authentication to access the metering database. WINconnect business system (firewalls and IT set-ups) prevents remote access.	NP	1
381	Condition 4.1.1	Clause 4.8(5)	Without limiting subclause 4.8(4), a network operator must ensure that electronic passwords and other electronic security controls are only issued to the specified authorised personnel and otherwise keep its records of electronic passwords, and other electronic security controls, secure from unauthorised access.	4	Given PRE has only 10 large customers and its sub-contractual arrangement with Synergy (to read meters remotely) and WINconnect (to manage the database and billing function) during the audit period this requirement was achieved.	NP	1
382	Condition 4.1.1	Clause 4.9	A network operator must retain energy data in its metering database for each metering point on its network, including any energy data that has been replaced under subclause 5.24, for at least the periods, and with the level of accessibility, prescribed.	4	The metering device itself can store 30 minutes interval energy data for 90 days as per the infrastructure service module of the master service deed. During the audit period this was the case with the meter internal storage capacity. Synergy then hold on to the energy data for 395 days (corresponds to 13 months) in a readily accessible format. WINconnect maintains this energy data for minimum of 5 years and 11 months in a format that is accessible within a reasonable timeframe.	NP	1
383	Condition 4.1.1	Clause 5.1(1)	A network operator must use all reasonable endeavours to accommodate another Code participant's requirement to obtain a metering service and requirements in	4	The Renewable Systems & Technology Project Manager confirmed that no such instance occurred during the audit period.	NP	NR

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			connection with the negotiation of a service level agreement.				
384	Condition 4.1.1	Clause 5.1(2)	Without limiting subclause 5.1(1), a network operator must: <ul style="list-style-type: none"> • expeditiously and diligently process all requests for a service level agreement; • negotiate in good faith with a Code participant regarding the terms for an agreement; and • to the extent reasonably practicable in accordance with good electricity industry practice, permit a Code participant to acquire a metering service containing only those elements of the metering service which the Code participant wishes to acquire. 	4	During the audit period, PRE has acquired 5 large customers in addition to their existing 5 customer from the last audit period. It also negotiated and contractually arrange meter installation, maintenance and operation service from Intellihub, reading service from Synergy, metering database and billing service from WINconnect. PRE conducted these processes in good faith with its customers in accordance with their Standard Terms and Conditions.	A	1
385	Condition 4.1.1	Clause 5.3(1)	A network operator must, for each metering point on its network, obtain energy data from the metering installation and transfer the energy data into its metering database by no later than 2 business days after the date for the scheduled meter reading for the metering point (or such other time as is specified in the applicable service level agreement).	4	PRE meter (Synergy) read energy data in 30 minutes interval remotely. Every night Synergy send the previous 24 hour energy data in secure communication file to WINconnect to store and process it further for billing purposes.	NP	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
385A	Condition 4.1.1	Clause 5.3(2)	<p>Energy data obtained and transferred under clause 5.3(1) must include:</p> <ul style="list-style-type: none"> for a metering point at which bi-directional electricity flows occur, a separate measurement of each of the electricity production and the electricity consumption at that metering point; and on and from five-minute settlement commencement, five-minute interval energy data in respect of 5MS meters. <p>(SWIN only in respect of 5MS meters)</p>	4	PRE maintains Type 4 meter installation for all its customers which are compliant with the Metering Code and with their own Metrology Procedure.	A	1
385B	Condition 4.1.1	Clause 5.3(3)	Notwithstanding the provisions of a service level agreement, on and from weekly settlement commencement, consecutive dates for a scheduled meter reading for a metering point on the SWIN must be no more than one week apart, except where the metering installation for the metering point has an accumulation meter. (SWIN only)	4	PRE maintain Type 4 meters at all their customer connection points that have an accumulation feature built in as per the Metrology Procedure.	A	1
386	Condition 4.1.1	Clause 5.4(1)	A network operator must, for each meter on its network, at least once in every 12-month period undertake a meter reading that provides an actual value that passes the validation processes in Appendix 2.	4	Synergy provide actual 30 minute interval readings on a daily basis to WINconnect. Also, upon registration of a new meter installation the commissioning process includes a verification of the energy data. New meters which are installed with Current Transformers (CT) undergo a CT Validation test post energisation of the meter to validate	NP	NR

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
					and test the energy data is recorded accurately at the meter. As an extended service upon instruction from PRE, Intellihub, as their meter installation service provider, is obligated to conduct a CT validation and data validation test at the physical meter point. No such extended service requests were raised during this audit period.		
387	Condition 4.1.1	Clause 5.4(1A)	The meter reading referred to in clause 5.4(1) must not be undertaken by the customer associated with the meter, and must be undertaken by a person who is employed or appointed by the network operator and who is suitably skilled in accordance with good electricity industry practice to carry out meter readings.	4	This meter reading was not performed by the respective customer themselves. It was performed by Synergy.	NP	NR
388	Condition 4.1.1	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).	4	PRE confirmed that Synergy has not requested the assistance of PRE with respect to their metering installation during the audit period. Generally, it is PRE requesting the assistance of Synergy with respect to metering installations. All of PRE's customer meters are Type 4 meter with remote communication functions. Its reading, taken at 30 minute intervals throughout the day, is deemed actual value. This reading meets the validation process prescribed in Appendix 2 of the Metering Code.	NP	NR

