



NEWMONT POWER PTY LTD

ELECTRICITY RETAIL LICENCE ERL 9,
ELECTRICITY DISTRIBUTION LICENCE EDL 4
PERFORMANCE AUDIT REPORT &
ASSET MANAGEMENT SYSTEM REVIEW REPORT

Prepared By Kevan McGill
Date 5 February 2009



McGill Engineering Services Pty Ltd

Engineering, Adjudication & Arbitration Services ABN 45 106 691 169

Stephen Cole
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Newmont Australia
388 Hay St
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Dear Mr Cole

Performance Audit Electricity Licences ERL 9 and EDL 4

The fieldwork on the performance audit of Retail Licence ERL 9 and performance audit and asset management review of Distribution licence EDL 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 9) and Distribution licence (EDL 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

5 February 2009

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Executive Summary

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

In my opinion, the licensee maintained, in all material aspects, effective control procedures in relation to the Retail Licence (ERL 9) and Distribution Licence (EDL 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

A summary of the findings of the performance audit is:

Ratings

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	49	28	21
Compliant 4	1	0	1
Compliant 3	1	1	0
Non-compliant 2	16	12	4
Significantly non compliant 1			
Not rated	65	54	11

* 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

The findings of the asset management review are summarized as;

Ratings

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

Performance Audit Objectives

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)¹.

McGill Engineering Services Pty Ltd has been engaged to carry out the performance audit for Electricity Retail Licence ERL 9 and Distribution Licence EDL 4 for Newmont Power Pty Ltd.

Audit Period

The audit period is 1 July 2006 to 30 June 2008.

Scope Limitation

The audit was undertaken by examination of documents, interviews with key persons and observations and is not a detailed inspection of physical items.

Excluded Conditions

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-

¹ Electricity compliance reporting manual, March 2008

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.

Newmont does not have any meters on its distribution assets and therefore all the requirements for the Meter Code that apply to the distribution licence have been excluded (300-308, 310-318, 320-330, 332, 334-341 343-348, 352-362, 364, 366-367, 369-375, 383, 385-389, 392-408, 410-415, 417 and 419). Western Power has some meters on Newmont's customer connections, so while there are no obligations between the licensee's retailer and distributor there are some obligations for Newmont with respect to Western Power.

Inherent Limitations

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

The *Authority* guideline² for performance audits sets out that the audit should be conducted in 3 phases.

1. Risk and Materiality Assessment

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 Audit Guidelines: Electricity, Gas and Water Licences, September 2006

2. System Analysis, Assertion Setting and Review

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

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 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
 - Stephen Cole and consultant David Lyne
- McGill Engineering Services Pty Ltd
 - Kevan McGill,

The audit was conducted during November and December 2008 with the final audit report submitted to the Authority by 24 December 2008.

Audit Requirements

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">• The control environment• Information system• Compliance procedures• Compliance attitude	K McGill	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

The licensee uses a special business entity for the supply of electricity and some of the strategic asset management functions are carried out by the owning entity. The spirit of the asset management system obligations are met but not by the licensed entity.

The licensee has two licences and has contracted the operation and maintenance of the distribution network to TransAlta. The lines supply two small loads for contracted customers (and ones with which a related business owns 50%) accordingly the need for protocols for interfaces between the licence types is not a required business function. The Retail 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.

There are three lines in the Distribution Licence. One line has been superseded by a Western Power line transferring power to a Western Power Substation. The line is disconnected. It is understood that the licensee will discuss with Western Power if the line is required for back up.

The customer for the other lines is 50% owned by the licensee's parent but because there is no controls of the customer at Board level it does not qualify as a subsidiary of the holding company and therefore related according to the *Act*. That is a licence is still required. These two lines supply very small loads that are not critical for the customer's mining operations. They supply water bores and there is at least two days supply of water and could be supplied by a diesel generator.

Overall Conclusion

In my opinion, the licensee maintained, in all material aspects, effective control procedures in relation to the Retail (ERL 9) and Distribution (EDL 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 21)

