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**SOUTHERN CROSS ENERGY**  
**ELECTRICITY RETAIL LICENCE ERL 7,**  
**ELECTRICITY GENERATION LICENCE EGL 13,**  
**ELECTRICITY DISTRIBUTION LICENCE EDL 3 &**  
**ELECTRICITY TRANSMISSION LICENCE ETL 4**  
**PERFORMANCE AUDIT REPORT &**  
**ASSET MANAGEMENT SYSTEM REVIEW REPORT**

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Prepared By Kevan McGill  
Date 8 December 2008



# McGill Engineering Services Pty Ltd

Engineering, Adjudication & Arbitration Services ABN 45 106 691 169

Mr Aron Willis  
General Manager  
Southern Cross Energy Partnership  
Level 36, Central Park  
152-158 St Georges Tce  
PERTH WA 6000

Dear Mr Willis

## **Performance Audit Electricity Licences ERL 7, EGL 13, EDL 3 and ETL 4**

The fieldwork on the performance audit of Retail Licence ERL 7 and performance audit and asset management review of Generation licence EGL 13, Distribution licence EDL 3 and Transmission licence ETL 4 for the audit period (1 July 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 7) Generation licence (EGL 13), Distribution licence (EDL 3) and Transmission licence (ETL 4) for the audit period on the relevant clauses referred to within the scope section of this report. While some non compliances were noted these are not material to achieving the licence obligations.

Yours sincerely

Kevan McGill  
Director

8 December 2008

## CONTENTS

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Executive Summary.....	5
Overall Conclusion.....	5
Performance Audit .....	5
Ratings .....	5
Asset Management Review .....	6
Ratings .....	6
Performance Audit.....	8
Performance Audit Objectives .....	8
Audit Period .....	8
Scope Limitation .....	8
Excluded Conditions.....	9
Inherent Limitations.....	9
Scope of the Audit.....	9
1. Risk and Materiality Assessment .....	10
2. System Analysis, Assertion Setting and Review .....	10
3. Fieldwork: Testing and Analysis.....	10
Audit Requirements .....	10
Relationship between licences.....	11
Overall Conclusion.....	11
Findings .....	12
Audit Results and Recommendations .....	17
Post Audit Implementation Plan .....	17
Asset Management System Review.....	18
Asset Management System Review Objectives.....	18
Asset Management System Review Recommendations.....	18
Asset management system review methodology .....	18
Use of Audit Processes and Practices .....	18
Audit priority .....	19
Overall conclusion .....	20
Findings.....	20
Review Results and Recommendations .....	20
Post Audit implementation Plan .....	21

Audit Evidence..... 22

    Audit Time ..... 22

Appendix 1 Performance Audit Detail Results and Recommendations ..... 23

    Licence Obligations Type 2 Generation / Distribution / Transmission ..... 23

    Licence Obligations Type 2 Retail / Distribution / Transmission..... 25

    Licence Obligations Type 2 Generation / Retail / Distribution / Transmission..... 25

    Licence Obligations Type NR Generation / Distribution / Transmission..... 29

    Licence Obligations Type NR Generation / Retail / Distribution / Transmission..... 30

    Electricity Industry (Licence Conditions) Regulations -Regulation 5(2) -Electricity  
    Industry Customer Transfer Code Type 2 Retail ..... 31

    Electricity Industry (Licence Conditions) Regulations -Regulation 5(2) -Electricity  
    Industry Customer Transfer Code Type 2 Retail / Distribution / Transmission..... 41

    Electricity Industry (Licence Conditions) Regulations -Regulation 5(2) -Electricity  
    Industry Customer Transfer Code Type 2 Distribution / Transmission..... 44

    Electricity Industry (Licence Conditions) Regulations -Regulation 5(2) -Electricity  
    Industry Customer Transfer Code Type NR Distribution / Transmission..... 58

    Electricity Industry (Licence Conditions) Regulations -Regulation 5(2) -Electricity  
    Industry Customer Transfer Code Type NR Retail / Distribution / Transmission ..... 61

    Metering Code Obligations Type 2 Distribution / Transmission..... 65

    Metering Code Obligations Type 2 Generation / Retail ..... 111

    Metering Code Obligations Type 2 Generation / Retail / Distribution / Transmission  
    ..... 118

    Metering Code Obligations Type NR Distribution / Transmission ..... 120

    Metering Code Obligations Type NR Generation / Retail..... 122

    Metering Code Obligations Type NR Generation / Retail / Distribution / Transmission  
    ..... 125

    Network Quality of Supply Regulations Type 2 Distribution / Transmission..... 127

    Network Quality of Supply Regulations Type NR Distribution / Transmission..... 131

Appendix II Asset management system review results and recommendations ..... 135

## Executive Summary

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This performance audit and asset management review was conducted in accordance with the guidelines issued by the Economic Regulation Authority (*Authority*) for the audit period (1 July 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 7), Generation Licence (EGL 13), Distribution Licence (EDL 3) and Transmission Licence (ETL 4) for the audit period based on the relevant clauses referred to within the scope section (Page 9) of this report. While some non compliances were noted these are not material to achieving the licence obligations.

## Performance Audit

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A summary of the findings of the performance audit is:

## 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	99	75	24
Compliant 4	2	1	1
Compliant 3			
Non-compliant 2	16	12	4
Significantly non compliant 1			
Not rated	113	101	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.

## Asset Management Review

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The findings of the asset management review are summarized as;

### Ratings

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The effectiveness ratings for each key process in the licensee's asset management system using the 6-point scale are described below.

Asset management review effectiveness rating scale

Effectiveness	Rating	Description
Continuously improving	5	Continuously improving organisation capability and process effectiveness
Quantitatively controlled	4	Measurable performance goals established and monitored
Well-defined	3	Standard processes documented, performed and coordinated
Planned and tracked	2	Performance is planned, supervised, verified and tracked
Performed informally	1	Base practices are performed
Not performed	0	Not performed (indicate if not applicable)

**Asset management effectiveness summary**

Asset Management System	Not performed	Performed informally	Planned and tracked	Well defined	Quantitatively controlled	Continuously improving
Process Effectiveness Rating	0	1	2	3	4	5
Asset planning						
Asset creation/ acquisition						
Asset disposal						
Environmental analysis						
Asset operations						
Asset maintenance						
Asset Management Information System						
Risk management						
Contingency planning						
Financial planning						
Capital expenditure planning						
Review of AMS						



## 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 7, Generation Licence EGL 13, Distribution Licence EDL3 and Transmission Licence ETL 4 for the Southern Cross Energy partnership.

### Audit Period

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The audit period is 1 July 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.

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



## Excluded Conditions

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Licence conditions applying to small use consumers have been excluded as the licensee has no small use consumers, accordingly conditions 72-77, 78-80, 88, 89, 93, 94; 97-102, 434 and 448-449 have been excluded from the audit. Conditions relating to the Electricity Corporations are not applicable (90-92, 333, 434, 439-443). Conditions relating to covered networks are not relevant (95). Conditions relating to the Code of Conduct for the supply of electricity to small use consumers (113 to 299 & 368-369) have been excluded as these apply to small use consumers only.

Note that the reporting manual requires compliance with the Customer Transfer Code as a requirement of the Electricity (Licence Compliance) Regulations 2005 but these regulations only apply to the Electricity Corporation (Verve, Western Power, Synergy and Horizon Power). However, it is an obligation of the Licence Clause 5 to comply with applicable Codes and accordingly compliance is reported in this audit. There are some non-compliances noted but these are of a technical nature and are a consequence of the licensee being vertically integrated.

The metering installations of the licensee were all established before the commencement of the Metering Code. Accordingly 3.14(1) of the Metering Code does not require any modification or upgrading of metering installations to comply with the Metering Code. Any items that may otherwise be noted as non-compliant will be regarded as not rated. The Licensee should seek exemption from the technical requirements from the Office of Energy so that the matters can be considered in detail rather than 'grandfather' coverage.

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

### 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.

### 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.

### 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 Perth office and Kalgoorlie, Kambalda, Leinster and Mt Keith licence areas were 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.

The key contacts were:

- Licensee
  - Dan Cannon, Harry Fernandez, Wana Yang, Keith Adams and Scott Norris
- McGill Engineering Services Pty Ltd
  - Kevan McGill, John McLoughlin

The audit was conducted during October and November 2008 with the final audit report submitted to the Authority by 30 November 2008.

## 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><li>• Compliance attitude</li></ul>	K McGill John McLoughlin	AUS 502: Audit Evidence AUS 806: Performance Auditing
4. Reporting	K McGill	ASA 300 replaces AUS 302 Planning AUS 806: Performance Auditing

### Relationship between licences

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The licensee has four licences and is essentially vertically integrated and accordingly the need for protocols for interfaces between the licence types is not a required business function. The licensee also has two customers and the relationship with these customers is detailed in the specific contracts so there is no business need for protocols to deal with customer/licensee interfaces.

The licensees are special vehicles for the supply of electricity and some of the strategic asset management functions are carried out by the owning entities. The spirit of the asset management system obligations are met but not by the licensed entities.

### Overall Conclusion

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In my opinion, the licensee maintained, in all material aspects, effective control procedures in relation to the Retail (ERL 7), Generation (EGL 13), Distribution (EDL 3)

and Transmission (ETL 4) licences for the audit period based on the relevant clauses referred to within the scope section of this report. While there have been some non compliances noted these are not material to achieving the obligations of the licences.

## 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 23)

Item	Licence obligation	Review priority	Rating	Rating 0 1 2 3 4 5
<b>Licence conditions Type 2 Generation/Distribution/Transmission</b>				
83.	16.1 & 16.2/19.1 & 19.2 /16.1 & 16.2 EIA s14(1)(b)	4	Compliant 5	■ ■ ■ ■ ■ ■
103	12.2/15.2/12.2 EIA s11	4	Not rated	□ □ □ □ □ □
104	12.3/15.3/12.3 EIA s11	4	Compliant 5	■ ■ ■ ■ ■ ■
108	16.4/19.4.16.4 EIA s11	4	Compliant 5	■ ■ ■ ■ ■ ■
				□ □ □ □ □ □
<b>Licence conditions Type 2 Retail/Distribution/Transmission</b>				
96	5.1/5.1/5.1 EIA s115(2)	4	Compliant 5	■ ■ ■ ■ ■ ■
				□ □ □ □ □ □
<b>Licence conditions Type 2 Generation/Retail/Distribution/Transmission</b>				
87.	5.1/5.1/5.1/5.1 EIA s41(6)	4	Not rated	□ □ □ □ □ □
105	13.1/20.1/16.1/13.1 EIA s11	4	Compliant 4	■ ■ ■ ■ □ □
107	15.2/22.2/18.2/15.2 EIA s11	4	Not rated	□ □ □ □ □ □
109	17.1/23.1/20.1/17.1 EIA s11	4	Compliant 5	■ ■ ■ ■ ■ ■
110	18.1/24.1/21.1/18.1 EIA s11	4	Not rated	□ □ □ □ □ □
111	19.2/25.2/22.2/19.2 EIA s11	4	Compliant 5	■ ■ ■ ■ ■ ■
112	20.1/26.1/23.1/20.1 EIA s11	4	Not rated	□ □ □ □ □ □
<b>Licence conditions Type NR Generation/Distribution/Transmission</b>				
82.	16.1/19.1/16.1 EIA s14(1)(a)	5	Compliant 4	■ ■ ■ ■ □ □
84	16.3/19.3/16.3 EIA s14(1)(c)	5	Compliant 5	■ ■ ■ ■ ■ ■
				□ □ □ □ □ □
<b>Licence conditions Type NR Generation/Retail/Distribution/Transmission</b>				
81.	15.1/22.1/18.1/15.1 EIA s13(1)	5	Compliant 5	■ ■ ■ ■ ■ ■
85.	4.1/4.1/4.1/4.1 EIA s17(1)	5	Compliant 5	■ ■ ■ ■ ■ ■
86	5.1/5.1/5.1/5.1 EIA s31(3)	5	Compliant 5	■ ■ ■ ■ ■ ■
				□ □ □ □ □ □

Electricity Industry (Licence Conditions) regulations r 5(2) - Customer Transfer Code Type 2 Retail				
6	3.2(2) <sup>3</sup>	4	Compliant 5	
7	3.4(1)	4	Not Compliant	
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	Not rated	
25	4.4(1)	4	Not rated	
26	4.4(2)	4	Not rated	
27	4.5(1)	4	Not rated	
28	4.6(3)	4	Not rated	
29	4.7	4	Not rated	
30	4.8(2)	4	Not rated	
44	4.16	4	Compliant 5	
45	4.17	4	Not rated	
52	6.4(1)	4	Not rated	
53	6.4(2)	4	Not rated	
Electricity Industry (Licence Conditions) regulations r 5(2) - Customer Transfer Code Type 2 Retail/Distribution/Transmission				
34	4.9(6)	4	Not rated	
39	4.11(3)	4	Not rated	
48	5.1(4)	4	Not Compliant	
49	6.2	4	Not rated	
54	6.6	4	Not Compliant	
57	7.1(3)	4	Not rated	
69	A6.2(b)	4	Not Compliant	
Electricity Industry (Licence Conditions) regulations r 5(2) - Customer Transfer Code Type 2 Distribution/Transmission				
2	2.2(1)(b)	4	Not Compliant	
3	3.1(1)(a)	4	Not Compliant	
4	3.1(1)(b)	4	Not Compliant	
5	3.1(2)	4	Not Compliant	
10	3.7(1)	4	Not rated	
11	3.7(2)	4	Compliant 5	
13	3.8(2)(a)	4	Not Compliant	
14	3.8(2)(b)	4	Compliant 5	
15	3.8(3)	4	Not Compliant	
20	3.10(1)	4	Compliant 5	
21	3.10(2)	4	Compliant 5	
22	4.1	4	Not Compliant	
31	4.9(1)	4	Not rated	
32	4.9(2)	4	Not rated	
33	4.9(3)	4	Not rated	
35	4.10(1)	4	Not rated	
36	4.10(2)	4	Not rated	
37	4.10(3)	4	Not rated	
38	4.11(1)	4	Not rated	

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

41	4.13	4	Not rated						
42	4.14	4	Not rated						
51	6.3(2)	4	Not rated						
60	Annex 1	4	Compliant 5						
61	Annex 2	4	Compliant 5						
62	Annex 3	4	Not Compliant						
63	A4.1 <sup>4</sup>	4	Compliant 5						
64	A4.2	4	Compliant 5						
65	A5(5) <sup>5</sup>	4	Not rated						
66	A5(6)	4	Not rated						
67	A5(7)	4	Not rated						
Electricity Industry (Licence Conditions) regulations r 5(2) - Customer Transfer Code Type NR Retail / Distribution / Transmission									
1	2.2(1)(a)	5	Not Compliant						
12	3.8(1)	5	Not Compliant						
46	5.1(1)	5	Not Compliant						
47	5.1(3)	5	Not Compliant						
50	6.3(1)	5	Compliant 5						
Electricity Industry (Licence Conditions) regulations r 5(2) - Customer Transfer Code Type NR Retail / Distribution / Transmission									
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) <sup>6</sup>	5	Compliant 5						
70	A6.6	5	Compliant 5						
71	A6.7	5	Compliant 5						
Licence Clause 5.1 Metering Code Type 2 Distribution / Transmission									
300	MC 2.2(1)(a)	4	Not rated						
301	MC 2.2(1)(b)	4	Not rated						
302	MC 3.1	4	Not rated						
303	MC 3.2(1)	4	Not rated						
304	MC 3.3(2)	4	Not rated						
305	MC 3.3(3)	4	Compliant 5						
306	MC 3.5(1) & (2)	4	Not rated						
307	MC 3.5(3)	4	Not rated						
308	MC 3.5(4)	4	Compliant 5						
310	MC 3.5(9)	4	Compliant 5						
311	MC 3.7	4	Compliant 5						
312	MC 3.8	4	Compliant 5						
313	MC 3.9(3)	4	Not rated						
314	MC 3.9(7)	4	Not rated						
315	MC 3.9(9)	4	Not rated						
316	MC 3.10	4	Not rated						
317	MC 3.11(1)	4	Compliant 5						
318	MC 3.11(2)	4	Not rated						
320	MC 3.12(1)	4	Compliant 5						

