



# Electricity Retail Performance Audit Report

## Landfill Gas & Power ERL 11

Prepared By Kevan McGill  
Date 29 September 2008



# McGill Engineering Services Pty Ltd

Engineering, Adjudication & Arbitration Services ABN 45 106 691 169

Dr Steve Gould  
General Manager Retail  
Landfill Gas & Power  
Ord St  
WEST PERTH WA 6005

Dear Dr Gould

## **Performance Audit Retail Licence ERL 11**

The fieldwork on the performance audit of Retail Licence ERL 11 for the audit period (30 June 2006 to 30 June 2008) is complete and I am pleased to submit the report to you.

In my opinion, the licensee maintained, in all material aspects, effective control procedures in relation to the Retail Licence (ERL 11) for the audit period on the relevant clauses referred to within the scope section of this report.

Yours sincerely

Kevan McGill  
Director

29 September 2008

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## Executive Summary

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This performance audit was conducted in accordance with the guidelines issued by the Economic Regulation Authority (*Authority*) for the audit period (30 June 2006 to 30 June 2008).

### Overall Conclusion

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In my opinion, the licensee maintained, in all material aspects, effective control procedures in relation to the Retail Licence (ERL 11) for the audit period based on the relevant clauses referred to within the scope section (Page 7) of this report.

### Performance Audit

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A summary of the findings of the performance audit is:

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#### Ratings

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The compliance rating for each licence condition using the 5-point rating scale is described below.

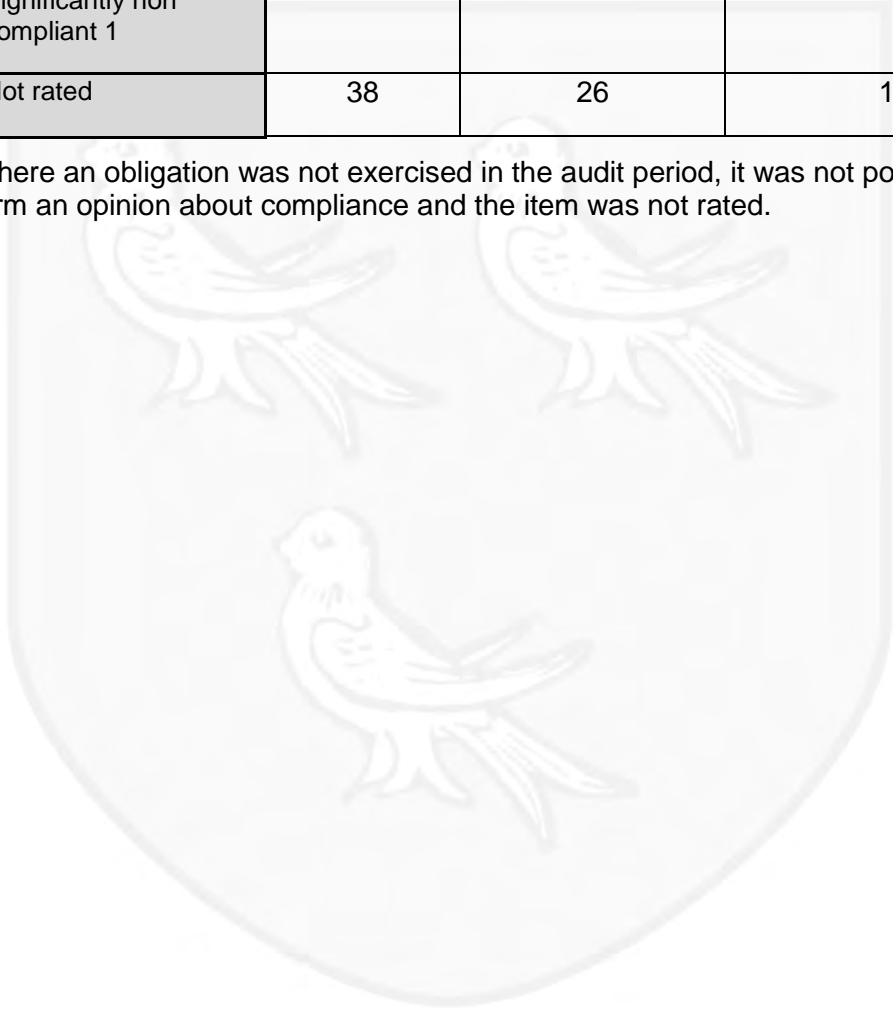
#### Operational/performance compliance rating scale

Compliance status	Rating	Description of compliance
COMPLIANT	5	Compliant with no further action required to maintain compliance
COMPLIANT	4	Compliant apart from minor or immaterial recommendations to improve the strength internal controls to maintain compliance
COMPLIANT	3	Compliant with major or material recommendations to improve the strength of internal controls to maintain compliance
NON-COMPLIANT	2	Does not meet minimum requirements
SIGNIFICANTLY NON-COMPLIANT	1	Significant weaknesses and/or serious action required

The results are summarised below.

Assessment	Licence obligations	Audit priority 4	Audit priority 5
Compliant 5	40	29	11
Compliant 4			
Compliant 3			
Non-compliant 2			
Significantly non compliant 1			
Not rated	38	26	12

\* Note Where an obligation was not exercised in the audit period, it was not possible to form an opinion about compliance and the item was not rated.



## PERFORMANCE AUDIT

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### Performance Audit Objectives

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Under section 13 of the *Electricity Industry Act 2004* (the Act), it is a requirement that every licensee provide the Economic Regulation Authority (*Authority*) not less than once in every period of 2 years with a performance audit conducted by an independent expert acceptable to the *Authority*.

The primary objective of the operational audit is to audit the effectiveness of measures taken by the Licensee to maintain quality and performance standards. The Act states a performance audit is an audit of the effectiveness of measures taken by the licensee to meet the performance criteria specified in the licence. The licence states that performance standards are contained in *applicable legislation*. Performance criteria are defined in the licence as:

- (a) the terms and conditions of the *licence*; and
- (b) any other relevant matter in connection with the *applicable legislation* that the *Authority* determines should form part of the *performance audit*.

