



# McGill Engineering Services Pty Ltd

Engineering, Adjudication & Arbitration Services ABN 45 106 691 169

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## **BHPBILLITON NICKELWEST PTY LTD DISTRIBUTION LICENCE EDL 2 RETAIL LICENCE ERL 2 PERFORMANCE AUDIT REPORT**

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**Prepared By Kevan McGill  
Date 9 September 2010**



# McGill Engineering Services Pty Ltd

Engineering, Adjudication & Arbitration Services ABN 45 106 691 169

Bill Head  
Energy Management Group  
Stainless Steel and Materials – Nickel West  
BHP Billiton Pty Ltd Nickel West  
152-158 St George Terrace  
PERTH WA 6000

Dear Mr Head

## **Performance Audit Electricity Licences**

The fieldwork on the performance audit of Distribution Licence EDL 2 and Retail Licence ERL 2, for the audit period (31 March 2008 to 30 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 good level of compliance with the licences conditions and integrity with the Licensee's reporting obligations. While there was a non compliance noted this was not a significant item.

In my opinion, the Licensee maintained, in all material aspects, control procedures in relation to the Distribution licence (EDL 2) and Retail Licence (ERL 2) for the audit period on the relevant clauses referred to within the scope section of this report.

Yours sincerely

Kevan McGill  
Director

Date 9 September 2010

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# CONTENTS

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1	Executive Summary .....	5
1.1	Overall Conclusion .....	5
1.2	Ratings .....	6
1.3	Section 32 Notice .....	7
2	Detailed report on Actions and Status of Section 32 Notice .....	9
3	Performance Audit .....	16
3.1	Performance Audit Objectives .....	16
3.2	Audit Period .....	17
3.3	Statement of Independence .....	17
3.4	Scope Limitation .....	17
3.4.1	Excluded Conditions .....	18
3.5	Inherent Limitations .....	18
3.6	Scope of the Audit .....	18
1.	Risk and Materiality Assessment .....	18
2.	System Analysis, Assertion Setting and Review .....	18
3.	Fieldwork: Testing and Analysis .....	19
3.7	Corrective actions from last audit. ....	20
3.8	Audit Roles .....	30
3.9	Audit Requirements .....	30
3.10	Distribution System / Retail customers .....	31
3.11	Licence .....	32
3.12	Overall Conclusion .....	32
3.13	Findings .....	33
3.14	Establishing the Context .....	37
3.14.1	Audit Results and Recommendations .....	37
3.14.2	Compliance elements requiring corrective measures .....	37
3.14.3	Suggestions for improvement .....	37
3.14.4	Post Audit Implementation Plan .....	43

3.15	Detailed findings.....	43
3.15.1	Audit work undertaken .....	43
3.16	Audit Evidence .....	44
3.17	Detailed audit findings .....	45
3.17.1	Electricity Industry Customer Transfer Code – Licence Conditions and Obligations .....	45
3.17.2	Electricity Industry Act – Licence Conditions and Obligations .....	45
3.17.3	Electricity Licences – Licence Conditions and Obligations .....	48
3.17.4	Electricity Industry Metering Code – Licence Conditions and Obligations (all licence condition Licence clause 5.1) .....	52
3.17.5	Electricity Industry (Network Quality and Reliability of Supply) Code – Licence Conditions and Obligations (all licence condition Licence clause 5.1).....	103

## 1 Executive Summary

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BHP Billiton Nickel West (*NiW*) holds an Electricity Distribution Licence (EDL2) and an Electricity Retail Licence (ERL2) issued by the Economic Regulation Authority under the Electricity Industry Act 2004. This performance audit was conducted in accordance with the guidelines issued by the Economic Regulation Authority (*Authority*) for the audit period (31 March 2008 to 30 March 2010) to assess Nickel West's level of compliance with the licence conditions.

Nickel West operates a small distribution network in the mining town of Leinster (the northern system) and a small non contiguous network to 5 mining customers in the Kambalda region (the southern system). In the southern system the distribution system consists of off-takes from another licensee's distribution or transmission system and connections to customers. The northern distribution system is the Leinster town site with less than 300 connections to consumers but who are not considered as customers as electricity is not retailed to the consumer.

Nickel West retails electricity to the same 5 mining customers in the southern system and to 1 mining customer in the northern system where the radial distribution is carried out by another licensee. There is no retail in Leinster town site. Nickel West purchases all its electricity from a third party.

The records and areas covered by the Licence were inspected and interviews were also held with key personnel at the operational sites (Leinster and Kambalda) and in the Perth Office. The extent of the Licensee's assets has not changed since the last audit.

While the Licence covers Mt Keith there are no distribution assets (other than self supply which is exempted by the Act) and no retail.

The Electricity Licences require Nickel West to provide the authority with an audit report from an independent expert on a defined time scale. This is the second audit of the licences held by Nickel West. Following the first audit, Nickel West was issued with a Section 32 Notice. This audit report also addresses the status of actions arising from this.

### 1.1 OVERALL CONCLUSION

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In my opinion, the Licensee has maintained a good level of compliance with the licences conditions and integrity with the Licensee's reporting obligations. While there was a non compliance noted this was not a significant item.

In my opinion, the Licensee maintained, in all material aspects, control procedures in relation to the Distribution Licence (EDL 2) and Retail Licence (ERL 2) for the audit period based on the relevant clauses referred to within the objectives section (Page 16) of this report. It is clearly apparent that Nickel West has raised the focus on compliance to the licence requirements and specifically to

- Improved customer documentation and focus
- Compliance with metering requirements
- Documentation and recording of interruptions to supply
- Undertaking power quality assessments

- Risk assessment and development of an Asset Management Plan (progress reported in the separate Asset Management System Review report)

A summary of the findings of the performance audit is given in section 1.2 below and following this, a summary assessment of actions taken for contraventions recorded in the Section 32 notice served on Nickel West is given in section 1.3 below:

## 1.2 RATINGS

A risk assessment approach is used to develop the depth of audit required for each Obligation and is documented in an Audit Plan approved by the Authority prior to audit. A 5 level Audit Priority scale is used based on the combined rating for Inherent Risk and Control Adequacy defined in the following table. Following approval of the audit plan, a number of obligations were approved by the Authority for removal from the audit. The Nickel West obligations assessed in this audit, all have an Audit Priority rating of 4 or 5

	Adequacy of existing controls			
Inherent risk		Weak	Moderate	Strong
	High	Audit Priority 1	Audit Priority 2	
	Medium	Audit Priority 3	Audit Priority 4	
	Low	Audit Priority 5		

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

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
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 total number of licence obligations assessed are summarised by audit priority ratings below.

Assessment	Total	Audit Priority				
		1	2	3	4	5
Compliant 5	52	19	0	0	27	6
Compliant 4	15	7	0	0	8	0
Compliant 3	0	0	0	0	0	0
Non-compliant 2	1	1	0	0	0	0
Significantly Non-compliant 1	0	0	0	0	0	0
Not Applicable	25	3	0	0	21	1
Not Rated	135	4	0	0	105	26

\* 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.

### 1.3 SECTION 32 NOTICE

The Authority issued a Section 32 Notice after the audit for the period 24 March 2006 (Commencement of Licence) to 30 March 2008.

A summary of actions and status for items relevant to the Performance Audit is given below with the detail provided in Section 2 of the main body of the report

Section 32 Notice Reference	Status
1.1	Complete
1.2	Complete
1.3	Complete
1.4	Complete
1.5	Complete
1.6	Complete
1.7	Complete
1.8	Complete
1.9	Complete
1.10	Complete
1.11	Complete
1.12	Complete
1.13	Complete
1.14	Complete
2	Complete
3.1	Complete

All actions raised for items relevant to the Performance Audit have been complete. Detailed status is given in Section 2 below

Items relevant to the Asset Management System shall be reported on in the Asset Management Review.



## 2 DETAILED REPORT ON ACTIONS AND STATUS OF SECTION 32 NOTICE

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Following the previous compliance audit, the Authority issued a Section 32 Notice to BHP Billiton Nickel West. Nickel West has undertaken work to close out the contraventions in the licence. Each item of the Notice is addressed below or in the Asset Management Plan Review

### **Schedule of Contraventions**

#### **1. Contravention of clause 5 of Electricity Distribution Licence 2**

Clause 5.1 of Electricity Distribution Licence 2 ("Distribution Licence") states:

*"Subject to any modifications or exemptions granted pursuant to the Act, the Licensee must comply with any applicable legislation including, but not limited to, the Electricity Industry Customer Transfer Code 2004, the Electricity Industry Metering Code 2005, the Reliability and Quality of Supply Code 2005 and the Code of Conduct for the Supply of Electricity to Small Use Customers 2004."*

*BHP Billiton Nickel West Pty Ltd ("NiW") has contravened clause 5.1 of the Distribution Licence as follows:*

- 1.1 *Clause 3.5(3) of the Electricity Industry Metering Code 2005 (Metering Code) requires a network operator, for each metering installation on its network, on and from the time of its connection to the network, to provide, install, operate and maintain the metering installation in the manner prescribed (unless otherwise agreed) in the Metering Code. The audit report discloses that meters were not checked or calibrated during the audit period (page 16).*

Status: Complete. The meters have been checked and calibrated to the extent possible, as there was no load on a number of meters and load is necessary to measure current (and KW/KWh) and determine the calibration accuracy.  
The calibration results were sighted and meet Code requirements. The metering installation predates the Meter Code implementation and the meters have to meet the *otherwise agreed* requirements which in this case are in the relevant Power Procurement Agreements (PPA).

- 1.2 *Clause 3.1 of the Metering Code requires a network operator to ensure that its meters meet the requirements specified in the applicable metrology procedure and also comply with any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act. The audit report discloses that the meters were last calibrated in the period between 2000 and 2003, CT/VT details were not available and the overall accuracy is unknown (page 16).*

Status: Complete. The meters have been checked and calibrated in 2009/10 to the extent possible, as there was no load on a number of meters and load is necessary to measure current (and KW/KWh) and determine the calibration accuracy.

The calibration results were sighted and CT/VT details established. The metering installation predates the Meter Code implementation. The meters have to meet the *applicable metrology procedures* which in this case are in the relevant Power Procurement Agreements (PPA). The Licensee is permitted by 3.14(4) to use protection class CTs providing that they meet the requirements of Appendix 1. The calibration reports indicate that Table 3, Appendix 1 is satisfied (all meters able to be calibrated (i.e. load available) meet the calibration requirements and the Volt ampere reactive (VAR) requirement for Type 3 meters are satisfied). As protection class CTs (permitted by 3.14(4)) they cannot be assured of meeting the applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act which are for measurement class CTs.

- 1.3 *Clause 3.8 of the Metering Code requires a network operator, for each metering installation on its network, to ensure that the metering installation is secured by means of devices or methods which, to the standard of good electricity industry practice, hinder unauthorized access and enable unauthorised access to be detected. The audit report discloses that metering installations that are installed on customer's premises have no locks and no meters were sealed (page 16).*

Status: Complete. The meters are on secured controlled access mine sites and within locked electrical rooms with controlled access which meets good electrical industry practice. Further locks within these controlled areas or meter seals are not required and in the case of some meters impracticable. The meters are electronically monitored and meter errors readily detected.

- 1.4 *Clause 3.9(3) of the Metering Code requires each metering installation to meet at least the requirements for that type of metering installation specified in Table 3 in Appendix 1 of the Metering Code. Clause 3.12(1) of the Metering Code requires a network operator to ensure that each metering installation complies with, at least, the prescribed design requirements. Clause 3.12(2) of the Metering Code requires a network operator to ensure that instrument transformers in its metering installations comply with the relevant requirements of any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act and any requirements specified in the applicable metrology procedure. The audit report discloses a lack of information and detail concerning the standards of the current metering installations (page 17) and the auditor is uncertain that the installations meet the requirements of the Code. Given the audit methodology and the lack of information, the Authority is of the opinion that NiW has not complied with these requirements of the Metering Code.*

Status: Complete. The metering installation predates the Meter Code implementation, and the Meter Code specifically allows for transitional arrangements in that under 3.14(1), a predating installation does not require to be updated to the Code and 3.14(4) allows protection Class CTs to be used for metering. The meters have been checked and calibrated (to the extent possible as there was no load on a number of meters and load is necessary to measure current (and KW/KWh) and the consequent

accuracy -calibration report sighted) and CT/VT details established. Relief from complying with Clauses 3.9(3), 3.12(1) and 3.12(2) is provided by the transitional arrangement of Clause 3.14(1). It is noted that Clause Code 3.9(3) is satisfied as the error requirements specified in Table 3 Appendix 1 is satisfied despite protection CT being used. Code 3.12(1) must be exempted as it requires measurement class CT to be used exclusively for metering but 3.14(4) allows protection class CTs to be used. As protection class CTs are permitted by 3.14(4) they cannot be assured of meeting the applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act as these are for metering class instruments (3.12(2)).

- 1.5 *Clause 3.12(4) of the Metering Code requires a network operator to maintain drawings and supporting information, to the standard of good electricity industry practice, detailing the metering installation for maintenance and auditing purposes. The audit report discloses that drawings and other information were not maintained (page 17).*

Status: Complete in that drawings have been provided as required by the last audit but in the opinion of the auditor there is an opportunity for further improvement in some of the technical content or cross reference other drawings and further work could be undertaken to meet best practice.

- 1.6 *Clause 3.14(3) of the Metering Code requires that if, under clause 3.14(2) of the Metering Code, a metering installation uses metering class CTs and VTs that do not comply with the prescribed requirements, then the network operator must either (or both) install meters of a higher class accuracy or apply accuracy calibration factors within the meter in order to achieve the overall accuracy requirements prescribed. The audit report discloses that no details of wiring configuration or CT/VT were available (page 18). Given the audit methodology and the lack of information, the Authority is of the opinion that NiW has not complied with these requirements of the Metering Code.*

Status: Complete. The metering installation predates the Meter Code implementation, and the Meter Code specifically allows for transitional arrangements in that under 3.14(1), a predating installation does not require to be updated to the Code and 3.14(4) allows protection Class CTs to be used for metering. The meters have been checked and calibrated (to the extent possible as there was no load on a number of meters and load is necessary to measure current (and KW/KWh) and the consequent accuracy -calibration report sighted) and CT/VT details established. The Licensee is not obliged to update meter installations according to 3.14(1), 3.14(2) subject to 3.14(3) but metering class CTs are not used so this clause is not applicable. As previously stated, the meters meet the requirements of Table 3 Appendix 1 (which are the prescribed requirements). Wiring configuration is as shown in drawings.

- 1.7 *Clause 4.2(1) of the Metering Code requires a network operator to ensure that its registry complies with the Code and the prescribed clause of the market rules. Clause 4.3(1) of the metering Code requires the standing data for a metering point must comprise at least the items specified. The audit report*

*discloses that the standing data does not contain all of the information specified (page 18).*

Status: Complete. The registry has been compiled and updated. A copy of the registry has been sighted and seen to contain the required information.

1.8 *Clause 5.20(1) of the Metering Code requires a network operator, within 6 months from the date that the Metering Code applies to the network operator, to develop, in accordance with the communication rules, an energy data verification request form. No such form has been developed (page 19).*

Status: Complete. A complying energy data request form has been developed. As there is no alternative retailer on the network there is no need for communication rules for communication between retailer and distributor. The retailer and distributor is the same person.

1.9 *Clause 5.21(9) of the Metering Code states that any written service level agreement in respect of the testing of the metering installations, or the auditing of information from the meters associated with the metering installations, must include a provision that no charge is to be imposed if the test or audit reveals a non-compliance with this Code which results in energy data errors in the network operator's favour. The audit report discloses that the metrology clauses in the Power Purchase Agreements entered into by NiW include information about the requirements to check the meters, but do not indicate whether this will be a chargeable item (page 19).*

Status: Complete. The Licensee has advised the customers in writing of the meter testing policy (copies sighted) and the policy clearly spells out that "no charge" will be made for regular meter testing or if a request for test reveals an error in the network operators favour. The Power Purchase Agreements have not been amended as this is an onerous task and the written communication meets the obligation.

1.10 *Clause 6.1(1) of the Metering Code requires a network operator to, in relation to its network, comply with the agreements, rules, procedures, criteria and processes prescribed. The audit report discloses that, with the exception of metering, there are no excursions from the terms of the Power Purchase Agreements entered into by NiW (page 19).*

Status: The licensee has undertaken the testing of the meters and shown these to be within the error limits required.  
Customers advised in writing of charging policy for meter testing. The Power Purchase Agreements have not been amended as this is an onerous task and the written communication meets the obligation.

1.11 *Clause 7.2(2) requires a network operator to notify each Code participant of its initial contact details and of any change to its contact details at least 3 business days before the change takes effect. The audit report indicates no formal communication took place (page 20).*

Status: Complete. The Licensee has written to its customers advising of the change of Company Name since the Power Purchase Agreements were signed and updated change of contact address for correspondence. There were no communication failures as the old address was left available for

communication for a long time. The Licensee is also in regular contact with its few customers. There has been no further change of address since this non-compliance was corrected. Controls will be further improved with a process to develop a compliance handbook with scheduled quarterly reviews.

- 1.12 *Clause 5(1) of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005 (Reliability Code) requires a distributor or transmitter to, as far as reasonably practicable, ensure that electricity supply to a customer's electrical installations complies with prescribed standards. The audit report discloses that there is no permanent monitoring of power quality and there is no formalised logging of power quality complaints (page 20). Given the lack of information, the Authority is of the opinion that NiW has not complied with these requirements of the Metering Code.*

Status: Complete. The Licensee has implemented sample surveys of power quality (copy sighted) as recommended in last audit. There have been no formal power quality complaints. The licensee worked closely with one customer to investigate issues of unplanned interruption to supply as a result of an intermittent fault either in the customer or Licensee's network. The customer relies on the network operator's circuit breaker for protection of the customer overhead line. The investigations were not complete in the audit period but are beyond the requirements of the Notice.