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
389	Condition 4.1.1	Clause 5.5(2)	<p>Subject to subclause 5.5(2A)(b), a network operator may impose a charge for the provision of data, but only if</p> <ul style="list-style-type: none"> a user has requested the energy data to the extent permitted by, and in accordance with the applicable service level agreement between it and the user; and if a customer has given a direction under subclause 5.17A(1), in accordance with the prescribed conditions. 	4	<p>The Renewable Systems & Technology Project Manager confirmed that no such instance occurred during the audit period.</p> <p>Provision of such service is detailed in the standard and extended service options within the model service level agreement between PRE and its customers.</p>	A	NR
390	Condition 4.1.1	Clause 5.5(2A)	A network operator must not impose a charge for the provision of standing data and for the provision of energy data if another enactment prohibits it doing so.	4	<p>The Renewable Systems & Technology Project Manager confirmed that no such instance occurred during the audit period.</p> <p>Provision of such service is detailed in the standard and extended service options within the model service level agreement between PRE and its customers.</p>	A	NR
391	Condition 4.1.1	Clause 5.6(1)	Subject to subclause 5.6(2), a network operator must provide validated, and where necessary, substituted or estimated energy data for a metering point to the user for the metering point and the IMO within the timeframes prescribed in subclause 5.6(1)(2).	4	PRE meter (Synergy) read energy data in 30 minutes interval remotely. Every night Synergy send the previous 24 hour energy data in secure communication file to WINconnect to store and process it further for billing purposes. The billing is performed on a monthly cycle as per the model service level agreement with the customers.	A	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
391A	Condition 4.1.1	Clause 5.6(3)	A network operator must provide validated, and where necessary substituted or estimated, interval energy data for a metering point to AEMO before 5pm on the first business day after the network operator obtains energy data for the metering point under clause 5.3(1)(a), or such other time as agreed in writing.	4	Not applicable for PRE meter installations	NP	NR
391B	Condition 4.1.1	Clause 5.6(5)	<p>Energy data provided under clauses 5.6(1) and 5.6(3) must include:</p> <ul style="list-style-type: none"> • for a metering point at which bi-directional electricity flows occur, a separate measurement of each of the electricity production and the electricity consumption at that metering point; and • on and from five-minute settlement commencement, five-minute interval energy data in respect of 5MS meters. <p>(SWIN only in respect of 5MS meters)</p>	4	PRE maintain Type 4 meters at all their customer connection points that can take separate measurement of each of the electricity production and the electricity consumption at that metering point. This obligation is documented in the Metrology Procedure.	A	1
392	Condition 4.1.1	Clause 5.7	If a replacement energy data value is inserted in a metering database for a metering point, the network operator must provide replacement energy data to the user for the metering point	4	The Renewable Systems & Technology Project Manager confirmed that no such instance occurred during the audit period.	NP	NR

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			and the IMO within the timeframes prescribed.				
393	Condition 4.1.1	Clause 5.8	A network operator must provide a user with whatever information the network operator has that is necessary to enable the user to comply with its obligations under the Code of Conduct, within the time necessary for the user to comply with the obligations.	4	The Renewable Systems & Technology Project Manager confirmed that no such instance occurred during the audit period.	NP	NR
394	Condition 4.1.1	Clause 5.9	A network operator must provide standing data, provided to or obtained by it under this Code, to users where required to do so under any enactment.	4	The Renewable Systems & Technology Project Manager confirmed that no such instance occurred during the audit period.	NP	NR
395	Condition 4.1.1	Clause 5.10	A network operator must provide a subset of the standing data to a retailer in accordance with the provisions of Annex 4 of the Customer Transfer Code.	4	The Renewable Systems & Technology Project Manager confirmed that no such instance occurred during the audit period.	NP	NR
396	Condition 4.1.1	Clause 5.11	If a transfer occurs at a connection point, then within 2 business days after the transfer date, as defined in the Customer Transfer Code, the network operator must provide the incoming retailer with a copy of the standing data for each metering point associated with the connection point.	4	The Renewable Systems & Technology Project Manager confirmed that no such instance occurred during the audit period.	NP	NR
397	Condition 4.1.1	Clause 5.12(1)	If a user gives a network operator an energy data request for a metering point in accordance with the communication rules, and the energy data request relates only to a time or	4	The Renewable Systems & Technology Project Manager confirmed that no such instance occurred during the audit period.	NP	NR

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			times for which the user was the current user at the metering point, then the network operator must provide a user with a complete set of energy data for the metering point within the timeframes prescribed.				
398	Condition 4.1.1	Clause 5.13	<p>If the current user for a metering point gives the network operator a standing data request for the metering point in accordance with the communication rules then the network operator must:</p> <ul style="list-style-type: none"> • provide the current user with a complete current set of standing data for a metering point; and • advise whether there is a communications link for the metering point, <p>within 2 business days after the receipt of the request.</p>	4	The Renewable Systems & Technology Project Manager confirmed that no such instance occurred during the audit period.	NP	NR
399	Condition 4.1.1	Clause 5.14(3)	If a user makes a bulk standing data request, the network operator must in accordance with the communication rules, acknowledge receipt of the request and provide the requested standing data within the timeframes prescribed.	4	The Renewable Systems & Technology Project Manager confirmed that no such instance occurred during the audit period.	NP	NR
400	Condition 4.1.1	Clause 5.15	If a network operator provides energy data to a user or the IMO it must also provide the date of the meter reading in accordance with the requirements specified.	4	PRE meter (Synergy) read energy data in 30 minutes interval remotely. Every night Synergy send the previous 24 hour energy data in secure communication file to WINconnect to store and process it further for billing purposes. The billing is performed on	A	NR

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
					a monthly cycle as per the model service level agreement with the customers. During the audit period, no energy data was provided to AEMO.		
401	Condition 4.1.1	Clause 5.16	If a user collects or receives energy data from a metering installation, then the user must provide the network operator with the energy data (in accordance with the communication rules) within the timeframes prescribed.	4	The network operator, Synergy remotely 'reads' and collect energy data from all of PRE's metering installation provide this information to PRE's billing agent WINconnect on daily basis. The user does not collect any energy data for the network operator.	NP	NR
402	Condition 4.1.1	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.	4	PRE invoicing to its customer is on monthly basis which also involves provision of standing data and consumed energy data as per the Standard Terms and Conditions.	A	1
403	Condition 4.1.1	Clause 5.17A(1)	A network operator must provide data for a metering point from its metering database to a person if (and to the extent that) the customer associated with the metering point gives the network operator a direction to do so that complies with subclause 5.17A(2).	4	The Renewable Systems & Technology Project Manager confirmed that no such instance occurred during the audit period.	NP	NR