Item	Licence obligation	Review priority	Rating	Rating 0 1 2 3 4 5									
Licence conditions Type 2 Distribution													
83.	19.1 & 19.2 EIA s14(1)(b)	4	Compliant 3										
103	15.2 EIA s11	4	Not rated										
104	15.3 EIA s11	4	Compliant 5										
108	19.4 EIA s11	4	Compliant 5										
Licence conditions Type 2 Retail/Distribution													
87.	5.1/5.1 EIA s41(6)	4	Not rated										
96	5.1/5.1 EIA s115(2)	4	Compliant 5										
105	20.1/16.1EIA s11	4	Compliant 5										
107	22.2/18.2/ EIA s11	4	Not rated										
109	23.1/20.1 EIA s11	4	Compliant 5										
110	24.1/21.1 EIA s11	4	Not rated										
111	25.2/22.2/ EIA s11	4	Compliant 5										
112	26.1/23.1 EIA s11	4	Not rated										
Licence conditions Type NR Distribution													
82.	19.1 EIA s14(1)(a)	5	Compliant 4										
84	19.3 EIA s14(1)(c)	5	Compliant 5										
Licence conditions Type NR Retail/Distribution													
81.	22.1/18.1 EIA s13(1)	5	Compliant 5										
85.	4.1/4.1 EIA s17(1)	5	Compliant 5										
86	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) ³	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										

³ Electricity Industry Customer Transfer Code number

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										
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										
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							
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 ⁴	4	Compliant 5							
64	A4.2	4	Compliant 5							
65	A5(5) ⁵	4	Not rated							

⁴ Electricity Industry Customer Transfer Code Annex 4⁵ Electricity Industry Customer Transfer Code Annex 5

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										
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										
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) ⁶	5	Compliant 5							
70	A6.6	5	Compliant 5							
71	A6.7	5	Compliant 5							
Licence Clause 5.1 Metering Code Type 2 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 Retail / Distribution										
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 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							

⁶ Electricity Industry Customer Transfer Code Annex 6

[illegible]

Audit Results and Recommendations

Summary of significant results

A number of non compliances have been recorded (1, 2, 3, 4, 5, 7, 12, 13, 15, 22, 46, 47, 48, 54, 62 and 69) for all of these elements there is a case for seeking an exemption from the Office of Energy for these items. An exemption can be sought because either the matters are covered by contract and there is no business case for the required protocols or the vertical integration of the licensees means that there is no business case for the required protocols.

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. Stephen Cole Business Manager – Joint Ventures and Energy, Newmont Australia should be responsible to do this by June 2009.

⁷Electricity Industry Network Quality & Reliability of Supply Code number

ASSET MANAGEMENT SYSTEM REVIEW

Asset Management System Review Objectives

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

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

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

- 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 during December 2008.

Audit priority

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 81).

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 Distribution Licence (EDL 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. The Asset Planning and Review are carried out by the owner (Newmont) which owns 100% of the licensee. The intent of the legislation is met as 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	Well defined	3
Asset maintenance	2	Well defined	3
Asset Management Information System	4	Well defined	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	Issue 1
	The licensee conducts the shorter timeframe asset management elements (operations, maintenance and contingency planning) with a

	contractor (TransAlta) for operations and maintenance. Other than a strategic overview, the elements of an asset management process exist informally.
	The owner uses a special business vehicle (the licensee) to own the licensed assets and a contractor (TransAlta) carries out the core processes such as operations and maintenance. The owning bodies such as Newmont Australia in Australia carry out the long term and strategic elements of an asset management system. Each mining operation is subject to an asset impairment testing process on an annual basis to assess the viability and carrying value of the asset. 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.
	Recommendation 1
	None - There is no business case for carrying out asset planning when it is carried out by the owning bodies.
Asset Disposal	Issue 1
	The licensee is considering approaching Western Power to see if the redundant line to Boulder substation is required by Western Power as a backup.
	Recommendation 1
	The licensee should consider deactivation of the redundant line if it is not transferred to Western Power.
AMS review	Issue 1
	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.
	Recommendation 1
	None - There is no business case for carrying out asset planning when it is carried out by the owning bodies.

Post Audit implementation Plan

AMS item	Recommendation	Responsible	When
Asset Disposal	The licensee should consider deactivation of the redundant line if it is not transferred to Western Power.	Manager Joint Ventures and Energy	July 2009

Audit Evidence

The following evidence was gathered for the audit.

1. Legislation and standards
 - *Electricity Industry Act 2004*
 - Auditing and Assurance handbook
 - Electricity Retail Licence ERL 9
 - Electricity Distribution Licence EDL 4
 - Licence maps
2. Licensee's documents
 - Electricity licence applications
 - Auditors statement
 - Annual compliance report
 - Licence fees invoices/payment
 - Fixed assets procedure
 - Integrated management system Manual
 - Capital effectiveness guidebook
 - Standards manual –property plant and mine development
 - Budget documents

Audit Time

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

Appendix 1 Performance Audit Detail Results and Recommendations

Licence Obligations Type 2 Distribution

Item 83 Distribution Licence Clauses 19.1 & 19.2							Compliance rating Compliant 3		
<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> .									
Observations									
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 assets of the licensee had been in operation for some years before the granting of a licence. A contractor (Trans Alta) operates and maintains the system according to their asset management system and this was the position at licence application time. The <i>Authority</i> was aware of the contractors' asset management system. There have been no substantive changes since.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 103 Distribution Licence Clause 15.2								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.									
Observations									
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 substantive changes to the Distribution systems in the audit period that would require an amendment to the asset management system.									
Issues									
None.									
Recommendations									

None.
Management Actions
Not applicable.