The licence also provides for individual licence conditions namely - the *Authority* may prescribe *individual performance standards* in relation to the *licensee* of its obligations under this *licence* or the *applicable legislation* (the Act and subordinate legislation).

The *Authority* has summarised the performance requirements in various legislation in its Electricity compliance reporting manual (March 2008)<sup>1</sup>.

McGill Engineering Services Pty Ltd has been engaged to carry out the performance audit for Electricity Retail Licence ERL 11 for the Landfill Gas & Power.

### Audit Period

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The audit period is 30 June 2006 to 30 June 2008.

### Scope Limitation

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The review was undertaken by examination of documents, interviews with key persons and observations and is not a detailed inspection of physical items. As the licensee does not have any small use customers, audit elements relating to small use customers (standard form contracts or the Code of Conduct for the supply of electricity to small use customers) have been deleted (items 89, 93, 94, 97-102).

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<sup>1</sup> Electricity compliance reporting manual, March 2008

## Inherent Limitations

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Because of the inherent limitations of any internal control structure, it is possible that fraud, error or non-compliance with laws and regulations may occur and not be detected.

An audit is not designed to detect all weaknesses in compliance measures as an audit is not performed continuously throughout the period and the audit procedures performed on the compliance measures are undertaken on a test basis.

Any projection of the evaluation of the operating licences to future periods is subject to the risk that the compliance measures in the plans may become inadequate because of changes in conditions or circumstances, or that the degree of compliance with them may deteriorate.

The audit opinion expressed in this report has been formed on the above basis.

## Scope of the Audit

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The *Authority* guideline<sup>2</sup> for performance audits sets out that the audit should be conducted in 3 phases.

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### 1. Risk and Materiality Assessment

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With reference to AS/NZS4360 Risk Management a preliminary assessment was made of the risk and materiality of non-compliance with the required licence conditions in order to focus the audit effort on areas of higher compliance risk and identify areas for testing and analysis.

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### 2. System Analysis, Assertion Setting and Review

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Through discussion, observation and review, a sample of cases or data was analysed relating to the licensee's quality and performance systems and standards against requirements of the Licence conditions to be audited.

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### 3. Fieldwork: Testing and Analysis

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Using the results of the risk assessment and systems analysis, detailed testing and analysis was performed to compare those standards maintained by the licensee with the relevant clauses of the Licence.

During this audit the West Perth office was visited.

There are no actions taken in response to recommendations in previous audit to follow up as this is the first audit.

The report to the licensee and the *Authority* clearly expresses the opinion of the auditor in respect of the findings of the audit.

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<sup>2</sup> Audit Guidelines: Electricity, Gas and Water Licences, September 2006

The key contacts were:

- Licensee
  - Steve Gould, Stacey Farquharson
- McGill Engineering Services Pty Ltd
  - Kevan McGill

The audit was conducted during September 2008 with the final audit report to be submitted to the Authority by 30 September 2008.

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### Audit Requirements

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Compliance with licence conditions was examined according to the likely inherent risk and the adequacy of controls to manage that risk.

#### Nature of audit work conducted

The *Authority* guidelines for performance audits require that the audit considers:

- a) **Process compliance** - the effectiveness of systems and procedures in place throughout the audit period, including the adequacy of internal controls.
- b) **Outcome compliance** – the actual performance against standards prescribed in the licence throughout the audit period.
- c) **Output compliance** – the existence of the output from systems and procedures throughout the audit period (that is, proper records exist to provide assurance that procedures are being consistently followed and controls are being maintained).
- d) **Integrity of performance reporting** – the completeness and accuracy of the performance reporting to the Authority.
- e) **Compliance with any individual licence conditions** - the requirements imposed on the specific licensee by the Authority or specific issues for follow-up that are advised by the Authority.

Stage	Auditor	Standard
1. Risk & Materiality Assessment Outcome - Operational/ Performance Audit Plan	K McGill	ASA 300 replaces AUS 302: Planning ASA 315 replaces AUS 402: Risk Assessments and Internal Controls AUS 808: Planning Performance Audits AS/NZS 4360:2004: Risk Management ERA Guidelines
2. System Analysis	K McGill	AUS 810: Special Purpose Reports on Effectiveness of Control Procedures
3. Fieldwork Assessment and testing of; <ul style="list-style-type: none"> <li>• The control environment</li> <li>• Information system</li> <li>• Compliance procedures</li> </ul>	K McGill	AUS 502: Audit Evidence AUS 806: Performance Auditing



• Compliance attitude		
4. Reporting	K McGill	ASA 300 replaces AUS 302 Planning AUS 806: Performance Auditing

### Overall Conclusion

In my opinion, the licensee maintained, in all material aspects, effective control procedures in relation to the Retail licence (ERL 11) for the audit period based on the relevant clauses referred to within the scope section of this report.