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
404	Condition 4.1.1	Clause 5.17A(3)	A network operator must comply with a direction under subclause 5.17A(1) within the timeframes prescribed.	4	The Renewable Systems & Technology Project Manager confirmed that no such instance occurred during the audit period.	NP	NR
405	Condition 4.1.1	Clause 5.18	If a user collects or receives information regarding a change in the energisation status of a metering point, then the user must provide the network operator with the prescribed information, including the stated attributes, within the timeframes prescribed.	4	The network operator has access to and controls all metering installations. During the audit period, PRE has acquired 5 more large customers in addition to their 5 large customers from last audit period and their metering installation were energised and commissioned. During all these commissioning activity, PRE's General Manager was present in person on site. Apart from commissioning of these customers installation, there has been no changes to energisation status of PRE's customer during the audit period.	NP	NR
406	Condition 4.1.1	Clause 5.19(1)	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.	4	There have been no requests by the network operator to collect information from customers during the audit period. PRE relied on Synergy/WINConnect, with respect to all meter reading and billing matters.	NP	NR
407	Condition 4.1.1	Clause 5.19(2)	A user must, to the extent that it is able, collect and maintain a record of the prescribed information in relation to the site of each	4	PRE has both retailing and distribution licences. During the audit period, PRE and its contracting parties (Synergy and WINconnect) met this obligation by collecting information from customers to assist PRE	A	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			connection point with which the user is associated.		meeting its obligations described in the metering Code. PRE maintains an operating map of all its customer connection points.		
408	Condition 4.1.1	Clause 5.19(3)	Subject to subclauses 5.19(3A) and 5.19(6), the user must, within 1 business day after becoming aware of any change in an attribute described in subclause 5.19(2), notify the network operator of the change.	4	PRE has both retailing and distribution licences. During the audit period, PRE and its contracting parties (Synergy and WINconnect) met this obligation. Also, only 5 more customers were commissioned by PRE in its microgrid during the audit period in addition to their existing 5 customers from their last audit period. PRE has complete knowledge of their customers at each stage of their application or change to their status.	A	1
409	Condition 4.1.1	Clause 5.19(5)	A network operator must give notice to a user, or (if there is a different current user) the current user, acknowledging receipt of any customer, site or address attributes from the user within the timeframes prescribed.	4	The Renewable Systems & Technology Project Manager confirmed that no such instance occurred during the audit period.	NP	NR
410	Condition 4.1.1	Clause 5.19(6)	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.	4	PRE has both retailing and distribution licences. Also, only 5 more customers were commissioned by PRE in its microgrid during the audit period with PRE having complete knowledge of any change of attribute. Also, there are no other retailers within the PRE microgrid network.	NP	1
411	Condition 4.1.1	Clause 5.20(1)	A network operator must, by not later than 6 months after the date this Code applies to the network operator, develop, in accordance with the communication rules, an	4	PRE has a standard format of Energy Data Verification Request Form for its users in their data pack that is given to the user at the time of their application for a connection point.	A	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			Energy Data Verification Request Form.				
412	Condition 4.1.1	Clause 5.20(2)	An Energy Data Verification Request Form must require a Code participant to provide the information prescribed.	4	The Energy Data Verification Request Form on the PRE website requires a Code participant to provide the following information: (a) the NMI and checksum for the connection point associated with the energy data; and (b) the reason for the request; and (c) for: (i) an interval meter — the start date and time and end date and time of the period to which the Code participant's request relates; and (ii) an accumulation meter — the meter reading date to which the request relates (which is to be the date of the actual reading if the network operator has advised the Code participant that the energy data derives.	NP	1
413	Condition 4.1.1	Clause 5.20(4)	If a Code participant requests verification of energy data under subclause 5.20(3), the network operator must, in accordance with the metrology procedure: <ul style="list-style-type: none"> • subject to subclause 5.20(5), use reasonable endeavours to verify energy data; and • inform the requesting Code participant of the result of the verification and provide the verified energy data to that Code 	4	The audit confirmed that no customers had requested verification of data by submitting an Energy Data Verification Request Form in the audit period.	NP	NR

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			participant within the timeframes prescribed.				
414	Condition 4.1.1	Clause 5.21(2)	A network operator must comply with any reasonable request under subclause 5.21(1).	4	The Regulatory Compliance Officer confirmed that there were no requests to undertake either a test or an audit or both of any one or more of: (a) the accuracy of the metering installation; and (b) the energy data from the metering installation; and (c) the standing data for the metering installation.	NP	NR
415	Condition 4.1.1	Clause 5.21(4)	A test or audit under subclause 5.21(1) is to be conducted in accordance with the metrology procedure and the applicable service level agreement.	4	As per obligation 414.	NP	NR
416	Condition 4.1.1	Clause 5.21(5)	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.	4	As per obligation 414.	NP	NR
417	Condition 4.1.1	Clause 5.21(6)	A Code participant must not make a request under subclause 5.21(1) that is inconsistent with any access arrangement or agreement.	4	The Renewable Systems & Technology Project Manager confirmed that no such instance occurred during the audit period.	NP	1
418	Condition 4.1.1	Clause 5.21(8)	A network operator may only impose a charge for the testing of the metering installations, or auditing of information from the meters	4	No such instance occurred during the audit period. Provision of such service is detailed in the extended metering service within the model service level agreement between PRE	A	NR

