



McGill Engineering Services Pty Ltd

Engineering, Adjudication & Arbitration Services ABN 45 106 691 169

NEWGEN NEERABUP PARTNERSHIP GENERATION LICENCE EGL 18 PERFORMANCE AUDIT REPORT

Prepared By Kevan McGill
Date 23 July 2010



McGill Engineering Services Pty Ltd

Engineering, Adjudication & Arbitration Services ABN 45 106 691 169

Phillip MacMahon
Operations Manager
ERM Power
PO Box 7152 Riverside Centre
Queensland 4000

Dear Mr MacMahon

Performance Audit Electricity Licences

The fieldwork on the performance audit of Generation Licence EGL 18 for the audit period (26 March 2008 to 31 March 2010) is complete and I am pleased to submit the report to you. The report reflects my findings and opinions.

In my opinion, the Licensee has maintained a high level of compliance with the licence conditions. While there was a non compliance is was not a material issue.

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the Generation licence (EGL 18) for the audit period on the relevant clauses referred to within the scope section of this report.

Yours sincerely

Kevan McGill
Director

Date 23 July 2010

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2 Executive Summary

This performance audit was conducted in accordance with the guidelines issued by the Economic Regulation Authority (*Authority*) for the audit period (26 March 2008 to 31 March 2010).

2.1 OVERALL CONCLUSION

In my opinion, the Licensee has maintained a high level of compliance with the licence conditions. While there was a non compliance it was not a material issue. In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the Generation Licence (EGL 18) for the audit period based on the relevant clauses referred to within the scope section (Page 8) of this report.

2.2 LICENSEE'S BUSINESS

The Licensee is an entity set up by its owning partners to operate and maintain the generation plant. The plant is a gas turbine operating in the WEM as a peak mode plant when the SWIS is operating near maximum generation demand. The plant consists of 2 Siemens 170MW open cycle gas turbines operated as one unit with a single 330KV Western Power transmission line connecting to the Western Power Neerabup substation. The gas supply is by a full sized (26 inch) lateral from the Dampier to Bunbury Natural Gas Pipeline.

2.3 PERFORMANCE AUDIT

A summary of the findings of the performance audit is:

2.4 COMPLIANCE SUMMARY RATINGS

The compliance rating for each Obligation using the 7-point rating scale (5 for numerical rating score and 2 not rated/not applicable scales) is described in table below and as determined by the auditor.

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	1	Significant weaknesses and/or serious action required

NON-COMPLIANT		
NOT APPLICABLE	N/A	Determined that the compliance obligation does not apply to the Licensee's business operations
NOT RATED	N/R	No relevant activity took place during the audit period, therefore it is not possible to assess compliance

The results are summarised below.

Assessment	Licence obligations	Audit priority 4	Audit priority 5
Compliant 5	15	10	5
Compliant 4	0	0	0
Compliant 3	1	1	0
Non-compliant 2	1	1	0
Significantly non compliant 1	0	0	0
Not Applicable	1	1	0
Not Rated	30	20	10

3 PERFORMANCE AUDIT

3.1 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 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.

The Licensee appointed McGill Engineering Services Pty Ltd to conduct the audit of its Generation Licence with approval from the Authority. A preliminary assessment was conducted with the Licensee's management to determine the inherent risk and the state of control for each compliance element of the Licence obligation. McGill Engineering Services Pty Ltd then prioritised the audit coverage based on the risk profile of the Licensee with an emphasis on providing greater focus and depth of testing for areas of higher risk to provide reasonable assurance that the Licensee had complied with the standards, outputs and outcomes under the Licence obligations.

The audit was conducted in a manner consistent with Australian Auditing Standards (AUS) 808 "Planning Performance Audits" and AUS 806 "Performance Auditing". McGill Engineering Services Pty Ltd evaluated the adequacy and effectiveness of the controls and performance by the Licensee relative to the standards referred in the Generation Licence through a combination of enquiries, examination of documents and detailed testing for Electricity Generation Licence EGL 18 for the Licensee.