### Findings

The conclusions of each of the elements of the licence are summarised in the following table. The audit risk as determined for each licence condition is also shown. The details of the audit can be seen in Appendix I (Page 13)

Item	Licence obligation clause	Audit priority	Rating	Rating					
				0	1	2	3	4	5
Licence Obligations Type 2									
87.	5.1 EIA s41(6)	4	Not rated						
96	5.1 EIA s115(2)	4	Compliant 5	■	■	■	■	■	■
105	20.1 EIA s11	4	Compliant 5	■	■	■	■	■	■
106	21.4 EIA s11	4	Not rated						
107	22.2 EIA s11	4	Compliant 5	■	■	■	■	■	■
109	23.1 EIA s11	4	Compliant 5	■	■	■	■	■	■
110	24.1 EIA s11	4	Compliant 5	■	■	■	■	■	■
111	25.2 EIA s11	4	Not rated						
112	26.1 EIA s11	4	Not rated						
Licence Obligations Type NR									
81.	22.1 EIA s13(1)	5	Compliant 5	■	■	■	■	■	■
85.	4.1 EIA s17(1)	5	Compliant 5	■	■	■	■	■	■
86	5.1 EIA s31(3)	5	Compliant 5	■	■	■	■	■	■
Electricity Industry Customer Transfer Code Type 2									
6	3.2(2) <sup>3</sup>	4	Compliant 5	■	■	■	■	■	■
7	3.4(1)	4	Compliant 5	■	■	■	■	■	■
8	3.5(3)	4	Compliant 5	■	■	■	■	■	■
9	3.6(2)	4	Not rated						
16	3.9(1)	4	Compliant 5	■	■	■	■	■	■
17	3.9(2)	4	Compliant 5	■	■	■	■	■	■
18	3.9(3)	4	Compliant 5	■	■	■	■	■	■
19	3.9(4)	4	Compliant 5	■	■	■	■	■	■
23	4.2(2)	4	Not rated						
24	4.3	4	Compliant 5	■	■	■	■	■	■
25	4.4(1)	4	Compliant 5	■	■	■	■	■	■
26	4.4(2)	4	Compliant 5	■	■	■	■	■	■
27	4.5(1)	4	Compliant 5	■	■	■	■	■	■
28	4.6(3)	4	Compliant 5	■	■	■	■	■	■
29	4.7	4	Compliant 5	■	■	■	■	■	■

<sup>3</sup> Electricity Industry Customer Transfer Code number

30	4.8(2)	4	Not rated							
39	4.11(3)	4	Compliant 5							
44	4.16	4	Compliant 5							
45	4.17	4	Compliant 5							
48	5.1(4)	4	Compliant 5							
49	6.2	4	Compliant 5							
52	6.4(1)	4	Not rated							
53	6.4(2)	4	Not rated							
54	6.6	4	Compliant 5							
57	7.1(3)	4	Not rated							
69	A6.2(b) <sup>4</sup>	4	Compliant 5							
Electricity Industry Customer Transfer Code Type NR										
40	4.12(3)	5	Not rated							
43	4.15	5	Not rated							
55	7.1(1)	5	Not rated							
56	7.1(2)	5	Not rated							
58	7.2(4)	5	Not rated							
59	7.3(2)	5	Not rated							
68	A6.2(a)	5	Compliant 5							
70	A6.6	5	Compliant 5							
71	A6.7	5	Compliant 5							
Metering Code Type 2										
309	5.1 MC 3.5(6)	4	Not rated							
319	5.1 MC 3.11(3)	4	Not rated							
331	5.1 MC 3.16(5)	4	Not rated							
342	5.1 MC 3.27	4	Compliant 5							
351	5.1 MC 4.5(2)	4	Not rated							
365	5.1 MC 5.5(3)	4	Compliant 5							
376	5.1 MC 5.16	4	Not rated							
377	5.1 MC 5.17(1)	4	Not rated							
378	5.1 MC 5.18	4	Not rated							
381	5.1 MC 5.19(3)	4	Not rated							
382	5.1 MC 5.19(4)	4	Not rated							
390	5.1 MC 5.21(5)	4	Not rated							
391	5.1 MC 5.21(6)	4	Not rated							
409	5.1 MC 5.27	4	Not rated							
416	5.1 MC 6.1(2)	4	Not rated							
420	5.1 MC 7.2(4)	4	Not rated							
421	5.1 MC 7.2(5)	4	Not rated							
422	5.1 MC 7.5	4	Compliant 5							
423	5.1 MC 7.6(1)	4	Compliant 5							
427	5.1 MC 8.1(4)	4	Not rated							
Metering Code Type NR										
349	5.1 MC 4.4(1)	5	Not rated							
350	5.1 MC 4.5(1)	5	Compliant 5							
363	5.1 MC 5.4(2)	5	Compliant 5							
379	5.1 MC 5.19(1)	5	Compliant 5							
380	5.1 MC 5.19(2)	5	Compliant 5							
384	5.1 MC 5.19(6)	5	Not rated							
418	5.1 MC 7.2(1)	5	Compliant 5							
424	5.1 MC 8.1(1)	5	Not rated							
425	5.1 MC 8.1(2)	5	Not rated							
426	5.1 MC 8.1(3)	5	Not rated							
428	5.1 MC 8.3(2)	5	Not rated							

<sup>4</sup> Electricity Industry Customer Transfer Code Annex 6

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## Audit Results and Recommendations

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### **Summary of significant results**

There are no non compliances or significant issues to highlight.

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### Post Audit Implementation Plan

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There are no issues to follow up.



## Audit Evidence

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The following evidence was gathered for the audit.

1. Legislation and standards
  - *Electricity Industry Act 2004*
  - Auditing and Assurance handbook
  - Electricity Retail Licence ERL 11
  
2. Licensee's documents
  - Electricity licence application
  - Auditors statement
  - Licence fee payment entries
  - Financial reports
  - Access agreements
  - Policy documents
    - a. Accounts
    - b. Customer data
    - c. Customer transfers
    - d. Corporate
    - e. Guidelines
    - f. Verifiable consent

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### Audit Time

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The audit was undertaken by Kevan McGill and took approximately 60 hours.

Appendix 1 Performance Audit Detail Results and Recommendations

Licence Obligations Type 2

<b>Licence obligation 5.1</b>									Compliance rating Not rated
<i>Electricity Industry Act section 41(6)</i> A licensee must pay the costs of taking an interest in land or an easement over land.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input type="checkbox"/>
As no interest in land or easement over land has occurred in the audit period, no cost payments arose and compliance or otherwise could not be assessed.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>									Compliance rating Compliant - 5
<i>Electricity Industry Act section 115(2).</i> A licensee that has, or is an associate of a person that has, access to services under an access agreement must not engage in conduct for the purpose of hindering or prohibiting access.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
No complaints have been received by the licensee or Western Power.									
<b>Issues</b>									
None.									
<b>Recommendations</b>									
None.									
<b>Management Actions</b>									
Not applicable.									