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			associated with the metering installations, or both, in accordance with the applicable service level agreement between it and the user.		and its customers. The charge for meter testing is stated in the model service level agreement.		
419	Condition 4.1.1	Clause 5.21(9)	Any written service level agreement entered into under subclause 5.21(7) must include a provision that no charge is to be imposed if the test or audit reveals a noncompliance with this Code.	4	PRE's model service level agreement includes the provision of PRE performing metering installation repair (SMS-3) following a test, audit or investigation identifying non-compliant metering installation, or upon notification of an outage or malfunction to a metering installation. Also, that there is no charge if the test or audit reveals a non-compliance. No such instance occurred during the audit period.	A	NR
420	Condition 4.1.1	Clause 5.21(11)	<p>If a test or audit shows that the accuracy of the metering installation or information from the meter associated with the metering installation does not comply with the requirements under this Code, the network operator must:</p> <ul style="list-style-type: none"> • advise the affected parties as soon as practicable of errors detected under a test or audit, the possible duration of the errors; and • must restore the accuracy of the metering installation in accordance with the applicable service level agreement. 	4	<p>The Renewable Systems & Technology Project Manager confirmed that no such instance occurred during the audit period.</p> <p>This obligation is documented in the model service level agreement.</p>	A	NR

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
421	Condition 4.1.1	Clause 5.21(12)	The original stored error correction data in a meter must not be altered except during accuracy testing and calibration of a metering installation.	4	The Renewable Systems & Technology Project Manager confirmed that no such instance occurred during the audit period. PRE's model service level agreement refers to its metrology procedure for substitution, estimation and validation of energy data.	A	NR
422	Condition 4.1.1	Clause 5.22(1)	A network operator must validate energy data in accordance with this Code applying, as a minimum, the prescribed rules and procedures set out in Appendix 2 and must, where necessary, substitute and estimate energy data under this Code applying, as a minimum, the prescribed rules and procedures set out in Appendix 3.	4	PRE's model service level agreement refers to its metrology procedure for substitution, estimation and validation of energy data, which in turn states that it is in accordance to the Metering Code. PRE's meter is remotely read in 30 minute intervals and this energy consumption data is sent to WINconnect on a daily basis. Given this, there is no data substitution or estimation involved.	A	NR
423	Condition 4.1.1	Clause 5.22(2)	The network operator must use check metering data, where available, to validate energy data provided that the check metering data has been appropriately adjusted for differences in metering installation accuracy in accordance with subclause 3.13.	4	The annual energy consumption of PRE customers do not meet the threshold of requiring partial check meter. There are no check meters installed in PRE's network.	NP	NR
424	Condition 4.1.1	Clause 5.22(3)	If a check meter is not available or energy data cannot be recovered from the metering installation within the time required under this Code, or if clause 5.22(7) applies, then the network operator must prepare substitute values using a method	4	Any estimated energy data is corrected to the actual data in the next cycle of billing. There were no instances of any disagreements between PRE and its customers during the audit period	A	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			contained in Appendix 3 (or in the case of a substitution under clause 5.22(7), a method contained in the metrology procedure) and agreed where necessary with the relevant Code participants.		PRE's model service level agreement refers to its metrology procedure for substitution, estimation and validation of energy data.		
425	Condition 4.1.1	Clause 5.22(4)	If a network operator detects a loss of energy data or incorrect energy data from a metering installation, it must notify each affected Code participant of the loss or error within 24 hours after detection.	4	The Renewable Systems & Technology Project Manager confirmed that no such instance occurred during the audit period.	NP	NR
426	Condition 4.1.1	Clause 5.22(5)	Substitution or estimation of energy data is required when energy data is missing, unavailable or corrupted, including in the circumstances described in this subclause.	4	Any estimated energy data is corrected to the actual data in the next cycle of billing. PRE's model service level agreement refers to its metrology procedure for substitution, estimation and validation of energy data.	A	1
427	Condition 4.1.1	Clause 5.22(6)	A network operator must review all validation failures before undertaking any substitution.	4	The Renewable Systems & Technology Project Manager confirmed that no such instance occurred during the audit period.	NP	NR
428	Condition 4.1.1	Clause 5.23(1)	If a network operator determines that there is no possibility of determining an actual value for a metering point, then the network operator must designate an estimated or substituted value for the metering point to be a deemed actual value for the metering point.	4	PRE has followed through their metrology procedure which is consistent with the Metering Code when no actual value were available during the audit period. Given that the PRE meters collect 30 minute interval energy data and has only experienced very few outages, its billing agent (WINconnect) nominate the substitute value aligned with the metrology procedure. PRE's model service level agreement refers to its metrology procedure for substitution, estimation and validation of energy data.	A	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
429	Condition 4.1.1	Clause 5.23(3)	If a network operator has designated a deemed actual value for a metering point then the network operator must: <ul style="list-style-type: none"> • repair or replace the meter or one or more of components of metering equipment (as appropriate) at the metering point; and • subclauses 5.24(3(c) and 5.24(4) apply in respect of the estimated or substituted value which was designated to be the deemed actual value. 	4	The Renewable Systems & Technology Project Manager confirmed that no such instance occurred during the audit period.	NP	NR
430	Condition 4.1.1	Clause 5.24(1)	If a network operator uses an actual value (first value) for energy data for a metering point, and a better quality actual or deemed actual value is available (second value), the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice.	4	The Renewable Systems & Technology Project Manager confirmed that no such instance occurred during the audit period.	NP	NR
431	Condition 4.1.1	Clause 5.24(2)	If a network operator uses a deemed actual value (first value) for energy data for a metering point, and a better quality deemed actual value is available (second value), then the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice.	4	The Renewable Systems & Technology Project Manager confirmed that no such instance occurred during the audit period.	NP	NR