¹ Electricity compliance reporting manual, March 2008

3.2 AUDIT PERIOD

The audit period is 26 March 2008 to 31 March 2010.

3.3 SCOPE LIMITATION

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

3.4 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.

3.5 STATEMENT OF INDEPENDENCE

To the best of my knowledge and belief, there is no basis for contraventions of any professional code of conduct in respect of the audit.

I have not done or contemplate undertaking any other work with the Licensee.

There are no independence threats due to:

- self-interest – as the audit company or a member of the audit team have no financial or non-financial interests in the Licensee or a related entity;
- self-review – no circumstance has occurred where:
 - the audit company or a member of the audit team has undertaken other non-audit work for the Licensee that is being evaluated in relation to the audit/review; or
 - when a member of the audit team was previously an officer or director of the Licensee; or
 - where a member of the audit team was previously an employee of the Licensee who was in a position to exert direct influence over material that will be subject to audit during an audit/review.

There is no risk of a self-review threat as:

- no work has been

- undertaken by the auditor, or a member of the audit/review team, for the Licensee within the previous 24 months; or
- the auditor is currently undertaking for the Licensee; or
- the auditor has submitted an offer, or intends to submit an offer, to undertake for the Licensee within the next 6 months; and
- familiarity – there is no close family relationship with a Licensee, its directors, officers or employees,
- and is not nor is perceived to be too sympathetic to the Licensee’s interests.

3.6 SCOPE OF THE AUDIT

The audit was 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. 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 Neerabup 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
 - Philip MacMahon, Operations Manager Bruno Lanciano Power Station Manager and Alison Jones Admin Assistant, Tony Petersen Admin Officer

- McGill Engineering Services Pty Ltd
 - Kevan McGill

The audit was conducted during May and June 2010. Kevan McGill spent about 100 hours on the audit.

3.7 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 Planning ASA 315: 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

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3.11 ESTABLISHING THE CONTEXT

The key legislation that governs the licensing of providers of electricity is the Electricity Industry Act 2004. In turn, the compliance elements in the Corporation’s Operating Licence were examined and referred to throughout the audit process.

3.11.1 AUDIT RESULTS AND RECOMMENDATIONS

Summary of significant results

A non compliance has been recorded and action is recommended for this item.

3.11.2 COMPLIANCE ELEMENTS REQUIRING CORRECTIVE MEASURES

No issues to require corrective action

3.11.3 SUGGESTIONS FOR IMPROVEMENT

Item 109 Electricity Industry Act section 11	Compliance rating Compliant 3
Licence: <i>Generation</i>	
<i>Generation Licence condition 17.1</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	
The Licensee is not under external administration however a change to the partnership occurred in the audit period but this did not affect the Licensee’s ability to meet its obligations. The Authority was advised of the change on 24/6/2010. The Licensee will need to pay the fee to amend the licence.	
Issues	
None	
Recommendations	
The Licensee will need to pay the fee to amend the licence.	
Management Actions	
Pay applicable fee on receipt of Tax Invoice.	

Item 110 Electricity Industry Act section 11	Compliance rating Non Compliant 2
Licence: <i>Generation</i>	
<i>Generation Licence condition</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	

The 2008 report was not provided but the plant was not operational so there was nil activity to measure to report. The 2009 report was made on time but did not report the 2008 no report. There was a technical non compliance in that the Licensee should have reported in 2008 that there was no activity to report and the 2009 report consequentially should have reported the 2008 no report. There is no systemic issue but a failure to make a report when the plant was not operational.

Issues

No material issue but controls could be improved to avoid missing required information

Recommendations

Confirm that a procedure is in place to remind of reporting dates.

Management Actions

Confirm that a procedure is in place to remind of reporting dates.

3.11.4 POST AUDIT IMPLEMENTATION PLAN

The Licensee is to provide a post audit plan but it will include

- The Licensee has since created re-occurring annual work order that will prompt to ensure that the licence reporting is timely. This prompt has also been duplicated in a site compliance calendar.