Item 104 Distribution Licence Clause 15.3							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.									
Observations									
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 expansions outside the licence areas.									
Issues									
None.									
Recommendations									
None.									
Management Actions									
Not applicable.									

Item 108 Distribution Licence Clause 19.4							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.									
Observations									
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 complies with the requirements.									
Issues									
None.									
Recommendations									
None.									
Management Actions									
Not applicable.									

Licence Obligations Type 2 Retail / Distribution

Item 87	Retail Licence Clause 5.1 / Distribution Licence Clause 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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 96	Retail Licence Clause 5.1 / Distribution Licence Clause 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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 105	Retail Licence Clause 20.1 / Distribution Licence Clauses 16.1							Compliance rating Compliant - 5	
<i>Electricity Industry Act section 11.</i> A licensee and any related body corporate must maintain accounting records that comply with the Australian Accounting Standards Board Standards or equivalent International Accounting Standards.									
Observations									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The licensee's auditor advises that the licensee complies with Australian accounting standards.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

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

Item 109	Retail Licence Clause 23.1 / Distribution Licence Clause 20.1							Compliance rating Compliant - 5	
<i>Electricity Industry Act section 11.</i> A licensee must comply, and require its auditor to comply, with the <i>Authority's</i> standard audit guidelines dealing with the performance audit.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 110	Retail Licence Clause 24.1 / Distribution Licence Clause 21.1							Compliance rating Not rated	
<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.									
Observations									
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> .									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 111	Retail Licence Clause 25.2 / Distribution Licence Clauses 22.2							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.									

Observations									
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> .									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 112	Retail Licence Clause 26.1 / Distribution Licence Clause 23.1						Compliance rating Not rated		
<i>Electricity Industry Act section 11.</i> Unless otherwise specified, all notices must be in writing.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Licence Obligations Type NR Distribution

Item 82	Distribution Licence Clause 19.1						Compliance rating Compliant 4		
<i>Electricity Industry Act section 14(1)(a).</i> A licensee must provide for an asset management system.									
Observations									
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 review has examined the asset management system but some of the value adding									

function is carried out by the owner and not the licensee.
Issues
None
Recommendations
None
Management Actions
Not applicable

Item 84	Distribution Licence Clause 19.3						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.									
Observations									
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 review satisfies the requirement.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Licence Obligations Type NR Retail / Distribution

Item 81	Retail Licence Clause 22.1 / Distribution Licence Clause 18.1							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.									
Observations									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
This audit satisfies the requirement.									

Issues
None
Recommendations
None
Management Actions
Not applicable

Item 85	Retail Licence Clause 4.1 / Distribution Licence Clause 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.									
Observations									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The fees have been paid within a month of being received.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 86	Retail Licence Clause 5.1 / Distribution Licence Clause 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.									
Observations									
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 loads are not critical to the customer's mining operations and the quality of supply is acceptable to the customers.									
Issues									
None									

Recommendations
None
Management Actions
Not applicable

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

Item 6	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.									
Observations									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
As the licensee has two contract customers, there are no processes for transfer of information between retailer and distributor. 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.									
Issues									
None									
Recommendations									
An exemption is sought from this requirement of the Code.									
Management Actions									
Approach the Office of Energy to seek an exemption from this requirement.									

Item 7	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.									
Observations									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
As the licensee two customers and is essentially vertically integrated there is no business need for protocols for passing information between their retailer and distributor.									

Issues
None
Recommendations
An exemption is sought from this requirement of the Code.
Management Actions
Approach the Office of Energy to seek an exemption from this requirement.

Item 8	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.									
Observations									
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 providing historical data without verifiable consent.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 9		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.									
Observations									
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.									
Issues									
None									

Recommendations
None
Management Actions
Not applicable

Item 16		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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 17		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.									
Observations									
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 aggregating historical consumption data of one customer with that of another customer where the customer has requested that it not be aggregated.									
Issues									
None									

Recommendations
None
Management Actions
Not applicable

Item 18	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.									
Observations									
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 disclosing data of one customer to any other person without their verifiable consent.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 19	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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									

Management Actions
Not applicable

Item 23 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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 24	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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 25	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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 26	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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 27	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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 28	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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 29	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.									
Observations									
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.
Issues
None
Recommendations
None
Management Actions
Not applicable

Item 30		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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 44		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.									
Observations									
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.									