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
432	Condition 4.1.1	Clause 5.24(3)	If a network operator uses an estimated or substituted value (first value) for energy data for a metering point, and a better quality actual, deemed, estimated or substituted value is available (second value), then the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice or the user and its customer jointly request it to do so.	4	The Renewable Systems & Technology Project Manager confirmed that no such instance occurred during the audit period.	NP	NR
433	Condition 4.1.1	Clause 5.24(4)	A network operator (acting in accordance with good electricity industry practice) must consider any reasonable request from a Code participant for an estimated or substituted value to be replaced under subclause 5.24.	4	The Renewable Systems & Technology Project Manager confirmed that no such instance occurred during the audit period.	NP	NR
434	Condition 4.1.1	Clause 5.25	A network operator must ensure the accuracy of estimated energy data in accordance with the methods in its metrology procedure and ensure that any transformation or processing of data preserves its accuracy in accordance with the metrology procedure.	4	The Renewable Systems & Technology Project Manager confirmed that no such instance occurred during the audit period.	NP	NR
435	Condition 4.1.1	Clause 5.27	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	4	PRE has both retailing and distribution licences. Also, only 5 more customers were commissioned by PRE in its microgrid in addition to their existing 5 customers from the last audit period during the audit period with PRE having complete knowledge of all their	NP	NR

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			incorrect within the timeframes prescribed.		customer attributes. Also, there is no other retailer within the PRE microgrid network.		
436	Condition 4.1.1	Clause 5.29	If a network operator makes an election under subclause 5.28 in respect of a network, then, (unless the election is terminated under the meter data agency agreement) the parties must undertake the activities prescribed, as applicable. (SWIN only)	4	PRE has appointed Synergy as its metering data agent, and not Western Power	NP	NR
437	Condition 4.1.1	Clause 5.30(1)	If a network operator makes an election under subclause 5.28 in relation to the network, then the parties must enter into an agreement in relation to the network, which must deal with at least the matters prescribed. (SWIN only)	4	PRE has appointed Synergy as its metering data agent, and not Western Power	NP	NR
439	Condition 4.1.1	Clause 5.31(2)	For each non-compliant metering installation notified under subclause 5.31(1)(b), the electing network operator may, by notice to the electricity networks corporation, require the electricity networks corporation to upgrade a non-compliant metering installation, in which case the electricity networks corporation must undertake the upgrade in accordance with the metering data agency agreement and good electricity industry practice.	4	There were 3 such upgrades made to the meters that had 3G communication ports and were replaced when 3G was phased out in November 2024.	NP	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
440	Condition 4.1.1	Clause 5.34(2)	Except to the extent that the metering data agency agreement provides otherwise, the costs which may be recovered by the electricity networks corporation under subclause 5.34(1) must not exceed the amounts prescribed.	4	PRE has appointed Synergy as its metering data agent, and not Western Power	NP	NR
447	Condition 4.1.1	Clause 6.1(1)	The network operator must, in relation to its network, comply with the agreements, rules, procedures, criteria and processes prescribed.	4	PRE complied with its model service level agreement, metrology procedure, mandatory link criteria (standard Type 4 metering solution) and registration process during the audit period. In lieu of established communication rules, it followed through using the agreed mode of communication via email, phone, etc. during the audit period.	A	1
448	Condition 4.1.1	Clause 6.1(2)	A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed.	4	PRE has both retailing and distribution licences. It maintains a communication log in an Excel format for future reference	A	1
448A	Condition 4.1.1	Clause 6.2	A network operator must, as soon as practicable and in any event no later than 6 months after the date this Code applies to it, submit to the ERA for its approval the prescribed documents in subclauses 6.2(a)-(d).	4	PRE has had its model service level agreement and the metrology procedure submitted and approved by the ERA within 6 months of updating the respective documents during the audit period. The mandatory link criteria is addressed due to the design and inbuilt characteristics of Type 4 metering installation which is an approved off-the-shelf product, constructed according to Australian standards and continues to remotely communicate with Synergy.	A	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
448B	Condition 4.1.1	Clause 6.18	A network operator must publish the document within 10 business days after notification of the ERA's approval under subclauses 6.13(1)(a)(i), 6.16 or 6.17.	4	<p>PRE is compliant with this requirement as confirmed at the PRE website. The ERA approved the Meterology procedure on 4 April 2022. The previous owner of PRE did not publish the procedure within 10 business days of approval.</p> <p>The previous audit report dated 22 June 2022 confirmed the procedure has been published on the website and noted this as a minor non-compliance. As this has been resolved, no further recommendation is made.</p> <p>The Licence Compliance Obligations Register includes this obligation.</p>	A	2
448C	Condition 4.1.1	Clause 6.19A(1)	A network operator must publish its communication rules as soon as practicable, and in any event within 6 months after the date this Code applies to it.	4	<p>PRE does not have a published communication rules document at this stage. The content of the communication rules are file formats, protocol, timeframes for data transfer, sufficient for users to design and commission their IT systems for b2b communication and to be compatible with communication rules as defined in the Transfer Code</p> <p>The definition of user was originally defined as parties who have an access contract under the access code. Via a footnote it was extended in the Metering Code to include every customer who has any contract, including a service contract</p> <p>None of PRE's customers will design and commission an IT system to transfer data with PRE.</p>	A	2