3.12 DETAILED FINDINGS

3.12.1 AUDIT WORK UNDERTAKEN

We conducted interviews and enquiries

- Understand the control environment by determining the responsibility matrix and key control points
- Obtain the policies and procedures for managing licensed areas; and
- Identify the information systems and processes employed to manage licensed areas
- Determine the level of understanding of the systems and processes for managing licensed areas
- In reviewing the procedures and protocols for managing provision of services within a licensed area, where applicable, we obtained flowcharts of the processes and assessed the reasonableness of the decision matrix and the adequacy of the control points implemented by the Licensee.

3.12.2 AUDIT EVIDENCE

The following audit evidence was obtained:

- Generation Licence
- Asset management agreement
- Decommissioning Plan
- Asset management system document
- Financial statements
- Job safety and environmental analysis procedure
- Licence fee invoices, journal entries
- Land lease payments
- Outage reports
- Servers back up schedules
- ERA annual returns
- Gas Pipeline Commissioning, Operations and Maintenance Hazard identification report

3.13 DETAILED AUDIT FINDINGS

The following sets out the audit findings

3.13.1 ELECTRICITY INDUSTRY ACT – LICENCE CONDITIONS AND OBLIGATIONS

Item 81 Generation Licence condition 15.1	Compliance rating Compliant 5
Licence: <i>Generation</i>	
<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	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee advised the Authority of the contract arrangements with the approval of the auditor.	
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 contracted with the auditor in accordance with the requirements.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 82 Generation Licence condition 16.1	Compliance rating Compliant 5
Licence: <i>Generation</i>	
<i>Electricity Industry Act section 13(1)</i> A Licensee must provide for an asset management system.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: Include Asset Management agreement, Asset management system document, Risk management policy, Decommissioning plans, Financial statements, Job safety and environmental analysis procedure, Outage reports and Gas Pipeline Commissioning, Operations and Maintenance Hazard identification report.	
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 an asset management system and the review will examine the efficacy of the system.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 83	Generation Licence condition 16.1 & 16.2								Compliance rating Compliant 5	
Licence: <i>Generation</i>										
<i>Electricity Industry Act section 13(1)</i> A Licensee must notify details of the asset management system and any substantial changes to it to the Authority.										
Observations										
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>							
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: Include Asset Management agreement, Asset management system document, Risk management policy, Decommissioning plans, Financial statements, Job safety and environmental analysis procedure, Outage reports and Gas Pipeline Commissioning, Operations and Maintenance Hazard identification report.										
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>	
The Licensee advised the Authority of the asset management system with the approval of the licence. There have been no substantial changes since.										
Issues										
None										
Recommendations										
None										
Management Actions										
Not applicable										

Item 84	Generation Licence condition 16.3								Compliance rating Compliant 5	
Licence: <i>Generation</i>										
<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										
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>							
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: Include Asset Management agreement, Asset management system document, Risk management policy, Decommissioning plans, Financial statements, Job safety and environmental analysis procedure, Outage reports and Gas Pipeline Commissioning, Operations and Maintenance Hazard identification report.										
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 contracted with the reviewer in accordance with the requirements.										
Issues										
None										
Recommendations										
None										
Management Actions										
Not applicable										

Item 85	Generation Licence condition 4.1								Compliance rating Compliant 5	
Licence: <i>Generation</i>										
<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									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: Licence invoices, journal entries.									
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 paid the fees and on time. The 2008 fee was paid twice and refund for second payment made in July 2009.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 86							Compliance rating		
Generation Licence condition 5.1							Compliant 5		
Licence: <i>Generation</i>									
<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									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee provided outage logs.									
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 plant has not been despatched on load let alone had any breakdowns.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 87							Compliance rating		
Generation Licence condition 5.11							Compliant 5		
Licence: <i>Generation</i>									
<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									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: Lease payment journal entries.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There has been no purchase of land in the audit period. The land is leased and payments are being made.									
Issues									
None									