- 1.13 *Clause 23(1) of the Reliability Code requires a distributor or transmitter to take all such steps as are reasonably necessary to monitor the operation of its network to ensure compliance with specified requirements. The audit report discloses a number of deficiencies with outage recording (page 20). The Authority is of the opinion that NiW has not complied with these requirements of the Reliability Code.*

Status: Complete. The Licensee has an outage log as recommended in last audit. The southern system is part of the mine SCADA. The southern network is not continuously monitored in real time by an operations room dedicated to the network but by is monitored by the mine site operations centre. Alarms or faults are relayed to network staff by mobile telephone. Outage reports requested in last audit have been sighted. The northern system is not monitored by the network operator. The system is very small (essentially Leinster town site) and outages are reported quickly for the network operator staff to respond. This meets the reasonably necessary requirements. Another network operator monitors the upstream supply and will endeavour to notify of any failures. Repair work is carried out by contractors. The reporting requirements do not apply as there are no small use customers.

- 1.14 *Clause 23(2) of the Reliability Code requires a distributor to keep records of information regarding its compliance with specific requirements for the period specified. The audit report discloses that all required information was not kept (page 21).*

Status: Complete. The Licensee has an outage log as recommended in last audit. The outage log is maintained by the Asset Manager and held as a spreadsheet with licence records on servers in Perth. The Licensee has



also carried out sample power quality surveys to assess compliance with 23(1)(a). There is only one year of records so it is not possible to verify the keeping for 5 years (which is the Licensee's practice). As Licensee does not have to make reports under s27 of the Network Quality and Reliability of Supply Regulations because there are no small use customers, 23(2) is not applicable outside any records it may keep on network quality and reliability standards and there is no prescribed period applicable for retention of documents.

## **2. Contravention of clause 19 of Distribution Licence**

Clause 19.1 of the Distribution Licence states:

*"The licensee must provide for, and notify the Authority of, an asset management system in relation to the distribution system within 2 business days from the commencement date or from the completion of construction of the distribution system, whichever is later."*

*The asset management system is defined in the Distribution Licence as "the measures that are to be taken by the licensee for the proper maintenance, expansion or reduction of the distribution system".*

*The audit report discloses that no formal asset management system exists and no details of the asset management system have been provided to the Authority (page 15). Further, although NiW appears to have an informal asset management system, the audit report discloses a number of deficiencies with NiW's asset management system for its distribution system. Some of the deficiencies disclosed in the audit report are such that the Authority does not consider that NiW's asset management system puts in place measures for the proper maintenance of the distribution system.*

*In particular, to comply with clause 19.1 of the Distribution Licence, the following measures are required to be implemented:*

- 2.1 NiW must formalise and implement an Asset Management Plan ("AMP") and must formally approve the AMP.*
- 2.2 The following issues must be adequately addressed in the AMP:*
  - 2.2.1 a list of available and required critical spares to avoid disposing of critical or retaining unnecessary plant;*
  - 2.2.2 high level disposal plans for electrical plant should be included in the AMP;*
  - 2.2.3 operational plans must be linked to service levels and reviewed regularly;*
  - 2.2.4 asset registers must be formalised and a complete set of plans created;*
  - 2.2.5 maintenance plans must be fully documented for plant and regularly reviewed;*
  - 2.2.6 the development of an IT system that would provide a roadmap to all relevant data and capture compliance issues including a mechanism to ensure regular reviews of the system;*
  - 2.2.7 a risk register and the process to review it regularly;*

- 2.2.8 *the use of risk analysis and its link to service levels;*
- 2.2.9 *contingency planning and documentation of that planning;*
- 2.2.10 *financial planning and documentation of that planning; and*
- 2.2.11 *a mechanism to ensure there are regular reviews of the AMS.*

Status: Please see Asset Management System review for action taken. The required actions have been taken but the approval of the asset management plan by the Licensee and development of a compliance handbook took place after the audit period.

### **3. Contravention of clause 5 of Electricity Retail Licence 2**

*Clause 5.1 of Electricity Retail Licence 2 ("Retail Licence") states:*

*"Subject to any modifications or exemptions granted pursuant to the Act, the licensee must comply with any applicable legislation including, but not limited to, the Electricity Industry Customer Transfer Code 2004, the Electricity Industry Metering Code 2005, the Reliability and Quality of Supply Code 2005 and the Code of Conduct for the Supply of Electricity to Small Use Customers 2004."*

*NiW has contravened clause 5.1 of the Retail Licence as follows:*

- 3.1 *Clause 5.19(2) of the Metering Code requires that a user, to the extent that it is able, to 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. The audit report discloses that points of contact were out of date (page 19)*

Action: Complete. The Licensee has requested, and to the extent that it is able, obtained updated customer attributes for all customers. As there are only 5 customers these records are held as letters on the appropriate customer file. An opportunity for further improvement is to prepare a simple consolidated table for easy reference.

### 3 PERFORMANCE AUDIT

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#### 3.1 PERFORMANCE AUDIT OBJECTIVES

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

The primary objective of the 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 audit.

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

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

The Licensee appointed McGill Engineering Services Pty Ltd to conduct the audit of its Distribution and Retail Licences 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 Distribution and Retail Licences through a combination of enquiries, examination of documents and detailed testing for Electricity Retail Licence ERL 2, Distribution Licence EDL2 for the Licensee.

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



### 3.2 AUDIT PERIOD

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The audit period is 31 March 2008 to 30 March 2010.

### 3.3 STATEMENT OF INDEPENDENCE

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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.

### 3.4 SCOPE LIMITATION

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

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### 3.4.1 EXCLUDED CONDITIONS

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Licence conditions applying to small use consumers have been excluded as the Licensee has no small use consumers, accordingly conditions 88-89, 94; 97-102, 434 and 448-449 have been excluded from the audit. Conditions relating to the Electricity Corporations are not applicable (78-80, 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. Conditions relating to Obligations to Connect Regulations (72-77) only apply to small use customers and therefore have been deleted from the audit. Conditions (450-452) in Network Quality and Reliability Code are only applicable to Small Use Consumers and have therefore been deleted. Conditions relating to being a supplier of last resort (93) have been deleted as the Licensees' area has not been designated.

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### 3.5 INHERENT LIMITATIONS

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

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

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

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

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### 3.6 SCOPE OF THE AUDIT

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The audit was conducted in 3 phases.

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#### 1. RISK AND MATERIALITY ASSESSMENT

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

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#### 2. SYSTEM ANALYSIS, ASSERTION SETTING AND REVIEW

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

.....  
**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 Kambalda and Leinster licensed areas were visited.

The actions to follow up previous audits are detailed in the following table.

### 3.6.1 CORRECTIVE ACTIONS FROM LAST AUDIT

No.	Condition	Corrective Action	Action since last audit	Further recommendation
85	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.	Within 3 months, NiW to set up a calendar of payment due dates and dates of payment along with filing of paper receipts. Responsible: BH	Complete: -A calendar was established as required. Delays in payment process occurred as a result of understanding of new management system.	Further action is to be developed to improve controls of expediting and tracking payment by developing a compliance manual and regular quarterly scheduled reviews.
86	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.	Standard procedure to be implemented using standard forms and all incidents recorded in a central log in Perth. After hours emergency response in the Northern System to be reviewed.	Complete - Incident log implemented Emergency response reviewed and after hours contacts updated.	No further action required.
429	A distributor or transmitter must, as far as reasonably practicable, ensure that electricity supply to a customer's electrical installations complies with prescribed standards.	Testing of supply quality to be done at least bi-annually.	Complete - Sample quality surveys implemented.	No further action is required to complete last audit action but a further opportunity is to schedule these surveys in SAP.
431	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	Outages should be logged and recorded. System to be developed over the next 6 months.	Complete - Incident log implemented	No further action required.

No.	Condition	Corrective Action	Action since last audit	Further recommendation
435	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	Improved outage logging and recording system to be set up within 2 months.	Complete - Incident log implemented	No further action required.
436	The average total length of interruptions of supply is to be calculated using the specified method.	Improved outage logging and recording system to be set up within 2 months.	Complete - Incident log implemented.	No further action required..
444	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.	Outage reports are to be compiled on a regular basis and sent through weekly to a central process overseer. System to be developed over the next 6 months.	Complete - Incident log implemented, and sent to process overseer (Asset Manager). Southern system monitored by SCADA. Reports on outages in northern system reported quickly. Incoming supply to northern system monitored by another network operator.	No further action required.
445	A distributor or transmitter must keep records of information regarding its compliance with specific requirements for the period specified.	Initial system to be developed over the next 6 months to show details of future compliance of action items.	Complete - The Licensee has an outage log as recommended in last audit and has also carried out sample power quality surveys. There is only one year of records so it is not possible to verify the keeping for 5 years (which is the Licensee's practice). As Licensee does not have to make reports under s27 of the Network Quality and Reliability of Supply Regulations because there are no small use customers, 23(2) is not applicable outside any records it may keep on network quality and reliability standards	No further action required.

No.	Condition	Corrective Action	Action since last audit	Further recommendation
450 - 452		Deleted as not applicable to this audit (Only apply to those with small use consumers).		
302	A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and also comply with any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act.	Over the next 12 months a full audit and inspection of the metrology system will be made to determine any gaps.	Complete. - Audit complete and gaps determined. The applicable metrology procedure is the PPAs and the applicable specifications of the National Measurement Institute under the National Measurement Act cannot be applied as they are for measurement class CTs and the Code allows protection class CTs (3.14(4)).	Non mandatory action (Audit Guidelines 11.9) In the event of a new customer requiring access a metrology procedure should be prepared.
303	An accumulation meter must at least conform to the requirements specified in the applicable metrology procedure and display, or permit access to a display of, the accumulated electricity production or consumption at the metering point in the manner prescribed.	Over the next 12 months a full audit and inspection of the metrology system will be made to determine any gaps.	Not applicable – There are no accumulation meters	No further action required.
307	A network operator must, for each metering installation on its network, on and from the time of its connection to the network, provide, install, operate and maintain the metering installation in the manner prescribed (unless otherwise agreed).	Meters to be maintained and checked in accordance with Australian standards. Initial testing to start within 6 months.	Complete - Meters maintained in accordance with the <i>otherwise agreed</i> criteria (the PPA contracts). Calibration report sighted.	Non mandatory actions (Audit Guidelines 11.9) Arrange for customers to provide load and calibrate the remaining meters and check clock rates.

No.	Condition	Corrective Action	Action since last audit	Further recommendation
310	If a network operator becomes aware that a metering installation does not comply with the Code, the network operator must advise affected parties of the noncompliance and arrange for the non-compliance to be corrected as soon as practicable.	Establish Metering Code Compliance procedures and determine level of compliance within 12 months.	Complete - Meters calibrated and updated where possible. Not all meters can accept a password but are not required to modify (grandfathered by - 3.14(1)). Meters meet the requirements of Code Table 3 Appendix 1 for those able to be calibrated.	No further action required.
312	A network operator must, for each metering installation on its network, ensure that the metering installation is secured by means of devices or methods which, to the standard of good electricity industry practice, hinder unauthorized access and enable unauthorized access to be detected.	Lock and seal all meters including test blocks within 4 months.	Complete - Meters adequately secured to the standard of good electricity industry practice.	No further action required.
313	Each metering installation must meet at least the requirements for that type of metering installation specified in Table 3 in Appendix 1 of the Code.	NiW is to document the current installations, determine the overall accuracy and develop a plan to achieve compliance within the next 12months.	Complete. Meters documented. Meters not required to be modified - as grandfathered by 3.14(1) but meet the requirements of Table 3 Appendix 1 despite being permitted to use protection class CTs	No further action required.
315	If compensation is carried out within the meter then the resultant metering system error must be as close as practicable to zero.	NiW is to document the current installations, determine the overall accuracy and develop a plan to achieve compliance within the next 12 months.	Complete. The current installation is documented. Meters meet specified requirements despite being permitted to use protection class CTs. Compensation is not carried out.	No further action required.

No.	Condition	Corrective Action	Action since last audit	Further recommendation
320	A network operator must ensure that each metering installation complies with, at least, the prescribed design requirements.	Drawing register to be updated and CT / VT details be made available before next audit.	Complete Drawings sighted and CT/VT details made available. The requirements of 3.12(1) cannot be met as they are inconsistent with the Code of allowing use of protection class CTs.	Non mandatory action (Audit Guidelines 11.9). Further opportunity for improvement is to improve technical content of drawings or cross reference other drawings.
321	A network operator must ensure that instrument transformers in its metering installations comply with the relevant requirements of any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act and any requirements specified in the applicable metrology procedure.	Drawing register to be updated and CT / VT details be made available before next audit.	Complete – Drawings sighted and CT/VT details made available. The drawings register/database has been updated at site. The applicable specifications of the National Measurement Institute under the National Measurement Act cannot be applied as they are for measurement class CTs and the Code allows protection class CTs (3.14(4)). The applicable metrology procedure is the PPAs.	Non mandatory action (Audit Guidelines 11.9) is to improve technical content of drawings.
323	A network operator must maintain drawings and supporting information, to the standard of good electricity industry practice, detailing the metering installation for maintenance and auditing purposes.	Drawings and data to be collated over the next 12 months.	Complete - Drawings and data collated. Drawings were sighted and noted they are in drawing database.	Non mandatory recommendation (Audit Guidelines 11.9) is to improve technical content of drawings or to include a cross reference to other drawings containing the information.



No.	Condition	Corrective Action	Action since last audit	Further recommendation
327	If, under clause 3.14(2) of the Code, a metering installation uses metering class CTs and VTs that do not comply with the prescribed requirements, then the network operator must either (or both) install meters of a higher class accuracy or apply accuracy calibration factors within the meter in order to achieve the overall accuracy requirements prescribed.	Drawing register to be updated and CT / VT details be made available before next audit	Complete – Drawings sighted and CT/VT details made available. The drawings register/database has been updated at site.	No further action required.
346	A network operator must prepare, and if applicable, must implement a disaster recovery plan to ensure that it is able, within 2 business days after the day of any disaster, to rebuild the metering database and provide energy data to Code participants	Recovery systems to have a testing schedule developed within 4 months and be tested at least annually.	Complete The energy data is captured to two independent systems – one SCADA and one SQL database. Either data set maybe used for provision of energy data. A disaster in one will not affect the data retained in the other, which will be immediately available and satisfying the requirement. Additionally, both data sets are backed up independently. Meter data is not required to be supplied to Code participants until after month end.	No further action required.
347	A network operator must ensure that its registry complies with the Code and the prescribed clause of the market rules.	Metering registry should be brought up to Code within 3months.	Complete Registry amended to Code requirements. The registry is maintained by the Asset Manager and held in Perth.	No further action required.

No.	Condition	Corrective Action	Action since last audit	Further recommendation
348	The standing data for a metering point must comprise at least the items specified	Metering registry should be brought up to Code within 3months.	Complete The meter Registry has been amended and contains the standing data required by the Code and additional data	No further action required.
351	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.	Error log to be implemented within the next 3 months.	Complete. The retailer and network operator is the same person. An error log is therefore considered superfluous to requirements. There is no alternative retailer for transfers to cause registry errors.	No further action required.
380	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.	Points of contact to be updated within 2 months.	Complete - The Licensee has requested, and to the extent that it is able, obtained updated customer attributes for all customers. As there are only 5 customers these records are held as letters on the appropriate customer file. Sample advice sighted.	No further action required.
385	A network operator must, within 6 months from the date this Code applies to the network operator, develop, in accordance with the communication rules, an energy data verification request form.	An Energy Data Verification Request Form is to be developed and copies distributed to customers within 3 months.	Complete Energy Data Verification Request Form has been developed and distributed to all customers.	No further action required.

No.	Condition	Corrective Action	Action since last audit	Further recommendation
386	An Energy Data Verification Request Form must require a Code participant to provide the information prescribed.	The Energy Data Verification Request Form to request the prescribed information.	Complete Energy Data Verification Request Form has been developed and contains the prescribed information.	No further action required.
393	Any written service level agreement in respect of the testing of the metering installations, or the auditing of information from the meters associated with the metering installations, must include a provision that no charge is to be imposed if the test or audit reveals a non-compliance with this Code which results in energy data errors in the network operator's favour.	PPAs to be amended by addendum to include this item within 6 months.	Complete Customers advised in writing of the meter testing policy (copies sighted) and the policy clearly spells out that "no charge" will be made for regular meter testing or if a request for test reveals an error in the network operators favour. The change of PPAs would be onerous and written advice achieves the required outcomes.	No further action required.
415	A network operator must, in relation to its network, comply with the agreements, rules, procedures, criteria and processes prescribed.	PPAs to be amended by addendum within 6 months.	Complete The applicable procedures and requirements are laid out in the PPAs or subsequent written correspondence. Change of PPAs would be onerous and written advice achieves the required outcomes.	No further action required.

No.	Condition	Corrective Action	Action since last audit	Further recommendation
419	A network operator must notify each Code participant of its initial contact details and of any change to its contact details at least 3 business days before the change takes effect.	Quality filing system for Code compliance issues to be implemented within 6 months.	Complete. - The Licensee has written to its customers advising of the Change of Company Name and updated change of contact address for correspondence. There has been no further change of address since this non-compliance was corrected.  The licensee has also developed a filing system for records of this nature, which is maintained by the Asset Manager and held centrally in Perth.	No further action required. Further opportunity is to develop compliance manual and regular quarterly scheduled reviews.
103 104	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..	NiW to produce an AMS and notify the ERA within 6 months.	Complete. An AMS has been produced and ERA notified on 10/2/2010.	Note: Efficacy of AMS is the subject of the AMS review.
82 83 84 108	A Licensee must provide for an asset management system. A Licensee must notify details of the asset management system and any substantial changes to it to the Authority. A Licensee must provide the Authority with a report by an independent expert as to the effectiveness of its asset management system every 24	Within 12 months NiW will develop an asset management system and submit to the ERA.	Complete. An AMS has been produced and ERA notified on 10/2/2010.	Note: Efficacy of AMS is the subject of the AMS review.