Issues
None
Recommendations
None
Management Actions
Not applicable

Item 45	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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 52	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.									
Observations									
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.									
Issues									
None									

Recommendations
None
Management Actions
Not applicable

Item 53		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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

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

Item 34		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.									
Observations									
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 has no meters. There have been no customer transfers in the audit period.									
Issues									
None									

Recommendations
None
Management Actions
Not applicable

Item 39Licence 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.									
Observations									
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 has no meters. There have been no customer transfers in the audit period.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 48Licence Clause 5.1							Compliance rating Not Compliant - 2		
Electricity Industry Customer Transfer Code clause 5.1(4) A network operator and a retailer must comply with approved communication rules.									
Observations									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There are no 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.									
Issues									
None									
Recommendations									
The Licensee should seek an exemption to this requirement.									

Management Actions

The Licensee should approach the Office of Energy to seek an exemption from this requirement.

Item 49	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.									
Observations									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input type="checkbox"/>
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 54	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.									
Observations									
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 which are essentially vertically integrated. Communications with customers are established by contract.									
Issues									
None									
Recommendations									
The Licensee should seek an exemption to this requirement.									

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

Item 57Licence 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.									
Observations									
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 disputes.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 69	Licence Clause 5.1						Compliance rating Not Compliant - 2		
<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.									
Observations									
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 which are essentially vertically integrated. Communications with customers are established by contract.									
Issues									
None									
Recommendations									
The Licensee should seek an exemption to this requirement.									
Management Actions									

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

Item 2	Licence Clause 5.1							Compliance rating Not Compliant - 2	
<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.									
Observations									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The licensee is essentially vertically integrated. There is no business need to establish arms-length treatment until another retailer becomes available on the network.									
Issues									
None									
Recommendations									
The Licensee should seek an exemption to this requirement.									
Management Actions									
The Licensee should approach the Office of Energy to seek an exemption from this requirement.									

Item 3	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.									
Observations									
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 a published standing data form. Data information requirements are established by contract.									
Issues									
None									
Recommendations									

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

Item 4	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.									
Observations									
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 a published historical data form. Data information requirements are established by contract.									
Issues									
None									
Recommendations									
The Licensee should seek an exemption to this requirement.									
Management Actions									
The Licensee should approach the Office of Energy to seek an exemption from this requirement.									

Item 5		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.									
Observations									
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 a published historical data form. Data information requirements are established by contract.									
Issues									
None									
Recommendations									
The Licensee should seek an exemption to this requirement.									

Management Actions

The Licensee should approach the Office of Energy to seek an exemption from this requirement.

Item 10	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.									
Observations									
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 invalid data requests.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 11	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.									
Observations									
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 information requirements are established by contract. There have been no cases of more than 10 data requests in a day.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 13	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.									
Observations									
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 information requirements are established by contract.									
Issues									
None									
Recommendations									
The Licensee should seek an exemption from this requirement.									
Management Actions									
The Licensee should approach the Office of Energy to seek an exemption from this requirement.									

Item 14	Licence Clause 5.1							Compliance rating Compliant - 5	
<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.									
Observations									
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 information requirements are established by contract. The licensee meets contracted obligations for data.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 15	Licence Clause 5.1								Compliance rating Not Compliant - 2	
<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.										
Observations										
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>	
As 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.										
Issues										
None										
Recommendations										
The Licensee should seek an exemption from this requirement.										
Management Actions										
The Licensee should approach the Office of Energy to seek an exemption from this requirement.										

Item 20	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.										
Observations										
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 information requirements are established by contract. The network operator has no meters.										
Issues										
None										
Recommendations										
None										
Management Actions										
Not applicable										

Item 21	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.										
Observations										
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 information requirements are established by contract. There are no meters.										
Issues										
None										
Recommendations										
None										
Management Actions										
Not applicable										

Item 22	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.										
Observations										
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 a published customer transfer request form.										
Issues										
None										
Recommendations										
The Licensee should seek an exemption from this requirement.										
Management Actions										
The Licensee should approach the Office of Energy to seek an exemption from this requirement.										

Item 31	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.										

Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 32	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 that in accordance with clause 4.9(1) of the Electricity Industry Customer Transfer Code.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 33	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.									
Observations									
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.									