Recommendations
None
Management Actions
Not applicable

3.13.2 ELECTRICITY LICENCES – LICENCE CONDITIONS AND OBLIGATIONS

Item 103 Electricity Industry Act section 11	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Generation Licence condition 12.2</i> A Licensee must amend the asset management system before an expansion or reduction in generating works, distribution systems and transmission systems and notify the Authority in the manner prescribed, if the expansion or reduction is not provided for in the asset management system.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: Not applicable.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There has been no expansion or reduction in the audit period except commissioning of the licensed plant.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 104 Electricity Industry Act section 11	Compliance rating Compliant 5
Licence: <i>Generation</i>	
<i>Generation Licence condition 12.3</i> A Licensee must not expand the generating works, distribution systems or transmission systems outside the licence area.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: Not applicable	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
There has been no expansion or reduction in the audit period except commissioning of the licensed plant	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 105 Electricity Industry Act section 11	Compliance rating Compliant 5
Licence: <i>Generation</i>	
<i>Generation Licence condition 13.1</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	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents Financial report summary.	
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 complies with Australian accounting standards.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 106 Electricity Industry Act section 11	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Generation Licence condition 14.4</i> A Licensee must comply with any individual performance standards prescribed by the Authority.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: Not applicable.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There are no individual performance standards.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 107 Electricity Industry Act section 11	Compliance rating Complaint 5
Licence: <i>Generation</i>	
<i>Generation Licence condition 15.2</i> A Licensee must comply, and require its auditor to comply, with the Authority's standard audit guidelines dealing with the performance audit.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee provided contracting arrangements to the Authority with the approval of the auditor.	
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 contracted with the auditor in accordance with the requirements.	

Issues
None
Recommendations
None
Management Actions
Not applicable

Item 108 Electricity Industry Act section 11	Compliance rating Compliant 5
Licence: <i>Generation</i>	
<i>Generation Licence condition 16.4</i> A Licensee must comply, and must require the Licensee's expert to comply, with the relevant aspects of the Authority's standard guidelines dealing with the asset management system.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee provided contracting arrangements to the Authority with the approval of the reviewer.	
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 contracted with the reviewer in accordance with the requirements.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 109 Electricity Industry Act section 11	Compliance rating Compliant 3
Licence: <i>Generation</i>	
<i>Generation Licence condition 17.1</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	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: Generation licence.	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The Licensee is not under external administration but a change to the partnership occurred in the audit period but this did not affect the Licensee's ability to meet its obligations. The Authority was advised of the change on 24/6/2010. The Licensee will need to pay the fee to amend the licence.	
Issues	
None	
Recommendations	
The Licensee will need to pay the fee to amend the licence.	
Management Actions	
Pay applicable fee on receipt of Tax Invoice.	

Item 110 Electricity Industry Act section 11	Compliance rating Not Compliant 2
Licence: <i>Generation</i>	
<i>Generation Licence condition 18.1</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	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: Annual returns.	
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 2008 report was not provided but the plant was not operational so there was nil activity to measure to report. The 2009 report was made on time but did not report the 2008 no report. There was a technical non compliance in that the Licensee should have reported in 2008 that there was no activity to report and the 2009 report consequentially should have reported the 2008 no report. There is no systemic issue but a failure to make a report when the plant was not operational.	
Issues	
No issue but controls could be improved to avoid missing required information	
Recommendations	
Confirm that a procedure is in place to remind of reporting dates.	
Management Actions	
Confirm that a procedure is in place to remind of reporting dates.	

Item 111 Electricity Industry Act section 11	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Generation Licence condition 19.2</i> A Licensee must publish any information it is directed by the Authority to publish, within the timeframes specified.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: Not applicable.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There was no requirement to publish any information.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 112 Electricity Industry Act section 11	Compliance rating Compliant 5
Licence: <i>Generation</i>	
<i>Generation Licence condition 20.1</i> Unless otherwise specified, all notices must be in writing.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: Sample communication with ERA.	