<b>Licence obligation 20.1</b>								Compliance rating Compliant - 5	
<i>Electricity Industry Act section 11.</i> A licensee and any related body corporate must maintain accounting records that comply with the Australian Accounting Standards Board Standards or equivalent International Accounting Standards.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The licensee's auditor confirms that the licensee complies with Australian auditing standards.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 21.4</b>								Compliance rating Not rated	
<i>Electricity Industry Act section 11.</i> A licensee must comply with any individual performance standards prescribed by the Authority.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input type="checkbox"/>
No individual performance standards have been applied. As there has been no activity, performance could not be rated.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 22.2</b>								Compliance rating Compliant - 5	
<i>Electricity Industry Act section 11.</i> A licensee must comply, and require its auditor to comply, with the <i>Authority's</i> standard audit guidelines dealing with the performance audit.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
This audit is in accordance with the <i>Authority's</i> guidelines.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 23.1</b>								Compliance rating Compliant - 5	
<i>Electricity Industry Act section 11.</i> A licensee must report to the Authority, in the manner prescribed, if a licensee is under external administration or there is a significant change in the circumstances upon which the licence was granted which may affect a licensee's ability to meet its obligations.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The licensee is not under external administration nor has there been a significant change in the circumstances on which the licence was granted and therefore no need to advise the <i>Authority</i> .									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 24.1</b>								Compliance rating Compliant - 5	
<i>Electricity Industry Act section 11.</i> A licensee must provide the Authority, in the manner prescribed, any information the Authority requires in connection with its functions under the Electricity Industry Act.									

<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The licensee has provided the information in the manner prescribed to the <i>Authority</i> .									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 25.2</b>								Compliance rating Not rated	
<i>Electricity Industry Act section 11.</i> A licensee must publish any information it is directed by the Authority to publish, within the timeframes specified.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The <i>Authority</i> did not direct any information to be published. As there has been no activity, performance could not be rated.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 26.1</b>								Compliance rating Not rated	
<i>Electricity Industry Act section 11.</i> Unless otherwise specified, all notices must be in writing									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
No notices were issued and accordingly it could not be observed if notices were in writing.									



<b>Issues</b>
None
<b>Recommendations</b>
None
<b>Management Actions</b>
Not applicable

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Licence Obligations Type NR

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<b>Licence obligation 22.1</b>	Compliance rating Compliant - 5								
<i>Electricity Industry Act section 13(1)</i> A licensee must, not less than once every 24 months, provide the Authority with a performance audit conducted by an independent expert acceptable to the Authority.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
This audit satisfies the requirement.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 4.1</b>	Compliance rating Compliant - 5								
<i>Electricity Industry Act section 17(1)</i> A licensee must pay to the Authority the prescribed licence fee within one month after the day of grant or renewal of the licence and within one month after each anniversary of that day during the term of the licence.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The fees have been paid and on time.									
<b>Issues</b>									
None									

<b>Recommendations</b>
None
<b>Management Actions</b>
Not applicable

<b>Licence obligation 5.1</b>	Compliance rating Compliant - 5
<i>Electricity Industry Act section 31(3)</i> A licensee must take reasonable steps to minimise the extent or duration of any interruption, suspension or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause.	
<b>Observations</b>	
Process	<input checked="" type="checkbox"/> Outcome
<input checked="" type="checkbox"/>	Output
<input checked="" type="checkbox"/>	Reporting
<input checked="" type="checkbox"/>	Compliance
<input checked="" type="checkbox"/>	
As a retailer the staff are aware of the need to refer any issues to the network operator.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	
<b>Management Actions</b>	
Not applicable	

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Electricity Industry (Licence Conditions) Regulations -Regulation 5(2) -Electricity Industry Transfer Code Type 2

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<b>Licence obligation 5.1</b>	Compliance rating Compliant - 5
<i>Electricity Industry Customer Transfer Code clause 3.2(2)</i> A retailer must submit a separate data request for each exit point unless otherwise agreed.	
<b>Observations</b>	
Process	<input checked="" type="checkbox"/> Outcome
<input checked="" type="checkbox"/>	Output
<input checked="" type="checkbox"/>	Reporting
<input checked="" type="checkbox"/>	Compliance
<input checked="" type="checkbox"/>	
All data requests are made through the network operator's computer portal (interface) which requires a data request for each exit point by specifying the NMI (National Metering Indicator) which uniquely identifies each exit (metering) point.	
<b>Issues</b>	
None	

<b>Recommendations</b>
None
<b>Management Actions</b>
Not applicable

<b>Licence obligation 5.1</b>	Compliance rating Compliant - 5								
<i>Electricity Industry Customer Transfer Code clause 3.4(1)</i> A retailer, unless otherwise agreed, must submit a data request electronically and must not submit more than a prescribed number of standing or historical data requests in a business day.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The network operator requires all data requests to be made through Western Power's portal and will not accept any other data requests. The portal will not permit more than 20 data requests a day.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>	Compliance rating Compliant - 5								
<i>Electricity Industry Customer Transfer Code clause 3.5(3)</i> A retailer must withdraw a request for historical consumption data if the contestable customer's verifiable consent ceases to apply before the network operator provides the historical consumption data.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
No complaints have been received by the licensee or Western Power about providing historical data without verifiable consent.									
<b>Issues</b>									
None									
<b>Recommendations</b>									