No.	Condition	Corrective Action	Action since last audit	Further recommendation
	months, or such longer period as determined by the Authority. 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.			

### 3.7 AUDIT ROLES

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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
  - Bill Head                      Asset Manager
  - Lionel Diprose              Kambalda Electrical Supervisor
  - Charlie Higgins              Consultant Contractor
  - Jack Howden                Maintenance Planner
  - Dave Harrison              Electrical Inspector
- McGill Engineering Services Pty Ltd
  - Kevan McGill

The audit was conducted during May to July 2010. Kevan McGill took about 150 hours on the audit.

### 3.8 AUDIT REQUIREMENTS

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

#### **Nature of audit work conducted**

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

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

Stage	Auditor	Standard
1. Risk & Materiality Assessment Outcome - Operational/ Performance Audit Plan	K McGill	ASA 300 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"> <li>• The control environment</li> <li>• Information system</li> <li>• Compliance procedures</li> <li>• Compliance attitude</li> </ul>	K McGill	AUS 502: Audit Evidence AUS 806: Performance Auditing
4. Reporting	K McGill	ASA 300 Planning AUS 806: Performance Auditing

### 3.9 DISTRIBUTION SYSTEM / RETAIL CUSTOMERS

The history of the system is that WMC Resources Limited (WMC) now trading as Nickel West following acquisition by BHP Billiton and registration of Change of Name, originally built, owned and maintained the generation and distribution systems required to operate its assets in Western Australia. This distribution network supplied mines the town of Leinster and owned by Nickel West.

Nickel West has since sold its generation assets and the majority of its distribution assets to TransAlta Energy Australia trading as Southern Cross Energy (SCE). Nickel West also sold some of the remote mines, complete with sections of the distribution network to third party mines. The remaining sum total length of Nickel West's distribution lines is limited to 72 kilometres.

The Nickel West distribution system is divided into what is referred to as the Northern System in the Leinster region and the Southern System in the Kambalda region. As part of the sale of the remote mines, Nickel west entered into Power Purchase Agreements to allow the mines to be viable and utilise existing gas supply, gas transport and power generation agreements to the benefit of all the parties. In some cases Nickel West entered into ore off take or tolling agreements. The above arrangements, whilst not core business for Nickel West, have required Nickel West to register as a distributor and retailer under the subsequent Electricity Industry Act 2004.

#### **Distribution**

The Northern Distribution System is an isolated system owned and operated for the most part by SCE. Nickel West operates a small portion of this distribution network in the mining town of Leinster (the northern system) with less than 300 connections through the

Leinster Supply Authority (LSA). Leinster is a closed town by invitation from Nickel West and provides residential accommodation and service facilities to their mine site at Leinster, Agnew Gold employees, support contractors and businesses.

The Southern Distribution System in the Kalgoorlie/Kambalda area is connected to the South West Interconnected System through a tie by SCE to Western Power at Boulder. The Nickel West portion of this distribution system is in the Kambalda region. It is essentially a non continuous radial system consisting of off-takes from another licensee's distribution system and connections to five mining customers. Some customers receive power at multiple metering points.

### **Retail**

Nickel West retails electricity to the same 5 mining customers in the southern system and to 1 mining customer in the northern system where the radial distribution is carried out by another licensee. There is no retail in Leinster town site. The LSA supplies approximately 300 houses, industrial and commercial premises and electricity is supplied without charge. Nickel West purchases all its electricity from a third party.

All Nickel West customers are mining operations with bilateral Power Purchase Agreements (PPA) and there are no Small Use Customers. For the purposes of this audit, a Customer has been defined by definitions used in the Metering Code 2005 and the Electricity Industry Act as being a person (or entity) to whom electricity is sold for the purpose of consumption. This definition is in line with the structure of the PPAs entered into by Nickel West. Several Customers have multiple metered entry connections covered by a single PPA.

While the Licences cover Mt Keith there are no distribution assets (other than the exempted self supply) and no retail.

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## **3.10 LICENCE**

The licence covers the Mt Keith area and allows for distribution and retail in that area. The Licensee can leave the licence as it is to allow for future expansion and explain in any audit that there is nothing to audit in that area or if it considers that there is no need for an expansion provision could advise the Authority (and pay the fee to amend the licence) to remove Mt Keith from the licence.

The Leinster site is covered by a Development Act. An exemption from licensing has been obtained for the like area of Newman. The Licensee may wish to examine if it wishes to explore a similar exemption.

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## **3.11 OVERALL CONCLUSION**

In my opinion, the Licensee has maintained a good level of compliance with the licences conditions while there was some non compliances they were not significant items.

In my opinion, the Licensee maintained, in all material aspects, control procedures in relation to the Retail (ERL 2) and Distribution (EDL 2) licences for the audit period based on the relevant clauses referred to within the scope section of this report.



## 3.12 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 detailed findings Page 45

Item	Licence Clause/Condition reference (Cl.=clause, Sch.=schedule)	Obligations under condition	Consequences (1=Minor, 2=Moderate, 3=Major)	Likelihood (A=likely, B=Probable, C=Unlikely)	Inherent Risk	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Licence Type (D=Distribution R = Retail)	Type	Audit priority	Rating						
Licence Conditions - Electricity Industry (Licence Conditions) Regulation										Rating						
Obligations - Electricity Industry Customer Transfer Code Clause										1	2	3	4	5	NA	NR
1 To 71	r <sup>2</sup> . 5(2)				Not rated as no alternative retailer on network											<input checked="" type="checkbox"/>
Licence Conditions – Licence Clause – Distribution/ Retail										Rating						
Obligations- Electricity Industry Act Section										1	2	3	4	5	NA	NR
81.	15.1	s <sup>3</sup> 13(1)	1	C	Low	M	D R	NR	5					<input checked="" type="checkbox"/>		
82.	16.1	s14(1)(a)	3	B	High	W	D R	NR	1					<input checked="" type="checkbox"/>		
83.	16.1 & 16.2	s14(1)(b)	3	B	High	W	D R	2	1					<input checked="" type="checkbox"/>		
84.	16.3	s14(1)(c)	3	B	High	W	D R	NR	1					<input checked="" type="checkbox"/>		
85.	4.1	s17(1)	3	B	High	W	D R	NR	1		<input checked="" type="checkbox"/>					
86.	5.1	s31(3)	3	B	High	W	D R	NR	1					<input checked="" type="checkbox"/>		
87.	5.1	s41(6)	2	C	Medium	M	D R	2	4							<input checked="" type="checkbox"/>
96.	5.1	s115(2)	2	C	Medium	M	R	2	4							<input checked="" type="checkbox"/>
Licence Conditions – Electricity Industry Act Section										Rating						
Obligations- Licence Clause – Distribution / Retail										1	2	3	4	5	NA	NR
103.	s11	15.2/12.2/12.2	3	B	High	W	D R	2	1							<input checked="" type="checkbox"/>
104.	s11	15.3/12.3/12.3	2	C	Medium	M	D R	2	4					<input checked="" type="checkbox"/>		
105.	s11	16.1/13.1/13.1/20.1	2	C	Medium	M	D R	2	4					<input checked="" type="checkbox"/>		
106.	s11	17.4/14.4/14.4/21.4	2	C	Medium	M	D R	2	4							<input checked="" type="checkbox"/>
107.	s11	18.2/15.2/15.2/22.2	2	C	Medium	M	D R	2	4					<input checked="" type="checkbox"/>		
108.	s11	19.4/16.4/16.4	3	B	High	W	D R	2	1					<input checked="" type="checkbox"/>		
109.	s11	20.1/17.1/17.1/24.1	2	C	Medium	M	D R	2	4							<input checked="" type="checkbox"/>

<sup>2</sup> r = Regulation

<sup>3</sup> s = Section of Act

110.	s11	21.1/18.1/ 18.1/24.1	2	C	Medium	M	D R	2	4					<input checked="" type="checkbox"/>		
111.	s11	22.2/19.2/ 19.2/25.2	2	C	Medium	M	D R	2	4							<input checked="" type="checkbox"/>
112.	s11	23.1/20.1/ 20.1/26.1	2	C	Medium	M	D R	2	4					<input checked="" type="checkbox"/>		
Licence Conditions – Licence clause										Rating						
Obligations- Electricity Industry Metering Code Clause										1	2	3	4	5	NA	NR
300.	5.1.	2.2(1)(a)	1	C	Low	M	D	NR	5						<input checked="" type="checkbox"/>	
301.	5.1	2.2(1)(b)	2	C	Medium	M	D	2	4						<input checked="" type="checkbox"/>	
302.	5.1	3.1	3	B	High	W	D	2	1					<input checked="" type="checkbox"/>		
303.	5.1	3.2(1)	3	B	High	W	D	2	1							<input checked="" type="checkbox"/>
304.	5.1	3.3(1)	2	C	Medium	M	D	2	4				<input checked="" type="checkbox"/>			
305.	5.1	3.3(3)	2	C	Medium	M	D	2	4							<input checked="" type="checkbox"/>
306.	5.1	3.5(1) & 3.5(2)	2	C	Medium	M	D	2	4				<input checked="" type="checkbox"/>			
307.	5.1	3.5(3)	3	B	High	W	D	2	1					<input checked="" type="checkbox"/>		
308.	5.1	3.5(4)	2	C	Medium	M	D	2	4				<input checked="" type="checkbox"/>			
309.	5.1	3.5(6)	2	C	Medium	M	D R	2	4							<input checked="" type="checkbox"/>
310.	5.1	3.5(9)	3	B	High	W	D	2	1					<input checked="" type="checkbox"/>		
311.	5.1	3.7	2	C	Medium	M	D	2	4							<input checked="" type="checkbox"/>
312.	5.1	3.8	3	B	High	W	D	2	1					<input checked="" type="checkbox"/>		
313.	5.1	3.9(3)	3	B	High	W	D	2	1				<input checked="" type="checkbox"/>			
314.	5.1	3.9(7)	2	C	Medium	M	D	2	4					<input checked="" type="checkbox"/>		
315.	5.1	3.9(9)	3	B	High	W	D	2	1							<input checked="" type="checkbox"/>
316.	5.1	3.10	2	C	Medium	M	D	2	4				<input checked="" type="checkbox"/>			
317.	5.1	3.11(1)	2	C	Medium	M	D	2	4					<input checked="" type="checkbox"/>		
318.	5.1	3.11(2)	2	C	Medium	M	D	2	4					<input checked="" type="checkbox"/>		
319.	5.1	3.11(3)	2	C	Medium	M	D R	2	4						<input checked="" type="checkbox"/>	
320.	5.1	3.12(1)	3	B	High	W	D	2	1				<input checked="" type="checkbox"/>			
321.	5.1	3.12(2)	3	B	High	W	D	2	1						<input checked="" type="checkbox"/>	
322.	5.1	3.12(3)	2	C	Medium	M	D	2	4				<input checked="" type="checkbox"/>			
323.	5.1	3.12(4)	3	B	High	W	D	2	1				<input checked="" type="checkbox"/>			
324.	5.1	3.13(1)	2	C	Medium	M	D	2	4						<input checked="" type="checkbox"/>	
325.	5.1	3.13(c)	2	C	Medium	M	D	2	4						<input checked="" type="checkbox"/>	
326.	5.1	3.13(4)	2	C	Medium	M	D	2	4						<input checked="" type="checkbox"/>	
327.	5.1	3.14(3)	3	B	High	W	D	2	1						<input checked="" type="checkbox"/>	
328.	5.1	3.16(1)	2	C	Medium	M	D	2	4						<input checked="" type="checkbox"/>	
329.	5.1	3.16(2)	2	C	Medium	M	D	2	4						<input checked="" type="checkbox"/>	
330.	5.1	3.16(3)	2	C	Medium	M	D	2	4						<input checked="" type="checkbox"/>	
331.	5.1	3.16(5)	2	C	Medium	M	D R	2	4						<input checked="" type="checkbox"/>	
332.	5.1	3.16(6)	2	C	Medium	M	D	2	4						<input checked="" type="checkbox"/>	
334.	5.1	3.20(1)	2	C	Medium	M	D	2	4							<input checked="" type="checkbox"/>
335.	5.1	3.20(3)	2	C	Medium	M	D	2	4							<input checked="" type="checkbox"/>
336.	5.1	3.21(1)	2	C	Medium	M	D	2	4							<input checked="" type="checkbox"/>
337.	5.1	3.21(2)	2	C	Medium	M	D	2	4							<input checked="" type="checkbox"/>
338.	5.1	3.22	2	C	Medium	M	D	2	4							<input checked="" type="checkbox"/>
339.	5.1	3.23(a)	2	C	Medium	M	D	2	4							<input checked="" type="checkbox"/>
340.	5.1	3.23(b)	2	C	Medium	M	D	2	4							<input checked="" type="checkbox"/>
341.	5.1	3.25)	2	C	Medium	M	D	2	4							<input checked="" type="checkbox"/>
342.	5.1	3.27	2	C	Medium	M	R	2	4							<input checked="" type="checkbox"/>
343.	5.1	3.29	2	C	Medium	M	D R	2	4						<input checked="" type="checkbox"/>	
344.	5.1	4.1(1)	2	C	Medium	M	D	2	4					<input checked="" type="checkbox"/>		
345.	5.1	4.2(2)	2	C	Medium	M	D	2	4					<input checked="" type="checkbox"/>		
346.	5.1	4.1(3)	3	B	High	W	D	2	1					<input checked="" type="checkbox"/>		

McGill Engineering Services Pty Ltd Page 35

404.	5.1	5.24(1)	2	C	Medium	M	D	2	4								<input checked="" type="checkbox"/>
405.	5.1	5.24(2)	2	C	Medium	M	D	2	4								<input checked="" type="checkbox"/>
406.	5.1	5.24(3)	2	C	Medium	M	D	2	4								<input checked="" type="checkbox"/>
407.	5.1	5.24(4)	2	C	Medium	M	D	2	4								<input checked="" type="checkbox"/>
408.	5.1	5.25	2	C	Medium	M	D	2	4								<input checked="" type="checkbox"/>
409.	5.1	5.27	2	C	Medium	M	R	2	4								<input checked="" type="checkbox"/>
410.	5.1	5.29	2	C	Medium	M	R	2	4							<input checked="" type="checkbox"/>	
411.	5.1	5.30(1)	2	C	Medium	M	R	2	4							<input checked="" type="checkbox"/>	
412.	5.1	5.31(1)	2	C	Medium	M	D	2	4							<input checked="" type="checkbox"/>	
413.	5.1	5.31(2)	2	C	Medium	M	D	2	4							<input checked="" type="checkbox"/>	
414.	5.1	5.34(2)	2	C	Medium	M	D	2	4							<input checked="" type="checkbox"/>	
415.	5.1	6.1(1)	3	B	High	W	D	2	1				<input checked="" type="checkbox"/>				
416.	5.1	6.1(2)	2	C	Medium	M	R	2	4				<input checked="" type="checkbox"/>				
417.	5.1	6.20(4)	1	C	Low	M	D	NR	5								<input checked="" type="checkbox"/>
418.	5.1	7.2(1)	1	C	Low	M	D R	NR	5					<input checked="" type="checkbox"/>			
419.	5.1	7.2(2)	3	B	High	W	D	2	1								<input checked="" type="checkbox"/>
420.	5.1	7.2(4)	2	C	Medium	M	R	2	4								<input checked="" type="checkbox"/>
421.	5.1	7.2(5)	2	C	Medium	M	R	2	4								<input checked="" type="checkbox"/>
422.	5.1	7.5	2	C	Medium	M	R	2	4					<input checked="" type="checkbox"/>			
423.	5.1	7.6(1)	2	C	Medium	M	R	2	4								<input checked="" type="checkbox"/>
424.	5.1	8.1(1)	1	C	Low	M	D R	NR	5								<input checked="" type="checkbox"/>
425.	5.1	8.1(2)	1	C	Low	M	D R	NR	5								<input checked="" type="checkbox"/>
426.	5.1	8.1(3)	1	C	Low	M	D R	NR	5								<input checked="" type="checkbox"/>
427.	5.1	8.1(4)	2	C	Medium	M	D R	2	4								<input checked="" type="checkbox"/>
428.	5.1	8.3(2)	1	C	Low	M	D R	NR	5								<input checked="" type="checkbox"/>
Licence Conditions – Licence clause										Rating							
Obligations- Electricity Industry (Network Quality and Reliability) Code Clause										1	2	3	4	5	NA	NR	
429.	5.1.	5.1	3	B	High	W	D	NR	1					<input checked="" type="checkbox"/>			
430.	5.1	8	1	C	Low	M	D	NR	5								<input checked="" type="checkbox"/>
431.	5.1	9	3	B	High	W	D	NR	1					<input checked="" type="checkbox"/>			
432.	5.1	10(1)	1	C	Low	M	D	NR	5					<input checked="" type="checkbox"/>			
433.	5.1.	10(2)	1	C	Low	M	D	NR	5					<input checked="" type="checkbox"/>			
435.	5.1	13(2)	3	B	High	W	D	NR	1				<input checked="" type="checkbox"/>				
436.	5.1	13(3)	3	B	High	W	D	2	1				<input checked="" type="checkbox"/>				
437.	5.1.	14(8)	2	C	Medium	M	D	2	4								<input checked="" type="checkbox"/>
438.	5.1	15(2)	2	C	Medium	M	D	2	4								<input checked="" type="checkbox"/>
444.	5.1	23(1)	3	B	High	W	D	NR	1				<input checked="" type="checkbox"/>				
445.	5.1	23(2)	3	B	High	W	D	2	1					<input checked="" type="checkbox"/>			
446.	5.1	24(3)	2	C	Medium	M	D	2	4								<input checked="" type="checkbox"/>
447.	5.1.	24(4)	2	C	Medium	M	D	2	4								<input checked="" type="checkbox"/>

### 3.13 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 Licence were examined and referred to throughout the audit process.