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 Authority did not require any notices. All material communication with the Authority is in writing.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

3.13.3 ELECTRICITY INDUSTRY METERING CODE – LICENCE CONDITIONS AND OBLIGATIONS (ALL LICENCE CONDITION LICENCE CLAUSE 5.1)

Item 309									Compliance rating
Licence condition 5.1									Not Rated
Licence: <i>Generation</i>									
<i>Electricity Industry Metering Code clause 3.5(6)</i>									
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									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no metering installations in the audit period (and none by the Licensee). Western Power is to undertake meter testing in next audit period but these are not on the licensed area.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 319									Compliance rating
Licence condition 5.1									Not Rated
Licence: <i>Generation</i>									
<i>Electricity Industry Metering Code clause 3.11(3)</i>									
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									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The Licensee is not aware of any outages.									
Issues									
None									

Recommendations
None
Management Actions
Not applicable

Item 331 Licence condition 5.1	Compliance rating Not Applicable
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 3.16(5)</i> 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	
Documents	<input type="checkbox"/> Compliance
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.	
Process	<input type="checkbox"/> Outcome
	<input type="checkbox"/> Output
	<input type="checkbox"/> Reporting
	<input type="checkbox"/> Compliance
There are no accumulation meters to be modelled therefore 3.16(4) does not apply and consequently 3.16(5) which depends on 3.16(4) also does not apply. The Licensee takes no part in metering as it is all done by Western Power, thus there is no need for a service level agreement.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 342 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<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	
Documents	<input checked="" type="checkbox"/> Compliance
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.	
Process	<input type="checkbox"/> Outcome
	<input type="checkbox"/> Output
	<input type="checkbox"/> Reporting
	<input type="checkbox"/> Compliance
No new meters have been installed in the audit period.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 349 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<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	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
The Licensee has no metering installation or database to create a discrepancy.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 350 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 4.5(1)</i> A Code participant must not knowingly permit the registry to be materially inaccurate.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
The Licensee has no way of knowing about Western Power's registry other than their own details which have not changed.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 351 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<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	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.	

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The Licensee has no way of knowing about Western Power’s registry other than their own details.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 363 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 5.4(2)</i> A user must, when reasonably requested by a network operator, use reasonable endeavours to assist the network operator to comply with the network operator’s obligation.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.	
Process	<input type="checkbox"/> Outcome
<input type="checkbox"/> Output	<input type="checkbox"/> Reporting
<input type="checkbox"/> Compliance	<input type="checkbox"/>
No requests were made of users or the Licensee. Western Power will be testing their meters in next audit period.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 365 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<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	
Documents	<input type="checkbox"/> Compliance
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.	
Process	<input type="checkbox"/> Outcome
<input type="checkbox"/> Output	<input type="checkbox"/> Reporting
<input type="checkbox"/> Compliance	<input type="checkbox"/>
The Licensee has no data to raise a charge for.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 376 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<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	
Documents	<input checked="" type="checkbox"/> Compliance
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.	
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 meters to collect information or data from.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 377 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<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	
Documents	<input type="checkbox"/> Compliance
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.	
Process	<input type="checkbox"/> Outcome
<input type="checkbox"/> Output	<input type="checkbox"/> Reporting
<input type="checkbox"/> Compliance	<input type="checkbox"/>
There are no meters to collect information or data from for billing.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 378 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<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									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There are no meters on site to be aware of energisation status. The Licensee's installation is metered by Western Power on the Western Power substation.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 379 Licence condition 5.1							Compliance rating Not Rated		
Licence: <i>Generation</i>									
<i>Electricity Industry Metering Code clause 5.19(1)</i> A user must, when requested by the network operator acting in accordance with good electricity industry practice, use reasonable endeavours to collect information from customers, if any, that assists the network operator in meeting its obligations described in the Code and elsewhere.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no requests.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 380 Licence condition 5.1							Compliance rating Not Rated		
Licence: <i>Generation</i>									
<i>Electricity Industry Metering Code clause 5.19(2)</i> A user must, to the extent that it is able, collect and maintain a record of the address, site and customer attributes, prescribed in relation to the site of each connection point, with which the user is associated.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The only connection point is with Western Power and there is no meter information to be collected.									