None
<b>Management Actions</b>
Not applicable

<b>Licence obligation 5.1</b>		Compliance rating Not rated	
<i>Electricity Industry Customer Transfer Code clause 3.6(2)</i> A retailer must pay any reasonable costs incurred by the network operator for work performed in relation to a withdrawn request for historical consumption data.			
<b>Observations</b>			
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>		
No requests for historical consumption data have been withdrawn. This has been confirmed by Western Power. As there has been no activity, performance could not be rated.			
<b>Issues</b>			
None			
<b>Recommendations</b>			
None			
<b>Management Actions</b>			
Not applicable			

<b>Licence obligation 5.1</b>		Compliance rating Compliant - 5	
<i>Electricity Industry Customer Transfer Code clause 3.9(1)</i> A retailer may only use data relating to a contestable customer to provide a contestable customer with a quotation for the supply of electricity by the retailer to the contestable customer or to initiate a transfer in relation to the contestable customer.			
<b>Observations</b>			
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>		
No complaints have been received by the licensee or Western Power about using data relating to another contestable customer to provide a quotation for transfer of a contestable customer.			
<b>Issues</b>			
None			
<b>Recommendations</b>			

None
<b>Management Actions</b>
Not applicable

<b>Licence obligation 5.1</b>	Compliance rating Compliant - 5								
<i>Electricity Industry Customer Transfer Code clause 3.9(2)</i> A retailer must not aggregate a contestable customer's historical consumption data with that of other contestable customers for the purposes of internal business development, if requested not to do so by the customer.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
No complaints have been received by the licensee or Western Power about aggregating historical consumption data of one customer with that of another customer where the customer has requested that it not be aggregated.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>	Compliance rating Compliant - 5								
<i>Electricity Industry Customer Transfer Code clause 3.9(3)</i> A retailer must not disclose a contestable customer's data to any other person without the verifiable consent of the contestable customer, except in the circumstances defined.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
No complaints have been received by the licensee or Western Power about disclosing data of one customer to any other person without the verifiable consent.									
<b>Issues</b>									
None									
<b>Recommendations</b>									

None
<b>Management Actions</b>
Not applicable

<b>Licence obligation 5.1</b>		Compliance rating Compliant - 5	
<i>Electricity Industry Customer Transfer Code clause 3.9(4)</i> A retailer must keep a copy of the verifiable consent received from a contestable customer for two years.			
<b>Observations</b>			
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>		
The licensee keeps copies of the verifiable consent for at least two years.			
<b>Issues</b>			
None			
<b>Recommendations</b>			
None			
<b>Management Actions</b>			
Not applicable			

<b>Licence obligation 5.1</b>		Compliance rating Compliant - 5	
<i>Electricity Industry Customer Transfer Code clause 4.2(2)</i> A retailer must submit a separate customer transfer request for each exit point unless otherwise agreed.			
<b>Observations</b>			
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>		
All transfer requests are made through the network operator's computer portal (interface) which requires a data request for each exit point by specifying the NMI (National Metering Indicator) which uniquely identifies each exit (metering) point.			
<b>Issues</b>			
None			
<b>Recommendations</b>			
None			

<b>Management Actions</b>
Not applicable

<b>Licence obligation 5.1</b>	Compliance rating Compliant - 5								
<p><i>Electricity Industry Customer Transfer Code clause 4.3</i>                  A retailer's reason for a transfer must be specified in the customer transfer request form as either to transfer a contestable customer to the retailer which submitted the customer transfer request or to reverse an erroneous transfer.</p>									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The network operator's portal only allows a choice between transfers or reverse of an erroneous transfer.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>	Compliance rating Compliant - 5								
<p><i>Electricity Industry Customer Transfer Code clause 4.4(1)</i>                  A retailer may only submit a customer transfer request if it has an access contract for the network, unless it is to reverse an erroneous transfer.</p>									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The licensee has an access contract and in any case there have been no erroneous transfers.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Management Actions</b>
Not applicable

<b>Licence obligation 5.1</b>	Compliance rating Not rated								
<i>Electricity Industry Customer Transfer Code clause 4.4(2)</i> A retailer that submits a customer transfer request to reverse an erroneous transfer must ensure the transfer was made in error and, if it is an incoming retailer, confirm the identity of the previous retailer.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no erroneous transfers and this has been confirmed with Western Power.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>	Compliance rating Compliant - 5								
<i>Electricity Industry Customer Transfer Code clause 4.5(1)</i> A retailer, unless otherwise agreed, must submit a customer transfer request electronically and must not submit more than a prescribed number of customer transfer requests in a business day or with the same nominated transfer date.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The network operator requires all transfer requests to be made through Western Power's portal and no others made. The portal will not permit more than 20 data requests a day.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									



<b>Management Actions</b>
Not applicable

<b>Licence obligation 5.1</b>	Compliance rating Compliant - 5								
<i>Electricity Industry Customer Transfer Code clause 4.6(3)</i> A retailer must withdraw a customer transfer request if the contestable customer's verifiable consent ceases to apply before the transfer occurs.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
No complaints have been received by the licensee or the network operator about transfer requests without verifiable consent.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>	Compliance rating Compliant - 5								
<i>Electricity Industry Customer Transfer Code clause 4.7</i> A retailer must nominate a transfer date in a customer transfer request in accordance with specified timeframes, except if the customer transfer request is to reverse an erroneous transfer.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The network operator's portal will not permit a request to proceed without a nominated transfer date in accordance with specified timeframes. There have been no erroneous transfers.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Management Actions</b>
Not applicable

<b>Licence obligation 5.1</b>	Compliance rating Not rated								
<i>Electricity Industry Customer Transfer Code clause 4.8(2)</i> A retailer must pay any reasonable costs incurred by a network operator for providing and/or installing a meter if a customer transfer request is withdrawn.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no withdrawn requests and this has been confirmed by Western Power. As there has been no activity, performance could not be rated.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>	Compliance rating Compliant - 5								
<i>Electricity Industry Customer Transfer Code clause 4.11(3)</i> A network operator and the retailer must take certain action if the contestable customer's meter is not read on the nominated transfer date.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The meters are read remotely by the network operator and are instantly available to allow customer transfers. In any case the meter read date becomes the transfer date.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Management Actions</b>
Not applicable