Issues
None
Recommendations
None
Management Actions
Not applicable

Item 35	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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 36	Licence Clause 5.1	Compliance rating Not rated							
<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.									
Observations									
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.									
Issues									
None									

Recommendations
None
Management Actions
Not applicable

Item 37		Licence Clause 5.1			Compliance rating Not rated				
<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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 38		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.									
Observations									
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 there are no meters.									
Issues									
None									
Recommendations									
None									

Management Actions
Not applicable

Item 41	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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 42	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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 51	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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 60	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.									
Observations									
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 requests for metering standing data are specified in the customer contracts.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 61	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.									

Observations									
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 does not have any meters.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 62	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.									
Observations									
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 a customer transfer request form unless another retailer is available on the network.									
Issues									
None									
Recommendations									
The Licensee should seek an exemption from this requirement.									
Management Actions									
The Licensee should approach the Office of Energy to seek an exemption from this requirement.									

Item 63	Licence Clause 5.1						Compliance rating Compliant - 5	
<i>Electricity Industry Customer Transfer Code clause A⁸4.1</i> A network operator must provide certain information, if available, to a retailer who submits a request for standing data.								

⁸ Electricity Industry Customer Transfer Code Annex 4

Observations									
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. The network operator does not have any meters.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 64	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.									
Observations									
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 does not have any meters.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 65	Licence Clause 5.1						Compliance rating Not rated	
<i>Electricity Industry Customer Transfer Code clause A5(5)⁹</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.								
Observations								

⁹ Electricity Industry Customer Transfer Code Annex 5

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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 66	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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 67	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.									
Observations									
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.									

Issues
None
Recommendations
None
Management Actions
Not applicable

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

Item 1		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.									
Observations									
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 arms-length treatment until another retailer is available on the network.									
Issues									
None									
Recommendations									
The Licensee should seek an exemption from this requirement.									
Management Actions									
The Licensee should approach the Office of Energy to seek an exemption from this requirement.									

Item 12Licence 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.									
Observations									
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 does not have any meters.
Issues
None
Recommendations
The Licensee should seek an exemption from this requirement.
Management Actions
The Licensee should approach the Office of Energy to seek an exemption from this requirement.

Item 46 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.									
Observations									
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. Communication rules have not been submitted.									
Issues									
None									
Recommendations									
The Licensee should seek an exemption from this requirement.									
Management Actions									
The Licensee should approach the Office of Energy to seek an exemption from this requirement.									

Item 47Licence 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.									
Observations									
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. Communication rules have not been submitted.									

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

Item 50		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.									
Observations									
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.									
Issues									
None									
Recommendations									
The Licensee should to seek an exemption from this requirement.									
Management Actions									
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

Item 40	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.		

Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 43	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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 55	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.								

Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 56	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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 58	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.									
Observations									
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.
Issues
None
Recommendations
None
Management Actions
Not applicable

Item 59	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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 68	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.									
Observations									
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.									

Issues
None
Recommendations
None
Management Actions
Not applicable

Item 70	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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 71	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.									
Observations									
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 is consistent.									

Issues
None
Recommendations
None
Management Actions
Not applicable

Metering Code Obligations Type 2 Retail

Item 342 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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 351 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.									
Observations									
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. The network operator does not have any meters.									

Issues
None
Recommendations
None
Management Actions
Not applicable

Item 365	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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 376	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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									

Management Actions
Not applicable

Item 377 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.									
Observations									
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 does not have any meters.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 378 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.									
Observations									
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 does not have any meters.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 381 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.									
Observations									
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									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 382 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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 390 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.									

Observations									
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. The network operator does not have any meters.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 391	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.									
Observations									
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. The network operator does not have any meters.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 409	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.									
Observations									
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. The network operator does									

not have any meters.
Issues
None
Recommendations
None
Management Actions
Not applicable

Item 416 Licence Clause 5.1							Compliance rating Compliant - 5		
<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.									
Observations									
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 and these prescribe the rules, procedures, agreements and criteria. The contract obligations are met.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 420 Licence Clause 5.1							Compliance rating Not rated		
<i>Electricity Industry Metering Code clause 7.2(4)</i> A Code participant must notify its contact details to a network operator with whom it has entered into an access contract within 3 business days after the network operator's request.									
Observations									
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 access contracts in the audit period and there have been no requests for contact details from the network operator.									

Issues
None
Recommendations
None
Management Actions
Not applicable

Item 421	Licence Clause 5.1	Compliance rating Not rated							
<i>Electricity Industry Metering Code clause 7.2(5)</i> A Code participant must notify any affected network operator of any change to the contact details it notified to the network operator at least 3 business days before the change takes effect									
Observations									
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 retailer and distributor have both moved their office addresses from South Australia to Subiaco. There is no need for the vertically integrated licensees to advise each other of the change nor is there a need to advise the contacted customers. The licensees' contractor's contact details have not changed and that is the necessary contact details for the customers and Western Power.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 422	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.									
Observations									
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.									