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

<sup>5</sup> Electricity Industry Customer Transfer Code Annex 5

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

321	MC 3.12(2)	4	Not rated						
322	MC 3.12(3)	4	Compliant 5						
323	MC 3.12(4)	4	Compliant 5						
324	MC 3.13(1)	4	Not rated						
325	MC 3.13(3) <sup>7</sup> (c)	4	Compliant 5						
326	MC 3.13(4)	4	Not rated						
327	MC 3.14(3)	4	Not rated						
328	MC 3.16(1)	4	Not rated						
329	MC 3.16(2)	4	Compliant 5						
330	MC 3.16(3)	4	Compliant 5						
332	MC 3.16(6)	4	Compliant 5						
334	MC 3.20(1)	4	Not rated						
335	MC 3.20(3)	4	Compliant 5						
336	MC3.21(1)	4	Not rated						
337	MC3.21(2)	4	Compliant 5						
338	MC 3.22	4	Not rated						
339	MC 3.23(a)	4	Compliant 5						
340	MC 3.23(b)	4	Not rated						
341	MC 3.25	4	Not rated						
343	MC 3.29	4	Not rated						
344	MC 4.1(1)	4	Compliant 5						
345	MC 4.1(2)	4	Compliant 5						
346	MC 4.1(3)	4	Compliant 5						
347	MC 4.2(1)	4	Compliant 5						
348	MC 4.2(2)	4	Compliant 5						
352	MC 4.6(1)	4	Not rated						
353	MC 4.6(2)	4	Not rated						
354	MC 4.7	4	Not rated						
355	MC 4.8(3)	4	Not rated						
356	MC 4.8(4)	4	Compliant 5						
357	MC 4.8(5)	4	Compliant 5						
358	MC 4.9	4	Compliant 5						
361	MC 5.3	4	Compliant 5						
364	MC 5.5(2)	4	Compliant 5						
366	MC 5.6(1)	4	Compliant 5						
367	MC 5.7	4	Compliant 5						
370	MC 5.10	4	Not rated						
371	MC 5.11	4	Not rated						
372	MC 5.12(1)	4	Compliant 5						
373	MC 5.13	4	Compliant 5						
374	MC 5.14(3)	4	Compliant 5						
375	MC 5.15	4	Compliant 5						
383	MC 5.19(5)	4	Compliant 5						
385	MC 5.20(1)	4	Not rated						
386	MC 5.20(2)	4	Not rated						
387	MC 5.20(4)	4	Not rated						
388	MC 5.21(2)	4	Not rated						
389	MC 5.21(4)	4	Not rated						
392	MC 5.21(8)	4	Not rated						
393	MC 5.21(9)	4	Compliant 5						
394	MC 5.21(11)	4	Not rated						
395	MC 5.21(12)	4	Not rated						
396	MC 5.22(1)	4	Not rated						
397	MC 5.22(2)	4	Compliant 5						

<sup>7</sup> Number reference in reporting manual missing

398	MC 5.22(3)	4	Not rated							
399	MC 5.22(4)	4	Compliant 5							
400	MC 5.22(5)	4	Compliant 5							
401	MC 5.22(6)	4	Compliant 5							
402	MC 5.23(1)	4	Compliant 5							
403	MC 5.23(2)	4	Not rated							
404	MC 5.24(1)	4	Compliant 5							
405	MC 5.24(2)	4	Compliant 5							
406	MC 5.24(3)	4	Compliant 5							
407	MC 5.24(4)	4	Not rated							
408	MC 5.25	4	Compliant 5							
410	MC 5.29	4	Not rated							
411	MC 5.30(1)	4	Not rated							
412	MC 5.31(1)	4	Not rated							
413	MC 5.31(2)	4	Not rated							
414	MC 5.34	4	Not rated							
415	MC 6.1(1)	4	Compliant 5							
419	MC 7.2(2)	4	Not rated							
Licence Clause 5.1 Metering Code Type 2 Generation / Retail										
342	MC 3.27	4	Not rated							
351	MC 4.5(2)	4	Not rated							
365	MC 5.5(3)	4	Compliant 5							
376	MC 5.16	4	Not rated							
377	MC 5.17(1)	4	Not rated							
378	MC 5.18	4	Not rated							
381	MC 5.19(3)	4	Not rated							
382	MC 5.19(4)	4	Not rated							
390	MC 5.21(5)	4	Not rated							
391	MC 5.21(6)	4	Not rated							
409	MC 5.27	4	Not rated							
416	MC 6.1(2)	4	Compliant 5							
420	MC 7.2(4)	4	Not rated							
421	MC 7.2(5)	4	Not rated							
422	MC 7.5	4	Compliant 5							
423	MC 7.6(1)	4	Not rated							
Licence Clause 5.1 Metering Code Type 2 Generation / Retail / Distribution / Transmission										
309	MC 3.5(6)	4	Compliant 5							
319	MC 3.11(3)	4	Compliant 5							
331	MC 3.16(5)	4	Not rated							
427	MC 8.1(4)	4	Not rated							
Licence Clause 5.1 Metering Code Type NR Distribution / Transmission										
359	MC 5.1(1)	5	Compliant 5							
360	MC 5.1(2)	5	Compliant 5							
362	MC 5.4(1)	5	Compliant 5							
417	MC 6.20(4)	5	Not rated							
Licence Clause 5.1 Metering Code Type NR Generation / Retail /										
363	MC 5.4(2)	5	Compliant 5							
379	MC 5.19(1)	5	Compliant 5							
380	MC 5.19(2)	5	Compliant 5							
384	MC 5.19(6)	5	Not rated							
424	MC 8.1(1)	5	Not rated							
425	MC 8.1(2)	5	Not rated							
426	MC 8.1(3)	5	Not rated							



Licence Clause 5.1 Metering Code Type NR Generation / Retail / Distribution / Transmission													
349	MC 4.4(1)	5	Compliant 5										
350	MC 4.5(1)	5	Compliant 5										
418	MC 7.2(1)	5	Compliant 5										
428	MC 8.3(2)	5	Not rated										
Licence Clause 5.1 Network Quality of Supply Regulations type 2 Distribution /Transmission													
436	NQS <sup>8</sup> 13(3)	4	Compliant 5										
437	NQS 14(8)	4	Not rated										
438	NQS 15(2)	4	Not rated										
445	NQS 23(2)	4	Compliant 5										
446	NQS 24(3)	4	Not rated										
447	NQS 24(4)	4	Not rated										
450	NQS 26	4	Compliant 5										
451	NQS 27(1)	4	Compliant 5										
452	NQS 27(3)	4	Compliant 5										
Licence Clause 5.1 Network Quality of supply Regulations type NR Distribution /Transmission													
429	NQS 5(1)	5	Compliant 5										
430	NQS 8	5	Compliant 5										
431	NQS 9	5	Compliant 5										
432	NQS 10(1)	5	Compliant 5										
433	NQS 10(2)	5	Compliant 5										
435	NQS 13(2)	5	Compliant 5										
444	NQS 23(1)	5	Compliant 5										

## Audit Results and Recommendations

### Summary of significant results

A number of non compliances have been recorded and for all of these elements there is a case for seeking an exemption from the Office of Energy for an exemption for these items.

### Post Audit Implementation Plan

Exemptions to be sought from the Office of Energy from the Transfer Code and Metering Code where they do not make business sense. Manager, Commercial & Business Development, Trans Alta Energy (Australia) Pty Ltd, Dan Cannon should be responsible to do this by June 2009.

<sup>8</sup>Electricity Industry Network Quality & Reliability of Supply Code number

## ASSET MANAGEMENT SYSTEM REVIEW

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### Asset Management System Review Objectives

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Under the *Electricity Industry Act 2004* (the Act) section 14, the licensee must develop and maintain an asset management system to manage the significant asset base for ongoing service delivery to its customers. The Act requires a review of the asset management system every two years (or other time approved by the Economic Regulation Authority - *Authority*).

An asset management system is to set out the measures to be taken by the licensee for the proper maintenance of assets used in the generation of electricity and in the operation and maintenance of, and, where relevant, the construction or alteration of, the generator's assets.

### Asset Management System Review Recommendations

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The recommendations identify:

- a) The asset management process.
- b) The effectiveness rating.
- c) The issue(s) identified that have resulted in the nominated effectiveness rating.
- d) The recommended action(s) to improve the effectiveness of the asset management process to an acceptable level.

### Asset management system review methodology

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The asset management review report provides a table that summarises the auditor's assessment of the effectiveness ratings for each key process in the licensee's asset management system using the 6-point scale described below.

The overall effectiveness rating is based on an assessment of the adequacy and effectiveness of the licensee's asset management system.

### Use of Audit Processes and Practices

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- 1 Accepted audit processes and practices were used to complete the review. These include the sampling techniques associated with process reviews such as interviews to define accountability, observations, document sighting and testing of users.
- 2 The review addressed four key elements of successful delivery of asset management to allow the assessment of the effectiveness of the asset management system. These elements are:
  - Process – the existence of a suitable process for activities
  - Documentation – the existence of a document defining a process

- Availability/accessibility/understanding – the process is understood, available to those required to use it and accessible to them
  - Use- confirmation the process is used consistently
- 3 The audit priorities were determined and include in the asset management system review plan approved by the *Authority*.

The review was conducted by Kevan McGill and John McLoughlin during November 2008.

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### Audit priority

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The *Authority* guidelines for asset management system reviews sets out a rating for audit priority based on inherent risk and existing controls. The following priorities were determined in accordance with the guidelines and audit plan and accepted by the Licensee.

The review priorities and findings are as follows. The detail of the review and findings can be seen in Appendix II (Page 135).

Item	Licence obligation	Inherent Risk	Controls risk requirement	Review priority	Rating					
					0	1	2	3	4	5
1	Asset planning	High	Strong	2						
2	Asset creation/ acquisition	High	Strong	2						
3	Asset disposal	Medium	Moderate	4						
4	Environmental analysis	Medium	Moderate	4						
5	Asset operations	High	Strong	2						
6	Asset maintenance	High	Strong	2						
7	Asset Management Information System	High	Strong	2						
8	Risk management	Medium	Moderate	4						
9	Contingency planning	Medium	Moderate	4						
10	Financial planning	Medium	Moderate	4						
11	Capital expenditure planning	Medium	Moderate	4						
12	Review of AMS	Medium	Moderate	4						

## Overall conclusion

In my opinion, the licensee maintained, in all material aspects, an adequate and effective asset management system in relation to the Generation Licence (EGL 13), Distribution Licence (EDL 3) and Transmission Licence (ETL 4) for the audit period based on the relevant clauses referred to within the scope section (Page 9) of this report. While a number of non compliances are noted they are not material for the effectiveness of an asset management system even if there is a division between the part undertaken by the licensee and those by the owners. While the licensee may be non-complaint the outcome is compliant.

## 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.

Asset management process	Review risk assessment	Rating	
Asset planning	2	Not performed	0
Asset creation/ acquisition	2	Well defined	3
Asset disposal	4	Well defined	3
Environmental analysis	4	Well defined	3
Asset operations	2	Quantitatively Controlled	4
Asset maintenance	2	Well defined	4
Asset Management Information System	4	Quantitatively Controlled	3
Risk management	4	Well defined	3
Contingency planning	4	Well defined	3
Financial planning	4	Well defined	3
Capital expenditure planning	4	Well defined	3
Review of AMS	4	Not performed	0

The overall effectiveness rating for each licence condition is based on an assessment of the effectiveness of the licensee's existing control procedures to manage its assets.

## Review Results and Recommendations

The following summarises the key results and recommendations

Asset Management Item	Recommendation
Asset Planning	<b>Issue 1</b>
	The licensee conducts the shorter timeframe asset management

	<p>elements (operations, maintenance and contingency planning) consistent with its planning needs. Other than a strategic overview, the elements of an asset management process exist informally.</p> <p>The owner uses a special vehicle to manage the licensed assets and these carry out the core processes such as operations and maintenance. The owning bodies carry out the long term and strategic elements of an asset management system. It would not be appropriate to require the licensed entities to carry out these functions when they are already carried out by the owning companies.</p>
	<p><b>Recommendation 1</b></p>
	<p>None - There is no business case for carrying out asset planning when it is carried out by the owning bodies.</p>
<p>AMS review</p>	<p><b>Issue 1</b></p> <p>Strategic asset planning is carried out by the owning companies and they carry out continuous review of the process. It would not be appropriate to require the licensed entities to carry out these functions when they are already carried out by the owning companies.</p> <p><b>Recommendation 1</b></p> <p>None - There is no business case for carrying out asset planning when it is carried out by the owning bodies.</p>

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**Post Audit implementation Plan**

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There are no actions required to be carried out.

## 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 7
  - Electricity Generation Licence EGL 13
  - Electricity Distribution Licence EDL 3
  - Electricity Transmission Licence ERL 4
  - Licence maps
  
2. Licensee's documents
  - Electricity licence application
  - Auditors statement
  - Licence fee payment entries
  - Financial reports
  - Annual compliance report
  - Reliability statistics
  - Licence fees invoices/payment
  - Fixed assets procedure
  - Corporate code of conduct
  - Budget documents

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### Audit Time

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The audit was undertaken by Kevan McGill and John McLoughlin and took approximately 120 hours.

**Appendix 1 Performance Audit Detail Results and Recommendations**

**Licence Obligations Type 2 Generation / Distribution / Transmission**

<b>Item 83</b>	Generation Licence Clauses 16.1 & 16.2 / Distribution Licence Clauses 19.1 & 19.2 / Transmission Licence Clauses 16.1 & 16.2								Compliance rating Compliant 5
<i>Electricity Industry Act section 14(1)(b)</i> The requirement is that a licensee must notify details of the asset management system and any substantial changes to it to the <i>Authority</i> .									
<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 advised the <i>Authority</i> of the asset management system in the licence application. There have been no substantive changes since.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 103</b>	Generation Licence Clause 12.2 / Distribution Licence Clause 15.2 / Transmission Licence Clause 12.2								Compliance rating Not rated
<i>Electricity Industry Act section 11.</i> The requirement is that a licensee must amend the asset management system before an expansion or reduction in generating works, distribution systems and transmission systems and notify the <i>Authority</i> in the manner prescribed, if the expansion or reduction is not provided for in the asset management system.									
<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"/>
There has been no expansion or reduction of the generating works in the audit period. There have been no substantive changes to the Transmission or Distribution systems in the audit period that would require an amendment to the asset management system.									
<b>Issues</b>									
None.									
<b>Recommendations</b>									
None.									

<b>Management Actions</b>
Not applicable.

<b>Item 104</b>	Generation Licence Clause 12.3 / Distribution Licence Clause 15.3 / Transmission Licence Clause 12.3	Compliance rating Compliant - 5							
<i>Electricity Industry Act section 11.</i> The requirement is that a licensee must not expand the generating works, distribution systems or transmission systems outside the licence area. If there is any expansion the relevant fees are to be paid.									
<b>Observations</b>									
Process	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	Ⓟ
There have been no expansions outside the licence areas.									
<b>Issues</b>									
None.									
<b>Recommendations</b>									
None.									
<b>Management Actions</b>									
Not applicable.									

<b>Item 108</b>	Generation Licence Clause 16.4 / Distribution Licence Clause 19.4 / Transmission Licence Clause 16.4	Compliance rating Compliant - 5							
<i>Electricity Industry Act section 11.</i> The requirement is that a licensee must comply, and must require the licensee's expert to comply, with the relevant aspects of the <i>Authority's</i> standard guidelines dealing with the asset management system.									
<b>Observations</b>									
Process	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	Ⓟ
This audit complies with the requirements.									
<b>Issues</b>									
None.									
<b>Recommendations</b>									
None.									
<b>Management Actions</b>									
Not applicable.									