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
					The Transfer Code does not currently apply to PRE until another retailer serves customers on the Peel network. PRE will develop communication rules once another retailer is about to enter the Peel network. This is considered a minor non-compliance. The Licence Compliance Obligations Register includes this obligation.		
448D	Condition 4.1.1	Clause 6.19B(1)	Once communication rules have been published for a network under clause 6.19A, or amended under clause 6.21(3), the communication rules may only be amended thereafter in accordance with the communication rules made under subclause 6.7(1)(k) or clause 6.19C.	4	As there are currently, no PRE communication rules, this is not rated.	NP	NR
449	Condition 4.1.1	Clause 6.20(4)	A network operator must amend any document in accordance with the ERA's final recommendation.	4	PRE submits their annual Compliance Report to ERA in accordance with their distribution licence EDL007 and their retail licence ERL028. There were no amendments requested by the ERA in the audit period.	NP	1
450	Condition 4.1.1	Clause 6.20(5)	The network operator must publish any document that has been amended under subclause 6.20(4).	4	All updated documents such as Metrology Procedure, etc. during the audit period have been published by PRE as confirmed on the website.	NP	1
451	Condition 4.1.1	Clause 7.2(1)	Code participants must use reasonable endeavours to ensure that they can send and receive a notice by post, facsimile and electronic communication and must	4	PRE's contact details are known to its customers and vice-versa given the limited number of large customers it had during the audit period. The audit confirmed that PRE	NP	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			notify the network operator of a telephone number for voice communication in connection with the Code.		can send and receive notices by post, email and facsimile.		
452	Condition 4.1.1	Clause 7.2(2)	A network operator must notify each Code participant of its initial contact details and of any change to its contact details at least 3 business days before the change takes effect.	4	PRE's contact details are known to its customers and vice- versa given the limited number of large customers it had during the audit period. No such change to PRE contact details occurred during the audit period.	NP	NR
453	Condition 4.1.1	Clause 7.2(4)	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.	4	PRE's contact details are known to its customers and vice- versa given the limited number of large customers it had during the audit period.	NP	1
454	Condition 4.1.1	Clause 7.2(5)	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.	4	PRE has both retailing and distribution licences. During the audit period PRE microgrid did not have any other retailer and added only 5 more customers in its portfolio.	NP	1
455	Condition 4.1.1	Clause 7.5	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.	4	Confidential information was handled appropriately in accordance with PRE's, Synergy's and WINconnect's respective confidential information and privacy policies. It adheres to National Electricity Rules and also relevant Australian privacy laws.	A	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
456	Condition 4.1.1	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.	4	Confidential information (standing data, energy data, commercially sensitive data) were disclosed as required by PRE's business and regulation such as to related body corporate (parent company), legal advisors, auditors, consultants/contractor during the course of doing its business during the audit period.	A	1
457	Condition 4.1.1	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.	4	<p>PRE's non-standard (for large customer) terms and condition agreement contains dispute resolution clauses. It is consistent with the intent of the Metering Code. PRE's non- standard (for large customer) terms and condition agreement stipulates step-by-step dispute escalation point and durations which is generally aligned with the Metering Code but uses slightly different escalation points and duration. There was only one disputed bill by a customer during the audit period which was then resolved amicably by PRE issuing a revised bill to the customer within 5 business days.</p> <p>PRE's standard (for small use customer) model service level agreement also has a dispute resolution clause that directly references to this obligation in the Metering Code.</p> <p>The obligation to meet 5 days after receipt of a dispute notice is included in the Licence Compliance Register.</p>	A	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
458	Condition 4.1.1	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.	4	The Regulatory Compliance Officer confirmed that no such instance occurred during the audit period.	NP	NR
459	Condition 4.1.1	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.	4	The Regulatory Compliance Officer confirmed that no such instance occurred during the audit period.	NP	NR
460	Condition 4.1.1	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.	4	PRE has prepared a written and signed record of the resolution with a customer re a dispute during the audit period. There were no other instances noted during the audit period.	NP	1
461	Condition 4.1.1	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).	4	PRE and the customer with a dispute conducted themselves in a professional manner and achieved an amicable resolution. There were no other instances noted during the audit period.	NP	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
Electricity Industry (Network Quality and Reliability of Supply) Code 2005							
462	Condition 4.1.1	Clause 5.1	A distributor or transmitter must, as far as reasonably practicable, ensure that electricity supply to a customer's electrical installations complies with prescribed standards	4	PRE network is designed, installed, operated and maintained to supply electricity adhering to voltage requirements set out in AS 60038; voltage fluctuations limits as set out AS/NZS 61000 Parts 3.3, 3.5 and 3.7; harmonic distortion limits outlined in AS/NZS 61000 Parts 3.2 and 3.6. This is detailed in PRE's service and technical installation rules. It is also stipulated in its network performance and planning criteria manual.	A	1
463	Condition 4.1.1	Clause 8	A distributor or transmitter must, so far as reasonably practicable, disconnect the supply of electricity to installations or property in specified circumstances, unless it is in the interest of the customer to maintain the supply.	4	No such instance occurred during the audit period. PRE's service and technical installation rules detail the provision of disconnection under certain circumstances to avoid damages and failure to adhere to harmonics and voltage fluctuation bands.	A	1
464	Condition 4.1.1	Clause 9	A distributor or transmitter must, as far as reasonably practicable, ensure that the supply of electricity is maintained and the occurrence and duration of interruptions is kept to a minimum.	4	This obligation is provisioned within various documents such as PRE's non-standard (large customer) terms and condition agreement, standard (small-use customer) terms and condition agreement which has not been used, and also in its service and technical installation rules. Review of sample of historic planned and unplanned outages during the audit period indicates an effort to restore the supply to customer as soon as possible.	A	1
465	Condition 4.1.1	Clause 10(1)	A distributor or transmitter must, so far as reasonably practicable, reduce	4	This obligation is provisioned within various documents such as PRE's non-standard (large customer) terms and condition	A	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			the effect of any interruption on a customer.		agreement, standard (small-use customer) terms and condition agreement which has not been used, and also in its service and technical installation rules. Review of a sample of historic planned and unplanned outages during the audit period indicates an effort to restore the supply to customer as soon as possible. Also, the planned outages were performed after consultation with and notification to customers. In one instance, the outage activity was re-scheduled to reduce the effect on its customer after a customer request.		
466	Condition 4.1.1	Clause 10(2)	A distributor or transmitter must consider whether, in specified circumstances, it should supply electricity by alternative means to a customer who will be affected by a proposed interruption.	4	No such instance occurred during the audit period. All planned outages were performed after consultation with and notification to customers. In one instance, the outage activity was re-scheduled to reduce effect to its customer up customer request. There was no need for alternate arrangements to be arranged by PRE. Alternate supply is considered in PRE's service and technical installation rules.	A	1
468	Condition 4.1.1\if	Clause 13(2)	A distributor or transmitter must, so far as reasonably practicable, ensure that customers in specified areas do not have average total lengths of interruptions of supply greater than specified durations.	4	Review of a sample of historic planned and unplanned outage durations during the audit period indicates that all outages were well within the duration limit of 160 minutes prescribed for "the urban areas other than the Perth CBD" except for 2 out of 11 outages. These were transformer upgrades at the request of customers. The audit confirmed that PRE took action "as far as reasonably practicable" to minimise the interruption to supply including overnight time when the	A	1