#### 3.13.1 AUDIT RESULTS AND RECOMMENDATIONS

##### Summary of significant results

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

#### 3.13.2 COMPLIANCE ELEMENTS REQUIRING CORRECTIVE MEASURES

<b>Item 85</b>	Compliance rating
Distribution Licence condition 4.1, Retail Licence condition 4.1	Not Compliant 2
<b>Licence:</b> <i>Distribution, Retail</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.	
<b>Observations</b>	
The 2008 fee was paid within a month of invoice from the Authority and within a month of the anniversary of the licence issue. But the 2009 fee was paid late being paid on 29 April which was 4 days after the anniversary of the licence issue.	
<b>Issues</b>	
The Licensee needs a procedure to ensure payment within the required time.	
<b>Recommendations</b>	
Develop a compliance manual and scheduled reviews. Arrange and track expedited payment to ensure payment on time in future.	

#### 3.13.3 SUGGESTIONS FOR IMPROVEMENT

<b>Item 103</b>	Compliance rating
Electricity Industry Act section 11	Not Rated
<b>Licence:</b> <i>Distribution</i>	
<i>Distribution Licence condition 15.2</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.	
<b>Observations</b>	
There has been no expansion or reduction in the audit period. Any expansion or reduction is allowed in the asset management plan. The Licence refers to Mt Keith but there are no distribution assets at that place. The Licensee	

should advise the Authority and pay the requisite fee to amend the Licence.
<b>Issues</b>
There is no item to cover amendment of licence. The AMP does not specifically cover Mt Keith as there are no assets.
<b>Recommendations</b>
The Licensee should advise the Authority and pay the requisite fee to amend the Licence to remove Mt Keith from the Licence if a provision for expansion is not likely to be needed.

<b>Item 302</b>	Compliance rating
Licence condition 5.1	Compliant 5
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.1</i> A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and also comply with any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act.	
<b>Observations</b>	
The meter installations predate the licence and therefore will be grandfathered as compliant (refer Meter Code 3.14(1)). The meters have been tested and are within the Meter Code accuracy levels. There is no metrology procedure for the organisation but the individual Power Purchase Agreements (PPA) cover meter installations and accuracy which is what a metrology procedure covers thus becoming the <i>applicable metrology procedures</i> . The meters cannot meet the requirements of the National Measurement Institute as the specifications apply to measurement class CTs and protection class CTs are allowed under the Code (3.14(4)). In any case metering is often at the substation and the customer is paying for line losses which are much more significant than any excesses of metering accuracy requirements.	
<b>Issues</b>	
A general metrology procedure does not exist and should be in place before a new customer is supplied,	
<b>Recommendations</b>	
In the event of a new customer requiring access a metrology procedure should be prepared. (Non mandatory recommendation Audit Guidelines 11.9)	

<b>Item 304</b>	Compliance rating
Licence condition 5.1	Compliant 4
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.3(1)</i> An interval meter must at least have an interface to allow the interval energy data to be downloaded in the manner prescribed using an interface compatible with the requirements specified in the applicable metrology procedure.	
<b>Observations</b>	
The meters have interfaces to download data and data is being downloaded but there is no general metrology procedure, which is defined in the power purchase agreements (the <i>applicable metrology procedure</i> ). In the mean time the Office of Energy should be approached to seek an exemption from the requirements of the Metering Code for the existing customers. There are no interval meters in the Leinster town site (while there are some old meters, none are read or charges for electricity made).	
<b>Issues</b>	
There is no general metrology procedure apart from the requirements embedded in Power Purchase Agreements.	
<b>Recommendations</b>	
Development of a general metrology procedure for inclusion in or attachment to future Power	

Purchase Agreements. (Non mandatory recommendation Audit Guidelines 11.9).

<b>Item 307</b>	Compliance rating
Licence condition 5.1	Compliant 5
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.5(3)</i> A network operator must, for each metering installation on its network, on and from the time of its connection to the network, provide, install, operate and maintain the metering installation in the manner prescribed (unless otherwise agreed).	
<b>Observations</b>	
There were no new meters installed in the audit period. Operating and maintaining the metering installation was in accordance with the otherwise agreed requirements (the PPAs). The metering installations are as agreed with customers This was subject of Section 32 Notice.	
<b>Issues</b>	
No load to complete some calibrations.	
<b>Recommendations</b>	
Arrange for customers to provide load and calibrate the remaining meters and check clock rates.	

<b>Item 308</b>	Compliance rating
Licence condition 5.1	Compliant 4
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.5(4)</i> A network operator must ensure that, except for a Type 7 metering installation, the metering point for a revenue metering installation is located as close as practicable to the connection point in accordance with good electricity industry practice.	
<b>Observations</b>	
The metering is generally at the point of connection. A few exceptions exist as a result of the topology of the network and customer locations after the sale of assets to junior miners. The customers have agreed to these arrangements and the installations are grandfathered. All customers are metered.	
<b>Issues</b>	
The requirement is that every connection (other than un-metered supplies) is metered as close as practicable to the connection point but this is not the case for some meters due to network topology. Meter Code 3.14(1) does not require installations that predate the Code to be updated.	
<b>Recommendations</b>	
Opportunity for improvement: Consider moving the meter installation closer to the connection point if a suitable opportunity arises.(Non mandatory recommendation Audit Guidelines 11.9)	

<b>Item 313</b>	Compliance rating
Licence condition 5.1	Compliant 4
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.9(3)</i> Each metering installation must meet at least the requirements for that type of metering installation specified in Table 3 in Appendix 1 of the Code.	
<b>Observations</b>	
The installations predate the Meter Code and therefore are grandfathered and do not require updating to meet the requirements of the Code. Refer to 3.14(1) of the Meter Code. The customers have accepted the accuracy in their contract (applicable metrology procedures). Meters have been calibrated to the extent possible as there was no load on a number of meters and load is necessary to measure current (and KW/KWh) and determine accuracy. Reactive	



capability (VAr) is available in meters as required but reactive power is not charged. Clock rates have not been verified. This was subject of Section 32 Notice.
<b>Issues</b>
There was no load on a number of meters and load is necessary to measure current (and KW/KWh) and determines accuracy.
<b>Recommendations</b>
The remaining meters should be calibrated at a time when the customers can arrange load (where possible) and clock rates checked. (Non mandatory recommendation – Audit guidelines 11.9)

<b>Item 316</b> Licence condition 5.1	Compliance rating Compliant 4
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.10</i> A network operator must ensure that any programmable settings within any of its metering installations, data loggers or peripheral devices, that may affect the resolution of displayed or stored data, meet the relevant requirements specified in the applicable metrology procedure and comply with any applicable specifications or guidelines specified by the National Measurement Institute under the National Measurement Act.	
<b>Observations</b>	
The metering installations predate the Meter Code and are grandfathered, refer Meter Code 3.14(1). The PPAs are the <i>applicable metrology procedure</i> . There is no general metrology procedure only the requirements of the power purchase agreements which are satisfied. A general metrology procedure should be developed before any new customers are supplied. The meters cannot meet the requirements of the National Measurement Institute as the specifications apply to measurement class CTs and protection class CTs are allowed under the Code.	
<b>Issues</b>	
No general metrology procedure.	
<b>Recommendations</b>	
A general metrology procedure should be developed before any new customers are supplied. (Non mandatory recommendation Audit Guidelines 11.9)	

<b>Item 320</b> Licence condition 5.1	Compliance rating Compliant 4
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.12(1)</i> A network operator must ensure that each metering installation complies with, at least, the prescribed design requirements.	
<b>Observations</b>	
The requirements of 3.12(1) cannot be met as it requires measurement class CTs to be used exclusively for measurement but protection class CTs are permitted by 3.14(4). The metering installations meet the requirements of the applicable metrology procedures (in the PPAs).	
<b>Issues</b>	
Drawings can be improved.	
<b>Recommendations</b>	
Opportunity for improvement is to improve technical content of drawings or cross reference other drawings with the required content. Develop a compliance manual with scheduled quarterly reviews. (Non mandatory recommendation –Audit Guidelines 11.9)	



<b>Item 321</b>	Compliance rating
Licence condition 5.1	Not Applicable
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.12(2)</i> A network operator must ensure that instrument transformers in its metering installations comply with the relevant requirements of any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act and any requirements specified in the applicable metrology procedure.	
<b>Observations</b>	
In some cases protection CTs are used but the accuracy requirements (Table 3 Appendix 1) are met. The use of protection CTs is permitted by 3.14(4) and therefore standards of metering transformers (specified by the National Measurement Institute under the National Measurement Act) are not applicable. The requirements specified in the <i>applicable metrology procedure</i> are those in the PPAs. The metering installations are grandfathered and meet the requirements agreed with the customers.	
<b>Issues</b>	
Drawings can be improved.	
<b>Recommendations</b>	
Opportunity for improvement is to improve technical content of drawings or cross reference other drawings with the required content. Develop a compliance manual with scheduled quarterly reviews. (Non mandatory recommendation –Audit Guidelines 11.9)	

<b>Item 322</b>	Compliance rating
Licence condition 5.1	Compliant 4
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.12(3)</i> A network operator must provide isolation facilities, to the standard of good electricity industry practice, to facilitate testing and calibration of the metering installation.	
<b>Observations</b>	
The metering installations predate the Code and are therefore grandfathered and do not require upgrading. Most metering installations have isolation facilities to meet the requirements.	
<b>Issues</b>	
Some calibration reports indicated restricted access to allow testing or potential to trip upstream supply. Some installations may not meet what is now considered good electricity industry practice.	
<b>Recommendations</b>	
Consider upgrading the meter installation to an improved standard if a suitable opportunity arises (Non mandatory recommendation Audit Guidelines 11.9)	

<b>Item 323</b>	Compliance rating
Licence condition 5.1	Compliant 4
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.12(4)</i> A network operator must maintain drawings and supporting information, to the standard of good electricity industry practice, detailing the metering installation for maintenance and auditing purposes.	
<b>Observations</b>	
A sample of meter documents has been sighted. Some of the drawings do not show all the required detail, which then exists on other technical drawing. The technical content of drawings could be improved or provide the cross reference to other technical drawings as is good engineering practice. This was subject of Section 32 Notice.	

<b>Issues</b>
Drawings can be improved.
<b>Recommendations</b>
The Licensee could improve the technical content of metering drawings or cross reference other drawings to meet good electricity industry practice. (Non mandatory recommendation Audit Guidelines 11.9)

<b>Item 419</b> Licence condition 5.1	Compliance rating Not rated
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 7.2(2)</i> A network operator must notify each Code participant of its initial contact details and of any change to its contact details at least 3 business days before the change takes effect.	
<b>Observations</b>	
Users have been advised of the head office change of address but not before change occurred. There have been no changes of network operational addresses so users are aware of technical contacts for emergency and service calls. The retailer and distributor is the same person so there is no practical advantage of notifying of change of address to each other. Customers hold an access contract (PPAs) thus becoming Code participant under the Code. There were no changes of address in the audit period.	
<b>Issues</b>	
There is an opportunity for process improvement to ensure notice is given in time.	
<b>Recommendations</b>	
A process should be put in place to advise users before changes in contact details occur. Suggest that this is achieved by being included in a compliance handbook with scheduled quarterly reviews.	

<b>Item 429</b> Licence condition 5.1	Compliance rating Compliant 5
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 5(1)</i> A distributor or transmitter must, as far as reasonably practicable, ensure that electricity supply to a customer's electrical installations complies with prescribed standards.	
<b>Observations</b>	
The sample quality surveys sighted show compliance with the requirements of regulation 6 and 7. However, standards were agreed with customers in power purchase agreements and these specify the relevant standards of the day (AS2279) . The old Australian standard uses a different method for voltage flicker and less detail for harmonics. Direct comparison was not possible. The old Australian standard has a more demanding total harmonic level than the Code. This was subject of Section 32 Notice.	
<b>Issues</b>	
Surveys should be scheduled on defined regular basis.	
<b>Recommendations</b>	
Non mandatory action is to schedule surveys in SAP planning system.	

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### 3.13.4 POST AUDIT IMPLEMENTATION PLAN

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The Licensee will be providing a separate post audit plan.

The Licensee should also consider revisions to the license area at Mt Keith and exemptions from the Office of Energy from the Transfer Code and Metering Code where they do not make business sense. For example there is no alternative retailer on the network or where customers pre date the Codes. The Asset Manager should be responsible to do this by June 2011.

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## 3.14 DETAILED FINDINGS

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### 3.14.1 AUDIT WORK UNDERTAKEN

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Interviews and enquiries were conducted to:

- Understand the control environment by determining the responsibility matrix and key control points
- Obtain the policies and procedures for managing licences and licensed areas; and
- Identify the information systems and processes employed to manage licences and licensed areas
- Determine the level of understanding of the systems and processes for managing licences and 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.

### 3.15 AUDIT EVIDENCE

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The following was considered in the audit.

- Distribution Licence
- Retail Licence
- Section 32 Notice
- Past audit/review
- Contact details
- Reticulation plans
- Meter testing policy letters
- Outage log & loss of supply registration form
- Meter calibration report
- Change of address letters
- Meter database
- Asset management plan
- Risk management policy
- Decommissioning plans
- Preventative maintenance procedure
- Maintenance management manual
- Health, Safety and Environment management manual
- Project management manual
- BHP Billiton Code of Business Conduct
- Power quality analysis sample report
- Power procurement agreement sample
- License fee invoice / Journal entries
- Meter drawings/documents
- Sample maintenance schedule
- High Voltage Isolation manual
- Fatal risk control standard
- Switching manual
- Calendar of payments and request for invoice

### 3.16 DETAILED AUDIT FINDINGS

The following sets out the audit findings

#### 3.16.1 ELECTRICITY INDUSTRY CUSTOMER TRANSFER CODE – LICENCE CONDITIONS AND OBLIGATIONS

<b>Item 1</b> through <b>Item 71</b> Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Compliance rating Not Rated
<b>Licence:</b> Distribution	
Electricity Industry Customer Transfer Code All the obligations relating to the Transfer Code have not been rated as there is no other retailer operating on the network to allow a transfer.	
<b>Observations</b>	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager. Documents: Not applicable	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There is no other retailers operating on the network therefore a transfer to another retailer is not possible.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

#### 3.16.2 ELECTRICITY INDUSTRY ACT – LICENCE CONDITIONS AND OBLIGATIONS

<b>Item 81</b> Distribution Licence condition 18.1, Retail Licence condition 22.1	Compliance rating Compliant 5
<b>Licence:</b> Distribution, Retail	
Electricity Industry Act section 13(1) A Licensee must, not less than once every 24 months, provide the Authority with a performance audit conducted by an independent expert acceptable to the Authority.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager. Documents: The Licensee contracted with the auditor to carry out the audit. The documents were forwarded to the Authority as part of the approval of the auditor. Licensee received approval from the Authority for audit scope and appointment of 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 contracted with the auditor to carry out the audit to meet the requirements. The last audit was also conducted to requirements.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 82</b>	Compliance rating
Distribution Licence condition 19.1	Compliant 5
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Act section 13(1)</i> A Licensee must provide for an asset management system.	
<b>Observations</b>	
Documents <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>	
<b>Evidence:</b> interviewed Asset Manager. Documents: Include, Asset Management Plan, Risk management policy, Decommissioning plans, Preventative maintenance procedure, Maintenance management manual, Health, Safety and Environment management manual, BHPBilliton Code of Business Conduct, Power quality analysis sample report, Power procurement agreement sample, Meter drawings/documents, High Voltage Isolation manual, Fatal risk control standard and Switching manual .	
Process <input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>	
The Licensee has an asset management system. A copy of the asset management plan was obtained, and maintenance systems reviewed at the sites. These included maintenance planning modules in SAP supported by spreadsheets. The asset management system includes time based and conditioned based maintenance. The review examined the efficacy of the asset management system.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 83</b>	Compliance rating
Distribution Licence condition 19.1 & 19.2	Compliant 5
<b>Licence:</b> <i>Distribution</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.	
<b>Observations</b>	
Documents <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>	
<b>Evidence:</b> interviewed Asset Manager. Documents: Include letter to ERA about new AMP. The asset management system was examined in the audit and review.	
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"/>	
Following the last audit an asset management plan has been developed and was advised to the Authority. There have been no substantial changes that required notifying the Authority	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 84</b>	Compliance rating
Distribution Licence condition 19.3	Compliant 5
<b>Licence:</b> <i>Distribution</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.	
<b>Observations</b>	
Documents <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>	

<b>Evidence:</b> interviewed Asset Manager. Documents: Include, Asset Management Plan, Previous asset management review. Approval and Appointment letters for current review.									
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 contracted McGill Engineering Services, with approval of the Authority, for the review in accordance with the requirements and the review plan documents have been forwarded to the Authority as part of approval of the auditor. The review is being carried out within the time frame approved. The last review was also conducted to requirements.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 85</b>					Compliance rating				
Distribution Licence condition 4.1, Retail Licence condition 4.1					Not Compliant 2				
<b>Licence:</b> <i>Distribution, Retail</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.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager. Documents: Include invoices and receipts									
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 fee was paid within a month of invoice from the Authority and within a month of the anniversary of the licence issue. But the 2009 fee was paid late being paid on 29 April which was 4 days after the anniversary of the licence issue. A calendar of key dates had been established and the licensee queried expected date of invoice. There were delays in payment due to new order and payment systems.									
<b>Issues</b>									
The Licensee needs a procedure to ensure payment within the required time.									
<b>Recommendations</b>									
Develop a compliance manual and scheduled reviews. Arrange and track expedited payment to ensure payment on time in future.									