<b>Licence obligation 5.1</b>	Compliance rating Compliant - 5								
<i>Electricity Industry Customer Transfer Code clause 4.16</i> An incoming retailer must retain a copy of a verifiable consent given by a contestable customer in relation to the lodgement of a customer transfer request for two years, except in the case of a customer transfer request to reverse an erroneous transfer.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The licensee retains the verifiable consent forms for at least two years.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>	Compliance rating Compliant - 5								
<i>Electricity Industry Customer Transfer Code clause 4.17</i> A previous retailer must not bill a contestable customer for charges incurred after the transfer time, except in the case of an erroneous transfer.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no complaints received by the licensee or Western Power about billing for charges incurred after a transfer time. There have been no erroneous transfers and this has been confirmed by Western Power. There have been no transfers out.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Management Actions</b>
Not applicable

<b>Licence obligation 5.1</b>	Compliance rating Compliant - 5								
<i>Electricity Industry Customer Transfer Code clause 5.1(4)</i> A network operator and a retailer must comply with approved communication rules.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no complaints received by the licensee or Western Power about non compliance with communication rules.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>	Compliance rating Compliant - 5								
<i>Electricity Industry Customer Transfer Code clause 6.2</i> A licensee's notice in relation to a data request or customer transfer request must identify the exit point to which it relates.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
All transfer or data requests are made through the network operator's computer portal (interface) which requires a transfer/data request for each exit point by specifying the NMI (National Metering Indicator) which uniquely identifies each exit (metering) point.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									

Not applicable

<b>Licence obligation 5.1</b>									Compliance rating Not rated	
<i>Electricity Industry Customer Transfer Code clause 6.4(1)</i> A retailer must notify its contact details to a network operator within three business days of a request.										
<b>Observations</b>										
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>	
There has been no request for contact details. As there has been no activity, performance could not be rated.										
<b>Issues</b>										
None										
<b>Recommendations</b>										
None										
<b>Management Actions</b>										
Not applicable										

<b>Licence obligation 5.1</b>									Compliance rating Not rated	
<i>Electricity Industry Customer Transfer Code clause 6.4(2)</i> A retailer must notify any change in its contact details to a network operator at least three business days before the change takes effect.										
<b>Observations</b>										
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>	
There has been no change in contact details. As there has been no activity, performance could not be rated.										
<b>Issues</b>										
None										
<b>Recommendations</b>										
None										
<b>Management Actions</b>										
Not applicable										

<b>Licence obligation 5.1</b>							Compliance rating Compliant - 5		
<i>Electricity Industry Customer Transfer Code clause 6.6</i> A network operator or a retailer must send required electronic communications to the applicable electronic communication address, in accordance with Annex 6.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The network operator requires all communication to be via its internet portal.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>							Compliance rating Not rated		
<i>Electricity Industry Customer Transfer Code clause 7.1(3)</i> If the dispute is resolved, the disputing parties must prepare a written and signed record of the resolution and adhere to the resolution.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no transfer disputes. As there has been no activity, performance could not be rated.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>									Compliance rating Compliant - 5
<i>Electricity Industry Customer Transfer Code clause A6.2(b)</i> A network operator and a retailer must establish a mechanism to generate an automated response message for each electronic communication (other than an automated response message) received at the electronic communication address.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The network operator requires the retailers to input via the internet portal and it provides an automated message in response.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

Electricity Industry (Licence Conditions) Regulations -Regulation 5(2) -Electricity Industry Transfer Code Type NR

<b>Licence obligation 5.1</b>									Compliance rating Not rated
<i>Electricity Industry Customer Transfer Code clause 4.12(3)</i> The parties to an access contract must negotiate in good faith any necessary amendments to the access contract arising from certain circumstances.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no amendments to the access contract. As there has been no activity, performance could not be rated.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									

Not applicable

<b>Licence obligation 5.1</b>									Compliance rating Not rated
<i>Electricity Industry Customer Transfer Code clause 4.15</i> In the case of a transfer to reverse an erroneous transfer, a network operator and all affected retailers (and the independent market operator if applicable) must act in good faith to ensure that the rights and obligations of the affected contestable customer are as they would have been had the erroneous transfer not occurred.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no erroneous transfers and this has been confirmed by Western Power. As there has been no activity, performance could not be rated.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>									Compliance rating Not rated
<i>Electricity Industry Customer Transfer Code clause 7.1(1)</i> For a dispute in respect of a matter under or in connection with the Electricity Industry Customer Transfer Code, any disputing party must meet within five business days of a request from another disputing party and attempt to resolve the dispute by negotiations in good faith.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no Transfer Code related disputes. As there has been no activity, performance could not be rated.									
<b>Issues</b>									
None									
<b>Recommendations</b>									



None
<b>Management Actions</b>
Not applicable

<b>Licence obligation 5.1</b>	Compliance rating Not rated								
<i>Electricity Industry Customer Transfer Code clause 7.1(2)</i> If the negotiations in 7.1(1) of the Electricity Industry Customer Transfer Code do not resolve the dispute within 10 days after the first meeting, the dispute must be referred to the senior executive officer of each disputing party who must attempt to resolve the dispute by negotiations in good faith.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no Transfer Code related disputes. As there has been no activity, performance could not be rated.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>	Compliance rating not rated								
<i>Electricity Industry Customer Transfer Code clause 7.2(4)</i> A disputing party that refers a dispute to the Authority must give notice to the Authority of the nature of the dispute, including specified details.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no Transfer Code related disputes. As there has been no activity, performance could not be rated.									
<b>Issues</b>									
None									
<b>Recommendations</b>									