**Licence Obligations Type 2 Retail / Distribution / Transmission**

<b>Item 96</b>	Retail Licence Clause 5.1 / Distribution Licence Clauses 15.1 / Transmission Licence Clauses 5.1	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 about hindering or prohibiting access.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

**Licence Obligations Type 2 Generation / Retail / Distribution / Transmission**

<b>Item 87</b>	Retail Licence Clause 5.1 / Distribution Licence Clauses 15.1 / Transmission Licence Clauses 5.1	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>Item 105</b>	Generation Licence Clause 13.1 / Retail Licence Clause 20.1 / Distribution Licence Clauses 16.1 / Transmission Licence Clauses 13.1	Compliance rating Compliant - 4							
<p><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.</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"/>
<p>The licensee's auditor advises that the joint venture is not required to comply with all Australian accounting standards. The auditor gives an opinion that the financial report represents fairly the financial position of the joint venture and complies with Australian accounting standards to the extent described in the accounts.</p>									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 107</b>	Generation Licence Clause 15.2 / Retail Licence Clause 22.2 / Distribution Licence Clauses 18.2 / Transmission Licence Clauses 15.2	Compliance rating Not rated							
<p><i>Electricity Industry Act section 11.</i>                  A licensee must comply with any individual performance standards prescribed by the Authority.</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 type="checkbox"/>
<p>No individual performance standards have been applied. As there has been no activity, performance could not be rated.</p>									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 109</b>	Generation Licence Clause 17.1 / Retail Licence Clause 23.1 / Distribution Licence Clauses 20.1 / Transmission Licence Clauses 17.1	Compliance rating Compliant - 5							
<p><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.</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"/>
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>Item 110</b>	Generation Licence Clause 18.1 / Retail Licence Clause 24.1 / Distribution Licence Clauses 21.1 / Transmission Licence Clauses 18.1	Compliance rating Not rated							
<p><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.</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 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>Item 111</b>	Generation Licence Clause 19.2 / Retail Licence Clause 25.2 / Distribution Licence Clauses 22.2 / Transmission Licence Clauses 19.2	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>Item 112</b>	Generation Licence Clause 20.1 / Retail Licence Clause 26.1 / Distribution Licence Clauses 23.1 / Transmission Licence Clauses 20.1	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 type="checkbox"/>
There has not been a requirement to issue notices.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

**Licence Obligations Type NR Generation / Distribution / Transmission**

<b>Item 82</b>	Generation Licence Clause 16.1 / Distribution Licence Clauses 19.1 / Transmission Licence Clauses 16.1							Compliance rating Compliant 4	
<i>Electricity Industry Act section 14(1)(a).</i> A licensee must provide for an asset management system.									
<b>Observations</b>									
Process	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	Ⓟ
This review has examined the asset management system but some of the value adding functions is carried out by the owner and not the licensee.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 84</b>	Generation Licence Clause 16.3 / Distribution Licence Clauses 19.3 / Transmission Licence Clauses 16.3							Compliance rating Compliant 5	
<i>Electricity Industry Act section 14(1)(c).</i> A licensee must provide the Authority with a report by an independent expert as to the effectiveness of its asset management system every 24 months, or such longer period as determined by the Authority.									
<b>Observations</b>									
Process	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	Ⓟ
This review satisfies the requirement.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

**Licence Obligations Type NR Generation / Retail / Distribution / Transmission**

<b>Item 81</b>	Generation Licence Clause 15.1 / Retail Licence Clause 22.1 / Distribution Licence Clauses 18.1 / Transmission Licence Clauses 15.1	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	<b>p</b>	Outcome	<b>p</b>	Output	<b>p</b>	Reporting	<b>p</b>	Compliance	<b>p</b>
This audit satisfies the requirement.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 85</b>	Generation Licence Clause 4.1 / Retail Licence Clause 4.1 / Distribution Licence Clauses 4.1 / Transmission Licence Clauses 4.1	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	<b>p</b>	Outcome	<b>p</b>	Output	<b>p</b>	Reporting	<b>p</b>	Compliance	<b>p</b>
The fees have been paid within a month of being received.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 86</b>	Generation Licence Clause 5.1 / Retail Licence Clause 5.1 / Distribution Licence Clauses 5.1 / Transmission Licence Clauses 5.1								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	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	Ⓟ
The licensee has significant penalties in its contracts with its customers for interruptions, suspension or restrictions of supply.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

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

<b>Item 6</b>	Retail Licence Clause 5.1								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	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	Ⓟ
As the licensee is essentially vertically integrated, there are no processes for transfer of information between retailer and distributor/transmitter. The information needs are specified in the contracts with customers. The customers have agreed (via contract) to receive a consolidated account for all exit points.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
An exemption is sought from this requirement of the Code.									

<b>Management Actions</b>
Approach the Office of Energy to seek an exemption from this requirement.

<b>Item 7</b>	Retail Licence Clause 5.1	Compliance rating Not Compliant - 2							
<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	✓	Outcome	Ⓟ	Output	Ⓟ	Reporting	✓	Compliance	✓
As the licensee is essentially vertically integrated there is no business need for protocols for passing information to their retailer.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
An exemption is sought from this requirement of the Code.									
<b>Management Actions</b>									
Approach the Office of Energy to seek an exemption from this requirement.									

<b>Item 8</b>	Retail Licence Clause 5.1	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	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	Ⓟ
No complaints have been received by the licensee about providing historical data without verifiable consent.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									



<b>Management Actions</b>
Not applicable

<b>Item 9</b>	Retail Licence Clause 5.1	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 type="checkbox"/>
No requests for historical consumption data have been withdrawn.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 16</b>	Retail Licence Clause 5.1	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 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>Item 17</b> Retail Licence Clause 5.1							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	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	Ⓟ
No complaints have been received by the licensee 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>Item 18</b> Retail Licence Clause 5.1							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	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	Ⓟ
No complaints have been received by the licensee about disclosing data of one customer to any other person without their verifiable consent.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 19</b>	Retail Licence Clause 5.1	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 customer contracts establish verifiable consent and these are retained. The contracts have been in existence for more than two years.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 23</b>	Retail Licence Clause 5.1	Compliance rating Not rated							
<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 type="checkbox"/>
There have been no customer transfers in the audit period.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 24</b>	Retail Licence Clause 5.1	Compliance rating Not rated
<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.									
<b>Observations</b>									
Process	✓	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	□
There have been no customer transfers in the audit period.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 25</b>	Retail Licence Clause 5.1	Compliance rating	Not rated						
<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.									
<b>Observations</b>									
Process	✓	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	□
There have been no customer transfers in the audit period.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 26</b>	Retail Licence Clause 5.1	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	✓	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	□

There have been no customer transfers in the audit period.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	
<b>Management Actions</b>	
Not applicable	

<b>Item 27</b>	Retail Licence Clause 5.1	Compliance rating Not rated							
<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 type="checkbox"/>
There have been no customer transfers in the audit period.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 28</b>	Retail Licence Clause 5.1	Compliance rating Not rated							
<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 type="checkbox"/>
There have been no customer transfers in the audit period.									
<b>Issues</b>									
None									

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

<b>Item 29</b>	Retail Licence Clause 5.1	Compliance rating Not rated							
<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 type="checkbox"/>
There have been no customer transfers in the audit period.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 30</b>	Retail Licence Clause 5.1	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 type="checkbox"/>
There have been no customer transfers in the audit period.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Management Actions</b>
Not applicable

<b>Item 44</b>	Retail Licence Clause 5.1	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 contracts (which establish verifiable consent) for at least two years.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 45</b>	Retail Licence Clause 5.1	Compliance rating Not rated							
<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 type="checkbox"/>
There have been no customer transfers in the audit period.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 52</b> Retail Licence Clause 5.1							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 type="checkbox"/>
As the licensee is essentially vertically integrated there is no need to notify contact details which are their own. There has been no change in contact details.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 53</b> Retail Licence Clause 5.1							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 type="checkbox"/>
There has been no change in contact details.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									



**Electricity Industry (Licence Conditions) Regulations -Regulation 5(2) -Electricity Industry Customer Transfer Code Type 2 Retail / Distribution / Transmission**

<b>Item 34</b>	Licence Clause 5.1								Compliance rating Not rated
<i>Electricity Industry Customer Transfer Code clause 4.9(6)</i> A network operator and retailer must agree to a revised nominated transfer date in 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 type="checkbox"/>
The network operator reads the meters remotely and manually daily. There have been no customer transfers in the audit period.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 39</b>	Licence Clause 5.1								Compliance rating Not rated
<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 type="checkbox"/>
The network operator reads the meters remotely and manually daily. There have been no customer transfers in the audit period.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 48</b>	Licence Clause 5.1								Compliance rating Not Compliant - 2
<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	✓	Outcome	✘	Output	✘	Reporting	✘	Compliance	✓
There are no approved communication rules. There is no business need for protocols for communication between retailer and distributor which are essentially vertically integrated. Communications with customers are established by contract.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
The Licensee should seek an exemption to this requirement.									
<b>Management Actions</b>									
The Licensee should approach the Office of Energy to seek an exemption from this requirement.									

<b>Item 49</b>	Licence Clause 5.1								Compliance rating Not rated
<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	✘	Outcome	✘	Output	✘	Reporting	✘	Compliance	☐
Data requests are established by contract with the customers and relate to their exit points. There have been no customer transfers in the audit period.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 54</b> Licence Clause 5.1		Compliance rating Not Compliant - 2							
<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	✓	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	✓
There is no business need for protocols for communication between retailer and distributor which are essentially vertically integrated. Communications with customers are established by contract.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
The Licensee should seek an exemption to this requirement.									
<b>Management Actions</b>									
The Licensee should approach the Office of Energy to seek an exemption from this requirement.									

<b>Item 57</b> Licence Clause 5.1		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	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	☐
There have been no transfer disputes.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 69</b>	Licence Clause 5.1								Compliance rating Not Compliant - 2
<p><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.</p>									
<b>Observations</b>									
Process	Y	Outcome	P	Output	P	Reporting	P	Compliance	Y
There is no business need for protocols for communication between retailer and distributor which are essentially vertically integrated. Communications with customers are established by contract.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
The Licensee should seek an exemption to this requirement.									
<b>Management Actions</b>									
The Licensee should approach the Office of Energy to seek an exemption from this requirement.									

**Electricity Industry (Licence Conditions) Regulations -Regulation 5(2) -Electricity Industry Customer Transfer Code Type 2 Distribution / Transmission**

<b>Item 2</b>	Licence Clause 5.1								Compliance rating Not Compliant - 2
<p><i>Electricity Industry Customer Transfer Code clause 2.2(1)(b)</i>                  A network operator must ensure that no retailer which is its associate receives a benefit in respect of the Electricity Industry Customer Transfer Code unless the benefit is either attributable to the arms-length application of the Electricity Industry Customer Transfer Code or the benefit is made available to all other retailers.</p>									
<b>Observations</b>									
Process	Y	Outcome	P	Output	P	Reporting	P	Compliance	Y
The licensee is essentially vertically integrated. There is no business need to establish arms-length treatment until another retailer becomes available on the network.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
The Licensee should seek an exemption to this requirement.									

<b>Management Actions</b>
The Licensee should approach the Office of Energy to seek an exemption from this requirement.

<b>Item 3</b>	Licence Clause 5.1	Compliance rating Not Compliant - 2							
<i>Electricity Industry Customer Transfer Code clause 3.1(1)(a)</i> A network operator must publish a request for standing data form which must comply with Annex 1 of the Electricity Industry Customer Transfer Code.									
<b>Observations</b>									
Process	✓	Outcome	✗	Output	✗	Reporting	✗	Compliance	✓
There is no business need for a published standing data form. Data information requirements are established by contract.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
The Licensee should seek an exemption to this requirement.									
<b>Management Actions</b>									
The Licensee should approach the Office of Energy to seek an exemption from this requirement.									

<b>Item 4</b>	Licence Clause 5.1	Compliance rating Not Compliant - 2							
<i>Electricity Industry Customer Transfer Code clause 3.1(1)(b)</i> A network operator must publish a request for historical data form which must comply with Annex 2 of the Electricity Industry Customer Transfer Code.									
<b>Observations</b>									
Process	✓	Outcome	✗	Output	✗	Reporting	✗	Compliance	✓
There is no business need for a published historical data form. Data information requirements are established by contract.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
The Licensee should seek an exemption to this requirement.									

<b>Management Actions</b>
The Licensee should approach the Office of Energy to seek an exemption from this requirement.

<b>Item 5</b>	Licence Clause 5.1	Compliance rating Not Compliant - 2							
<i>Electricity Industry Customer Transfer Code clause 3.1(2)</i> If a network operator publishes an amended data request form it must comply with Annex 1 or Annex 2 of the Electricity Industry Customer Transfer Code, as applicable.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There is no business need for a published historical data form. Data information requirements are established by contract.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
The Licensee should seek an exemption to this requirement.									
<b>Management Actions</b>									
The Licensee should approach the Office of Energy to seek an exemption from this requirement.									

<b>Item 10</b>	Licence Clause 5.1	Compliance rating Not rated							
<i>Electricity Industry Customer Transfer Code clause 3.7(1)</i> A network operator must, subject to clause 3.7(3) of the Electricity Industry Customer Transfer Code, electronically notify a retailer if its data request is not valid.									
<b>Observations</b>									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no invalid data requests.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 11</b> Licence Clause 5.1							Compliance rating Compliant - 5		
<i>Electricity Industry Customer Transfer Code clause 3.7(2)</i> A network operator must comply with clause 3.7(1) of the Electricity Industry Customer Transfer Code within defined timeframes depending on the number of standing or historical data requests that the retailer submits.									
<b>Observations</b>									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Data information requirements are established by contract. There have been no cases of more than 10 data requests in a day.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 13</b> Licence Clause 5.1							Compliance rating Not Compliant - 2		
<i>Electricity Industry Customer Transfer Code clause 3.8(2)(a)</i> A network operator must provide the requested data under a valid data request electronically in a format in accordance with the communication rules if they have been approved or otherwise in accordance with the metering code.									
<b>Observations</b>									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Data information requirements are established by contract.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
The Licensee should seek an exemption from this requirement.									
<b>Management Actions</b>									
The Licensee should approach the Office of Energy to seek an exemption from this requirement.									

<b>Item 14</b>	Licence Clause 5.1									Compliance rating Compliant - 5
<p><i>Electricity Industry Customer Transfer Code clause 3.8(2)(b)</i>                  A network operator must provide the requested data under a valid data request in accordance with a specified timetable.</p>										
<b>Observations</b>										
Process	▮	Outcome	▮	Output	▮	Reporting	▮	Compliance	▮	
Data information requirements are established by contract. The licensee meets contracted obligations for data.										
<b>Issues</b>										
None										
<b>Recommendations</b>										
None										
<b>Management Actions</b>										
Not applicable										

<b>Item 15</b>	Licence Clause 5.1									Compliance rating Not Compliant - 2
<p><i>Electricity Industry Customer Transfer Code clause 3.8(3)</i>                  A network operator must electronically notify the retailer of the most likely exit points to which a data request relates, up to a maximum of 10, if a retailer submits a data request under clause 3.4 and the network operator has not allocated a UMI for the exit point and it is unable to determine a single exit point to which the data request relates.</p>										
<b>Observations</b>										
Process	▮	Outcome	▮	Output	▮	Reporting	▮	Compliance	▮	Ÿ
As the licensee is essentially vertically integrated there is no business need for protocols for communication between network operator and their retailer. The contracts allow for aggregated information for their exit points.										
<b>Issues</b>										
None										
<b>Recommendations</b>										
The Licensee should seek an exemption from this requirement.										
<b>Management Actions</b>										
The Licensee should approach the Office of Energy to seek an exemption from this requirement.										



<b>Item 20</b>	Licence Clause 5.1									Compliance rating Compliant - 5
<i>Electricity Industry Customer Transfer Code clause 3.10(1)</i> A network operator must not charge for the provision of standing data.										
<b>Observations</b>										
Process	▮	Outcome	▮	Output	▮	Reporting	▮	Compliance	▮	
Data information requirements are established by contract. There are no charges for metering information.										
<b>Issues</b>										
None										
<b>Recommendations</b>										
None										
<b>Management Actions</b>										
Not applicable										

<b>Item 21</b>	Licence Clause 5.1									Compliance rating Compliant - 5
<i>Electricity Industry Customer Transfer Code clause 3.10(2)</i> A network operator must not charge more for historical consumption data than the defined amounts.										
<b>Observations</b>										
Process	▮	Outcome	▮	Output	▮	Reporting	▮	Compliance	▮	
Data information requirements are established by contract. There are no charges for metering information.										
<b>Issues</b>										
None										
<b>Recommendations</b>										
None										
<b>Management Actions</b>										
Not applicable										

<b>Item 22</b>	Licence Clause 5.1									Compliance rating Not Compliant - 2
<i>Electricity Industry Customer Transfer Code clause 4.1</i> A network operator must publish a customer transfer request form which must comply with Annex 3 of the Electricity Industry Customer Transfer Code.										

<b>Observations</b>									
Process	✓	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	✓
There is no business need for a published customer transfer request form.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
The Licensee should seek an exemption from this requirement.									
<b>Management Actions</b>									
The Licensee should approach the Office of Energy to seek an exemption from this requirement.									

<b>Item 31</b>	Licence Clause 5.1	Compliance rating	Not rated						
<i>Electricity Industry Customer Transfer Code clause 4.9(1)</i> A network operator must object to a customer transfer request in certain circumstances as set out in clause 4.9(1) of the Electricity Industry Customer Transfer Code.									
<b>Observations</b>									
Process	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	☐
There have been no customer transfer requests.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 32</b>	Licence Clause 5.1	Compliance rating	Not rated						
<i>Electricity Industry Customer Transfer Code clause 4.9(2)</i> A network operator must not object to a customer transfer request otherwise than in accordance with clause 4.9(1) of the Electricity Industry Customer Transfer Code.									
<b>Observations</b>									
Process	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	☐
There have been no customer transfer requests.									