Item 86						Compliance rating			
Distribution Licence condition 5.1, Retail Licence condition 5.1						Compliant 5			
Licence: Distribution, Retail									
Electricity Industry Act section 31(3) A licensee must take reasonable steps to minimise the extent or duration of any interruption, suspension or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Asset Manager, listed site staff. Documents: Include incident log.									
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"/>
Interruptions are logged. The northern system had two interruptions which were caused by loss of generation outside the control of the Licensee. The southern system had 6 interruptions, one by a loss of external generation and the remaining due to lightning. Personnel are on call with access to a callout vehicle. An agreement is in place for additional support in the northern system and contractors are available in the southern area. In all cases the interruption was minimised.									
Issues									

None
<b>Recommendations</b>
None

<b>Item 87</b>	Compliance rating
Distribution Licence condition 5.1, Retail Licence condition 5.1	Not Rated
<b>Licence:</b> <i>Distribution, Retail</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.	
<b>Observations</b>	
Documents <input type="checkbox"/> Compliance <input type="checkbox"/>	
<b>Evidence:</b> interviewed Asset Manager, listed site staff. Documents: Not applicable	
Process <input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>	
There have been no interests/easements taken in land in the audit period to assess compliance. All assets are on mining leases and no payments are made for interests or easements in land.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 96</b>	Compliance rating
Transmission Licence condition 5.1, Retail Licence condition 5.1	Not Rated
<b>Licence:</b> <i>Transmission, Retail</i>	
<i>Electricity Industry Act section 115(2)</i> A Licensee that has, or is an associate of a person that has, access to services under an access agreement must not engage in conduct for the purpose of hindering or prohibiting access.	
<b>Observations</b>	
Documents <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>	
<b>Evidence:</b> interviewed Asset Manager Documents: Not applicable.	
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 for access to the network so there is no behaviour that could engage in conduct for the purpose of hindering or prohibiting access.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

### 3.16.3 ELECTRICITY LICENCES – LICENCE CONDITIONS AND OBLIGATIONS

<b>Item 103</b>	Compliance rating
Electricity Industry Act section 11	Not Rated
<b>Licence:</b> <i>Distribution</i>	
<i>Distribution Licence condition 15.2</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.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager. Documents: Include, Asset Management Plan, Risk management policy, Decommissioning plans, Preventative maintenance procedure, Maintenance management manual, Health, Safety and Environment management manual, BHP Billiton Code of Business Conduct, Power quality analysis sample report, Power procurement agreement sample, Meter drawings/documents, High Voltage Isolation manual, Fatal risk control standard and Switching manual									
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. Expansion or reduction is allowed for in the asset management plan. The Licence refers to Mt Keith but there are no distribution assets other than the exempted self supply. The Licensee should consider advising the Authority and pay the requisite fee to amend the Licence if expansion capacity is not required.									
<b>Issues</b>									
There is no item to cover amendment of licence. The AMP does not specifically cover Mt Keith as there are no assets.									
<b>Recommendations</b>									
The Licensee should consider advising the Authority and pay the requisite fee to amend the Licence to remove Mt Keith from the Licence.									

<b>Item 104</b>								Compliance rating	
Electricity Industry Act section 11								Compliant 5	
<b>Licence:</b> <i>Distribution</i>									
<i>Distribution Licence condition 15.3</i>									
A Licensee must not expand the generating works, distribution systems or transmission systems outside the licence area.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager. 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 let alone outside the licence area.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 105</b>								Compliance rating	
Electricity Industry Act section 11								Compliant 5	
<b>Licence:</b> <i>Distribution, Retail</i>									
<i>Distribution Licence condition 16.1, Retail Licence Condition 20.1</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.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager. Documents: The BHP Billiton annual report declaration by the financial auditor has been sighted. It is noted that Nickel West does not publish audited									

accounts but is audited as part of BHP Billiton. The BHP Billiton audited accounts refers to compliance with the appropriate accounting standards.									
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 BHP Billiton annual report shows compliance with accounting standards.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 106</b>	Compliance rating
Electricity Industry Act section 11	Not Rated
<b>Licence:</b> <i>Distribution, Retail</i>	
<i>Distribution Licence condition 17.4, Retail Licence Condition 21.4</i>	
A Licensee must comply with any individual performance standards prescribed by the Authority.	
<b>Observations</b>	
Documents	<input type="checkbox"/>
Compliance	<input type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager. 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 applied by the Authority to assess compliance.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 107</b>	Compliance rating
Electricity Industry Act section 11	Compliant 5
<b>Licence:</b> <i>Distribution, Retail</i>	
<i>Distribution Licence condition 18.2, Retail Licence Condition 22.2</i>	
A Licensee must comply, and require its auditor to comply, with the Authority's standard audit guidelines dealing with the performance audit.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager. Documents: The audit plan was forwarded to the Authority, approval of the auditor obtained prior to appointment.	
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 to comply with the requirements.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 108</b>	Compliance rating
Electricity Industry Act section 11	Compliant 5
<b>Licence:</b> <i>Distribution</i>	
<i>Distribution Licence condition 19.4</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.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>

<b>Evidence:</b> interviewed Asset Manager. Documents: The AMS review plan has been forwarded to the Authority as part of 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 to comply with the requirements.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 109</b>						Compliance rating			
Electricity Industry Act section 11						Not Rated			
<b>Licence:</b> <i>Distribution, Retail</i>									
<i>Distribution Licence condition 20.1, Retail Licence Condition 23.1</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.									
<b>Observations</b>									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager. Documents: Not applicable.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The Licensee is not under external administration so not able to assess compliance with advice requirements.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

Item 110							Compliance rating		
Electricity Industry Act section 11							Compliant 5		
Licence: Distribution, Retail									
Distribution Licence condition 21.1, Retail Licence Condition 24.1									
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 Asset Manager. The Asset Manager advised that there have been no requests for information from the Authority other than Performance Audit, AMS Review and Compliance Report. Documents: The reporting manual returns have been sighted.									
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 met the reporting manual requirements.									
Issues									
None									
Recommendations									
None									

<b>Item 111</b>	Compliance rating Not Rated
Electricity Industry Act section 11	
<b>Licence:</b> <i>Distribution, Retail</i>	
<i>Distribution Licence condition 22.2, Retail Licence Condition 25.2</i> A licensee must publish any information it is directed by the Authority to publish, within the	

timeframes specified.									
<b>Observations</b>									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager. Documents: Not applicable.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The Authority has not directed any information to be published so unable to assess compliance with publishing requirements.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 112</b>						Compliance rating			
Electricity Industry Act section 11						Compliant 5			
<b>Licence:</b> <i>Distribution, Retail</i>									
<i>Distribution Licence condition 23.1, Retail Licence Condition 26.1</i>									
Unless otherwise specified, all notices must be in writing.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager. Documents: Sample communication with ERA sighted.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
No notices have been required by the Authority. All material communication with the Authority is in writing.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

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

<b>Item 300</b>						Compliance rating			
Licence condition 5.1						Not Applicable			
<b>Licence:</b> <i>Distribution</i>									
<i>Electricity Industry Metering Code clause 2.2(1)(a)</i>									
A network operator must treat all Code participants that are its associates on an arms-length basis.									
<b>Observations</b>									
Documents	<input type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager. Documents: Not applicable.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The retailer and distributor is the same person and there is no alternative retailer on the network. Provided there is no alternative retailer, there is no commercial reason for the network operator to treat the retailer on an arms-length basis and the requirement is assessed as Not Applicable.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 301</b>		Compliance rating	
Licence condition 5.1		Not Applicable	
<b>Licence:</b> <i>Distribution</i>			
<i>Electricity Industry Metering Code clause 2.2(1)(b)</i> A network operator must ensure that no Code participant that is its associate receives a benefit in respect of the Code unless the benefit is attributable to an arm's length application of the Code or is also made available to all other Code participants on the same terms and conditions.			
<b>Observations</b>			
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager. Documents: Not applicable.			
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>
The retailer and distributor is the same person and as there is no alternative retailer on the network to require arms length treatment, no differential treatment is possible. Accordingly the issue is not applicable during the audit period.			
<b>Issues</b>			
None			
<b>Recommendations</b>			
None			

<b>Item 302</b>		Compliance rating	
Licence condition 5.1		Compliant 5	
<b>Licence:</b> <i>Distribution</i>			
<i>Electricity Industry Metering Code clause 3.1</i> A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and also comply with any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act.			
<b>Observations</b>			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases.			
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>
The meter installations predate the licence and therefore will be grandfathered as compliant (refer Meter Code 3.14(1)). The meters have been tested and are within the Meter Code accuracy levels. There is no metrology procedure for the organisation but the individual Power Purchase Agreements (PPA) cover meter installations and accuracy which is what a metrology procedure covers thus becoming the <i>applicable metrology procedures</i> . The meters cannot meet the requirements of the National Measurement Institute as the specifications apply to measurement class CTs and where protection class CTs are allowed under the Code (3.14(4)). In any case metering is often at the substation and the customer is paying for line losses which are much more significant than any excesses of metering accuracy requirements. This was subject of Section 32 Notice.			
<b>Issues</b>			
A general metrology procedure does not exist and should be in place before a new customer is supplied,			
<b>Recommendations</b>			
In the event of a new customer requiring access, a metrology procedure should be prepared. (Non mandatory recommendation Audit Guidelines 11.9)			

<b>Item 303</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.2(1)</i> An accumulation meter must at least conform to the requirements specified in the applicable metrology procedure and display, or permit access to a display of, the accumulated electricity production or consumption at the metering point in the manner prescribed.	
<b>Observations</b>	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Reviewed meter registry.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There are no accumulation meters (non interval meters).	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 304</b> Licence condition 5.1	Compliance rating Compliant 4
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.3(1)</i> An interval meter must at least have an interface to allow the interval energy data to be downloaded in the manner prescribed using an interface compatible with the requirements specified in the applicable metrology procedure.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Reviewed meter registry.	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The meters have interfaces to download data and data is being downloaded. There is no general metrology procedure, but metrology is defined in the power purchase agreements becoming the <i>applicable metrology procedure</i> . There are no interval meters in the Leinster town site. While there are some old meters, none are read for raising charges for electricity.	
<b>Issues</b>	
There is no general metrology procedure apart from the requirements embedded in Power Purchase Agreements.	
<b>Recommendations</b>	
Development of a general metrology procedure for inclusion in or attachment to future Power Purchase Agreements. (Non mandatory recommendation Audit Guidelines 11.9).	

<b>Item 305</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.3(3)</i> If a metering installation is required to include a communications link, the link must (where necessary), include a modem and isolation device approved under the relevant telecommunications regulations, to allow the interval energy data to be downloaded in the manner prescribed.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>

<b>Evidence:</b> interviewed Asset Manager, Documents: Meter drawings, calibration results, meter data bases.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The metering installations communications links are all on internal communication systems and therefore do not have to comply with the relevant telecommunications requirements.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

Item 306					Compliance rating				
Licence condition 5.1					Compliant 4				
Licence: Distribution									
Electricity Industry Metering Code clause 3.5(1)& (2)									
A network operator must ensure that there is a metering installation at every connection point on its network which is not a Type 7 connection point. Unless it is a Type 7 metering installation, the metering installation must meet the functionality requirements prescribed.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Asset Manager, listed site staff, inspected site substations and sample installations. Documents viewed include: Metering drawings, photographs and calibration test reports.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
All connections are metered. The metering is generally at the point of connection and item 308 deals with proximity of metering to connection point.									
Issues									
The requirement is that every connection other than un-metered supplies is metered at the connection point but the proximity is covered in item 308 and this item requires metering for each connection point. The functionality requirements are satisfied.									
Recommendations									
None									

Item 307					Compliance rating				
Licence condition 5.1					Compliant 5				
Licence: Distribution									
Electricity Industry Metering Code clause 3.5(3) A network operator must, for each metering installation on its network, on and from the time of its connection to the network, provide, install, operate and maintain the metering installation in the manner prescribed (unless otherwise agreed).									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases									
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 were no new meters installed in the audit period. Operating and maintaining the metering installation was in accordance with the otherwise agreed requirements (the PPAs). The metering installations are as agreed with customers This was subject of Section 32 Notice.									
Issues									
No load to complete some calibrations									

<b>Recommendations</b>
Arrange for customers to provide load and calibrate the remaining meters and check clock rates.

<b>Item 308</b> Licence condition 5.1	Compliance rating Compliant 4
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.5(4)</i> A network operator must ensure that, except for a Type 7 metering installation, the metering point for a revenue metering installation is located as close as practicable to the connection point in accordance with good electricity industry practice.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases.	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The metering is generally at the point of connection. A few exceptions exist as a result of the topology of the network and customer locations after the sale of assets to junior miners. The customers have agreed to these arrangements. All customers are metered.	
<b>Issues</b>	
The requirement is that every connection (other than un-metered supplies) is metered as close as practicable to the connection point but this is not the case for some meters due to network topology. Meter Code 3.14(1) does not require installations that predate the Code to be updated.	
<b>Recommendations</b>	
Opportunity for improvement: Consider moving the meter installation closer to the connection point if a suitable opportunity arises.(Non mandatory recommendation Audit Guidelines 11.9)	

<b>Item 309</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Distribution, Retail</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.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases. PPAs	
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. There have been no charges for operating or maintaining a metering installation and this is in line with the service level agreement (PPAs) and communicated with customers.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 310</b> Licence condition 5.1	Compliance rating Compliant 5
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.5(9)</i>	



If a network operator becomes aware that a metering installation does not comply with the Code, the network operator must advise affected parties of the noncompliance and arrange for the non-compliance to be corrected as soon as practicable.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases.									
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 added password protection as a result of the last audit to all meters that are able to accept a password. A small number of meters do not have this capability. Meter Code 3.14(1) does not require installations that predate the Code to be updated. All meters are therefore considered compliant with the code.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 311</b>						Compliance rating			
Licence condition 5.1						Not Rated			
<b>Licence:</b> <i>Distribution</i>									
<i>Electricity Industry Metering Code clause 3.7</i> All devices that may be connected to a telecommunications network must be compatible with the Telecommunications network and comply with all applicable State and Commonwealth enactments.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There are no devices connected to Telecommunications network but instead connect to internal mines communications systems.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 312</b>						Compliance rating			
Licence condition 5.1						Compliant 5			
<b>Licence:</b> <i>Distribution</i>									
<i>Electricity Industry Metering Code clause 3.8</i> A network operator must, for each metering installation on its network, ensure that the metering installation is secured by means of devices or methods which, to the standard of good electricity industry practice, hinder unauthorized access and enable unauthorized access to be detected.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The meters are on controlled access mine sites and in locked substations which require access permits for any work. This is adequate security hindering unauthorized access meeting good electricity industry practice. The meters are remotely monitored and any unauthorized changes will be detected.									

This was subject of Section 32 Notice.
<b>Issues</b>
None
<b>Recommendations</b>
None

<b>Item 313</b>	Compliance rating
Licence condition 5.1	Compliant 4
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.9(3)</i> Each metering installation must meet at least the requirements for that type of metering installation specified in Table 3 in Appendix 1 of the Code.	
<b>Observations</b>	
Documents <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>	
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases.	
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 installations predate the Meter Code and therefore are grandfathered and do not require updating to meet the requirements of the Code. Refer to 3.14(1) of the Meter Code. The customers have accepted the accuracy in their contract (applicable metrology procedures). Meters have been calibrated to the extent possible as there was no load on a number of meters and load is necessary to measure current (and KW/KWh) and determine accuracy. Reactive capability (VAR) is available in meters as required but reactive power is not charged. Clock rates have not been verified. This was subject of Section 32 Notice.	
<b>Issues</b>	
There was no load on a number of meters and load is necessary to measure current (and KW/KWh) and determines accuracy.	
<b>Recommendations</b>	
The remaining meters should be calibrated at a time when the customers can arrange load (where possible) and clock rates checked. Non mandatory recommendation – Audit guidelines 11.9)	

<b>Item 314</b>	Compliance rating
Licence condition 5.1	Compliant 5
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.9(7)</i> For a metering installation used to supply a customer with requirements above 1000 volts that require a VT and whose annual consumption is below 750MWh, the metering installation must meet the relevant accuracy requirements of Type 3 metering installation for active energy only.	
<b>Observations</b>	
Documents <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>	
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases, PPAs	
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 installations predate the meter Code and therefore are grandfathered and do not require updating to meet the requirements of the Code. Refer to 3.14(1) of the Meter Code. Meters meet the requirements to the extent possible as there was no load on a number of meters and load is necessary to measure current (and KW/KWh) and determine accuracy. The metering accuracy has been agreed by the customers (applicable metrology procedures).	
<b>Issues</b>	
None	

<b>Recommendations</b>
None

<b>Item 315</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.9(9)</i> If compensation is carried out within the meter then the resultant metering system error must be as close as practicable to zero.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
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 compensation has been carried out within the meter.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 316</b> Licence condition 5.1	Compliance rating Compliant 4
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.10</i> A network operator must ensure that any programmable settings within any of its metering installations, data loggers or peripheral devices, that may affect the resolution of displayed or stored data, meet the relevant requirements specified in the applicable metrology procedure and comply with any applicable specifications or guidelines specified by the National Measurement Institute under the National Measurement Act.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The metering installations predate the Meter Code and are grandfathered and do not require updating to meet the requirements of the Code, refer Meter Code 3.14(1). The PPAs are the <i>applicable metrology procedure</i> . There is no general metrology procedure only the requirements of the power purchase agreements which are satisfied. A general metrology procedure should be developed before any new customers are supplied. The meters cannot meet the requirements of the National Measurement Institute as the specifications apply to measurement class CTs and protection class CTs are allowed under the Code (3.14(4)).	
<b>Issues</b>	
No general metrology procedure.	
<b>Recommendations</b>	
A general metrology procedure should be developed before any new customers are supplied. (Non mandatory recommendation Audit Guidelines 11.9)	