None
<b>Management Actions</b>
Not applicable

<b>Licence obligation 5.1</b>	Compliance rating Not rated								
<i>Electricity Industry Customer Transfer Code clause 7.3(2)</i> A disputing party must at all times conduct itself in a manner which is directed towards achieving the objectives in clause 7.3(1) of the Electricity Industry Customer Transfer Code.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no Transfer Code related disputes. As there has been no activity, performance could not be rated.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>	Compliance rating Compliant - 5								
<i>Electricity Industry Customer Transfer Code clause A6.2(a)</i> A network operator and a retailer must use reasonable endeavours to ensure that its information system on which electronic communications are made is operational 24 hours a day and 7 days a week.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The network operator's internet system is available 24 hours a day, 7 days a week. There have been no complaints received by the licensee or Western Power about availability of communication systems.									
<b>Issues</b>									
None									

<b>Recommendations</b>
None
<b>Management Actions</b>
Not applicable

<b>Licence obligation 5.1</b>	Compliance rating Compliant - 5								
<i>Electricity Industry Customer Transfer Code clause A6.6</i> The originator of an electronic communication must identify itself in the communication.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The network operator's internet portal requires a login that identifies the retailer. The network operator's response identifies the network operator.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>	Compliance rating Compliant - 5								
<i>Electricity Industry Customer Transfer Code clause A6.7</i> The originator of an electronic communication must use reasonable endeavours to adopt a consistent data format for information over time, to facilitate any automated processing of the information by the addressee.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The network operator's internet portal results in a consistent data format.									
<b>Issues</b>									
None									
<b>Recommendations</b>									

None
<b>Management Actions</b>
Not applicable

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**Metering Code Obligations Type 2**

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<b>Licence obligation 5.1</b>								Compliance rating NA	
<i>Electricity Industry Metering Code clause 3.5(6)</i> The requirement is that 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 between it and the user.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input type="checkbox"/>
This requirement is listed in the Reporting Manual but is an obligation on the network operator and not the licensee.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>								Compliance rating Not rated	
<i>Electricity Industry Metering Code clause 3.11(3)</i> The requirement is that a Code participant who becomes aware of an outage or malfunction of a metering installation must advise the network operator as soon as practicable.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
No metering outages or malfunctions have occurred in the audit period. As there has been no activity, performance could not be rated.									
<b>Issues</b>									
None									

<b>Recommendations</b>
None
<b>Management Actions</b>
Not applicable

<b>Licence obligation 5.1</b>	Compliance rating Not rated								
<i>Electricity Industry Metering Code clause 3.16(5)</i> The requirement is that a network operator or a user may require the other to negotiate and enter into a written service level agreement in respect of the matters in the metrology procedure dealt with under clause 3.16(4) of the Code.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
This requirement relates to the conversion of non interval metering to interval metering. All the meters are interval meters (half hour meters) so there is no need for conversion. As there has been no activity, performance could not be rated.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>	Compliance rating Compliant - 5								
<i>Electricity Industry Metering Code clause 3.27</i> 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.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The meters were installed by Western Power – the network operator.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Management Actions</b>
Not applicable

<b>Licence obligation 5.1</b>	Compliance rating Not rated								
<i>Electricity Industry Metering Code clause 4.5(2)</i> If a Code participant (other than a network operator) becomes aware of a change to or an 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.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The licensee is a Code participant but no issues about standing data have arisen. As there has been no activity, performance could not be rated.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>	Compliance rating Compliant 5								
<i>Electricity Industry Metering Code clause 5.5(3).</i> A user must not impose any charge for the provision of the data under this Code unless it is permitted to do so under another enactment.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Data has been provided at no cost.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>									Compliance rating Not rated
<i>Electricity Industry Metering Code clause 5.16.</i> A user that collects or receives energy data from a metering installation must provide the network operator with the energy data (in accordance with the communication rules) within the timeframes prescribed.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The network operator (Western Power) reads the meters remotely and therefore collects the energy data and not the licensee. As there has been no activity, performance could not be rated.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>									Compliance rating Not rated
<i>Electricity Industry Metering Code clause 5.17(1).</i> 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.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The network operator (Western Power) reads the meters remotely and provides the energy data and not the licensee. As there has been no activity, performance could not be rated.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>								Compliance rating Not rated	
<i>Electricity Industry Metering Code clause 5.18.</i> A user that collects or receives information regarding a change in the energisation status of a metering point must provide the network operator with the prescribed information, including the stated attributes, within the timeframes prescribed.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There has been no change to the energisation state of the meters. As there has been no activity, performance could not be rated.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>								Compliance rating Not rated	
<i>Electricity Industry Metering Code clause 5.19(3).</i> A user must, after becoming aware of any change in a site's prescribed attributes, notify the network operator of the change within the timeframes prescribed.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no new clients in the audit period and therefore has been no change in the sites prescribed attributes. As there has been no activity, performance could not be rated.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>								Compliance rating Not rated	
<i>Electricity Industry Metering Code clause 5.19(4).</i> A user that becomes aware that there is a sensitive load at a customer's site must									



immediately notify the network operator's Network Operations Control Centre of the fact.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There are no sensitive loads. As there has been no activity, performance could not be rated.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>									Compliance rating Not rated
<i>Electricity Industry Metering Code clause 5.21(5).</i> A Code participant must not request a meter test or audit 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.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no meter tests or audits. As there has been no activity, performance could not be rated.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>									Compliance rating Not rated
<i>Electricity Industry Metering Code clause 5.21(6).</i> A Code participant must not make a test or audit request that is inconsistent with any access arrangement or agreement.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>

There have been no meter tests or audits. As there has been no activity, performance could not be rated.
<b>Issues</b>
None
<b>Recommendations</b>
None
<b>Management Actions</b>
Not applicable