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

<b>Item 33</b>	Licence Clause 5.1	Compliance rating Not rated							
<i>Electricity Industry Customer Transfer Code clause 4.9(3)</i> A network operator that objects to a customer transfer request must give an electronic notice detailing specified information to a retailer within the timeframe 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 type="checkbox"/>
There have been no customer transfer requests.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 35</b>	Licence Clause 5.1	Compliance rating Not rated							
<i>Electricity Industry Customer Transfer Code clause 4.10(1)</i> A network operator must take certain action in accordance with a defined timetable following the receipt of a valid customer transfer request, subject to clauses 4.10(2) and 4.10(3) of the Electricity Industry Customer Transfer Code and using all reasonable endeavours to affect the 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 type="checkbox"/>
There have been no customer transfer requests.									
<b>Issues</b>									
None									

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

<b>Item 36</b>	Licence Clause 5.1	Compliance rating Not rated							
<p><i>Electricity Industry Customer Transfer Code clause 4.10(2)</i>                  A network operator must take certain action if it considers that it is unlikely to be able to meet its obligations under clause 4.10(1) of the Electricity Industry Customer Transfer Code within the defined timetable.</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 type="checkbox"/>
There have been no customer transfer requests.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 37</b>	Licence Clause 5.1	Compliance rating Not rated							
<p><i>Electricity Industry Customer Transfer Code clause 4.10(3)</i>                  In certain circumstances a network operator must electronically notify the retailer of the most likely exit points to which a customer transfer request relates, up to a maximum of 10, if the network operator has not allocated the exit point a UMI and it is unable to determine a single exit point to which the customer transfer request relates, within the specified timeframe.</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 type="checkbox"/>
There have been no customer transfer requests.									
<b>Issues</b>									
None									

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

<b>Item 38</b>	Licence Clause 5.1	Compliance rating Not rated							
<i>Electricity Industry Customer Transfer Code clause 4.11(1)</i> A transfer may only occur on a day the contestable customer's meter is actually read.									
<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"/>
There have been no customer transfer requests. In any case meters are read daily.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 41</b>	Licence Clause 5.1	Compliance rating Not rated							
<i>Electricity Industry Customer Transfer Code clause 4.13</i> A network operator must within two business days after the transfer date give an electronic notice of the transfer and the transfer date to the incoming retailer, the previous retailer and, if applicable, the independent market operator.									
<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"/>
There have been no customer transfer requests.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Management Actions</b>
Not applicable

<b>Item 42</b>	Licence Clause 5.1	Compliance rating	Not rated
<i>Electricity Industry Customer Transfer Code clause 4.14</i> A network operator must, following a transfer, do all that is necessary to ensure that charges up to the transfer time are paid by or charged to the previous retailer and charges from the transfer time are paid by or charged to the incoming 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 type="checkbox"/>		
There have been no customer transfer requests.			
<b>Issues</b>			
None			
<b>Recommendations</b>			
None			
<b>Management Actions</b>			
Not applicable			

<b>Item 51</b>	Licence Clause 5.1	Compliance rating	Not rated
<i>Electricity Industry Customer Transfer Code clause 6.3(2)</i> A network operator must notify each retailer of its initial contact details, and any amended contact details 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 type="checkbox"/>		
There have been no changes in contact details which are shared anyway.			
<b>Issues</b>			
None			
<b>Recommendations</b>			
None			
<b>Management Actions</b>			
Not applicable			

<b>Item 60</b>	Licence Clause 5.1									Compliance rating Compliant - 5
<i>Electricity Industry Customer Transfer Code clause Annex 1</i> A network operator's request for standing data must require a retailer to provide certain information.										
<b>Observations</b>										
Process	▮	Outcome	▮	Output	▮	Reporting	▮	Compliance	▮	
The requests for metering standing data are specified in the customer contracts.										
<b>Issues</b>										
None										
<b>Recommendations</b>										
None										
<b>Management Actions</b>										
Not applicable										

<b>Item 61</b>	Licence Clause 5.1									Compliance rating Compliant - 5
<i>Electricity Industry Customer Transfer Code clause Annex 2</i> A network operator's request for historical consumption data must require a retailer to provide certain information.										
<b>Observations</b>										
Process	▮	Outcome	▮	Output	▮	Reporting	▮	Compliance	▮	
The requests for metering data are specified in the customer contracts.										
<b>Issues</b>										
None										
<b>Recommendations</b>										
None										
<b>Management Actions</b>										
Not applicable										

<b>Item 62</b>	Licence Clause 5.1									Compliance rating Not Compliant - 2
<i>Electricity Industry Customer Transfer Code clause Annex 3</i> A network operator's customer transfer request form must require a retailer to provide certain information.										

<b>Observations</b>									
Process	✓	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	✓
There is no business need for a customer transfer request form unless another retailer is available on the network.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
The Licensee should seek an exemption from this requirement.									
<b>Management Actions</b>									
The Licensee should approach the Office of Energy to seek an exemption from this requirement.									

<b>Item 63</b>	Licence Clause 5.1	Compliance rating Compliant - 5							
<i>Electricity Industry Customer Transfer Code clause A<sup>9</sup>4.1</i> A network operator must provide certain information, if available, to a retailer who submits a request for standing data.									
<b>Observations</b>									
Process	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	Ⓟ
The information is shared between the network operator and their retailer.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 64</b>	Licence Clause 5.1	Compliance rating Compliant - 5
<i>Electricity Industry Customer Transfer Code clause A4.2</i> A network operator must provide certain metering data, if available, in a prescribed manner to a retailer who submits a request for historical consumption data.		

<sup>9</sup> Electricity Industry Customer Transfer Code Annex 4



<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 information is shared between the network operator and their retailer.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 65</b>	Licence Clause 5.1	Compliance rating	Not rated						
<i>Electricity Industry Customer Transfer Code clause A5(5)<sup>10</sup></i> A network operator must respond to a request from a retailer for an UMI and checksum for an exit point within one business day of receiving a retailer'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 type="checkbox"/>
There have been no such requests.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 66</b>	Licence Clause 5.1	Compliance rating	Not rated
<i>Electricity Industry Customer Transfer Code clause A5(6)</i> A network operator must provide the most likely matches to the retailer, up to a maximum of 99, if a request does not return a single UMI and checksum.			

<sup>10</sup> Electricity Industry Customer Transfer Code Annex 5

<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"/>
There have been no such requests.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 67</b>	Licence Clause 5.1								Compliance rating Not rated
<i>Electricity Industry Customer Transfer Code clause A5(7)</i> A network operator must, unless otherwise advised by the retailer, provide the UMI and checksum for the relevant exit point if a request returns a single UMI and checksum.									
<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"/>
There have been no such requests.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

**Electricity Industry (Licence Conditions) Regulations -Regulation 5(2) -Electricity Industry Customer Transfer Code Type NR Distribution / Transmission**

<b>Item 1</b>	Licence Clause 5.1								Compliance rating Not Compliant - 2
<i>Electricity Industry Customer Transfer Code clause 2.2(1)(a)</i> A network operator must treat all retailers which are its associates on an arms-length basis.									

<b>Observations</b>									
Process	✓	Outcome	✘	Output	✘	Reporting	✘	Compliance	✓
There is no business need for arms-length treatment until another retailer is available on the network.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
The Licensee should seek an exemption from this requirement.									
<b>Management Actions</b>									
The Licensee should approach the Office of Energy to seek an exemption from this requirement.									

<b>Item 12</b>	Licence Clause 5.1	Compliance rating Not Compliant - 2							
<i>Electricity Industry Customer Transfer Code clause 3.8(1)</i> A network operator must comply with clause 3.7(1) of the Electricity Industry Customer Transfer Code within defined timeframes depending on the number of standing or historical data requests that the retailer submits.									
<b>Observations</b>									
Process	✘	Outcome	✘	Output	✘	Reporting	✘	Compliance	✓
The data requirements are specified in the contracts.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
The Licensee should seek an exemption from this requirement.									
<b>Management Actions</b>									
The Licensee should approach the Office of Energy to seek an exemption from this requirement.									

<b>Item 46</b>	Licence Clause 5.1	Compliance rating Not Compliant - 2							
<i>Electricity Industry Customer Transfer Code clause 5.1(1)</i> A network operator must submit communication rules to the <i>Authority</i> within six months after the commencement of the Electricity Industry Customer Transfer Code.									

<b>Observations</b>									
Process	✓	Outcome	✓	Output	✓	Reporting	✓	Compliance	✓
There is no business need for protocols for communication between retailer and distributor or transmitter. Communication rules have not been submitted.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
The Licensee should seek an exemption from this requirement.									
<b>Management Actions</b>									
The Licensee should approach the Office of Energy to seek an exemption from this requirement.									

<b>Item 47</b>	Licence Clause 5.1	Compliance rating Not Compliant - 2							
<i>Electricity Industry Customer Transfer Code clause 5.1(1)</i> A network operator must take certain action before submitting the communication rules to the Authority.									
<b>Observations</b>									
Process	✓	Outcome	✓	Output	✓	Reporting	✓	Compliance	✓
There is no business need for protocols for communication between retailer and distributor or transmitter. Communication rules have not been submitted.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
The Licensee should seek an exemption from this requirement.									
<b>Management Actions</b>									
The Licensee should approach the Office of Energy to seek an exemption from this requirement.									

<b>Item 50</b>	Licence Clause 5.1	Compliance rating Compliant - 5
<i>Electricity Industry Customer Transfer Code clause 6.3(1)</i> A network operator must use its reasonable endeavours to ensure that a retailer can give it a notice by post, facsimile or electronic communication and notify the retailer of a telephone number for voice 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"/>
There is no business need for protocols for communication between retailer and distributor or transmitter. The communication between retailer and distributor or transmitter is an internal issue.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
The Licensee should to seek an exemption from this requirement.									
<b>Management Actions</b>									
The Licensee should approach the Office of Energy to seek an exemption from this requirement.									

**Electricity Industry (Licence Conditions) Regulations -Regulation 5(2) -Electricity Industry Customer Transfer Code Type NR Retail / Distribution / Transmission**

<b>Item 40</b>	Licence Clause 5.1	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 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>Item 43</b>	Licence Clause 5.1	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 type="checkbox"/>
There have been no erroneous transfers.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 55</b>	Licence Clause 5.1	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 type="checkbox"/>		
There have been no Transfer Code related disputes.			
<b>Issues</b>			
None			
<b>Recommendations</b>			
None			
<b>Management Actions</b>			
Not applicable			

<b>Item 56</b>	Licence Clause 5.1	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 type="checkbox"/>
There have been no Transfer Code related disputes.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 58</b>	Licence Clause 5.1									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 type="checkbox"/>	
There have been no Transfer Code related disputes.										
<b>Issues</b>										
None										
<b>Recommendations</b>										
None										
<b>Management Actions</b>										
Not applicable										

<b>Item 59</b>	Licence Clause 5.1									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 type="checkbox"/>
There have been no Transfer Code related disputes.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 68</b>	Licence Clause 5.1	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 communication between retailer and distributor or transmitter is an internal issue and is available 24 hours a day, 7 days a week.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 70</b>	Licence Clause 5.1	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"/>
There is no business need for protocols for communication between retailer and									



distributor or transmitter. The communication between retailer and distributor or transmitter is an internal issue and identifies the user.
<b>Issues</b>
None
<b>Recommendations</b>
None
<b>Management Actions</b>
Not applicable

<b>Item 71</b>	Licence Clause 5.1	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	<b>p</b>	Outcome	<b>p</b>	Output	<b>p</b>	Reporting	<b>p</b>	Compliance	<b>p</b>
There is no business need for protocols for communication between retailer and distributor or transmitter. The communication between retailer and distributor or transmitter is an internal issue and is consistent.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

**Metering Code Obligations Type 2 Distribution / Transmission**

<b>Item 300</b>	Licence Clause 5.1	Compliance rating Not rated
<i>Electricity Industry Metering Code clause 2.2(1)(a)</i> A network operator must treat all Code participants that are its associates on an arms-length basis.		

<b>Observations</b>									
Process	Y	Outcome	P	Output	P	Reporting	P	Compliance	Y
There is no business need for arms-length treatment until another retailer is available on the networks. Under clause 3.14(1) of the Metering Code the licensee is 'grandfathered' from these obligations.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
The Licensee should seek an exemption from this requirement.									
<b>Management Actions</b>									
The Licensee should approach the Office of Energy to seek an exemption from this requirement.									

<b>Item 301</b>	Licence Clause 5.1								Compliance rating Not rated	
<i>Electricity Industry Metering Code clause 2.2(1)(b)</i> 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.										
<b>Observations</b>										
Process	Y	Outcome	Y	Output	Y	Reporting	Y	Compliance	Y	
There is no business need for arms-length treatment until another retailer is available on the networks. Under clause 3.14(1) of the Metering Code the licensee is 'grandfathered' from these obligations.										
<b>Issues</b>										
None										
<b>Recommendations</b>										
The Licensee should seek an exemption from this requirement.										
<b>Management Actions</b>										
The Licensee should approach the Office of Energy to seek an exemption from this requirement.										

<b>Item 302</b>	Licence Clause 5.1								Compliance rating Not rated	
<i>Electricity Industry Metering Code clause 3.1</i> A network operator must ensure that its meters meet the requirements specified in the										

applicable metrology procedure and also comply with any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act.									
<b>Observations</b>									
Process	Y	Outcome	P	Output	P	Reporting	P	Compliance	Y
The contracts with customers specify the metering requirements and accuracy has been accepted by the customers. There is no metrology procedure. Under clause 3.14(1) of the Metering Code the licensee is 'grandfathered' from these obligations.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
The Licensee should seek an exemption from this requirement.									
<b>Management Actions</b>									
The Licensee should approach the Office of Energy to seek an exemption from this requirement.									

<b>Item 303</b>	Licence Clause 5.1								Compliance rating Not rated	
<i>Electricity Industry Metering Code clause 3.2(1)</i> 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 accumulated electricity production or consumption at the metering point in the manner prescribed.										
<b>Observations</b>										
Process	P	Outcome	P	Output	P	Reporting	P	Compliance	Y	
The contracts with customers specify the metering requirements and accuracy has been accepted by the customers. There is no metrology procedure. Under clause 3.14(1) of the Metering Code the licensee is 'grandfathered' from these obligations.										
<b>Issues</b>										
None										
<b>Recommendations</b>										
The Licensee should seek an exemption from this requirement.										
<b>Management Actions</b>										
The Licensee should approach the Office of Energy to seek an exemption from this requirement.										

<b>Item 304</b> Licence Clause 5.1							Compliance rating Not rated		
<i>Electricity Industry Metering Code clause 3.3(2)</i> 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.									
<b>Observations</b>									
Process	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	✓
The contracts with customers specify the metering requirements and accuracy has been accepted by the customers. There is no metrology procedure. Under clause 3.14(1) of the Metering Code the licensee is 'grandfathered' from these obligations.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
The Licensee should seek an exemption from this requirement.									
<b>Management Actions</b>									
The Licensee should approach the Office of Energy to seek an exemption from this requirement.									

<b>Item 305</b> Licence Clause 5.1							Compliance rating Compliant - 5		
<i>Electricity Industry Metering Code clause 3.3(3)</i> 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 telecommunications regulations, to allow the interval energy data to be downloaded in the manner prescribed.									
<b>Observations</b>									
Process	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	Ⓟ
The communications equipment is licensed under telecommunications regulations.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 306</b> Licence Clause 5.1							Compliance rating Not rated		
<i>Electricity Industry Metering Code clause 3.5(1) &amp; 3.5(2)</i> A network operator must ensure that there is a metering installation at every connection point on its network which is not a Type 7 connection point. Unless it is a Type 7 metering installation, the metering installation must meet the functionality requirements prescribed.									
<b>Observations</b>									
Process	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	✓
The metering requirements are specified in the customer contracts and have aggregated data. The customers have accepted the metering accuracy which does not comply with the Metering Code. Under clause 3.14(1) of the Metering Code the licensee is 'grandfathered' from these obligations.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
The Licensee should seek an exemption from this requirement.									
<b>Management Actions</b>									
The Licensee should approach the Office of Energy to seek an exemption from this requirement.									

<b>Item 307</b> Licence Clause 5.1							Compliance rating Not rated		
<i>Electricity Industry Metering Code clause 3.5(3)</i> A network operator must, for each metering installation on its network, on and from the time of its connection to the network, provide, install, operate and maintain the metering installation in the manner prescribed (unless otherwise agreed).									
<b>Observations</b>									
Process	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	✓
The metering requirements are specified in the customer contracts and have aggregated data. Does not comply with the Metering Code- there is no metrology procedure and customer accepts accuracy without meeting 3.9. Under clause 3.14(1) of the Metering Code the licensee is 'grandfathered' from these obligations.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
The Licensee should seek an exemption from this requirement.									

<b>Management Actions</b>
The Licensee should approach the Office of Energy to seek an exemption from this requirement.

<b>Item 308</b>	Licence Clause 5.1	Compliance rating Compliant - 5							
<i>Electricity Industry Metering Code clause 3.5(4)</i> A network operator must ensure that, except for a Type 7 metering installation, 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.									
<b>Observations</b>									
Process	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	Ⓟ
The metering requirements are specified in the customer contracts and are in accordance with good electricity industry practice.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 310</b>	Licence Clause 5.1	Compliance rating Compliant - 5							
<i>Electricity Industry Metering Code clause 3.5(9)</i> If a network operator becomes aware that a metering installation does not comply with the Code, the network operator must advise affected parties of the non-compliance and arrange for the non-compliance to be corrected as soon as practicable.									
<b>Observations</b>									
Process	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	Ⓟ
The customers have not complained about metering installations.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									

Not applicable

<b>Item 311</b> Licence Clause 5.1							Compliance rating Compliant - 5		
<i>Electricity Industry Metering Code clause 3.7</i> 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.									
<b>Observations</b>									
Process	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	Ⓟ
Devices connected to the telecommunications network comply but these are not metering installation equipment.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 312</b> Licence Clause 5.1							Compliance rating Compliant - 5		
<i>Electricity Industry Metering Code clause 3.8</i> A network operator must, for each metering installation on its network, ensure that the metering installation is secured by means of devices or methods which, to the standard of good electricity industry practice, hinder unauthorized access and enable unauthorized access to be detected.									
<b>Observations</b>									
Process	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	Ⓟ
The metering installations are secure.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 313</b> Licence Clause 5.1								Compliance rating Not rated	
<i>Electricity Industry Metering Code clause 3.9(3)</i> Each metering installation must meet at least the requirements for that type of metering installation specified in Table 3 in Appendix 1 of the Code.									
<b>Observations</b>									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The metering requirements are specified in the customer contracts and the customers have accepted the accuracy even if they do not meet the requirements of the Metering Code. Under clause 3.14(1) of the Metering Code the licensee is 'grandfathered' from these obligations.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
The Licensee should seek an exemption from this requirement.									
<b>Management Actions</b>									
The Licensee should approach the Office of Energy to seek an exemption from this requirement.									