Issues
None
Recommendations
None
Management Actions
Not applicable

Item 423 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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Metering Code Obligations Type 2 Retail / Distribution

Item 309 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.									
Observations									
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 does not have any meters.									

Issues
None
Recommendations
None
Management Actions
Not applicable

Item 319	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.		
Observations		
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. The network operator does not have any meters.		
Issues		
None		
Recommendations		
None		
Management Actions		
Not applicable		

Item 331	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.		
Observations		
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. The network operator does not have any meters.		

Issues
None
Recommendations
None
Management Actions
Not applicable

Item 427 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.									
Observations									
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. The network operator does not have any meters.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Metering Code Obligations Type NR Retail / Distribution

Item 349 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.									
Observations									
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 does not have any meters.									

Issues
None
Recommendations
None
Management Actions
Not applicable

Item 350 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.									
Observations									
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. The network operator does not have any meters.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 418 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.									
Observations									
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 and retailer have the current contact details, which are their own. The licensees' contractor's contact details have not changed and that is the necessary contact details for the customers and Western Power.									
Issues									
None									

Recommendations
None
Management Actions
Not applicable

Item 428 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.									
Observations									
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. The network operator does not have any meters.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Network Quality of Supply Regulations Type 2 Distribution / Transmission

Item 436 Licence Clause 5.1							Compliance rating Compliant - 4		
Network Quality of Supply Regulations regulation 13(3) The average total length of interruptions of supply is to be calculated using the specified method.									
Observations									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The network operator's contractor calculates SAIDI and SAIFI using 3 year averages which is acceptable to the customers but is not the 4 year average of the Code. The loads are not critical to the customer's mining operations.									
Issues									
None									

Recommendations
None
Management Actions
Not applicable

Item 437 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.	
Observations	
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.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 438 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.	
Observations	
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 loads are not critical to the customer's mining operations.	
Issues	
None	
Recommendations	
None	

Management Actions
Not applicable

Item 445 Licence Clause 5.1							Compliance rating Compliant - 5		
Network Quality of Supply Regulations regulation 23(2) A distributor or transmitter must keep records of information regarding its compliance with specific requirements for the period specified.									
Observations									
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's contractor keeps records of information regarding its compliance.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 446 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.									
Observations									
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.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 447 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.									
Observations									
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 loads are not critical to the customer's mining operations. There have been no quality investigations.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Network Quality of Supply Regulations Type NR Distribution

Item 429 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.									
Observations									
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 loads are not critical to the customer's mining operations and quality of supply is appropriate for this duty..									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 430 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.									
Observations									
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 loads are not critical to the customer's mining operations. There is no high requirement for continuity of supply.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 431	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 the supply of electricity is maintained and the occurrence and duration of interruptions is kept to a minimum.									
Observations									
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 loads are not critical to the customer's mining operations. There is no high requirement for continuity of supply.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 432	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.								
Observations								

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 loads are not critical to the customer's mining operations. There is no high requirement for continuity of supply.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 433	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.									
Observations									
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 loads are not critical to the customer's mining operations. There is no high requirement for continuity of supply.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 435	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.									
Observations									
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 loads are not critical to the customer's mining operations. There is no high requirement for continuity of supply. The interruptions are less than the code									

requirements.
Issues
None
Recommendations
None
Management Actions
Not applicable

Item 444 Licence Clause 5.1							Compliance rating Compliant - 5		
Network Quality of Supply Regulations regulation 23(1) A distributor or transmitter must take all such steps as are reasonably necessary to monitor the operation of its network to ensure compliance with specified requirements.									
Observations									
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 specify the quality of supply. There is no requirement for continuity of supply and the quality is monitored.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Appendix II Asset management system review results and recommendations