Issues
None
Recommendations
None
Management Actions
Not applicable

Item 381 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<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	
Documents	<input type="checkbox"/> Compliance
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.	
Process	<input type="checkbox"/> Outcome
	<input type="checkbox"/> Output
	<input type="checkbox"/> Reporting
	<input type="checkbox"/> Compliance
The only connection point is with Western Power and there have been no changes in attributes.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 382 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<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	
Documents	<input checked="" type="checkbox"/> Compliance
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.	
Process	<input checked="" type="checkbox"/> Outcome
	<input checked="" type="checkbox"/> Output
	<input checked="" type="checkbox"/> Reporting
	<input checked="" type="checkbox"/> Compliance
There are no sensitive loads and the Licensee sells to the Wholesale Electricity Market.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 384 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 5.19(6)</i> A user must use reasonable endeavours to ensure that it does not notify the network operator of a change in an attribute that results from the provision of standing data by the network operator to the user.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.	
Process	<input checked="" type="checkbox"/> Outcome
	<input checked="" type="checkbox"/> Output
	<input checked="" type="checkbox"/> Reporting
	<input checked="" type="checkbox"/> Compliance
There has been no standing data provided by the network operator. There is no customer information that the Licensee would hold.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 390 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 5.21(5)</i> A Code participant must not request a 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	
Documents	<input type="checkbox"/> Compliance
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.	
Process	<input type="checkbox"/> Outcome
	<input type="checkbox"/> Output
	<input type="checkbox"/> Reporting
	<input type="checkbox"/> Compliance
The Licensee does not own meters to test and has not requested Western Power to test. Western Power will test their meters in next audit period.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 391 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<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									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The Licensee does not own meters to test and has not requested Western Power to test.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 409 Licence condition 5.1							Compliance rating Not Rated		
Licence: <i>Generation</i>									
<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									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee does not own meters to test and has not requested Western Power to test.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no requests.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 416 Licence condition 5.1							Compliance rating Compliant 5		
Licence: <i>Generation</i>									
<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									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.									
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 complied with Western Power's requirements and there have been no complaints.									
Issues									
None									

Recommendations
None
Management Actions
Not applicable

Item 418 Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Generation</i>	
<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	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Western Power has the Licensee's relevant addresses.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 420 Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Generation</i>	
<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	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Western Power has the Licensee's relevant addresses. There was no request in the audit period.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 421 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<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	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no address changes.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 422 Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Generation</i>	
<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	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
There has been no disclosure of confidential information (the Licensee has no meter information to disclose).	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 423 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<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	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>

Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There has been no confidential information to be disclosed (the Licensee has no meter information to disclose).									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 424 Licence condition 5.1								Compliance rating Not Rated	
Licence: <i>Generation</i>									
<i>Electricity Industry Metering Code clause 8.1(1)</i> Representatives of disputing parties must meet within 5 business days after a notice given by a disputing party to the other disputing parties and attempt to resolve the dispute under or in connection with the Electricity Industry Metering Code by negotiations in good faith.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no disputes (the Licensee has no meter information to dispute and has no disputes with Western Power).									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 425 Licence condition 5.1								Compliance rating Not Rated	
Licence: <i>Generation</i>									
<i>Electricity Industry Metering Code clause 8.1(2)</i> If a dispute is not resolved within 10 business days after the dispute is referred to representative negotiations, the disputing parties must refer the dispute to a senior management officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no disputes (the Licensee has no meter information to dispute and has no disputes with Western Power).									
Issues									
None									

Recommendations
None
Management Actions
Not applicable

Item 426 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 8.1(3)</i> If the dispute is not resolved within 10 business days after the dispute is referred to senior management negotiations, the disputing parties must refer the dispute to the senior executive officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no disputes (the Licensee has no meter information to dispute and has no disputes with Western Power).	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 427 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<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	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: The Licensee has no meters and Western Power meters at the Neerabup substation.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no disputes (the Licensee has no meter information to dispute and has no disputes with Western Power).	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 428 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<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	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
The Licensee has no meters and Western Power meters at the Neerabup substation.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Phil MacMahon, listed staff on site. Documents: There have been no disputes (the Licensee has no meter information to dispute and has no disputes with Western Power).	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	