<b>Item 314</b> Licence Clause 5.1								Compliance rating Not rated	
<i>Electricity Industry Metering Code clause 3.9(7)</i> For a metering installation used to supply a customer with requirements above 1000 volts that require a VT and whose annual consumption is below 750MWh, the metering installation must meet the relevant accuracy requirements of Type 3 metering installation for active energy only.									
<b>Observations</b>									
Process	<input checked="" type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The metering requirements are specified in the customer contracts and the customers have accepted the accuracy even if they do not meet the requirements of the Metering Code. Under clause 3.14(1) of the Metering Code the licensee is 'grandfathered' from these obligations.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
The Licensee should seek an exemption from this requirement.									



<b>Management Actions</b>
The Licensee should approach the Office of Energy to seek an exemption from this requirement.

<b>Item 315</b>	Licence Clause 5.1	Compliance rating	Not rated
<i>Electricity Industry Metering Code clause 3.9(9)</i> If compensation is carried out within the meter then the resultant metering system error must be as close as practicable to zero.			
<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"/>		
Compensation has not been carried out.			
<b>Issues</b>			
None			
<b>Recommendations</b>			
None			
<b>Management Actions</b>			
Not applicable			

<b>Item 316</b>	Licence Clause 5.1	Compliance rating	Not rated
<i>Electricity Industry Metering Code clause 3.10</i> A network operator must ensure that any programmable settings within any of its metering installations, data loggers or peripheral devices, that may affect the resolution of displayed or stored data, meet the relevant requirements specified in the applicable metrology procedure and comply with any applicable specifications or guidelines specified by the National Measurement Institute under the National Measurement 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 metering requirements are specified in the customer contracts and the customers have accepted the accuracy even if they do not meet the requirements of the Metering Code. Under clause 3.14(1) of the Metering Code the licensee is 'grandfathered' from these obligations.			
<b>Issues</b>			
None			

<b>Recommendations</b>
The Licensee should seek an exemption from this requirement.
<b>Management Actions</b>
The Licensee should approach the Office of Energy to seek an exemption from this requirement.

<b>Item 317</b> Licence Clause 5.1	Compliance rating Compliant - 5				
<i>Electricity Industry Metering Code clause 3.11(1)</i> A network operator must ensure that a metering installation on its network permits collection of data within the timeframes and to the level of availability 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 metering requirements are specified in the customer contracts and the customers have accepted the data collection.					
<b>Issues</b>					
None					
<b>Recommendations</b>					
None					
<b>Management Actions</b>					
Not applicable					

<b>Item 318</b> Licence Clause 5.1	Compliance rating Not rated				
<i>Electricity Industry Metering Code clause 3.11(2)</i> A network operator must make repairs to the metering installation in accordance with the applicable service level agreement if an outage or malfunction occurs to a metering installation.					
<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"/>
There have been no outages or malfunctions of metering installations in the audit period.					
<b>Issues</b>					
None					
<b>Recommendations</b>					
None					

<b>Management Actions</b>
Not applicable

<b>Item 320</b> Licence Clause 5.1	Compliance rating Compliant - 5				
<i>Electricity Industry Metering Code clause 3.12(1)</i> A network operator must ensure that each metering installation at least, complies with the prescribed design requirements.					
<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 metering requirements are specified in the customer contracts and the customers have accepted the metering installations.					
<b>Issues</b>					
None					
<b>Recommendations</b>					
None					
<b>Management Actions</b>					
Not applicable					

<b>Item 321</b> Licence Clause 5.1	Compliance rating Not rated				
<i>Electricity Industry Metering Code clause 3.12(2)</i> 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.					
<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 metering requirements are specified in the customer contracts and the customers have accepted the metering installations even if they do not meet the Metering Code. Under clause 3.14(1) of the Metering Code the licensee is 'grandfathered' from these obligations.					
<b>Issues</b>					
None					

<b>Recommendations</b>
The Licensee should seek an exemption from this requirement.
<b>Management Actions</b>
The Licensee should approach the Office of Energy to seek an exemption from this requirement.

<b>Item 322</b> Licence Clause 5.1	Compliance rating Compliant - 5
<i>Electricity Industry Metering Code clause 3.12(3)</i> A network operator must provide isolation facilities, to the standard of good electricity industry practice, to facilitate testing and calibration of the metering installation.	
<b>Observations</b>	
Process	▮ Outcome
▮ Output	▮ Reporting
▮ Compliance	▮
The metering installations have isolation facilities.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	
<b>Management Actions</b>	
Not applicable	

<b>Item 323</b> Licence Clause 5.1	Compliance rating Compliant - 5
<i>Electricity Industry Metering Code clause 3.12(4)</i> A network operator must maintain drawings and supporting information, to the standard of good electricity industry practice, detailing the metering installation for maintenance and auditing purposes.	
<b>Observations</b>	
Process	▮ Outcome
▮ Output	▮ Reporting
▮ Compliance	▮
The network operator maintains drawings.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Management Actions</b>
Not applicable

<b>Item 324</b> Licence Clause 5.1	Compliance rating Not rated								
<p><i>Electricity Industry Metering Code clause 3.13(1)</i>                  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.</p>									
<b>Observations</b>									
Process	<b>p</b>	Outcome	<b>p</b>	Output	<b>p</b>	Reporting	<b>p</b>	Compliance	<b>y</b>
<p>The metering requirements are specified in the customer contracts and the customers have accepted the metering installations. Full check metering is not provided but some partial check metering is provided. Under clause 3.14(1) of the Metering Code the licensee is 'grandfathered' from these obligations.</p> <p>The interface with Wester Power has check metering.</p>									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 325</b> Licence Clause 5.1	Compliance rating Compliant - 5								
<p><i>Electricity Industry Metering Code clause 3.13(3)(c)</i>                  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.</p>									
<b>Observations</b>									
Process	<b>p</b>	Outcome	<b>p</b>	Output	<b>p</b>	Reporting	<b>p</b>	Compliance	<b>p</b>
<p>The metering requirements are specified in the customer contracts and the customers have accepted the metering installations. Partial Check metering meets requirements.</p>									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Management Actions</b>
Not applicable

<b>Item 326</b> Licence Clause 5.1	Compliance rating Not rated				
<p><i>Electricity Industry Metering Code clause 3.13(4)</i>                  A check metering installation for a metering point must not exceed twice the error level permitted under clause 3.9 for the revenue metering installation for the metering point, and must be connected in such a way that it measures the same load conditions as the revenue metering installation for the metering point, and must be otherwise consistent with the prescribed requirements.</p>					
<b>Observations</b>					
Process	Ⓟ Outcome	Ⓟ Output	Ⓟ Reporting	Ⓟ Compliance	✓
The metering requirements are specified in the customer contracts and the customers have accepted the metering installations even if they do not meet the Metering Code. Under clause 3.14(1) of the Metering Code the licensee is 'grandfathered' from these obligations.					
<b>Issues</b>					
None					
<b>Recommendations</b>					
The Licensee should seek an exemption from this requirement.					
<b>Management Actions</b>					
The Licensee should approach the Office of Energy to seek an exemption from this requirement.					

<b>Item 327</b> Licence Clause 5.1	Compliance rating Not rated				
<p><i>Electricity Industry Metering Code clause 3.14(3)</i>                  If, under clause 3.14(2) of the Code, a metering installation uses metering class CTs and VTs that do not comply with the prescribed requirements, then the network operator must either (or both) install meters of higher class accuracy or apply accuracy calibration factors within the meter in order to achieve the overall accuracy requirements prescribed.</p>					
<b>Observations</b>					
Process	Ⓟ Outcome	Ⓟ Output	Ⓟ Reporting	Ⓟ Compliance	✓
The metering requirements are specified in the customer contracts and the customers have accepted the metering installations even if they do not meet the Metering Code. Under clause 3.14(1) of the Metering Code the licensee is 'grandfathered' from these obligations.					

<b>Issues</b>
None
<b>Recommendations</b>
The Licensee should seek an exemption from this requirement.
<b>Management Actions</b>
The Licensee should approach the Office of Energy to seek an exemption from this requirement.

<b>Item 328</b> Licence Clause 5.1	Compliance rating Not rated
<i>Electricity Industry Metering Code clause 3.16(1)</i> A network operator must ensure that a Type 1 metering installation to Type 5 metering installation on the network has the facilities and functionality prescribed.	
<b>Observations</b>	
Process	<input type="checkbox"/> Outcome
<input type="checkbox"/> Output	<input type="checkbox"/> Reporting
<input type="checkbox"/> Compliance	<input checked="" type="checkbox"/>
The metering requirements are specified in the customer contracts and the customers have accepted the metering installations even if they do not meet the Metering Code. Under clause 3.14(1) of the Metering Code the licensee is 'grandfathered' from these obligations.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
The Licensee should seek an exemption from this requirement.	
<b>Management Actions</b>	
The Licensee should approach the Office of Energy to seek an exemption from this requirement.	

<b>Item 329</b> Licence Clause 5.1	Compliance rating Compliant - 5
<i>Electricity Industry Metering Code clause 3.16(2)</i> A network operator must ensure that a Type 1 metering installation to Type 4 metering installation on the network includes a communications link.	
<b>Observations</b>	
Process	<input type="checkbox"/> Outcome
<input type="checkbox"/> Output	<input type="checkbox"/> Reporting
<input type="checkbox"/> Compliance	<input type="checkbox"/>
Remote metering has communication links.	

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

<b>Item 330</b> Licence Clause 5.1	Compliance rating Compliant - 5				
<i>Electricity Industry Metering Code clause 3.16(3)</i> If a device is used as a data logger, the energy data for a metering point on the network must be collated in trading intervals within the metering installation unless it has been agreed between the network operator and the Code participant that energy data may be recorded in sub-multiples of a trading interval.					
<b>Observations</b>					
Process	Ⓟ Outcome	Ⓟ Output	Ⓟ Reporting	Ⓟ Compliance	Ⓟ
The metering requirements are specified in the customer contracts and meters are read automatically and manually daily. The customer does not require energy data in trading intervals.					
<b>Issues</b>					
None					
<b>Recommendations</b>					
None					
<b>Management Actions</b>					
Not applicable					

<b>Item 332</b> Licence Clause 5.1	Compliance rating Compliant - 5				
<i>Electricity Industry Metering Code clause 3.16(6)</i> A network operator may only impose a charge for the matters dealt with in the metrology procedure in accordance with the applicable service level agreement between it and the user.					
<b>Observations</b>					
Process	Ⓟ Outcome	Ⓟ Output	Ⓟ Reporting	Ⓟ Compliance	Ⓟ
The metering requirements are specified in the customer contracts and no charges are made for metering issues.					



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

<b>Item 334</b> Licence Clause 5.1	Compliance Rating Not rated								
<i>Electricity Industry Metering Code clause 3.20(1)</i> A network operator must, if reasonably requested by a Code participant, provide enhanced technology features in a metering installation.									
<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"/>
Enhanced technology has not been requested.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 335</b> Licence Clause 5.1	Compliance rating Compliant - 5								
<i>Electricity Industry Metering Code clause 3.20(3)</i> A network operator may only impose a charge for the provision of metering installations with enhanced technology features 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 checked="" type="checkbox"/>
The metering requirements are specified in the customer contracts no charges have been made for metering installations.									
<b>Issues</b>									
None									

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

<b>Item 336</b> Licence Clause 5.1	Compliance rating Not rated				
<i>Electricity Industry Metering Code clause 3.21(1)</i> Meters containing an internal real time clock must maintain time accuracy as prescribed. Time drift must be measured over a period of 1 month.					
<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 metering requirements are specified in the customer contracts and the customers have accepted the metering installations. Under clause 3.14(1) of the Metering Code the licensee is 'grandfathered' from these obligations.					
<b>Issues</b>					
None					
<b>Recommendations</b>					
The Licensee should seek an exemption from this requirement.					
<b>Management Actions</b>					
The Licensee should approach the Office of Energy to seek an exemption from this requirement.					

<b>Item 337</b> Licence Clause 5.1	Compliance rating Compliant - 5				
<i>Electricity Industry Metering Code clause 3.21(2)</i> 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.					
<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 metering requirements are specified in the customer contracts and the customers have accepted the metering installations.					
<b>Issues</b>					
None					
<b>Recommendations</b>					

None
<b>Management Actions</b>
None

<b>Item 338</b> Licence Clause 5.1	Compliance rating Not rated								
<i>Electricity Industry Metering Code clause 3.22</i> 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.									
<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"/>
Enhanced facilities have not been required.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 339</b> Licence Clause 5.1	Compliance rating Compliant - 5								
<i>Electricity Industry Metering Code clause 3.23(a)</i> Where signals are provided from the meter for the user or the user's customer use, a network operator must ensure that signals are isolated by relays or electronic buffers to prevent accidental or malicious damage to 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 metering requirements are specified in the customer contracts and the customers have accepted the metering installations. Metering installations are secure from accidental or malicious damage.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Management Actions</b>
Not applicable

<b>Item 340</b> Licence Clause 5.1	Compliance rating Not rated								
<p><i>Electricity Industry Metering Code clause 3.23(b)</i>                  Where signals are provided from the meter for the user or the user's customer use, a network operator must provide the user or the user's customer with sufficient details of the signal specification to enable compliance with clause 3.23(c) of the Code.</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 type="checkbox"/>
The users do not receive metering signals.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 341</b> Licence Clause 5.1	Compliance rating Not rated								
<p><i>Electricity Industry Metering Code clause 3.25</i>                  A network operator that operates and maintains a pre-payment meter on its network must operate and maintain the pre-payment meter in accordance with good electricity industry practice and, as far as reasonably practicable, minimise any departure from what the requirements of the Code would have been in respect of the pre-payment meter if clause 3.24 were deleted.</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 type="checkbox"/>
There are no pre-payment meters.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Management Actions</b>
Not applicable

<b>Item 343</b> Licence Clause 5.1	Compliance rating Not rated				
<i>Electricity Industry Metering Code clause 3.29</i> A network operator must publish a list of registered metering installation providers, including the prescribed details, and at least annually, update the list.					
<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 meters have been installed in the audit period. There is no business need for a list of registered meter installation providers.					
<b>Issues</b>					
None					
<b>Recommendations</b>					
None					
<b>Management Actions</b>					
Not applicable					

<b>Item 344</b> Licence Clause 5.1	Compliance rating Compliant - 5				
<i>Electricity Industry Metering Code clause 4.1(1)</i> A network operator must establish, maintain and administer a metering database containing standing data and energy data for each metering point on its network.					
<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 has metering database.					
<b>Issues</b>					
None					
<b>Recommendations</b>					
None					
<b>Management Actions</b>					
Not applicable					

<b>Item 345</b> Licence Clause 5.1							Compliance rating Compliant - 5		
<i>Electricity Industry Metering Code clause 4.1(2)</i> A network operator must ensure that its metering database and associated links, circuits, information storage and processing systems are secured by means of devices or methods which, to the standard of good electricity industry practice, hinder unauthorized access and enable unauthorized access to be detected.									
<b>Observations</b>									
Process	▮	Outcome	▮	Output	▮	Reporting	▮	Compliance	▮
The metering database is secured. Access is controlled (password) and backed up including secure copies held in Calgary Canada.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 346</b> Licence Clause 5.1							Compliance rating Compliant - 5		
<i>Electricity Industry Metering Code clause 4.1(3)</i> A network operator must prepare, and if applicable, must implement a disaster recovery plan to ensure that it is able, within 2 business days after the day of any disaster, to rebuild the metering database and provide energy data to Code participants.									
<b>Observations</b>									
Process	▮	Outcome	▮	Output	▮	Reporting	▮	Compliance	▮
The network operator has disaster recovery in place including offsite storage in Calgary, Canada									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 347</b> Licence Clause 5.1							Compliance rating Not rated		
<i>Electricity Industry Metering Code clause 4.2(1)</i> A network operator must ensure that its registry complies with the Code and the prescribed clause of the market rules.									
<b>Observations</b>									
Process	▮	Outcome	▮	Output	▮	Reporting	▮	Compliance	▮
The metering requirements are specified in the customer contracts and metering accuracy has been accepted by the customers. The network operator carries standing data in their customer database sufficient to identify the metering information of the customer. Under clause 3.14(1) of the Metering Code the licensee is 'grandfathered' from these obligations.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 348</b> Licence Clause 5.1							Compliance rating Not rated		
<i>Electricity Industry Metering Code clause 4.2(2)</i> The standing data for a metering point must comprise at least the items specified.									
<b>Observations</b>									
Process	▮	Outcome	▮	Output	▮	Reporting	▮	Compliance	▮
The network operator does not carry complying standing data in their metering database, but carries customer information sufficient to identify the metering information of the customer. Under clause 3.14(1) of the Metering Code the licensee is 'grandfathered' from these obligations.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 352</b> Licence Clause 5.1							Compliance rating Not rated		
<i>Electricity Industry Metering Code clause 4.6(1)</i> If a network operator is notified of a change to or inaccuracy in an item of standing data by a Code participant which is the designated source for the item of standing data, then the network operator must update the registry.									
<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"/>
There has been no change of standing data in the audit period.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 353</b> Licence Clause 5.1							Compliance rating Not rated		
<i>Electricity Industry Metering Code clause 4.6(2)</i> 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 undertake investigations to the standard of good electricity industry practice to determine whether the registry should be updated, and update the registry as required.									
<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"/>
There has been no change of standing data in the audit period.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									