<b>Licence obligation 5.1</b>	Compliance rating Not rated								
<i>Electricity Industry Metering Code clause 5.27.</i> Upon request, a current user must provide the network operator with customer attribute information that it reasonably believes are missing or incorrect within the timeframes prescribed.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There has been no missing or incorrect customer attributes. As there has been no activity, performance could not be rated.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>	Compliance rating Not rated								
<i>Electricity Industry Metering Code clause 6.1(2).</i> A user must in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Western Power, the network operator, provides the metering services. No complaints have been received by the licensee or the network operator on metering rules, procedures, agreements or criteria prescribed. As there has been no activity,									

performance could not be rated.
<b>Issues</b>
None
<b>Recommendations</b>
None
<b>Management Actions</b>
Not applicable

<b>Licence obligation 5.1</b>									Compliance rating Not rated
<i>Electricity Industry Metering Code clause 7.2(4)</i> A Code participant must notify its contact details to a network operator with whom it has entered into an access contract within 3 business days after the network operator's request.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There has been no new access contract in the audit period and there have been no requests for contact details from the network operator. As there has been no activity, performance could not be rated.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>									Compliance rating Not rated
<i>Electricity Industry Metering Code clause 7.2(5)</i> A Code participant must notify any affected network operator of any change to the contact details it notified to the network operator at least 3 business days before the change takes effect									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There has been no change in contact details. As there has been no activity, performance could not be rated.									

<b>Issues</b>
None
<b>Recommendations</b>
None
<b>Management Actions</b>
Not applicable

<b>Licence obligation 5.1</b>	Compliance rating Compliant - 5								
<i>Electricity Industry Metering Code clause 7.5</i> A Code participant must 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.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
No complaints have risen about disclosure of confidential information.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>	Compliance rating Compliant - 5								
<i>Electricity Industry Metering Code clause 7.6(1)</i> A Code participant must disclose or permit the disclosure of confidential information that is required to be disclosed by the Code.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
No information has been required to be disclosed.									
<b>Issues</b>									
None									
<b>Recommendations</b>									

None
<b>Management Actions</b>
Not applicable

<b>Licence obligation 5.1</b>	Compliance rating Not rated								
<i>Electricity Industry Metering Code clause 8.1(4)</i>									
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.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no metering disputes. As there has been no activity, performance could not be rated.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

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Metering Code Obligations Type NR

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<b>Licence obligation 5.1</b>	Compliance rating Not rated								
<i>Electricity Industry Metering Code clause 4.4(1)</i>									
A network operator and affected Code participants must liaise together to determine the most appropriate way to resolve a discrepancy between energy data held in a metering installation and data held in the metering database.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no discrepancies in energy data which is read by the network operator anyway.									
<b>Issues</b>									
None									
<b>Recommendations</b>									

None
<b>Management Actions</b>
Not applicable

<b>Licence obligation 5.1</b>		Compliance rating Compliant - 5	
<i>Electricity Industry Metering Code clause 4.5(1)</i> A Code participant must not knowingly permit the registry to be materially inaccurate.			
<b>Observations</b>			
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>		
There have been no inaccuracies in the registry which is held by the network operator anyway. There have been no complaints about registry inaccuracies.			
<b>Issues</b>			
None			
<b>Recommendations</b>			
None			
<b>Management Actions</b>			
Not applicable			

<b>Licence obligation 5.1</b>		Compliance rating Compliant - 5	
<i>Electricity Industry Metering Code clause 5.4(2)</i> A user must, when reasonably requested by a network operator, use reasonable endeavours to assist the network operator to comply with the network operator's obligation. Meters have to be read at least once per year and if not, has assistance been provided by the licensee to the network operator to read the meter.			
<b>Observations</b>			
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>		
The network operator (Western Power) reads the meters remotely (each half hour) and no assistance has been required by the licensee.			
<b>Issues</b>			
None			
<b>Recommendations</b>			
None			
<b>Management Actions</b>			
Not applicable			

<b>Licence obligation 5.1</b>									Compliance rating Compliant - 5
<i>Electricity Industry Metering Code clause 5.19(1)</i> 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.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no complaints about the collection of customer information.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>									Compliance rating Compliant - 5
<i>Electricity Industry Metering Code clause 5.19(2)</i> A user must, to the extent that it is able, collect and maintain a record of the address, site and customer attributes, prescribed in relation to the site of each connection point, with which the user is associated.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The customer gives its address or meter number and licensee looks it up on the Western Power System to get the NMI. The licensee then uses the NMI to correspond with network operator.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>									Compliance rating Not rated
<i>Electricity Industry Metering Code clause 5.19(6)</i> A user must use reasonable endeavours to ensure that it does notify the network operator of a change in an attribute that results from the provision of standing data by the network operator to the user.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no changes in (metering) attributes. As there has been no activity, performance could not be rated.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>									Compliance rating Compliant - 5
<i>Electricity Industry Metering Code clause 7.2(1)</i> Code participants must use reasonable endeavours to ensure that they can send and receive a notice by post, facsimile and electronic communication and must notify the network operator of a telephone number for voice communication in connection with the Code.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The network operator has the current contact details which have been confirmed with Western Power.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>									Compliance rating Not rated
<i>Electricity Industry Metering Code clause 8.1(1)</i>									



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 under or in connection with the Electricity Industry Metering Code by negotiations in good faith.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no metering disputes. As there has been no activity, performance could not be rated.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>									Compliance rating Not rated
<i>Electricity Industry Metering Code clause 8.1(2)</i>									
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.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no metering disputes. As there has been no activity, performance could not be rated.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>									Compliance rating Not rated
<i>Electricity Industry Metering Code clause 8.1(3)</i> 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.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no metering disputes. As there has been no activity, performance could not be rated.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Licence obligation 5.1</b>									Compliance rating Not rated
<i>Electricity Industry Metering Code clause 8.3(2)</i> The disputing parties must at all times conduct themselves in a manner which is directed towards achieving the objective of dispute resolution with as little formality and technicality and with as much expedition as the requirements of Part 8 of the Code and a proper hearing and determination of the dispute, permit.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no metering disputes. As there has been no activity, performance could not be rated.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									