Asset Planning						Effectiveness rating Not performed - 0	
1. Asset planning							
Asset planning strategies are focused on meeting customer needs in the most effective and efficient manner (delivering the right service at the right price).							
Observations							
Process	<input checked="" type="checkbox"/>	Documentation	<input checked="" type="checkbox"/>	Availability	<input checked="" type="checkbox"/>	Use	<input checked="" type="checkbox"/>
<p>Asset Planning Process/Plan and its currency</p> <p>The licensee has 3 distribution lines (20km) at Kalgoorlie. One line has been superseded by a Western Power line and the other lines do not supply elements that are critical for the customers.</p> <p>The licensee uses a contractor (TransAlta) and these assets are included in the contractor's well developed and current asset plans for operations, maintenance and contingencies. The contractor reviews this plan annually. There is no formal strategic asset plan covering the broader or strategic elements by the Licensee.</p> <p>Allocation of responsibilities / statutory obligations</p> <p>The organisational arrangements allocate responsibilities. There is documentation (such as Integrated Management System manual) requiring compliance with statutory obligations.</p>							
Issues							
<p>The licensee conducts the shorter timeframe asset management elements (operations, maintenance and contingency planning) with a contractor (TransAlta) for operations and maintenance. Other than a strategic overview, the elements of an asset management process exist informally.</p> <p>The owner uses a special business vehicle (the licensee) to own the licensed assets and a contractor (TransAlta) carries out the core processes such as operations and maintenance. The owning bodies such as Newmont Australia in Australia carry out the long term and strategic elements of an asset management system. Each mining operation is subject to an asset impairment testing process on an annual basis to assess the viability and carrying value of the asset. 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>							
Recommendation							
None - There is no business case for carrying out asset planning when it is carried out by the owning bodies.							
Rating							

Not Performed - 0

Asset Creation						Effectiveness rating Well defined - 3	
2 Asset creation and acquisition							
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.							
Observations							
Process	<input checked="" type="checkbox"/>	Documentation	<input checked="" type="checkbox"/>	Availability	<input checked="" type="checkbox"/>	Use	<input checked="" type="checkbox"/>
<p><i>Policies and procedures for asset creation / sample creation activities</i></p> <p>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 distribution plant in the audit period. There is a plant and equipment policy covering asset acquisition disposal and impairment.</p> <p>The distribution assets are overhead lines. The lines are constructed to appropriate standards.</p> <p><i>Meeting statutory obligations</i></p> <p>There are documents requiring employees and contractors to meet statutory obligations. There are documents requiring the contractors to meet statutory obligations.</p> <p>The asset creation processes are appropriate.</p>							
Issues							
The procurement processes are appropriate.							
Rating							
Well defined - 3							

Asset Disposal						Effectiveness rating Well Defined - 3	
3. Asset disposal							
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.							
Observations							
Process	<input checked="" type="checkbox"/>	Documentation	<input checked="" type="checkbox"/>	Availability	<input checked="" type="checkbox"/>	Use	<input checked="" type="checkbox"/>
Policies and procedures for asset disposal / sample disposal activities There is no disposal action in the audit period. There are disposal processes in addition to those for justification of replacement of plant (which includes disposal of redundant plant). There are documented procedures for disposal of fixed assets. Each mining							

operation is subject to an asset impairment testing process on an annual basis to assess the viability and carrying value of the asset. There is a plant and equipment policy covering asset acquisition disposal and impairment.

The disposal processes are well defined.

Meeting statutory obligations

There are well documented obligations of the licensee and their employees to comply with statutory obligations.

Issues

The licensee is considering approaching Western Power to see if the redundant line is required by Western Power as a backup.

Recommendation

The licensee should consider deactivation of the redundant line if it is not transferred to Western Power.

Rating

Well defined - 3

Environmental analysis						Effectiveness rating Well defined - 3	
4. Environmental analysis							
Environmental analysis examines the asset system environment and assesses all external factors affecting the asset system.							
Observations							
Process	<input checked="" type="checkbox"/>	Documentation	<input checked="" type="checkbox"/>	Availability	<input checked="" type="checkbox"/>	Use	<input checked="" type="checkbox"/>
Standards / monitoring / reporting / breaches							
The licensee's owner and the operation/maintenance contractor have environmental management policies. Reporting and monitoring tools are appropriate.							
The Licensee has no environmental licences.							
The principal external threats are storms to the distribution assets. The assets are not critical to the customers and a local diesel generator will be provided if a line is out of action for more than 3 days.							
Issues							
There are no environmental requirements to report.							
There are contingency plans for back up generation to minimise outages.							
Recommendation							
None							

Rating
Well defined - 3

Asset operations						Effectiveness rating Well defined - 3	
5. Asset operations							
Operations functions relate to the day-to-day running of assets and directly affect service levels and costs.							
Observations							
Process	<input checked="" type="checkbox"/>	Documentation	<input checked="" type="checkbox"/>	Availability	<input checked="" type="checkbox"/>	Use	<input checked="" type="checkbox"/>
<i>Policies and procedures for asset operation / sample activities</i> The distribution and transmission assets are overhead lines. The lines are constructed to appropriate standards. The asset register is part of the contractor's maintenance IT system. The owner also has an asset register. <i>Training/ resources / exceptions</i> The licensee has contractor operating 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							
Well defined - 3							

Asset Maintenance						Effectiveness rating Well defined - 3	
6. <i>Asset maintenance</i>							
Maintenance functions relate to the upkeep of assets and directly affect service levels and costs.							
Observations							
Process	<input checked="" type="checkbox"/>	Documentation	<input checked="" type="checkbox"/>	Availability	<input checked="" type="checkbox"/>	Use	<input checked="" type="checkbox"/>
<i>Policies and procedures for asset maintenance / sample activities</i> 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.