<b>Item 354</b> Licence Clause 5.1							Compliance rating Not rated		
<i>Electricity Industry Metering Code clause 4.7</i> A network operator must notify any affected user for a metering point of the updated standing data within the timeframes prescribed, where that user would otherwise be entitled to the updated standing 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 type="checkbox"/>
There has been no change of standing data in the audit period.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 355</b> Licence Clause 5.1							Compliance rating Not rated		
<i>Electricity Industry Metering Code clause 4.8(3)</i> A network operator must allow a user who supplies, purchases or generates electricity 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 'read only' password provided by the network operator.									
<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"/>
There has been no request for remote reading by users.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 356</b> Licence Clause 5.1							Compliance rating Compliant - 5		
<i>Electricity Industry Metering Code clause 4.8(4)</i> A network operator must have security devices and methods in place that ensure that energy data held in its metering installation and data held in its metering database is secured from unauthorized local or remote access, in the manner prescribed, sufficient to the standard of good electricity industry practice.									
<b>Observations</b>									
Process	▮	Outcome	▮	Output	▮	Reporting	▮	Compliance	▮
The network operator's metering information is secure to good electricity industry practice.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 357</b> Licence Clause 5.1							Compliance rating Compliant - 5		
<i>Electricity Industry Metering Code clause 4.8(5)</i> A network operator must ensure that electronic passwords and other electronic security controls are secured from unauthorized access and are only issued to authorized personnel.									
<b>Observations</b>									
Process	▮	Outcome	▮	Output	▮	Reporting	▮	Compliance	▮
The network operator's metering information is secure to good electricity industry practice.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 358</b>	Licence Clause 5.1									Compliance rating Compliant - 5
<i>Electricity Industry Metering Code clause 4.9</i> A network operator must retain energy data in its metering database for each metering point on its network for at least the periods, and with the level of accessibility, prescribed.										
<b>Observations</b>										
Process	▮	Outcome	▮	Output	▮	Reporting	▮	Compliance	▮	
The energy data requirements are specified in the customer's contracts.										
<b>Issues</b>										
None										
<b>Recommendations</b>										
None										
<b>Management Actions</b>										
Not applicable										

<b>Item 361</b>	Licence Clause 5.1									Compliance rating Compliant - 5
<i>Electricity Industry Metering Code clause 5.3</i> 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 within the timeframes prescribed.										
<b>Observations</b>										
Process	▮	Outcome	▮	Output	▮	Reporting	▮	Compliance	▮	
The energy data requirements are specified in the customer's contracts.										
<b>Issues</b>										
None										
<b>Recommendations</b>										
None										
<b>Management Actions</b>										
Not applicable										

<b>Item 364</b>	Licence Clause 5.1									Compliance rating Compliant - 5
<i>Electricity Industry Metering Code clause 5.5(2)</i> A network operator may only impose a charge for the provision of data under this Code in accordance with the applicable service level agreement between it and the user and										

must not impose a charge for the provision of data if another enactment prohibits it from doing so.									
<b>Observations</b>									
Process	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	Ⓟ
The energy data requirements are specified in the customer's contracts and no charge has been made for data provision.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 366</b>	Licence Clause 5.1							Compliance rating Compliant - 5	
<i>Electricity Industry Metering Code clause 5.6(1)</i> 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.									
<b>Observations</b>									
Process	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	Ⓟ
The Licensee has an automated validation process performed daily.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 367</b>	Licence Clause 5.1							Compliance rating Compliant - 5	
<i>Electricity Industry Metering Code clause 5.7</i> A network operator must provide replacement energy data to the user for the metering point and the IMO within the timeframes prescribed.									
<b>Observations</b>									

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The Licensee has an automated validation process performed daily.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 370</b>	Licence Clause 5.1							Compliance rating Not rated	
<i>Electricity Industry Metering Code clause 5.10</i> 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.									
<b>Observations</b>									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There is no business need to provide a subset of standing data as the database is shared. Under clause 3.14(1) of the Metering Code the licensee is 'grandfathered' from these obligations.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
The Licensee should seek an exemption from this requirement.									
<b>Management Actions</b>									
The Licensee should approach the Office of Energy to seek an exemption from this requirement.									

<b>Item 371</b>	Licence Clause 5.1							Compliance rating Not rated	
<i>Electricity Industry Metering Code clause 5.11</i> If a transfer occurs at a connection point, a network operator must provide an incoming retailer with a copy of the standing data for each metering point associated with the connection point within the timeframes prescribed.									
<b>Observations</b>									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>

There have been no customer transfers in the audit period.
<b>Issues</b>
None
<b>Recommendations</b>
None
<b>Management Actions</b>
Not applicable

<b>Item 372</b> Licence Clause 5.1	Compliance rating Compliant - 5				
<i>Electricity Industry Metering Code clause 5.12(1)</i> If a network operator is given a request in accordance with the communication rules and the energy data request relates only to a time or times for which the user was the current user at the metering point, a network operator must provide a user with a complete set of energy data for a metering point within the timeframes prescribed.					
<b>Observations</b>					
Process	Ⓟ Outcome	Ⓟ Output	Ⓟ Reporting	Ⓟ Compliance	Ⓟ
The metering information is specified in the customer contracts. Data has been provided in accordance with the contracts.					
<b>Issues</b>					
None					
<b>Recommendations</b>					
None					
<b>Management Actions</b>					
Not applicable					

<b>Item 373</b> Licence Clause 5.1	Compliance rating Compliant - 5				
<i>Electricity Industry Metering Code clause 5.13</i> A network operator must provide a 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, within the timeframes prescribed, if it is given a request in accordance with the communication rules.					
<b>Observations</b>					
Process	Ⓟ Outcome	Ⓟ Output	Ⓟ Reporting	Ⓟ Compliance	Ⓟ
The metering information is specified in the customer contracts. Data has been provided					

in accordance with the contracts.
<b>Issues</b>
None
<b>Recommendations</b>
None
<b>Management Actions</b>
Not applicable

<b>Item 374</b> Licence Clause 5.1	Compliance rating Compliant - 5
<i>Electricity Industry Metering Code clause 5.14(3)</i> A network operator must acknowledge receipt of a bulk standing data request from a user and provide the requested standing data within the timeframes prescribed in accordance with the communication rules.	
<b>Observations</b>	
Process	Ⓟ Outcome
Ⓟ Output	Ⓟ Reporting
Ⓟ Compliance	Ⓟ
The metering information is specified in the customer contracts. Data has been provided in accordance with the contracts.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	
<b>Management Actions</b>	
Not applicable	

<b>Item 375</b> Licence Clause 5.1	Compliance rating Compliant - 5
<i>Electricity Industry Metering Code clause 5.15</i> A network operator that provides energy data to a user or the IMO must also provide the date of the meter reading.	
<b>Observations</b>	
Process	Ⓟ Outcome
Ⓟ Output	Ⓟ Reporting
Ⓟ Compliance	Ⓟ
The metering information is specified in the customer contracts. Data has been provided in accordance with the contracts.	

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

<b>Item 383</b> Licence Clause 5.1	Compliance rating Compliant - 5				
<i>Electricity Industry Metering Code clause 5.19(1)</i> 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.					
<b>Observations</b>					
Process	Ⓟ Outcome	Ⓟ Output	Ⓟ Reporting	Ⓟ Compliance	Ⓟ
The metering information is specified in the customer contracts. Data has been provided in accordance with the contracts.					
<b>Issues</b>					
None					
<b>Recommendations</b>					
None					
<b>Management Actions</b>					
Not applicable					

<b>Item 385</b> Licence Clause 5.1	Compliance rating Not rated				
<i>Electricity Industry Metering Code clause 5.20(1)</i> A network operator must, within 6 months from the date this Code applies to the network operator, develop, in accordance with the communication rules, an energy data verification request form.					
<b>Observations</b>					
Process	Ⓜ Outcome	Ⓟ Output	Ⓟ Reporting	Ⓟ Compliance	Ⓜ
There is no business need for an energy data verification request form. The metering information is specified in the customer contracts. Data has been provided in accordance with the contracts. Under clause 3.14(1) of the Metering Code the licensee is 'grandfathered' from these obligations.					



<b>Issues</b>
None
<b>Recommendations</b>
The Licensee should seek an exemption from this requirement.
<b>Management Actions</b>
The Licensee should approach the Office of Energy to seek an exemption from this requirement.

<b>Item 386</b> Licence Clause 5.1	Compliance rating Not rated
<i>Electricity Industry Metering Code clause 5.20(2)</i> An Energy Data Verification Request Form must require a Code participant to provide the information prescribed.	
<b>Observations</b>	
Process	<input type="checkbox"/> Outcome
<input type="checkbox"/> Output	<input type="checkbox"/> Reporting
<input type="checkbox"/> Compliance	<input checked="" type="checkbox"/>
There is no business need for an energy data verification request form. The metering information is specified in the customer contracts. Data has been provided in accordance with the contracts. Under clause 3.14(1) of the Metering Code the licensee is 'grandfathered' from these obligations.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
The Licensee should seek an exemption from this requirement.	
<b>Management Actions</b>	
The Licensee should approach the Office of Energy to seek an exemption from this requirement.	

<b>Item 387</b> Licence Clause 5.1	Compliance rating Not rated
<i>Electricity Industry Metering Code clause 5.20(4)</i> If a Code participant requests verification of energy data, a network operator must, in accordance with the metrology procedure, 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 within the timeframes prescribed.	
<b>Observations</b>	
Process	<input type="checkbox"/> Outcome
<input type="checkbox"/> Output	<input type="checkbox"/> Reporting
<input type="checkbox"/> Compliance	<input checked="" type="checkbox"/>
Verification has been provided in accordance with the customer contracts. There is no	

metrology procedure. Under clause 3.14(1) of the Metering Code the licensee is 'grandfathered' from these obligations.
<b>Issues</b>
None
<b>Recommendations</b>
The Licensee should seek an exemption from this requirement.
<b>Management Actions</b>
The Licensee should approach the Office of Energy to seek an exemption from this requirement.

<b>Item 388</b> Licence Clause 5.1	Compliance rating Not rated				
<i>Electricity Industry Metering Code clause 5.21(2)</i> A network operator must comply with any reasonable request by a Code participant to undertake either a test or an audit of the accuracy of the metering installation or the energy or standing data of the metering installation.					
<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"/>
There have been no requests for a test or audit of metering installations.					
<b>Issues</b>					
None					
<b>Recommendations</b>					
None					
<b>Management Actions</b>					
Not applicable					

<b>Item 389</b> Licence Clause 5.1	Compliance rating Not rated				
<i>Electricity Industry Metering Code clause 5.21(4)</i> A test or audit is to be conducted in accordance with the metrology procedure and the applicable service level 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 type="checkbox"/>
There have been no requests for a test or audit of metering installations.					

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

<b>Item 392</b> Licence Clause 5.1	Compliance rating Not rated				
<i>Electricity Industry Metering Code clause 5.21(8)</i> A network operator may only impose a charge for the testing of the metering installations, or auditing of information from the meters associated with the metering installations, or both, 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"/>
There have been no requests for a test or audit of metering installations.					
<b>Issues</b>					
None					
<b>Recommendations</b>					
None					
<b>Management Actions</b>					
Not applicable					

<b>Item 393</b> Licence Clause 5.1	Compliance rating Compliant - 5				
<i>Electricity Industry Metering Code clause 5.21(9)</i> Any written service level agreement in respect of the testing of the metering installations, or the auditing of information from the meters associated with the metering installations, must include a provision that no charge is to be imposed if the test or audit reveals a non-compliance with this Code which results in energy data errors in the network operator's favour.					
<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 requests for a test or audit of metering installations. The customer contracts specify the metering requirements and they do not apply a charge for testing.					

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

<b>Item 394</b> Licence Clause 5.1	Compliance rating Not rated				
<i>Electricity Industry Metering Code clause 5.21(11)</i> A network operator must 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.					
<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"/>
There have been no requests for a test or audit of metering installations.					
<b>Issues</b>					
None					
<b>Recommendations</b>					
None					
<b>Management Actions</b>					
Not applicable					

<b>Item 395</b> Licence Clause 5.1	Compliance rating Not rated				
<i>Electricity Industry Metering Code clause 5.21(12)</i> The original stored error correction data in a meter must not be altered except during accuracy testing and calibration of a metering installation.					
<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"/>
There have been no requests for a test or audit of metering installations.					
<b>Issues</b>					
None					

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

<b>Item 396</b> Licence Clause 5.1	Compliance rating Not rated								
<p><i>Electricity Industry Metering Code clause 5.22(1)</i>                  A network operator must validate energy data in accordance with this Code applying, as a minimum, the prescribed rules and procedures and must, where necessary, substitute and estimate energy data under this Code applying, as a minimum, the prescribed rules and procedures.</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 type="checkbox"/>
The network operator validates energy data in accordance with the customer contracts. Under clause 3.14(1) of the Metering Code the licensee is 'grandfathered' from these obligations.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
The Licensee should seek an exemption from this requirement.									
<b>Management Actions</b>									
The Licensee should approach the Office of Energy to seek an exemption from this requirement.									

<b>Item 397</b> Licence Clause 5.1	Compliance rating Compliant - 5								
<p><i>Electricity Industry Metering Code clause 5.22(2)</i>                  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.</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"/>
Check metering data is used where available to validate metering installation accuracy.									
<b>Issues</b>									
None									

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

<b>Item 398</b> Licence Clause 5.1	Compliance rating Not rated								
<i>Electricity Industry Metering Code clause 5.22(3)</i> A network operator must prepare substitute values using the prescribed method if a check meter is not available or energy data cannot be recovered from the metering installation within the time required.									
<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"/>
Substitute values have been used in accordance with customer contracts.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 399</b> Licence Clause 5.1	Compliance rating Compliant - 5								
<i>Electricity Industry Metering Code clause 5.22(4)</i> A network operator that detects a loss of energy data or incorrect energy data from a metering installation must notify each affected Code participant of the loss or error within 24 hours after detection.									
<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 notifies the users in accordance with the customer contracts.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Management Actions</b>
Not applicable

<b>Item 400</b> Licence Clause 5.1	Compliance rating Compliant - 5				
<i>Electricity Industry Metering Code clause 5.22(5)</i> Substitution or estimation of energy data is to be required when energy data is missing, unavailable or corrupted, including in the circumstances described.					
<b>Observations</b>					
Process	Ⓟ Outcome	Ⓟ Output	Ⓟ Reporting	Ⓟ Compliance	Ⓟ
Substitution or estimation of energy data is used for missing data in accordance with the customer contracts.					
<b>Issues</b>					
None					
<b>Recommendations</b>					
None					
<b>Management Actions</b>					
Not applicable					

<b>Item 401</b> Licence Clause 5.1	Compliance rating Compliant - 5				
<i>Electricity Industry Metering Code clause 5.22(6)</i> A network operator must review all validation failures before undertaking any substitution.					
<b>Observations</b>					
Process	Ⓟ Outcome	Ⓟ Output	Ⓟ Reporting	Ⓟ Compliance	Ⓟ
The network operator reviews all validation failures according to the customer contracts.					
<b>Issues</b>					
None					
<b>Recommendations</b>					
None					
<b>Management Actions</b>					
Not applicable					

<b>Item 402</b> Licence Clause 5.1							Compliance rating Compliant - 5		
<i>Electricity Industry Metering Code clause 5.23(1)</i> A network operator that determines that there is no possibility of determining an actual value for a metering point must designate an estimated or substituted value for the metering point to be a deemed actual value for the metering point.									
<b>Observations</b>									
Process	▮	Outcome	▮	Output	▮	Reporting	▮	Compliance	▮
The network operator makes all estimations or substitutions according to the customer contracts.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 403</b> Licence Clause 5.1							Compliance rating Compliant - 5		
<i>Electricity Industry Metering Code clause 5.23(2)</i> A network operator that has designated a deemed actual value for a metering point must repair or replace the meter or one or more of components of metering equipment (as appropriate) at the metering point.									
<b>Observations</b>									
Process	▮	Outcome	▮	Output	▮	Reporting	▮	Compliance	▮
The network operator makes all meter repairs or replacements according to the customer contracts. There has been one meter replacement in the audit period.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									