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
					affected businesses were closed. As there have been minimal outages in the audit period and reasonable action has been taken to minimise the outages, this is considered compliant with the obligation. There is a detailed procedure to minimise any supply interruptions.		
469	Condition 4.1.1	Clause 13(3)	The average total length of interruptions of supply is to be calculated using the specified method.	4	Review of sample of historic planned and unplanned outages duration during the audit period indicates that all outages were well within the duration limit of 160 minutes prescribed for 'the urban areas other than the Perth CBD' except for 2 out of 11 outages due to network upgrades. As per the Performance datasheets to ERA up to 2022/23, the average supply interruption was 0 minutes in 2022/23 and 81.5 minutes in 2022/23. The ERA did not require a Performance datasheet for 2023/24 as the reporting only applies to distributors of retailers that supply electricity to small use customers and PRE does not have any small use customers.	A	1
470	Condition 4.1.1	Clause 14(8)	A distributor or transmitter must, on request, provide to an affected customer a free copy of an instrument issued by the Minister and of any notice given under section 14(7) of the <i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005</i> .	4	This is not applicable to PRE as it has not received any instrument from Minister or exemption during the audit period.	NP	NR

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
471	Condition 4.1.1	Clause 15(2)	A distributor or transmitter that agrees with a customer to exclude or modify certain provisions must set out the advantages and disadvantages to the customer of doing so in their agreement.	4	This is not applicable to PRE during the audit period as neither discussed, negotiated nor agreed to exclude or modify certain provisions. Hence there are no outlining of pros and cons of such actions.	NP	NR
472	Condition 4.1.1	Clause 18	A distributor operating a relevant distribution system must, in specified circumstances, make a payment to a customer within a specific timeframe for a failure to give required notice of planned interruption.	4	All planned outages were adequately notified to affected customers in advance during the audit period. There were no claims for failure to give required notice.	NP	NR
473	Condition 4.1.1	Clause 19	A distributor operating a relevant distribution system must, in specified circumstances, make a payment to a customer within a specific timeframe if a supply interruption exceeds 12 hours.	4	No such instance occurred as all outages during the audit period were less than 12 hours. Also, PRE is not an electricity networks corporation.	NP	NR
474	Condition 4.1.1	Clause 21(1)	A distributor operating a relevant distribution system must provide eligible customers with information about applying for payments for failure to meet the requirements in sections 18 and 19 of the <i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005</i> .	4	Not rated because PRE is not an electricity networks corporation.	NP	NR
475	Condition 4.1.1	Clause 21(2)	A distributor operating a relevant distribution system must provide written notice to customers about payments for failure to meet the requirements in sections 18 and 19 of the <i>Electricity Industry (Network</i>	4	Not rated because PRE is not an electricity networks corporation.	NP	NR

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			<i>Quality and Reliability of Supply) Code 2005.</i>				
476	Condition 4.1.1	Clause 21(3)	A distributor operating a relevant distribution system must provide written notice to eligible customers about payments for failure to meet the requirements in sections 18 and 19 of the <i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005</i> not less than once in each financial year.	4	Not rated because PRE is not an electricity networks corporation.	NP	NR
477	Condition 4.1.1	Clause 23(1)	A distributor or transmitter must take all such steps as are reasonably necessary to monitor the operation of its network to ensure compliance with specified requirements.	4	PRE monitors its operation to adhere to provisions outlined in various documents such as PRE's non-standard (large customer) terms and condition agreement, standard (small- use customer) terms and condition agreement which has not been used, and also in its service and technical installation rules in relation to minimising the effect of interruption to customers. Review of a sample of historic planned and unplanned outages during the audit period indicates recording of its network operation.	A	1
478	Condition 4.1.1	Clause 23(2)	A distributor or transmitter must keep records of information regarding its compliance with specific requirements for the period specified.	4	PRE retains an Outage Register. It has also annually reported its performance against its licence conditions (EDL007 and ERL28) datasheet to the ERA. This information is available in its website.	A	1
479	Condition 4.1.1	Clause 24(3)	A distributor or transmitter must complete a quality investigation requested by a customer in accordance with specified requirements.	4	No such quality investigation was requested by PRE customer during the audit period.	NP	NR

No. ⁵	Licence Condition	Obligation Under Legislation	Description	Audit Priority (1=highest; 5=lowest)	Observations (including any potential improvements)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
480	Condition 4.1.1	Clause 24(4)	A distributor or transmitter must report the results of an investigation to the customer concerned.	4	No such quality investigation was requested by PRE customer during the audit period.	NP	NR