<b>Item 317</b> Licence condition 5.1	Compliance rating Compliant 5
<b>Licence:</b> <i>Distribution</i>	

<i>Electricity Industry Metering Code clause 3.11(1)</i>									
A network operator must ensure that a metering installation on its network permits collection of data within the timeframes and to the level of availability specified.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases, PPAs.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The metering installations meet the requirements specified in the power purchase agreements which are the <i>applicable service level agreements</i> which is allowed in the Code (3.11(1)(b)).									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 318</b>								Compliance rating	
Licence condition 5.1								Compliant 5	
<b>Licence:</b> <i>Distribution</i>									
<i>Electricity Industry Metering Code clause 3.11(2)</i>									
A network operator must make repairs to the metering installation in accordance with the applicable service level agreement if an outage or malfunction occurs to a metering installation.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases, PPAs.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The metering repairs have been done in accordance with the requirements of the power purchase agreements (which are the <i>applicable service level agreements</i> with the customers) and are allowed in the Code (3.11(2)).									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 319</b>								Compliance rating	
Licence condition 5.1								Not Applicable	
<b>Licence:</b> <i>Distribution, Retail</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.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
No advice has been received from customers. A code participant is defined as someone with an access contract and the Power Purchase Agreements are access contracts. The retailer (Code participant) and the network operator are the same person.									
<b>Issues</b>									
None									

<b>Recommendations</b>
None

<b>Item 320</b> Licence condition 5.1	Compliance rating Compliant 4
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.12(1)</i> A network operator must ensure that each metering installation complies with, at least, the prescribed design requirements.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases, PPAs.	
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 requirements of 3.12(1) cannot be met as it requires measurement class CTs to be used exclusively for measurement but protection class CTs are permitted by 3.14(4). The metering installations meet the requirements of the applicable metrology procedures (in the PPAs).	
<b>Issues</b>	
Drawings can be improved.	
<b>Recommendations</b>	
Opportunity for improvement is to improve technical content of drawings or cross reference other drawings with the required content. Develop a compliance manual with scheduled quarterly reviews. (Non mandatory recommendation –Audit Guidelines 11.9)	

<b>Item 321</b> Licence condition 5.1	Compliance rating Not Applicable
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.12(2)</i> A network operator must ensure that instrument transformers in its metering installations comply with the relevant requirements of any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act and any requirements specified in the applicable metrology procedure.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases, PPAs	
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"/>
In some cases protection CTs are used but the accuracy requirements (Table 3 Appendix 1) are met. The use of protection CTs is permitted by 3.14(4) and therefore standards of metering transformers (specified by the National Measurement Institute under the National Measurement Act) are not applicable. The requirements specified in the <i>applicable metrology procedure</i> are those in the PPAs. The metering installations are grandfathered and meet the requirements agreed with the customers.	
<b>Issues</b>	
Drawings can be improved.	
<b>Recommendations</b>	
Opportunity for improvement is to improve technical content of drawings or cross reference other drawings with the required content. Develop a compliance manual with scheduled quarterly reviews. (Non mandatory recommendation –Audit Guidelines 11.9)	

<b>Item 322</b>	Compliance rating
Licence condition 5.1	Compliant 4
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.12(3)</i> A network operator must provide isolation facilities, to the standard of good electricity industry practice, to facilitate testing and calibration of the metering installation.	
<b>Observations</b>	
Documents <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>	
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases.	
Process <input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>	
The metering installations predate the Code and are therefore grandfathered and do not require upgrading. Most metering installations have isolation facilities to meet the requirements.	
<b>Issues</b>	
Some calibration reports indicated restricted access to allow testing or potential to trip upstream supply. Some installations may not meet what is now considered good electricity industry practice.	
<b>Recommendations</b>	
Consider upgrading the meter installation to an improved standard if a suitable opportunity arises (Non mandatory recommendation Audit Guidelines 11.9)	

<b>Item 323</b>	Compliance rating
Licence condition 5.1	Compliant 4
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.12(4)</i> A network operator must maintain drawings and supporting information, to the standard of good electricity industry practice, detailing the metering installation for maintenance and auditing purposes.	
<b>Observations</b>	
Documents <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>	
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
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"/>	
A sample of meter documents has been sighted. Some of the drawings do not show all the required detail, which then exists on other technical drawing. The technical content of drawings could be improved or provide the cross reference to other technical drawings as is good engineering practice. This was subject of Section 32 Notice.	
<b>Issues</b>	
Drawings can be improved.	
<b>Recommendations</b>	
The Licensee could improve the technical content of metering drawings or cross reference other drawings to meet good electricity industry practice. (Non mandatory recommendation Audit Guidelines 11.9)	

<b>Item 324</b>	Compliance rating
Licence condition 5.1	Not Applicable
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.13(1)</i> A network operator must procure the user or the user's customer to install (or arrange for the installation of) a full check metering installation or partial check metering installation in accordance with the prescribed requirements.	

<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Check metering installations are not required. In any case as the metering installations were commissioned before the Meter Code came into existence the requirement is not applicable (3.14(1)).									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 325</b>						Compliance rating			
Licence condition 5.1						Not Applicable			
<b>Licence:</b> <i>Distribution</i>									
<i>Electricity Industry Metering Code clause 3.13(c)</i> A partial check metering installation must be physically arranged in a manner determined by the network operator, acting in accordance with good electricity industry practice.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Partial check metering is not required. In any case as the metering installations were commissioned before the Meter Code came into existence the requirement is not applicable (3.14(1)).									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 326</b>						Compliance rating			
Licence condition 5.1						Not Applicable			
<b>Licence:</b> <i>Distribution</i>									
<i>Electricity Industry Metering Code clause 3.13(4)</i> A check metering installation for a metering point must not exceed twice the error level permitted under clause 3.9 for the revenue metering installation for the metering point, and must be connected in such a way that it measures the same load conditions as the revenue metering installation for the metering point, and must be otherwise consistent with the prescribed requirements.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Check metering installations are not required. In any case as the metering installations were commissioned before the Meter Code came into existence the requirement is not applicable (3.14(1)).									
<b>Issues</b>									
None									



<b>Recommendations</b>
None

<b>Item 327</b> Licence condition 5.1	Compliance rating Not Applicable
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.14(3)</i> If, under clause 3.14(2) of the Code, a metering installation uses metering class CTs and VTs that do not comply with the prescribed requirements, then the network operator must either (or both) install meters of a higher class accuracy or apply accuracy calibration factors within the meter in order to achieve the overall accuracy requirements prescribed.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
Metering transformers meet the requirements of Table 3 Appendix 1. In any case as the metering installations were commissioned before the Meter Code came into existence. Clause 3.14(3) is only applicable for installations committed before Code commencement (3.14(1)) and not commissioned within a specified time frame. This was subject of Section 32 Notice.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 328</b> Licence condition 5.1	Compliance rating Not Applicable
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.16(1)</i> A network operator must ensure that a Type 1 metering installation to Type 5 metering installation on the network has the facilities and functionality prescribed.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
The installation is not connected to the WEM so the requirements are not applicable.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 329</b> Licence condition 5.1	Compliance rating Not Applicable
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.16(2)</i> A network operator must ensure that a Type 1 metering installation to Type 4 metering installation on the network includes a communications link.	



<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The installation is not connected to the WEM so the requirements are not applicable.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 330</b> Licence condition 5.1								Compliance rating Not Applicable	
<b>Licence:</b> <i>Distribution</i>									
<i>Electricity Industry Metering Code clause 3.16(3)</i> If a device is used as a data logger, the energy data for a metering point on the network must be collated in trading intervals within the metering installation unless it has been agreed between the network operator and the Code participant that energy data may be recorded in submultiples of a trading interval.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The installation is not connected to the WEM so the requirements are not applicable.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 331</b> Licence condition 5.1								Compliance rating Not Applicable	
<b>Licence:</b> <i>Distribution, Retail</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.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The installation is not connected to the WEM so the requirements are not applicable. There are no accumulation meters to be modelled, so 3.16(4) does not apply and consequently 3.16(5) which depends on 3.16(4) also does not apply.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 332</b>	Compliance rating
Licence condition 5.1	Not Applicable
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.16(6)</i> A network operator may only impose a charge for the matters dealt with in the metrology procedure in accordance with the applicable service level agreement between it and the user.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
The installation is not connected to the WEM so the requirements are not applicable.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 334</b>	Compliance rating
Licence condition 5.1	Not Rated
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.20(1)</i> A network operator must, if reasonably requested by a Code participant, provide enhanced technology features in a metering installation.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
Advanced technology features have not been requested.	
<b>Issues</b>	
None	
<b>Management Actions</b>	
Not applicable	

<b>Item 335</b>	Compliance rating
Licence condition 5.1	Not Rated
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.20(3)</i> A network operator may only impose a charge for the provision of metering installations with enhanced technology features in accordance with the applicable service level agreement between it and the user.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
Advanced technology features have not been requested.	
<b>Issues</b>	
None	

<b>Recommendations</b>
None

<b>Item 336</b>					Compliance rating				
Licence condition 5.1					Not Rated				
<b>Licence:</b> <i>Distribution</i>									
<i>Electricity Industry Metering Code clause 3.21(1)</i>									
Meters containing an internal real time clock must maintain time accuracy as prescribed. Time drift must be measured over a period of 1 month.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations.									
Documents: Meter drawings, calibration results, meter data bases									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Advanced technology features have not been requested.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 337</b>					Compliance rating				
Licence condition 5.1					Not Rated				
<b>Licence:</b> <i>Distribution</i>									
<i>Electricity Industry Metering Code clause 3.21(2)</i>									
If a metering installation includes measurement elements and an internal data logger at the same site, it must include facilities on site for storing the interval energy data for the periods prescribed.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations.									
Documents: Meter drawings, calibration results, meter data bases									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Advanced technology features have not been requested.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

Item 338 Licence condition 5.1					Compliance rating Not Rated									
Licence: <i>Distribution</i>														
<i>Electricity Industry Metering Code clause 3.22</i> A network operator providing one or more metering installations with enhanced technology features must be licensed to use and access the metering software applicable to all devices being installed and be able to program the devices and set parameters.														
Observations														
Documents		<input checked="" type="checkbox"/>	Compliance		<input checked="" type="checkbox"/>									
Evidence: interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases														
Process		<input type="checkbox"/>	Outcome		<input type="checkbox"/>	Output		<input type="checkbox"/>	Reporting		<input type="checkbox"/>	Compliance		<input type="checkbox"/>
Advanced technology features have not been requested.														

<b>Issues</b>
None
<b>Recommendations</b>
None

<b>Item 339</b>					Compliance rating				
Licence condition 5.1					Not Rated				
<b>Licence:</b> <i>Distribution</i>									
<i>Electricity Industry Metering Code clause 3.23(a)</i> Where signals are provided from the meter for the user or the user's customer use, a network operator must ensure that signals are isolated by relays or electronic buffers to prevent accidental or malicious damage to the meter.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Advanced technology features have not been requested.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 340</b>					Compliance rating				
Licence condition 5.1					Not Rated				
<b>Licence:</b> <i>Distribution</i>									
<i>Electricity Industry Metering Code clause 3.23(b)</i> Where signals are provided from the meter for the user or the user's customer use, a network operator must provide the user or the user's customer with sufficient details of the signal specification to enable compliance with clause 3.23(c) of the Code.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Advanced technology features have not been requested.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 341</b>	Compliance rating
Licence condition 5.1	Not Rated
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 3.25</i> A network operator that operates and maintains a prepayment meter on its network must operate and maintain the pre-payment meter in accordance with good electricity industry practice and, as far as reasonably practicable, minimise any departure from what the requirements of the Code would have been in respect of the pre-payment meter if clause 3.24 were deleted.	

<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There are no Prepayment meters.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 342</b> Licence condition 5.1						Compliance rating Not Rated			
<b>Licence:</b> <i>Retail</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.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
No new meters have been installed in the audit period.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 343</b> Licence condition 5.1						Compliance rating Not applicable			
<b>Licence:</b> <i>Distribution</i>									
<i>Electricity Industry Metering Code clause 3.29</i> A network operator must publish a list of registered metering installation providers, including the prescribed details, and at least annually, update the list.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases									
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"/>
Clause 3.28 provides that a network operator <u>may</u> register or deregister a person to undertake some or all of the activities relating to installation of metering. Nickel West has chosen not to register anyone. An installer for any new metering installation shall be considered at time required as installations are non standard. As registration is optional and there is no person registered, the requirement to publish and update a list is not applicable.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 344</b>	Compliance rating
Licence condition 5.1	Compliant 5
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 4.1(1)</i> A network operator must establish, maintain and administer a metering database containing standing data and energy data for each metering point on its network.	
<b>Observations</b>	
Documents <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>	
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
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 maintains a database of the required information.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 345</b>	Compliance rating
Licence condition 5.1	Compliant 5
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 4.1(2)</i> A network operator must ensure that its metering database and associated links, circuits, information storage and processing systems are secured by means of devices or methods which, to the standard of good electricity industry practice, hinder unauthorized access and enable unauthorized access to be detected.	
<b>Observations</b>	
Documents <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>	
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases.	
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 databases and associated links, circuits, information storage and processing systems are secure by passwords with varying access levels.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 346</b>	Compliance rating
Licence condition 5.1	Compliant 5
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 4.1(3)</i> A network operator must prepare, and if applicable, must implement a disaster recovery plan to ensure that it is able, within 2 business days after the day of any disaster, to rebuild the metering database and provide energy data to Code participants.	
<b>Observations</b>	
Documents <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>	
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases.	
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 servers are backed up and recovery time has been tested. Recovery of energy data is within next meter reading as energy readings self correct at the next meter reading (half hour). The	

database registry is recovered within 1 hour and general recovery of servers within 1 day. The energy data is captured to two independent systems – one SCADA and one SQL database. Either data set maybe used for provision of energy data. A disaster in one will not affect the data retained in the other, which will be immediately available and satisfying the requirement. Additionally, both data sets are backed up independently. Meter data is not required to be supplied to Code participants until after month end. The disaster recovery plan is covered by having independent dual data sets.
<b>Issues</b>
None
<b>Recommendations</b>
None

<b>Item 347</b> Licence condition 5.1	Compliance rating Not Applicable
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 4.2(1)</i> A network operator must ensure that its registry complies with the Code and the prescribed clause of the market rules.	
<b>Observations</b>	
Documents <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>	
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
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 is not part of the WEM so the market rules are not applicable. The registry meets the requirements. This was subject of Section 32 Notice.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 348</b> Licence condition 5.1	Compliance rating Compliant 5
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 4.3(1)</i> The standing data for a metering point must comprise at least the items specified.	
<b>Observations</b>	
Documents <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>	
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
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 a complete print out of the registry information which contains the standing data required by the code and additional data.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 349</b>		Compliance rating	
Licence condition 5.1		Compliant 5	
<b>Licence:</b> <i>Distribution, Retail</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.			
<b>Observations</b>			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. <b>Documents:</b> Meter drawings, calibration results, meter data bases			
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 power purchase agreements set out discrepancy resolution issues. For some remote meters where the communication link is weak, data is stored in the communication modules adjacent to the meter. No discrepancy issue arose other than an invoicing issue not related to meter data and this was resolved.			
<b>Issues</b>			
None			
<b>Recommendations</b>			
None			

<b>Item 350</b>		Compliance rating	
Licence condition 5.1		Compliant 5	
<b>Licence:</b> <i>Distribution, Retail</i>			
<i>Electricity Industry Metering Code clause 4.5(1)</i> A Code participant must not knowingly permit the registry to be materially inaccurate.			
<b>Observations</b>			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. <b>Documents:</b> Meter drawings, calibration results, meter data bases			
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 meter database has been sighted and there are no known errors other than an invoicing error which is not a registry error. There have been no customer (Code participants) complaints.			
<b>Issues</b>			
None			
<b>Recommendations</b>			
None			

<b>Item 351</b>		Compliance rating	
Licence condition 5.1		Not Rated	
<b>Licence:</b> <i>Retail</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.			
<b>Observations</b>			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. <b>Documents:</b> Meter drawings, calibration results, meter data bases			
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>
Compliance	<input type="checkbox"/>		
No errors to the registry have been advised from customers. A code participant is defined as			



someone with an access contract and the Power Purchase Agreements are access contracts. There are no alternative retailers for transfers to cause registry errors. There is no need for a process for notification as the retailer and the network operator are the same person.
<b>Issues</b>
None
<b>Recommendations</b>
None

<b>Item 352</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 4.6(1)</i> If a network operator is notified of a change to or inaccuracy in an item of standing data by a Code participant which is the designated source for the item of standing data, then the network operator must update the registry.	
<b>Observations</b>	
Documents <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>	
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
Process <input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>	
No changes or inaccuracies have been advised from customers so there was no action consequent to advice. A code participant is defined as someone with an access contract and the Power Purchase Agreements are access contracts. The retailer and the network operator is the same person so no formal correspondence has taken place. Data in the registry has been amended as incidental additional data became available.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 353</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 4.6(2)</i> If a network operator is notified of a change to or inaccuracy in an item of standing data by a Code participant which is not the designated source for the item of standing data, or otherwise becomes aware of a change to or inaccuracy in an item of standing data, then the network operator must undertake investigations to the standard of good electricity industry practice to determine whether the registry should be updated, and update the registry as required.	
<b>Observations</b>	
Documents <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>	
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
Process <input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>	
No changes or inaccuracies have been advised.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 354</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 4.7</i> A network operator must notify any affected user for a metering point of the updated standing data within the timeframes prescribed, where that user would otherwise be entitled to the updated standing data.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases, correspondence files	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
No changes or inaccuracies have been advised by users that would require advice to users.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 355</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 4.8(3)</i> A network operator must allow a user who supplies, purchases or generates electricity to have local and (where a suitable communications link is installed) remote access to the energy data for metering points at its associated connection points, using a 'read only' password provided by the network operator.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases, correspondence files	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
No requests for remote access have been received.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 356</b> Licence condition 5.1	Compliance rating Compliant 5
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 4.8(4)</i> A network operator must have security devices and methods in place that ensure that energy data held in its metering installation and data held in its metering database is secured from unauthorized local or remote access, in the manner prescribed, sufficient to the standard of good electricity industry practice.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The metering installations and data are on controlled access mine sites. Password access is required for access to the database so it is secured from unauthorized local or remote access, in the manner prescribed, sufficient to the standard of good electricity industry practice.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 357</b> Licence condition 5.1	Compliance rating Compliant 5
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 4.8(5)</i> A network operator must ensure that electronic passwords and other electronic security controls are secured from unauthorized access and are only issued to authorized personnel.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The metering information is secured by the BHP Billiton IT requirements and is secured by passwords with varying access levels. Passwords are only issued to authorised personnel and BHP Billiton IT policies also detail requirements for password usage.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 358</b> Licence condition 5.1	Compliance rating Compliant 5
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 4.9</i> A network operator must retain energy data in its metering database for each metering point on its network for at least the periods, and with the level of accessibility, prescribed.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
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 is retained by IT systems with back up of servers and retained for the required time. Metered energy data from 2004 has been sighted and is available immediately on the computer network to the appropriate personnel.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 359</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 5.1(1)</i> A network operator must use all reasonable endeavours to accommodate another Code participant's requirement to obtain a metering service and requirements in connection with the negotiation of a service level agreement.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
No requests for a metering service were made in the audit period.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 360</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 5.1(2)</i> A network operator must expeditiously and diligently process all requests for a service level agreement and negotiate its terms in good faith. A network operator must, to the extent reasonably practicable in accordance with good electricity industry practice, permit a Code participant to acquire a metering service containing only those elements of the metering service which the Code participant wishes to acquire.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
No requests for a metering service were made in the audit period.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 361</b> Licence condition 5.1	Compliance rating Compliant 5
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 5.3</i> A network operator must, for each metering point on its network, obtain energy data from the metering installation and transfer the energy data into its metering database within the timeframes prescribed.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases.	