<b>Item 404</b> Licence Clause 5.1							Compliance rating Compliant - 5		
<p><i>Electricity Industry Metering Code clause 5.24(1)</i>          A network operator that 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), must replace the first value with the second value if doing so would be consistent with good electricity industry practice.</p>									
<b>Observations</b>									
Process	▮	Outcome	▮	Output	▮	Reporting	▮	Compliance	▮
The network operator makes all estimations or substitutions according to the customer contracts.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 405</b> Licence Clause 5.1							Compliance rating Compliant - 5		
<p><i>Electricity Industry Metering Code clause 5.24(2)</i>          A network operator that 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), must replace the first value with the second value if doing so would be consistent with good electricity industry practice.</p>									
<b>Observations</b>									
Process	▮	Outcome	▮	Output	▮	Reporting	▮	Compliance	▮
The network operator makes all estimations or substitutions according to the customer contracts.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 406</b> Licence Clause 5.1							Compliance rating Compliant - 5		
<i>Electricity Industry Metering Code clause 5.24(3)</i> A network operator that 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), 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.									
<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 makes all estimations or substitutions according to the customer contracts.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 407</b> Licence Clause 5.1							Compliance rating Not rated		
<i>Electricity Industry Metering Code clause 5.24(4)</i> 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.									
<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"/>
There has been no request in the audit period.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 408</b> Licence Clause 5.1							Compliance rating Compliant - 5		
<i>Electricity Industry Metering Code clause 5.25</i> 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.									
<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 metering requirements are specified in the customer contracts and the customer has accepted the accuracy of information provided. There is no business need for a metrology procedure.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 410</b> Licence Clause 5.1							Compliance rating Not rated		
<i>Electricity Industry Metering Code clause 5.29</i> If a network operator makes an election for the electricity networks corporation to be its metering data agent in relation to a network, then, except to the extent that the metering data agency agreement provides otherwise, the parties must undertake the activities 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 type="checkbox"/>
Western Power is not the metering data agent.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 411</b> Licence Clause 5.1							Compliance rating Not rated		
<i>Electricity Industry Metering Code clause 5.30(1)</i> If a network operator makes an election for the electricity networks corporation to be its metering data agent in relation to a network, then the electing network operator and the electricity networks corporation must enter into a metering data agency agreement in relation to the network, which must deal with at least the matters 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 type="checkbox"/>
Western Power is not the metering data agent.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 412</b> Licence Clause 5.1							Compliance rating Not rated		
<i>Electricity Industry Metering Code clause 5.31(1)</i> If a network operator makes an election for the electricity networks corporation to be its metering data agent in relation to a network, the electricity networks corporation must assess the compliance of each metering installation in the network with this Code and notify the electing network operator of each non-compliant metering installation.									
<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"/>
Western Power is not the metering data agent.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 413</b> Licence Clause 5.1							Compliance rating Not rated		
<i>Electricity Industry Metering Code clause 5.31(2)</i> An 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.									
<b>Observations</b>									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Western Power is not the metering data agent.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 414</b> Licence Clause 5.1							Compliance rating Not rated		
<i>Electricity Industry Metering Code clause 5.34</i> Except to the extent that the metering data agency agreement provides otherwise, the costs which may be recovered by the electricity networks corporation for acting as the network operator's metering data agent must not exceed the amounts prescribed.									
<b>Observations</b>									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Western Power is not the metering data agent.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 415</b> Licence Clause 5.1							Compliance rating Compliant - 5		
<i>Electricity Industry Metering Code clause 6.1(1)</i> A network operator must, in relation to its network, comply with the agreements, rules, procedures, criteria and processes 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 metering requirement are specified in the customer contracts and accepted by the customers.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 419</b> Licence Clause 5.1							Compliance rating Not rated		
<i>Electricity Industry Metering Code clause 7.2(2)</i> 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.									
<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"/>
There has been no change in contact details in the audit period.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

**Metering Code Obligations Type 2 Generation / Retail**

<b>Item 342</b> Licence Clause 5.1								Compliance rating Not rated	
<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 type="checkbox"/>
There have been no meters installed in the audit period.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 351</b> Licence Clause 5.1								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 type="checkbox"/>
The licensee is a Code participant but no issues about standing data have arisen.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 365</b> Licence Clause 5.1							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>Item 376</b> Licence Clause 5.1							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 type="checkbox"/>
The users do not collect energy data.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 377</b> Licence Clause 5.1							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 type="checkbox"/>
The metering requirements are specified in the customer contracts. The licensee provides metering data and not a user.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 378</b>	Licence Clause 5.1	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 type="checkbox"/>
There has been no change to the energisation state of the meters.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 381</b>	Licence Clause 5.1	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 type="checkbox"/>
There have been no new customers in the audit period and there has been no change in a sites prescribed attributes									

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

<b>Item 382</b> Licence Clause 5.1	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 type="checkbox"/>
There are no sensitive loads.					
<b>Issues</b>					
None					
<b>Recommendations</b>					
None					
<b>Management Actions</b>					
Not applicable					

<b>Item 390</b> Licence Clause 5.1	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 type="checkbox"/>
There have been no meter tests or audits.					
<b>Issues</b>					
None					
<b>Recommendations</b>					
None					

<b>Management Actions</b>
Not applicable

<b>Item 391</b> Licence Clause 5.1	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 type="checkbox"/>
There have been no meter tests or audits.					
<b>Issues</b>					
None					
<b>Recommendations</b>					
None					
<b>Management Actions</b>					
Not applicable					

<b>Item 409</b> Licence Clause 5.1	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 type="checkbox"/>
There has been no missing or incorrect customer attributes.					
<b>Issues</b>					
None					
<b>Recommendations</b>					
None					
<b>Management Actions</b>					
Not applicable					

<b>Item 416</b> Licence Clause 5.1		Compliance rating Compliant - 5	
<p><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.</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 type="checkbox"/>		
<p>The metering requirements are specified in the customer contracts and these prescribe the rules, procedures, agreements and criteria. The contract obligations are met.</p>			
<b>Issues</b>			
None			
<b>Recommendations</b>			
None			
<b>Management Actions</b>			
Not applicable			

<b>Item 420</b> Licence Clause 5.1		Compliance rating Not rated	
<p><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.</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 type="checkbox"/>		
<p>There have been no new access contracts in the audit period and there have been no requests for contact details from the network operator.</p>			
<b>Issues</b>			
None			
<b>Recommendations</b>			
None			
<b>Management Actions</b>			
Not applicable			

<b>Item 421</b> Licence Clause 5.1		Compliance rating Not rated	
<p><i>Electricity Industry Metering Code clause 7.2(5)</i>          A Code participant must notify any affected network operator of any change to the</p>			

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 type="checkbox"/>
There has been no change in contact details.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 422</b>	Licence Clause 5.1	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>Item 423</b>	Licence Clause 5.1	Compliance rating Not rated
<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 type="checkbox"/>
No information has been required to be disclosed.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

**Metering Code Obligations Type 2 Generation / Retail / Distribution / Transmission**

<b>Item 309</b>	Licence Clause 5.1	Compliance rating Compliant - 5							
<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 checked="" type="checkbox"/>
The metering requirements are specified in the customer contracts and no charge can be made for metering installations according to the contract.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 319</b>	Licence Clause 5.1	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 type="checkbox"/>
No metering outages or malfunctions have occurred in the audit period.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 331</b>	Licence Clause 5.1	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 type="checkbox"/>
This requirement relates to the conversion of non interval metering to interval metering. There is no need for conversion as the customers are billed on aggregated data in accordance with the contract.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 427</b>	Licence Clause 5.1	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 type="checkbox"/>

There have been no metering disputes.
<b>Issues</b>
None
<b>Recommendations</b>
None
<b>Management Actions</b>
Not applicable

**Metering Code Obligations Type NR Distribution / Transmission**

<b>Item 359</b> Licence Clause 5.1	Compliance rating Compliant - 5									
<i>Electricity Industry Metering Code clause 5.1(1)</i> A network operator must use all reasonable endeavours to accommodate another Code participant's requirement to obtain a metering service and requirements in connection with the negotiation of a service level agreement.										
<b>Observations</b>										
Process	<table border="1"> <tr> <td>Ⓟ</td> <td>Outcome</td> <td>Ⓟ</td> <td>Output</td> <td>Ⓟ</td> <td>Reporting</td> <td>Ⓟ</td> <td>Compliance</td> <td>Ⓟ</td> </tr> </table>	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	Ⓟ
Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	Ⓟ		
Metering requirements are specified in the customer contracts. The contracts establish a service level agreement.										
<b>Issues</b>										
None										
<b>Recommendations</b>										
None										
<b>Management Actions</b>										
Not applicable										

<b>Item 360</b> Licence Clause 5.1	Compliance rating Compliant - 5
<i>Electricity Industry Metering Code clause 5.1(2)</i> A network operator must expeditiously and diligently process all requests for a service level agreement and negotiate its terms in good faith. A network operator must, 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.	
<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"/>
Metering requirements are specified in the customer contracts. The contracts establish a service level agreement.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 362</b>	Licence Clause 5.1	Compliance rating Compliant - 5							
<i>Electricity Industry Metering Code clause 5.4(1)</i> A network operator must, for each accumulation meter on its network, use reasonable endeavours to undertake a meter reading that provides an actual value at least once in any 12 month period.									
<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"/>
Meters are read remotely (every half hour) and manually daily.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 417</b>	Licence Clause 5.1	Compliance rating Not rated							
<i>Electricity Industry Metering Code clause 6.20(4)</i> A network operator must amend any document in accordance with the Authority's final findings.									
<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"/>
There have been no documents submitted for approval and therefore no requirement to									

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

**Metering Code Obligations Type NR Generation / Retail**

<b>Item 363</b> Licence Clause 5.1	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	<b>P</b> Outcome
<b>P</b> Output	<b>P</b> Reporting
<b>P</b> Compliance	<b>P</b>
Meters are read remotely (every half hour) and manually daily.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	
<b>Management Actions</b>	
Not applicable	

<b>Item 379</b> Licence Clause 5.1	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	<b>P</b> Outcome
<b>P</b> Output	<b>P</b> Reporting
<b>P</b> Compliance	<b>P</b>

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>Item 380</b> Licence Clause 5.1	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 metering requirements are specified in the customer contracts and the licensee maintains customer information.					
<b>Issues</b>					
None					
<b>Recommendations</b>					
None					
<b>Management Actions</b>					
Not applicable					

<b>Item 384</b> Licence Clause 5.1	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 type="checkbox"/>
There have been no changes in (metering) attributes.					
<b>Issues</b>					
None					

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

<b>Item 424</b> Licence Clause 5.1	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 type="checkbox"/>
There have been no metering disputes.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 425</b> Licence Clause 5.1	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 type="checkbox"/>
There have been no metering disputes.									
<b>Issues</b>									
None									
<b>Recommendations</b>									

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

<b>Item 426</b> Licence Clause 5.1	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 type="checkbox"/>
There have been no metering disputes.					
<b>Issues</b>					
None					
<b>Recommendations</b>					
None					
<b>Management Actions</b>					
Not applicable					

**Metering Code Obligations Type NR Generation / Retail / Distribution / Transmission**

<b>Item 349</b> Licence Clause 5.1	Compliance rating Compliant - 5				
<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 type="checkbox"/>
Discrepancies have been resolved to the satisfaction of the customer. The only failure was due to a communications issue.					
<b>Issues</b>					
None					
<b>Recommendations</b>					

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

<b>Item 350</b> Licence Clause 5.1	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. There have been no complaints about registry inaccuracies.					
<b>Issues</b>					
None					
<b>Recommendations</b>					
None					
<b>Management Actions</b>					
Not applicable					

<b>Item 418</b> Licence Clause 5.1	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.					
<b>Issues</b>					
None					
<b>Recommendations</b>					
None					
<b>Management Actions</b>					
Not applicable					

<b>Item 428</b> Licence Clause 5.1							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 type="checkbox"/>
There have been no metering disputes.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

**Network Quality of Supply Regulations Type 2 Distribution / Transmission**

<b>Item 436</b> Licence Clause 5.1							Compliance rating Compliant - 4		
<i>Network Quality of Supply Regulations regulation 13(3)</i> The average total length of interruptions of supply is to be calculated using the specified method.									
<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 calculates SAIDI and SAIFI using 3 year averages which is acceptable to the customers but is not the 4 year average of the Code.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 437</b>	Licence Clause 5.1								Compliance rating Not rated
<i>Network Quality of Supply Regulations regulation 14(8)</i> 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 Electricity Industry (Network Quality and Reliability of Supply) Code 2005.									
<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"/>
There is no exemption of compliance with quality issues by the Minister so the notice requirement is not relevant.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 438</b>	Licence Clause 5.1								Compliance rating Not rated
<i>Network Quality of Supply Regulations regulation 15(2)</i> 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.									
<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"/>
There has been no agreement to exclude or modify any provisions. The quality is specified in the contracts with significant penalties for breaches.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 445</b>	Licence Clause 5.1								Compliance rating Compliant - 5
<i>Network Quality of Supply Regulations regulation 23(2)</i> A distributor or transmitter must keep records of information regarding its compliance									



with specific requirements for the period 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 distributor and transmitter keep records of information regarding its compliance.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 446</b>	Licence Clause 5.1								Compliance rating Not rated
<i>Network Quality of Supply Regulations regulation 24(3)</i> A distributor or transmitter must complete a quality investigation requested by a customer in accordance with specified requirements.									
<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"/>
There have been no quality investigations.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 447</b>	Licence Clause 5.1								Compliance rating Not rated
<i>Network Quality of Supply Regulations regulation 24(4)</i> A distributor or transmitter must report the results of an investigation to the customer concerned.									
<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"/>
The quality of supply is specified in the customer contracts with significant penalties for breaches. There have been no quality investigations.									

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

<b>Item 450</b> Licence Clause 5.1	Compliance rating Compliant – 5
<i>Network Quality of Supply Regulations regulation 26</i> A distributor or transmitter must arrange for an independent audit and report on its systems for monitoring, and its compliance with specific requirements. This is to be carried out in respect of the operation of such systems during each year ending on 30 June.	
<b>Observations</b>	
Process	<b>p</b> Outcome
<b>p</b> Output	<b>p</b> Reporting
<b>p</b> Compliance	<b>p</b>
There has been an audit and report for the first year of the audit period. As there are no small use customers a report is not required.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	
<b>Management Actions</b>	
Not applicable	

<b>Item 451</b> Licence Clause 5.1	Compliance rating Compliant - 5
<i>Network Quality of Supply Regulations regulation 27(1)</i> A distributor or transmitter must prepare and publish a report about its performance in accordance with specified requirements.	
<b>Observations</b>	
Process	<b>p</b> Outcome
<b>p</b> Output	<b>p</b> Reporting
<b>p</b> Compliance	<b>p</b>
A report has been published. As there are no small use customers a report is not required.	
<b>Issues</b>	
None	

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

<b>Item 452</b> Licence Clause 5.1	Compliance rating Compliant - 5				
<i>Network Quality of Supply Regulations regulation 27(3)</i> A distributor or transmitter must give a copy of its report about its performance to the Minister and the Authority within the specified period.					
<b>Observations</b>					
Process	Ⓟ Outcome	Ⓟ Output	Ⓟ Reporting	Ⓟ Compliance	Ⓟ
A report has been published. As there are no small use customers a report is not required.					
<b>Issues</b>					
None					
<b>Recommendations</b>					
None					
<b>Management Actions</b>					
Not applicable					

**Network Quality of Supply Regulations Type NR Distribution / Transmission**

<b>Item 429</b> Licence Clause 5.1	Compliance rating Compliant - 5				
<i>Network Quality of Supply Regulations regulation 5(1)</i> A distributor or transmitter must, as far as reasonably practicable, ensure that electricity supply to a customer's electrical installations complies with prescribed standards.					
<b>Observations</b>					
Process	Ⓟ Outcome	Ⓟ Output	Ⓟ Reporting	Ⓟ Compliance	Ⓟ
The customer contracts specify the quality of supply which meets Code requirements.					
<b>Issues</b>					
None					
<b>Recommendations</b>					
None					

<b>Management Actions</b>
Not applicable

<b>Item 430</b> Licence Clause 5.1	Compliance rating Compliant - 5
<i>Network Quality of Supply Regulations regulation 8</i> 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.	
<b>Observations</b>	
Process	<b>P</b> Outcome
<b>P</b> Output	<b>P</b> Reporting
<b>P</b> Compliance	<b>P</b>
The customer contracts specify the connection responses to quality issues. There is a high requirement for continuity of supply.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	
<b>Management Actions</b>	
Not applicable	