5. Audit Recommendations

Table of Current Audit Non- Compliances and Recommendations			
A. Resolved during current audit period			
Item (no.) & Obligation (no.)	Non-Compliance/Controls Improvement (Legislative Obligation/Compliance Rating/Details)	Date Resolved (& management action taken)	Auditor's Comments
	Nil		
B. Unresolved at end of current audit period			
Recommendation (no./year) & Obligation (no.)	Non-Compliance/Controls Improvement (Legislative Obligation/Compliance Rating//Details)	Auditor's Recommendation	Management Action taken by end of audit period
	Nil		

Appendix A – Audit Methodology

A1. Audit Approach

The audit applied a risk-based audit approach consistent with the requirements of the Australian Standard on *Assurance Engagement ASAE3100 – Compliance Engagements* and the ERA 2019 Audit and Review Guidelines – Electricity and Gas Licences (Latest version published in August 2022).

Our approach to meeting the requirements for a Performance Audit is set out below.

Audit Planning

- Contact PRE to gain an understanding of the business, relevant management plans and systems that may affect the risk assessment for planning purposes (*completed*).
- Prepare a risk assessment including any specific factors or changes relevant to the licensee (in tabular form against each licence condition).
- Submit a draft **Audit Plan**, including the risk assessment and proposed approach, to PRE and ERA for review and approval.
- Send a **Pre-Visit Checklist** of information and documentation to PRE to enable staff to prepare for the visit (and where possible, send Quantum Assurance the information prior to the site visit).

Fieldwork

- Conduct a site visit to Peel Business Park.
- Conduct meetings with key contacts to assess the effectiveness of systems and procedures in place and to compare actual performance against the licence standards.
- Obtain copies of the latest performance reporting statistics and relevant correspondence between the licensee and the ERA for the audit period.
- The audit steps for the **Performance Audit** will include:
 - **analysis of documented procedures** to assess whether they are consistent with regulatory requirements or arrangements under the licence;
 - **review of systems and procedures** to assess whether they reflect compliance obligations and performance standards, including assessing and testing the following:
 - **control environment** – management's philosophy and operating style, organisational structure, assignment of authority and responsibilities, the use of internal audit, the use of information technology and the skills and experience of the key staff members;
 - **information system** – the appropriateness of the information systems to record the information needed to comply with the licence, accuracy of data, security of data and documentation describing the information system;
 - **control procedures** – the presence of systems and procedures to monitor compliance with the licence and to detect and correct non-compliance or under-performance;

- **compliance attitude** - the action taken by the licensee in response to the previous audit recommendations, and an assessment of management's attitude towards compliance; and
- **outcome compliance** – the actual performance against standards prescribed in the licence throughout the audit period (Not applicable).
- Update the risk assessment with any new information obtained in the course of the audit and, in instances of significant non-compliance, assess the licensee's plan to ensure compliance and recommend any further improvements to achieve compliance.

Reporting

- Prior to the conclusion of the visit, the lead auditor will discuss any observations and recommendations with PRE management to confirm our understanding of the issues and to discuss the action to be taken.
- Provide a draft report to PRE for review no later than two weeks before the report is due for submission to the ERA and make any revisions necessary.
- Following feedback from the ERA, update the report and provide it to PRE for review and feedback prior to preparing the final report.
- Issue the final report to PRE for their submission to ERA.

The audit report is to comply with the format prescribed in the 2019 Audit and Review Guidelines – Electricity and Gas Licences (updated August 2022).

A2. Licensee's Representatives Participating in the Audit

- Stephan Boras - Regulatory Compliance Officer
- Jason Good – General Manager
- Casey Gibson – Customer Service Manager
- Tim Forsyth – Technology & System Lead
- Dean Tanner – Network Operations Manager

A3. Key Documents Examined

Regulatory Compliance

- *Electricity Industry Act 2004*
- *Electricity Industry (Metering Code) 2012*
- *Economic Regulation Authority (Licensing Funding) Regulations 2014*
- *Electricity Industry (Network Quality and Reliability of Supply) Code 2005*
- Electricity Compliance Reporting Manual (February 2023 and previous versions January 2023 and February 2022)
- Electricity Distribution Licence EDL07 (Version 2)
- Electricity Retail Licence ERL28 (Version 2) Operating Area Map (ERA-EL-156 – A)
- Performance Audit Report (June 2022)
- Post Audit Implementation Plan (latest)
- Compliance Reports to the ERA for 2021/22, 2022/23 and 2023/24
- Performance datasheets to ERA for 2021/22 and 2022/23

Performance Audit

- Zenith/Intellihub MSA – Final
- Synergy ESA – Executed Agreement
- Synergy ESA Extension
- Master Services Deed
- Asset Management Plan
- Licence Compliance Obligations
- Licence Compliance Process
- Risk Register
- Registration Process for Metering Installation Providers
- Metrology Procedure
- Meter Data Customer Checklist
- Large Customer Microgrid Electricity Supply Agreement
- Schedule 1 – Microgrid Electricity Supply Agreement Large Customer PRE
- Welcome Pack and Introduction Pack – New Customers
- Terms and Conditions (PRE Connection Contract)
- Customer List (1 April 2022 and 31 March 2025)
- Complaints and Communications Log PRE Invoices (sample)
- Peel Outage Summary – April 2022 to March 2025
- Customer Billing and Disconnection – Reconnection Process
- Debtors process
- PRE ETAC – Notice of Extension
- PRE Fees and Charges
- Monthly Compliance Meeting minutes
- Annual Budget FY2024/25

A4. Consultants

NAME AND POSITION	HOURS
Geoff White - Director	20
Susan Smith - Manager	30
Tanuja Sanders – Engineering Consultant	30
TOTAL	80

END OF REPORT