The asset plan for operations, maintenance and contingencies contains performance measures.

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's contractor carries out first line maintenance and sub contracts major works. The licensee's contractor employs a specialist HV maintenance team who carry out planned maintenance activities.

Training / resources / exceptions

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.

Issues

The maintenance is appropriate for the duty required.

Recommendation

None.

Rating

Well defined - 3

Asset Management Information System						Effectiveness rating Well defined - 3	
7. Asset Management Information System (MIS)							
An asset management information system is a combination of processes, data and software that support the asset management functions.							
Observations							
Process	<input checked="" type="checkbox"/>	Documentation	<input checked="" type="checkbox"/>	Availability	<input checked="" type="checkbox"/>	Use	<input checked="" type="checkbox"/>

Policies and procedures

The licensee's contractor 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).

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.

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.

Exceptions

The reliability of the plant is evidence of good maintenances practices and that exceptions are being followed up.

Issues

None

Recommendation

None

Rating

Well defined 3

Risk management						Effectiveness rating Well Defined- 3	
8. Risk management							
Risk management involves the identification of risks and their management within an acceptable level of risk.							
Observations							
Process	<input checked="" type="checkbox"/>	Documentation	<input checked="" type="checkbox"/>	Availability	<input checked="" type="checkbox"/>	Use	<input checked="" type="checkbox"/>

<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 Licensee has developed contingencies for 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>
Issues
None
Recommendation
None
Rating
Well Defined- 3

Contingency planning	Effectiveness rating Well defined - rating 3
<p>9. Contingency planning</p> <p>Contingency plans document the steps to deal with the unexpected failure of an asset.</p>	
Observations	
Process	<input checked="" type="checkbox"/> Documentation
<input checked="" type="checkbox"/> Availability	<input checked="" type="checkbox"/> Use
<p><i>Development of contingency plans / currency</i> The licensee's contractor has good documentation of its data recovery plans.</p> <p>The Licensee has detailed maintenance scheduled out for several years, with minor and major shutdowns allowed to deal with potential issues.</p> <p>The maintenance regime is geared to keeping the plant operational without forced outages.</p> <p><i>Testing of contingency plans</i> The licensee's contractor tests safety systems routinely.</p> <p>The licensee's contractor conducts major incident training.</p>	
Issues	
None	
Recommendation	
None	

Rating
Well defined - 3

Financial planning						Effectiveness rating Well defined - rating 3	
10. Financial planning							
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.							
Observations							
Process	<input checked="" type="checkbox"/>	Documentation	<input checked="" type="checkbox"/>	Availability	<input checked="" type="checkbox"/>	Use	<input checked="" type="checkbox"/>
Financial planning process / plans The Licensee has financial plans, budgeting and monitoring processes. These are on an annual basis and upgraded year by year. No capital is planned to be spent on these assets, only operations and maintenance costs.							
Issues							
None							
Recommendation							
None							
Rating							
Well defined - rating 3							

Capital expenditure planning					Effectiveness rating Well defined - rating 3		
11. Capital expenditure planning							
<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>							
Observations							
Process	<input checked="" type="checkbox"/>	Documentation	<input checked="" type="checkbox"/>	Availability	<input checked="" type="checkbox"/>	Use	<input checked="" type="checkbox"/>
Capital expenditure process / plans							
<p>The Licensee has financial plans, budgeting and monitoring processes. No capital is planned to be spent on these assets, only operations and maintenance costs. Life of mine budgeting occurs for the owners assets and an annual basis and includes capital</p>							

expenditure plans, but this asset has no current plans.
Issues
None.
Recommendation
None
Rating
Well defined - rating 3

Review of AMS						Effectiveness rating Not Performed - rating 0	
12. Review of AMS							
The asset management system is regularly reviewed and updated.							
Observations							
Process	<input checked="" type="checkbox"/>	Documentation	<input checked="" type="checkbox"/>	Availability	<input checked="" type="checkbox"/>	Use	<input checked="" type="checkbox"/>
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.							
Issues							
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.							
Recommendation							
None - There is no business case for carrying out asset planning when it is carried out by the owning bodies.							
Rating							
Not Performed - rating 0							