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 is downloaded every half hour which is less than the 2 day requirement.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 362</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 5.4(1)</i> A network operator must, for each accumulation meter on its network, use reasonable endeavours to undertake a meter reading that provides an actual value at least once in any 12 month period.	
<b>Observations</b>	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There are no accumulation meters.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 363</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Retail</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.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
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 (customers). A code participant is defined as someone with an access contract and the Power Purchase Agreements are access contracts. The retailer and the network operator is the same person so there is no practical distinction between where the need arises.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 364</b> Licence condition 5.1	Compliance rating Compliant 5
<b>Licence:</b> <i>Distribution</i>	

<p><i>Electricity Industry Metering Code clause 5.5(2)</i> A network operator may only impose a charge for the provision of data under this Code in accordance with the applicable service level agreement between it and the user and must not impose a charge for the provision of data if another enactment prohibits it from doing so.</p>									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<p><b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases, correspondence files</p>									
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 users were only charged in accordance with the power purchase agreements which are the <i>applicable service level agreements</i> . No complaints were received.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

Item 365 Licence condition 5.1							Compliance rating Compliant 5						
Licence:       Retail													
Electricity Industry Metering Code clause 5.5(3) 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 checked="" type="checkbox"/>	Compliance		<input checked="" type="checkbox"/>								
Evidence: interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases													
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"/>
Users were not charged for data.													
Issues													
None													
Recommendations													
None													

Item 366 Licence condition 5.1							Compliance rating Not Applicable		
Licence: <i>Distribution</i>									
<i>Electricity Industry Metering Code clause 5.6(1)</i> A network operator must provide validated, and where necessary, substituted or estimated energy data for a metering point to the user for the metering point and the IMO within the timeframes prescribed.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases, PPAs									
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 data is provided according to the <i>applicable service level agreements</i> (the PPAs) The network is not part of the WEM and the requirement is not applicable as daily settlements with the IMO are not required.									
Issues									
None									

<b>Recommendations</b>
None

<b>Item 367</b> Licence condition 5.1	Compliance rating Not Applicable
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 5.7</i> A network operator must provide replacement energy data to the user for the metering point and the IMO within the timeframes prescribed.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases, PPAs.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
The network is not part of the WEM and the requirement is not applicable as daily settlements with the IMO are not required. The data is replaced in accordance with the timeframes in the relevant service level agreement (the Power Procurement Agreements). The policy is to use zero as the replacement value when smaller loads have an error and peak values are not estimated for any other replacement.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 370</b> Licence condition 5.1	Compliance rating Not Applicable
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 5.10</i> A network operator must provide a subset of the standing data to a retailer in accordance with the provisions of Annex 4 of the Customer Transfer Code.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There is no alternative retailer to transfer to so transfer code is not applicable.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 371</b> Licence condition 5.1	Compliance rating Not Applicable
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 5.11</i> If a transfer occurs at a connection point, a network operator must provide an incoming retailer with a copy of the standing data for each metering point associated with the connection point within the timeframes prescribed.	

<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There is no alternative retailer to transfer to so transfer code is not applicable.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 372</b> Licence condition 5.1						Compliance rating Not Rated			
<b>Licence:</b> <i>Distribution</i>									
<i>Electricity Industry Metering Code clause 5.12(1)</i> If a network operator is given a request in accordance with the communication rules and the energy data request relates only to a time or times for which the user was the current user at the metering point, a network operator must provide a user with a complete set of energy data for a metering point within the timeframes prescribed.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases, correspondence files									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no requests and no transfers to require energy data. The users have been provided energy data according to the PPAs (applicable service level agreements).									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 373</b> Licence condition 5.1						Compliance rating Not Rated			
<b>Licence:</b> <i>Distribution</i>									
<i>Electricity Industry Metering Code clause 5.13</i> A network operator must provide a current user with a complete current set of standing data for a metering point and advise whether there is a communications link for the metering point, within the timeframes prescribed, if it is given a request in accordance with the communication rules.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases, correspondence files									
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 (There are no communication rules as there is no need for them with no other retailer on network).									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									



<b>Item 374</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 5.14(3)</i> A network operator must acknowledge receipt of a bulk standing data request from a user and provide the requested standing data within the timeframes prescribed in accordance with the communication rules.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
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.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 375</b> Licence condition 5.1	Compliance rating Compliant 5
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 5.15</i> A network operator that provides energy data to a user or the IMO must also provide the date of the meter reading.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
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"/>
Dates are included with meter readings on invoices or supporting data.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 376</b> Licence condition 5.1	Compliance rating Compliant 5
<b>Licence:</b> <i>Retail</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.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
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"/>

Users do not collect or receive energy data to send to network operator (and no communication rules for which there is no need with no other retailer on network). Data is uploaded automatically.
<b>Issues</b>
None
<b>Recommendations</b>
None

<b>Item 377</b> Licence condition 5.1	Compliance rating Compliant 5
<b>Licence:</b> <i>Retail</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.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
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"/>
Standing and validated energy data is provided on invoices. There is no enactment to provide data but the Power Purchase Agreements do make provision for meter data to be provided to a customer after month end. Time frames are not specified. Energy data has been provided. Applicable enactments such as the code of conduct do not apply as there are no small use consumers.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 378</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Retail</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.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
No change in energisation status occurred in the audit period.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 379</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Retail</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.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases, correspondence files	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There has been no request to collect information.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	
<b>Management Actions</b>	
Not applicable	

<b>Item 380</b> Licence condition 5.1	Compliance rating Compliant 5
<b>Licence:</b> <i>Retail</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.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
Contacts lists and address, site and customer attributes and sample advice to customers sighted. This was subject of Section 32 Notice.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 381</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Retail</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.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases, correspondence files	

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There has been no change to site attributes. There has been no advice from users.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 382</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Retail</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.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
No sensitive load exists on network.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 383</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 5.19(5)</i> A network operator must give notice to a user, or (if there is a different current user) the current user, acknowledging receipt of any customer, site or address attributes from the user within the timeframes prescribed.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There was no new customer site or address attributes in the audit period to require a notice.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 384</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Distribution</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.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. <b>Documents:</b> Meter drawings, calibration results, meter data bases									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There were no changes in attributes in the audit period.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 385</b> Licence condition 5.1	Compliance rating Compliant 5
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 5.20(1)</i> A network operator must, within 6 months from the date this Code applies to the network operator, develop, in accordance with the communication rules, an energy data verification request form.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, <b>Documents:</b> Energy Data Verification Request Form	
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"/>
An energy data verification was not produced within the prescribed period, which was reported in the previous audit. The time period is now no longer relevant. An energy data verification request form has been developed as required by the last audit. There are no communication rules. This was subject of Section 32 Notice.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 386</b> Licence condition 5.1	Compliance rating Compliant 5
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 5.20(2)</i> An Energy Data Verification Request Form must require a Code participant to provide the information prescribed.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. <b>Documents:</b> Meter drawings, calibration results, meter data bases, Energy Data Verification Request Form	
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"/>
An energy data verification request form has been developed containing the required information as required from the last audit.	
<b>Issues</b>	
None	

<b>Recommendations</b>
None

<b>Item 387</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 5.20(4)</i> If a Code participant requests verification of energy data, a network operator must, in accordance with the metrology procedure, use reasonable endeavours to verify energy data and inform the requesting Code participant of the result of the verification and provide the verified energy data within the timeframes prescribed.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases, correspondence files	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There were no requests in the audit period.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 388</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 5.21(2)</i> A network operator must comply with any reasonable request by a Code participant to undertake either a test or an audit of the accuracy of the metering installation or the energy or standing data of the metering installation.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases, correspondence files	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There were no requests in the audit period.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 389</b> Licence condition 5.1	Compliance rating Compliant 5
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 5.21(4)</i> A test or audit is to be conducted in accordance with the metrology procedure and the applicable service level agreement.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>

<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases, PPAs									
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 tests confirmed the meter accuracy in accordance with the power purchase agreements which are the relevant service level agreements.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 390</b> Licence condition 5.1							Compliance rating Not Rated							
<b>Licence:</b> <i>Retail</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.														
<b>Observations</b>														
Documents		<input checked="" type="checkbox"/>	Compliance		<input checked="" type="checkbox"/>									
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases, correspondence files														
Process		<input type="checkbox"/>	Outcome		<input type="checkbox"/>	Output		<input type="checkbox"/>	Reporting		<input type="checkbox"/>	Compliance		<input type="checkbox"/>
There were no requests in the audit period. The network is not on the WEM.														
<b>Issues</b>														
None														
<b>Recommendations</b>														
None														

Item 391 Licence condition 5.1							Compliance rating Not Rated							
Licence: <i>Retail</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 checked="" type="checkbox"/>	Compliance		<input checked="" type="checkbox"/>									
Evidence: interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases, correspondence files														
Process		<input type="checkbox"/>	Outcome		<input type="checkbox"/>	Output		<input type="checkbox"/>	Reporting		<input type="checkbox"/>	Compliance		<input type="checkbox"/>
There were no requests in the audit period.														
Issues														
None														
Recommendations														
None														

<b>Item 392</b> Licence condition 5.1	Compliance rating Compliant 5
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 5.21(8)</i> A network operator may only impose a charge for the testing of the metering installations, or auditing of information from the meters associated with the metering installations, or both, in accordance with the applicable service level agreement between it and the user.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
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 were no charges for meter testing.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 393</b> Licence condition 5.1	Compliance rating Compliant 5
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 5.21(9)</i> Any written service level agreement in respect of the testing of the metering installations, or the auditing of information from the meters associated with the metering installations, must include a provision that no charge is to be imposed if the test or audit reveals a non-compliance with this Code which results in energy data errors in the network operator's favour.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases, PPAs	
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 power purchase agreements allow for meter testing but are silent about who pays but the practice is not to charge and the customers have been advised in writing of the policy.	
<b>Issues</b>	
The last audit recommended power purchase agreements are amended to be explicit about charging. The clients have been sent letters setting out the charging policy which meets the requirements. Amending the Power Purchase Agreements is a very substantial exercise and not economical for this requirement. This was subject of Section 32 Notice.	
<b>Recommendations</b>	
None	

<b>Item 394</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 5.21(11)</i> A network operator must advise the affected parties as soon as practicable of errors detected under a test or audit, the possible duration of the errors, and must restore the accuracy of the metering installation in accordance with the applicable service level agreement.	



<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
No errors were discovered in tests to require action.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 395</b> Licence condition 5.1						Compliance rating Compliant 5			
<b>Licence:</b> <i>Distribution</i>									
<i>Electricity Industry Metering Code clause 5.21(12)</i> The original stored error correction data in a meter must not be altered except during accuracy testing and calibration of a metering installation.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases									
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"/>
Error correction data was not altered or destroyed during calibration or tests. Stored data in a meter is not used.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 396</b> Licence condition 5.1						Compliance rating Compliant 5			
<b>Licence:</b> <i>Distribution</i>									
<i>Electricity Industry Metering Code clause 5.22(1)</i> A network operator must validate energy data in accordance with this Code applying, as a minimum, the prescribed rules and procedures and must, where necessary, substitute and estimate energy data under this Code applying, as a minimum, the prescribed rules and procedures.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases									
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"/>
Validation was not required (installed before Code and CT ratios not changed, check metering is not required). Substituted or estimated data has been zero for smaller loads (this is not an issue to the retailer who is the same person as the network operator). For larger loads, estimated energy is substituted using Substitution Method 13 or interpolated data which will self correct the following month. Peak power is not estimated during periods of data loss, which meets substitution method 18 requirements.									
<b>Issues</b>									
None									

<b>Recommendations</b>
None

<b>Item 397</b> Licence condition 5.1	Compliance rating Not applicable
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 5.22(2)</i> The network operator must use check metering data, where available, to validate energy data provided that the check metering data has been appropriately adjusted for differences in metering installation accuracy.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
Check metering not installed or required.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 398</b> Licence condition 5.1	Compliance rating Compliant 5
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 5.22(3)</i> A network operator must prepare substitute values using the prescribed method if a check meter is not available or energy data cannot be recovered from the metering installation within the time required.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Check metering not installed or required. Substituted or estimated data has been zero for smaller loads (this is not an issue to the retailer who is the same person as the network operator). For larger loads, estimated energy is substituted using Substitution Method 13 or interpolated data which will self correct the following month. Peak power is not estimated during periods of data loss, which meets substitution method 18 requirements.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 399</b> Licence condition 5.1	Compliance rating Compliant 4
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 5.22(4)</i> A network operator that detects a loss of energy data or incorrect energy data from a metering	

installation must notify each affected Code participant of the loss or error within 24 hours after detection.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases, correspondence file, PPAs									
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"/>
When a loss of energy data is detected, zero is charged for smaller loads when data is lost or self correcting estimate reading is employed for large loads (Method 13). Peak power is not estimated so customers not disadvantaged (substitution method 18). Any loss of energy data or incorrect energy data is handled according to the applicable metrology procedure (PPAs). As any estimation self corrects or is irrelevant to the customer there is no requirement to notify the customer.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 400</b> Licence condition 5.1						Compliance rating Compliant 4			
<b>Licence:</b> <i>Distribution</i>									
<i>Electricity Industry Metering Code clause 5.22(5)</i> Substitution or estimation of energy data is to be required when energy data is missing, unavailable or corrupted, including in the circumstances described.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases									
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"/>
When energy data is missing, unavailable or corrupted, the substituted or estimated data has been zero for smaller loads (this is not an issue to the retailer who is the same person as the network operator). For larger loads, estimated energy is substituted using Substitution Method 13 or interpolated data which will self correct the following month. Peak power is not estimated during periods of data loss, which meets substitution method 18 requirements and so customers not disadvantaged.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 401</b> Licence condition 5.1						Compliance rating Compliant 5			
<b>Licence:</b> <i>Distribution</i>									
<i>Electricity Industry Metering Code clause 5.22(6)</i> A network operator must review all validation failures before undertaking any substitution.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, Documents: Meter drawings, calibration results, meter data bases, correspondence file									
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"/>
Failure of the energy data validation has been noted when data has been missing, unavailable or									

corrupted and data has had to be substituted as described in Item 400, and the reason for failure is understood.
<b>Issues</b>
None
<b>Recommendations</b>
None

<b>Item 402</b> Licence condition 5.1	Compliance rating Compliant 5
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 5.23(1)</i> A network operator that determines that there is no possibility of determining an actual value for a metering point must designate an estimated or substituted value for the metering point to be a deemed actual value for the metering point.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases, energy data.	
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"/>
Where there is no possibility of determining an actual value for a metering point the designated, substituted or estimated data has been deemed to be zero for smaller loads (this is not an issue to the retailer who is the same person as the network operator). For larger loads, the designated, substituted or estimated energy a deemed value is determined using Substitution Method 13 or interpolated data which will self correct the following month. Peak power is not estimated during periods of data loss, which meets substitution method 18 requirements.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 403</b> Licence condition 5.1	Compliance rating Compliant 5
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 5.23(3)</i> A network operator that has designated a deemed actual value for a metering point must repair or replace the meter or one or more of components of metering equipment (as appropriate) at the metering point.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, Documents: N/A	
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"/>
Following substitution of a deemed value the faulty equipment, communication link or logging system is repaired or replaced as appropriate. Evidence is provided in load trending in following month.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 404</b> Licence condition 5.1		Compliance rating Not Rated	
<b>Licence:</b> <i>Distribution</i>			
<i>Electricity Industry Metering Code clause 5.24(1)</i> A network operator that uses an actual value (first value) for energy data for a metering point, and a better quality actual or deemed actual value is available (second value), must replace the first value with the second value if doing so would be consistent with good electricity industry practice.			
<b>Observations</b>			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases			
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>
Compliance	<input type="checkbox"/>		
No better values have become available. It would not be necessary to revise the reading with the second value (accumulator register) for large loads as the error will self correct the following month. For small loads the assumed value of zero consumption will be retained as good electricity industry customer relations.			
<b>Issues</b>			
None			
<b>Recommendations</b>			
None			