<b>Item 431</b> Licence Clause 5.1	Compliance rating Compliant - 5
<i>Network Quality of Supply Regulations regulation 9</i> A distributor or transmitter must, as far as reasonably practicable, ensure that that the supply of electricity is maintained and the occurrence and duration of interruptions is kept to a minimum.	
<b>Observations</b>	
Process	<b>P</b> Outcome
<b>P</b> Output	<b>P</b> Reporting
<b>P</b> Compliance	<b>P</b>
The customer contracts specify the connection responses to quality issues. There is a high requirement for continuity of supply.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	
<b>Management Actions</b>	
Not applicable	

<b>Item 432</b> Licence Clause 5.1							Compliance rating Compliant - 5		
<i>Network Quality of Supply Regulations regulation 10(1)</i> A distributor or transmitter must, so far as reasonably practicable, reduce the effect of any interruption on a customer.									
<b>Observations</b>									
Process	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	Ⓟ
The customer contracts specify the connection responses to quality issues. There is a high requirement for continuity of supply.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 433</b> Licence Clause 5.1							Compliance rating Compliant - 5		
<i>Network Quality of Supply Regulations regulation 10(2)</i> 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.									
<b>Observations</b>									
Process	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	Ⓟ
The customer contracts specify the connection responses to quality issues. There is a high requirement for continuity of supply.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 435</b> Licence Clause 5.1							Compliance rating Compliant -5		
<i>Network Quality of Supply Regulations regulation 13(2)</i>									

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.									
<b>Observations</b>									
Process	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	Ⓟ
The customer contracts specify the quality of supply. There is a high requirement for continuity of supply. The interruptions are less than the code requirements.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 444</b>	Licence Clause 5.1								Compliance rating Compliant - 5	
<i>Network Quality of Supply Regulations regulation 23(1)</i>										
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.										
<b>Observations</b>										
Process	Ⓟ	Outcome	Ⓟ	Output	Ⓟ	Reporting	Ⓟ	Compliance	Ⓟ	
The customer contracts specify the quality of supply. There is a high requirement for continuity of supply and the quality is monitored.										
<b>Issues</b>										
None										
<b>Recommendations</b>										
None										
<b>Management Actions</b>										
Not applicable										

**Appendix II Asset management system review results and recommendations**

<b>Asset Planning</b>						<b>Effectiveness rating</b> Not performed - 0	
<p>1. <i>Asset planning</i></p> <p>Asset planning strategies are focused on meeting customer needs in the most effective and efficient manner (delivering the right service at the right price).</p>							
<b>Observations</b>							
Process	⦿	Documentation	✓	Availability	⦿	Use	⦿
<p><i>Asset Planning Process/Plan and its currency</i></p> <p>The licensee has 40 MW gas turbine generators at Kalgoorlie, Kambalda, Leinster and Mt Keith and Mt Keith has a 22MW gas turbine. There is also diesel generation (77MW) at Leinster and Mt Keith, mainly as backup and spinning reserve. The licensee has 187km of distribution lines in Kalgoorlie, Kambalda, Leinster and Mt Keith areas and 285 km of transmission line connecting the licence areas.</p> <p>The licensee has well developed and current asset plans for operations, maintenance and contingencies. This plan is reviewed annually. A manager is allocated to business development to cover the broader aspects of asset planning. There is no formal strategic asset plan covering the broader or strategic elements.</p> <p><i>Allocation of responsibilities / statutory obligations</i></p> <p>The organisational arrangements allocate responsibilities. There is documentation requiring compliance with statutory obligations.</p>							
<b>Issues</b>							
<p>The licensee conducts the shorter timeframe asset management elements (operations, maintenance and contingency planning) consistent with its planning needs. Other than a strategic overview, the elements of an asset management process exist informally.</p> <p>The owner uses a special vehicle (the licensee) to manage the licensed assets and these carry out the core processes such as operations and maintenance. The owning bodies such as Trans Alta (Australia) Pty Ltd in Australia and Trans Alta Corporation in Canada carry out the long term and strategic elements of an asset management system. It would not be appropriate to require the licensed entities to carry out these functions when they are already carried out by the owning companies.</p>							
<b>Recommendation</b>							
None - There is no business case for carrying out asset planning when it is carried out by the owning bodies.							
<b>Rating</b>							
Not Performed - 0							

<b>Asset Creation</b>						Effectiveness rating Well defined - 3	
<i>2 Asset creation and acquisition</i>							
Asset creation/acquisition means the provision or improvement of an asset where the outlay can be expected to provide benefits beyond the year of outlay.							
<b>Observations</b>							
Process	Ⓟ	Documentation	Ⓟ	Availability	Ⓟ	Use	Ⓟ
<i>Policies and procedures for asset creation / sample creation activities</i>							
Procurement of major electricity plant is a very significant exercise taking considerable time. There are documented procedures for fixed assets. There has been no asset creation on the generating, distribution or transmission plant in the audit period.							
The gas turbines are by well known manufacturer of aero derivative machines (aircraft jet engines) that are highly reliable. The diesel plant is legacy plant from the mine owners. The distribution and transmission assets are overhead lines. The lines are constructed to appropriate standards. There are detailed designs by a well recognised consultant (Stapleton and Associates) for both the distribution and transmission lines (and not just standard procedures with the detail left to the contractor). Construction of the lines is by well recognised contractors such as Outback Power. Construction of the substations was by well recognised contractors such as Downer EDI.							
<i>Meeting statutory obligations</i>							
There are documents requiring employees and contractors to meet statutory obligations.							
The asset creation processes are appropriate.							
<b>Issues</b>							
The procurement processes are appropriate.							
<b>Rating</b>							
Well defined - 3							

<b>Asset Disposal</b>						Effectiveness rating Well Defined - 3	
<i>3. Asset disposal</i>							
Effective asset disposal frameworks incorporate consideration of alternatives for the disposal of surplus, obsolete, under-performing or unserviceable assets. Alternatives are evaluated in cost-benefit terms.							
<b>Observations</b>							
Process	Ⓟ	Documentation	Ⓟ	Availability	Ⓟ	Use	Ⓟ
<i>Policies and procedures for asset disposal / sample disposal activities</i>							
There is no disposal action in the audit period and none are contemplated. There are disposal processes in addition to those for justification of replacement of plant (which includes disposal of redundant plant). Removing the licensed plant is unlikely during the							



<p>life of the customers' mines. There are documented procedures for disposal of fixed assets.</p> <p>The disposal processes are well defined.</p> <p><i>Meeting statutory obligations</i>          There are well documented obligations of the licensee and their employees to comply with statutory obligations.</p>
<b>Issues</b>
None.
<b>Recommendation</b>
None
<b>Rating</b>
Well defined - 3

<b>Environmental analysis</b>	Effectiveness rating Well defined - 3			
<p>4. <i>Environmental analysis</i></p> <p>Environmental analysis examines the asset system environment and assesses all external factors affecting the asset system.</p>				
<b>Observations</b>				
Process	<table border="1"> <tr> <td>Documentation</td> <td>Availability</td> <td>Use</td> </tr> </table>	Documentation	Availability	Use
Documentation	Availability	Use		
<p><i>Standards / monitoring / reporting / breaches</i>          The licensee has an Environmental Management Plan (EMP) developed to implement an environmental management system that complies with ISO 14001 standards and have been separately audited. Reporting and monitoring tools are appropriate.</p> <p>The Licensee has a number of environmental licences and no unresolved issues have arisen with respect to environmental matters. Issues about air quality, waste fuel, contaminants and chemical storage are being managed actively. No non compliances have been reported.</p> <p>The principal external threats to the generation assets relate to availability of fuel and storms to distribution and transmission. The Licensee has documented the threats to specific plant and developed contingencies for these threats. Major breakdowns are an internal issue covered under contingencies.</p>				
<b>Issues</b>				
<p>There are no environmental non-compliances reported.</p> <p>There are contingency plans for fuel availability, back up generation and spare gas turbine engine to minimise outages.</p>				

<b>Recommendation</b>
None
<b>Rating</b>
Well defined - 3

<b>Asset operations</b>	Effectiveness rating Quantitatively Controlled - 4
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*5. Asset operations*

Operations functions relate to the day-to-day running of assets and directly affect service levels and costs.

**Observations**

Process	Ⓟ	Documentation	Ⓟ	Availability	Ⓟ	Use	Ⓟ
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*Policies and procedures for asset operation / sample activities*

Some of the generation plant operates in base load mode which is a low thermal cycling mode with reduced stresses and the remaining in mid merit or standby with some cycling stresses. The demands of the mining process dictate continuous generation with contractual penalties for interruptions to supply. Dispatch profiles are loaded into the control systems to manage loading rates and thermal stresses.

There is a spare gas turbine engine and gear box to minimise outages.

The asset plan for operations, maintenance and contingencies contains performance measures and operating procedures for a number of differing scenarios. .

The distribution and transmission assets are overhead lines. The lines are constructed to appropriate standards. The licensee records forced outages which have been trending down since 1999. There are significant penalties for outages in the customer contracts.

The asset register is part of the maintenance IT system.

*Training/ resources / exceptions*

The licensee operates the plant. The resourcing is appropriate and ongoing training is evident as are the operating procedures and practices. Plant operation and related maintenance appears to take due allowance of any exceptions in the licensed plant.

**Issues**

The asset operation is appropriate for the duty.

**Recommendation**

None

**Rating**

Quantitatively Controlled - 4

<b>Asset Maintenance</b>						Effectiveness rating Quantitatively Controlled - 4	
6. <i>Asset maintenance</i>							
Maintenance functions relate to the upkeep of assets and directly affect service levels and costs.							
<b>Observations</b>							
Process	Ⓟ	Documentation	Ⓟ	Availability	Ⓟ	Use	Ⓟ
<p><i>Policies and procedures for asset maintenance / sample activities</i></p> <p>Maintenance is controlled by an IT system that coordinates tasks, incorporates condition, risk, breakdown and time based maintenance. Maintenance jobs are standardised which gives a quality and safety assurance and change management where by changing the standard job specification the work process is changed. Spare parts required for standard jobs and inventories are also contained in the system.</p> <p>The asset plan for operations, maintenance and contingencies contains performance measures.</p> <p>The licensee provides first line maintenance and contracts to suppliers such as GE to service their major maintenance outages. There is a spare gas turbine engine and gear box to minimise outages. This enables a very small 36 hours to change an engine (required for 50,000 hours of operation – including penalties for starts and special events). Condition monitoring of the generators (including flux probes and vibration sensors) is routinely carried out. Inventory of critical spares are maintained and tracked on the maintenance system</p> <p>The distribution and transmission lines are maintained for supply continuity. The lines are routinely washed and at higher frequencies in know dusty areas. There has been regular pole condition monitoring, pole reinforcement and replacement where required. The licensee carries out first line maintenance and contracts major works. The licensee employs a specialist HV maintenance team who carry out planned maintenance activities.</p> <p><i>Training / resources / exceptions</i></p> <p>Maintenance is scheduled well into the future and these actions appear appropriate for the type of equipment. The resourcing is appropriate and ongoing training is evident as are the operating procedures and practices. High Voltage training occurs at Western Power and College of Electrical Training. Plant maintenance appears to take due allowance of any exceptions in the licensed plant.</p>							
<b>Issues</b>							
The maintenance is appropriate for the duty required.							
<b>Recommendation</b>							
None.							
<b>Rating</b>							
Quantitatively Controlled - 4							

<b>Asset Management Information System</b>						Effectiveness rating Well defined - 3	
<p><i>7. Asset Management Information System (MIS)</i></p> <p>An asset management information system is a combination of processes, data and software that support the asset management functions.</p>							
<b>Observations</b>							
Process	Ⓟ	Documentation	Ⓟ	Availability	Ⓟ	Use	Ⓟ
<p><i>Policies and procedures</i></p> <p>The licensee has a competent asset management information system with a number of elements. The maintenance management system is an award winning system based on The Maintenance Engineering Society Australia – MESA (Engineers Australia).</p> <p>It has complex spreadsheets managing expenditure and a dedicated maintenance management database (GPMate) to control a complex list of items. The maintenance system links project management to scheduled tasks to standard work plans (assisting with safety and change management), asset register and parts inventory. Documentation is appropriate.</p> <p>Access to write to the database is controlled (passwords) and changes are tracked. There is good documentation for data recovery procedures which include operating on the Perth office server and backing up the servers in Calgary, Canada to ensure data integrity.</p> <p><i>Exceptions</i></p> <p>The reliability of the plant is evidence of good maintenances practices and that exceptions are being followed up.</p>							
<b>Issues</b>							
None							
<b>Recommendation</b>							
None							
<b>Rating</b>							
Well defined 3							

<b>Risk management</b>						Effectiveness rating Well Defined- 3	
<p><i>8. Risk management</i></p> <p>Risk management involves the identification of risks and their management within an acceptable level of risk.</p>							
<b>Observations</b>							
Process	Ⓟ	Documentation	Ⓟ	Availability	Ⓟ	Use	Ⓟ

<p><i>Policies and procedures</i>          The Licensee has a documented risk management procedure and there is evidence that risk based approaches is carried out.</p> <p>The provision of contingencies such as a spare gas turbine engine is a result of critical risk management. The Licensee has documented the threats to specific plant and developed contingencies for these threats which are based on assessment of risks.</p> <p><i>Training</i>          There is evidence of training and awareness by staff of risk based approaches.</p>
<b>Issues</b>
None
<b>Recommendation</b>
None
<b>Rating</b>
Well Defined- 3

<b>Contingency planning</b>	Effectiveness rating Well defined - rating 3
<p>9. <i>Contingency planning</i>          Contingency plans document the steps to deal with the unexpected failure of an asset.</p>	
<b>Observations</b>	
Process	Documentation
Availability	Use
<p><i>Development of contingency plans / currency</i>          The Licensee has good documentation of its data recovery plans.</p> <p>The Licensee has documented the threats to specific plant and developed contingencies for these threats. Fuel contingencies are provided with local reserves of fuel oil. An inventory of spare parts is kept as is a spare gas turbine engine and gear box.</p> <p>The Licensee has detailed maintenance scheduled out for several years, with minor and major shutdowns allowed to deal with potential issues. Maintenance is partly conducted on condition based maintenance which monitors critical items for indicators of future failure.</p> <p>The maintenance regime is geared to keeping the plant operational without forced outages.</p> <p><i>Testing of contingency plans</i>          The recent gas shortage exercised the use of fuel contingencies. The licensee tests safety systems routinely.</p> <p>The licensee conducts major incident training.</p>	

<b>Issues</b>
None
<b>Recommendation</b>
None
<b>Rating</b>
Well defined - 3

<b>Financial planning</b>	Effectiveness rating Well defined - rating 3
<p><i>10. Financial planning</i></p> <p>The financial planning component of the asset management plan brings together the financial elements of the service delivery to ensure its financial viability over the long term.</p>	
<b>Observations</b>	
Process	<b>p</b> Documentation
	<b>p</b> Availability
	<b>p</b> Use
	<b>p</b>
<p><i>Financial planning process / plans</i></p> <p>The Licensee has financial plans, budgeting and monitoring processes. These are on 1 year and 5 year cycles with projections to 13 years and upgraded year by year. Long ranges forecasting provides business outlook over the next 5 to 20 years.</p>	
<b>Issues</b>	
None	
<b>Recommendation</b>	
None	
<b>Rating</b>	
Well defined - rating 3	

<b>Capital expenditure planning</b>	Effectiveness rating Well defined - rating 3
<p><i>11. Capital expenditure planning</i></p> <p>The capital expenditure plan provides a schedule of new works, rehabilitation and replacement works, together with estimated annual expenditure on each over the next five or more years.</p> <p>Since capital investments tend to be large and lumpy, projections would normally be expected to cover at least 10 years, preferably longer. Projections over the next five years would usually be based on firm estimates.</p>	

<b>Observations</b>							
Process	Ⓟ	Documentation	Ⓟ	Availability	Ⓟ	Use	Ⓟ
<p><i>Capital expenditure process / plans</i>                  The Licensee has financial plans, budgeting and monitoring processes. These are on 1 year and 5 year cycles with projections to 13 years and upgraded year by year. Long ranges forecasting provides business outlook over the next 5 to 20 years.</p>							
<b>Issues</b>							
None.							
<b>Recommendation</b>							
None							
<b>Rating</b>							
Well defined - rating 3							

<b>Review of AMS</b>						Effectiveness rating Not Performed - rating 0	
<p>12. <i>Review of AMS</i>                  The asset management system is regularly reviewed and updated.</p>							
<b>Observations</b>							
Process	✓	Documentation	✓	Availability	✓	Use	✓
<p>As a supplier of electricity the service delivery is heavily asset based and needs an AMS. There is ongoing review of asset issues relating to operations, maintenance and contingencies.</p>							
<b>Issues</b>							
<p>Strategic asset planning is carried out by the owning companies and they carry out continuous review of the process. There is a division of an asset management system where the owners carry out the strategic asset planning and the licensee carries out the shorter term and operational functions. It would not be appropriate to require the licensed entities to carry out these functions when they are already carried out by the owning companies.</p>							
<b>Recommendation</b>							
None - There is no business case for carrying out asset planning when it is carried out by the owning bodies.							
<b>Rating</b>							
Not Performed - rating 0							