<b>Item 405</b> Licence condition 5.1		Compliance rating Not Rated	
<b>Licence:</b> <i>Distribution</i>			
<i>Electricity Industry Metering Code clause 5.24(2)</i> A network operator that uses a deemed actual value (first value) for energy data for a metering point, and a better quality deemed actual value is available (second value), must replace the first value with the second value if doing so would be consistent with good electricity industry practice.			
<b>Observations</b>			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases.			
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>
Compliance	<input type="checkbox"/>		
No better values have become available. It would not be necessary to revise the reading with the second value (accumulator register) for large loads as the error will self correct the following month. For small loads the assumed value of zero consumption will be retained as good electricity industry customer relations.			
<b>Issues</b>			
None			
<b>Recommendations</b>			
None			

<b>Item 406</b> Licence condition 5.1		Compliance rating Not Rated	
<b>Licence:</b> <i>Distribution</i>			
<i>Electricity Industry Metering Code clause 5.24(3)</i> A network operator that uses an estimated or substituted value (first value) for energy data for a metering point, and a better quality actual, deemed, estimated or substituted value is available (second value), must replace the first value with the second value if doing so would be consistent with good electricity industry practice or the user and its customer jointly request it to do so.			
<b>Observations</b>			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases, correspondence file.			
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>
Compliance	<input type="checkbox"/>		
No better values have become available. It would not be necessary to revise the reading with the second value (accumulator register) for large loads as the error will self correct the following month. For small loads the assumed value of zero consumption will be retained as good electricity industry customer relations. There have been no requests.			
<b>Issues</b>			
None			
<b>Recommendations</b>			
None			

<b>Item 407</b> Licence condition 5.1		Compliance rating Not Rated	
<b>Licence:</b> <i>Distribution</i>			
<i>Electricity Industry Metering Code clause 5.24(4)</i> A network operator (acting in accordance with good electricity industry practice) must consider any reasonable request from a Code participant for an estimated or substituted value to be replaced.			
<b>Observations</b>			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases, correspondence file			
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 for an estimated or substituted value to be replaced. There is no disadvantage to the customer that would require this due to self correction or zero energy estimate.			
<b>Issues</b>			
None			
<b>Recommendations</b>			
None			

<b>Item 408</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 5.25</i> A network operator must ensure the accuracy of estimated energy data in accordance with the methods in its metrology procedure and ensure that any transformation or processing of data preserves its accuracy in accordance with the metrology procedure.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
The accuracy is not relevant where a zero energy value has been substituted or no higher peak power value has been estimated. The accuracy is also not relevant where the estimate will self correct the following month. The metrology procedure is the PPA.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 409</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Retail</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.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
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. The retailer and the network operator is the same person.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 410</b> Licence condition 5.1	Compliance rating Not Applicable
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 5.29</i> If a network operator makes an election for the electricity networks corporation to be its metering data agent in relation to a network, then, except to the extent that the metering data agency agreement provides otherwise, the parties must undertake the activities prescribed.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations.	

Documents: Meter drawings, calibration results, meter data bases									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There has been no election for Western Power to be the metering agent.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 411</b> Licence condition 5.1								Compliance rating Not Applicable	
<b>Licence:</b> <i>Distribution</i>									
<i>Electricity Industry Metering Code clause 5.30(1)</i> If a network operator makes an election for the electricity networks corporation to be its metering data agent in relation to a network, then the electing network operator and the electricity networks corporation must enter into a metering data agency agreement in relation to the network, which must deal with at least the matters prescribed.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There has been no election for Western Power to be the metering agent.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 412</b> Licence condition 5.1								Compliance rating Not Applicable	
<b>Licence:</b> <i>Distribution</i>									
<i>Electricity Industry Metering Code clause 5.31(1)</i> If a network operator makes an election for the electricity networks corporation to be its metering data agent in relation to a network, the electricity networks corporation must assess the compliance of each metering installation in the network with this Code and notify the electing network operator of each non-compliant metering installation.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There has been no election for Western Power to be the metering agent.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									



<b>Item 413</b> Licence condition 5.1		Compliance rating Not Applicable	
<b>Licence:</b> <i>Distribution</i>			
<i>Electricity Industry Metering Code clause 5.31(2)</i> An electing network operator may, by notice to the electricity networks corporation, require the electricity networks corporation to upgrade a non-compliant metering installation, in which case the electricity networks corporation must undertake the upgrade in accordance with the metering data agency agreement and good electricity industry practice.			
<b>Observations</b>			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases			
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>
Compliance	<input type="checkbox"/>		
There has been no election for Western Power to be the metering agent.			
<b>Issues</b>			
None			
<b>Recommendations</b>			
None			

<b>Item 414</b> Licence condition 5.1		Compliance rating Not Applicable	
<b>Licence:</b> <i>Distribution</i>			
<i>Electricity Industry Metering Code clause 5.34(2)</i> Except to the extent that the metering data agency agreement provides otherwise, the costs which may be recovered by the electricity networks corporation for acting as the network operator's metering data agent must not exceed the amounts prescribed.			
<b>Observations</b>			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases			
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>
Compliance	<input type="checkbox"/>		
There has been no election for Western Power to be the metering agent.			
<b>Issues</b>			
None			
<b>Recommendations</b>			
None			

<b>Item 415</b> Licence condition 5.1	Compliance rating Compliant 4
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 6.1(1)</i> A network operator must, in relation to its network, comply with the agreements, rules, procedures, criteria and processes prescribed.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases, PPAs	
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 procedures are laid out in the power purchase agreements. There is no evidence of departures from the agreements. An invoice error was noted but this was not as a result of a metering issue. There have been no complaints. This was subject of Section 32 Notice.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 416</b> Licence condition 5.1	Compliance rating Compliant 4
<b>Licence:</b> <i>Retail</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.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
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 evidence of the retailer not complying with the agreements other than an invoicing error that was fixed.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 417</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 6.20(4)</i> A network operator must amend any document in accordance with the Authority's final findings.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The Licensee has not been required to amend any metering documents.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 418</b> Licence condition 5.1	Compliance rating Compliant 5
<b>Licence:</b> <i>Distribution, Retail</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.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases.	
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 requirement is satisfied as users can be contact by post, facsimile or electronic communication means. There have been no complaints from users. The retailer and the network operator is the same person.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 419</b> Licence condition 5.1	Compliance rating Not rated
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry Metering Code clause 7.2(2)</i> A network operator must notify each Code participant of its initial contact details and of any change to its contact details at least 3 business days before the change takes effect.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, Documents: correspondence file	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There was no change of address in the audit period. This was subject of Section 32 Notice.	
<b>Issues</b>	
There is an opportunity for process improvement to ensure notice is given in time.	
<b>Recommendations</b>	
A process should be put in place to advise users before changes in contact details occur. Suggest that this is achieved by being included in a compliance handbook with scheduled quarterly reviews.	

<b>Item 420</b> Licence condition 5.1		Compliance rating Not Rated	
<b>Licence:</b> <i>Distribution, Retail</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.			
<b>Observations</b>			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, Documents: Not applicable			
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>
Compliance <input type="checkbox"/>			
The obligation is on the customer or retailer and not on the network operator. The retailer and the network operator is the same person and notification is superfluous. Network operator has made no requests.			
<b>Issues</b>			
None			
<b>Recommendations</b>			
None			

<b>Item 421</b> Licence condition 5.1		Compliance rating Not Rated	
<b>Licence:</b> <i>Distribution, Retail</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.			
<b>Observations</b>			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, Documents: Not applicable			
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>
Compliance <input type="checkbox"/>			
The obligation is on the customer or retailer and not on the network operator. The retailer and the network operator is the same person and notification is superfluous.			
<b>Issues</b>			
None			
<b>Recommendations</b>			
None			

<b>Item 422</b> Licence condition 5.1		Compliance rating Compliant 5	
<b>Licence:</b> <i>Distribution, Retail</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.			
<b>Observations</b>			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, Documents: correspondence file			
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 data systems have secure access. There is no evidence of complaints about disclosure of confidential information.
<b>Issues</b>
None
<b>Recommendations</b>
None

<b>Item 423</b> Licence condition 5.1							Compliance rating Not Rated							
<b>Licence:</b> <i>Distribution, Retail</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.														
<b>Observations</b>														
Documents		<input checked="" type="checkbox"/>	Compliance		<input checked="" type="checkbox"/>									
<b>Evidence:</b> interviewed Asset Manager, Documents: Not applicable														
Process		<input type="checkbox"/>	Outcome		<input type="checkbox"/>	Output		<input type="checkbox"/>	Reporting		<input type="checkbox"/>	Compliance		<input type="checkbox"/>
There is no information required to be disclosed.														
<b>Issues</b>														
None														
<b>Recommendations</b>														
None														

Item 424 Licence condition 5.1					Compliance rating Not Rated									
Licence: <i>Distribution, Retail</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 checked="" type="checkbox"/>	Compliance		<input checked="" type="checkbox"/>									
Evidence: interviewed Asset Manager, Documents: correspondence file														
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 disputes in the audit period.														
Issues														
None														
Recommendations														
None														

<b>Item 425</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Distribution, Retail</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.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, Documents: correspondence file									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no metering disputes in the audit period.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 426</b> Licence condition 5.1								Compliance rating Not Rated	
<b>Licence:</b> <i>Distribution, Retail</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.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, Documents: correspondence file									
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 disputes in the audit period.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 427</b> Licence condition 5.1								Compliance rating Not Rated	
<b>Licence:</b> <i>Distribution, Retail</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.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, Documents: correspondence file									
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 disputes in the audit period.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 428</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Distribution, Retail</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.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
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 disputes in the audit period.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

### 3.16.5 ELECTRICITY INDUSTRY (NETWORK QUALITY AND RELIABILITY OF SUPPLY) CODE – LICENCE CONDITIONS AND OBLIGATIONS (ALL LICENCE CONDITION LICENCE CLAUSE 5.1)

<b>Item 429</b> Licence condition 5.1	Compliance rating Compliant 5
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 5(1)</i> A distributor or transmitter must, as far as reasonably practicable, ensure that electricity supply to a customer's electrical installations complies with prescribed standards.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Power quality survey, incident logs, network plans, PPAs	
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 sample quality surveys sighted show compliance with the requirements of regulation 6 and 7. However, standards were agreed with customers in power purchase agreements and these specify the relevant standards of the day (AS2279) . The old Australian standard uses a different method for voltage flicker and less detail for harmonics. Direct comparison was not possible. The old Australian standard has a more demanding total harmonic level than the Code. This was subject of Section 32 Notice.	
<b>Issues</b>	
Surveys should be scheduled on defined regular basis.	
<b>Recommendations</b>	
Non mandatory action is to schedule surveys in SAP planning system.	

<b>Item 430</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Distribution</i>	

<p><i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 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.</p>									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<p><b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations.  Documents: Power quality survey, incident logs, network plans.</p>									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
<p>There have been no disconnections for network quality and reliability of supply issues during the audit period. Due to the network configuration and topology, quality of supply is not continuously monitored. Disconnection of the customer would, if quality of supply became an issue, be carried out in the most reasonably practical manner unless it is in the interest of the customer to maintain supply. The customer on site representative would be contacted where possible. Some underfrequency protection is provided to some customers by protection and load shedding schemes operated by the generator, or by protection schemes installed by the customer.</p>									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<p><b>Item 431</b>  Licence condition 5.1</p>								<p>Compliance rating  Compliant 5</p>	
<p><b>Licence:</b> <i>Distribution</i></p>									
<p><i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 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.</p>									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<p><b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations.  Documents: Power quality survey, incident logs, network plans, SCADA sighted.</p>									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
<p>Interruptions are logged. The northern system had five interruptions, two of which were caused by loss of generation outside the control of the Licensee. The southern system had six interruptions, one of which was caused by loss of generation outside the control of the Licensee and five of which were caused by lightning (2 on Licensee lines and 4 on customer lines). The interruptions have been minor and response is in line with service levels expected for the number and size of customers and network. There is a requirement for mine production to keep interruptions to a minimum. The log of outages requested in last audit has been sighted.</p>									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<p><b>Item 432</b>  Licence condition 5.1</p>								<p>Compliance rating  Compliant 5</p>	
<p><b>Licence:</b> <i>Distribution</i></p>									
<p><i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 10(1)</i>  A distributor or transmitter must, so far as reasonably practicable, reduce the effect of any interruption on a customer.</p>									



<b>Observations</b>										
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>							
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Power quality survey, incident logs, network plans.										
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"/>	
Planned outages are coordinated with mine production/shutdowns. The unplanned outages were restored as soon as reasonably practicable and as expected for a radial system. There is no remote switching on the network. Personnel are required to travel to the site for local switching operations. Impact to customers is reduced by having on call personnel with vehicle access..										
<b>Issues</b>										
None										
<b>Recommendations</b>										
None										

<b>Item 433</b> Licence condition 5.1	Compliance rating Compliant 5
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 10(2)</i> A distributor or transmitter must consider whether, in specified circumstances, it should supply electricity by alternative means to a customer who will be affected by a proposed interruption.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Power quality survey, incident logs, network plans The power purchase agreements cover supply reliability.	
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 is essentially radial and there is no backup for line failures. There have been no requests for standby or alternative supply due to shutdown. These circumstances are very unlikely as planned outages are coordinated with mine shutdowns.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 435</b> Licence condition 5.1	Compliance rating Compliant 4
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 13(2)</i> A distributor or transmitter must, so far as reasonably practicable, ensure that customers in specified areas do not have average total lengths of interruptions of supply greater than specified durations.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Power quality survey, incident logs, network plans.	
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 instances of unplanned interruptions exceeding specified levels (290 minutes) due to causes within the control of the network operator (lightning or loss of external generation being causes). Two planned events took longer than 4 hours. The customers were notified and they were rectified in a reasonable time. The outage log requested in last audit has been sighted. As the number of customers is very low each outage affected one customer. The	

average duration was of the order of 205 minutes for all causes which is within the Code requirements.
<b>Issues</b>
None
<b>Recommendations</b>
None

<b>Item 436</b> Licence condition 5.1					Compliance rating Compliant 4				
<b>Licence:</b> <i>Distribution</i>									
<i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 13(3)</i> The average total length of interruptions of supply is to be calculated using the specified method.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Power quality survey, incident logs, network plans									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
As a result of the previous audit, the Licensee has started collecting outage statistics but these are hard to have statistical meaning with so few customers. The statistics are being gathered but there is only one year of statistics available and a 4 year average is not yet possible. The average to date meets the required standard.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 437</b> Licence condition 5.1						Compliance rating Not Rated			
<b>Licence:</b> <i>Distribution</i>									
<i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 14(8)</i> A distributor or transmitter must, on request, provide to an affected customer a free copy of an instrument issued by the Minister and of any notice given under section 14(7) of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Power quality survey, incident logs, network plans.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
No requests have been made.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 438</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 15(2)</i>	

A distributor or transmitter that agrees with a customer to exclude or modify certain provisions must set out the advantages and disadvantages to the customer of doing so in their agreement.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Power quality survey, incident logs, network plans.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no new agreements in the audit period.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 444</b> Licence condition 5.1							Compliance rating Compliant 4		
<b>Licence:</b> <i>Distribution</i>									
<i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 23(1)</i> A distributor or transmitter must take all such steps as are reasonably necessary to monitor the operation of its network to ensure compliance with specified requirements.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Power quality survey, incident logs, network plans SCADA sighted.									
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 southern system is part of the mine SCADA. The southern network is not continuously monitored in real time by an operations room dedicated to the network but by is monitored by the mine site operations centre. Alarms or faults are relayed to network staff by mobile telephone. Outage reports requested in last audit have been sighted. The northern system is not monitored by the network operator. The system is very small (essentially Leinster town site) and outages are reported quickly for the network operator staff to respond. This meets the reasonably necessary requirements. Another network operator monitors the upstream supply and will endeavour to notify of any failures. Repair work is carried out by contractors. The reporting requirements do not apply as there are no small use customers. This was subject of Section 32 Notice.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 445</b> Licence condition 5.1						Compliance rating Compliant 5			
<b>Licence:</b> <i>Distribution</i>									
<i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 23(2)</i> A distributor or transmitter must keep records of information regarding its compliance with specific requirements for the period specified.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Power quality survey, incident logs, network plans									
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 time requirement only applies to reports under s27 which in turn are not required as there are									

no small use consumers. Power quality surveys and incident logs are being maintained for 23(1)(a) This was subject of Section 32 Notice.
<b>Issues</b>
None
<b>Recommendations</b>
None

<b>Item 446</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 24(3)</i> A distributor or transmitter must complete a quality investigation requested by a customer in accordance with specified requirements.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Power quality survey, incident logs, network plans, correspondence files	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
No requests have been made.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 447</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Distribution</i>	
<i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 24(4)</i> A distributor or transmitter must report the results of an investigation to the customer concerned.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Asset Manager, inspected substations and sample installations. Documents: Power quality survey, incident logs, network plans, correspondence files	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
No requests/reports have been made.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	