



McGill Engineering Services Pty Ltd

Engineering, Adjudication & Arbitration Services ABN 45 106 691 169

SOUTH WEST COGENERATION JOINT VENTURE GENERATION LICENCE EGL 9 PERFORMANCE AUDIT REPORT

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



McGill Engineering Services Pty Ltd

Engineering, Adjudication & Arbitration Services ABN 45 106 691 169

Andy Wearmouth
Facilities Manager
South West Cogeneration Joint Venture
15 William Street
Perth WA 6000

Dear Mr Wearmouth

Performance Audit Electricity Licences

The fieldwork on the performance audit of Generation Licence EGL 9 for the audit period (1 July 2008 to 30 June 2010) is complete and I am pleased to submit the report to you. The report reflects my findings and opinions.

In my opinion, the Licensee has maintained a high level of compliance with the licence conditions and integrity with reporting obligations. There is a non compliance.

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the Generation licence (EGL 9) for the audit period on the relevant clauses referred to within the objectives section of this report.

Yours sincerely

Kevan McGill
Director

Date 9 September 2010

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2 Executive Summary

This performance audit was conducted in accordance with the guidelines¹ issued by the Economic Regulation Authority (*Authority*) for the audit period (1 July 2008 to 30 June 2010).

2.1 OVERALL CONCLUSION

In my opinion, the Licensee has maintained a high level of compliance with the licence conditions and integrity with reporting obligations. There is a non compliance.

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the Generation licence (EGL 9) for the audit period on the relevant clauses referred to within the objectives section (Page 6) of this report.

2.2 LICENSEE'S BUSINESS

The Licensee's plant is on the BHP Billiton Worsley Alumina (WAPL) refinery which requires electricity and steam for the refining process. The Licensee provides steam and a quantity of electricity to the plant process and surplus electricity to the WEM for the balance of the plant output. Small quantities of electricity are drawn from the power system when the plant is shut down or for start up purposes. It has 116 MW of combined cycle gas turbine generation plant. The plant has a heat recovery steam generator fed by gas turbine exhaust gas and capable of supplementary gas firing to increase the steam capacity. The steam is used in the alumina refinery and not for additional generation as would be the case for a combined cycle machine. The first period of the contract for steam and electricity with Worsley Alumina expires at the end of 2015 and advice of advice on exercising the second 10 year option is due by end 2012.

The Licensee is an entity established by the owning joint venture partners to operate and maintain the plant and accordingly the full scope of asset management is not able to be carried out by the Licensee. The Licensee's business model and resources are those consistent with operating and maintaining gas turbine generation plant in accordance with its contractual obligations and does not have the capacity to undertake strategic asset management functions. The Licensee cannot require the owning partners to carry out these strategic functions and if the owning partners do, at their discretion, carry out these functions they may or may not involve the Licensee.

2.3 PERFORMANCE AUDIT

A summary of the findings of the performance audit is:

¹ Economic Regulation Authority: Audit guidelines: Electricity, Gas and Water Licences Aug 2010

2.4 COMPLIANCE SUMMARY RATINGS

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

Compliance status	Rating	Description of compliance
COMPLIANT	5	Compliant with no further action required to maintain compliance
COMPLIANT	4	Compliant apart from minor or immaterial recommendations to improve the strength internal controls to maintain compliance
COMPLIANT	3	Compliant with major or material recommendations to improve the strength of internal controls to maintain compliance
NON-COMPLIANT	2	Does not meet minimum requirements
SIGNIFICANTLY 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 results are summarised below.

Assessment	Licence obligations	Audit priority 3	Audit priority 4	Audit priority 5
Compliant 5	14		8	6
Compliant 4	0		0	0
Compliant 3	0		0	0
Non-compliant 2	1		1	0
Significantly non compliant 1	0		0	0
Not Applicable	8		5	3
Not Rated	24	1	16	7

3 PERFORMANCE AUDIT

3.1 PERFORMANCE AUDIT OBJECTIVES

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

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

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

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

The *Authority* has summarised the performance requirements in various legislation in its Electricity compliance reporting manual (March 2008)².

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

The audit was conducted in a manner consistent with Australian Auditing Standards (AUS) 808 "Planning Performance Audits" and AUS 806 "Performance Auditing". McGill Engineering Services Pty Ltd evaluated the adequacy and effectiveness of the controls and performance by the Licensee relative to the standards referred in the Generation Licence through a combination of enquiries, examination of documents and detailed testing for Electricity Generation Licence EGL 9 for the Licensee.

² Electricity compliance reporting manual, March 2008

3.2 AUDIT PERIOD

The audit period is 1 July 2008 to 30 June 2010.

3.3 SCOPE LIMITATION

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

Assessment of accuracy of computations is limited to inspection of spreadsheets and the like with an overview of the calculations and random inspection of formulae. Because of the nature of this type of inspection no conclusion can be made that all calculations are correct nor can assurance that data entry errors have not occurred be drawn. The form and nature of financial statements have been examined but no detailed examination of the calculations therein.

3.4 INHERENT LIMITATIONS

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

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

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

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

3.5 STATEMENT OF INDEPENDENCE

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

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

There are no independence threats due to:

- self-interest – as the audit company or a member of the audit team have no financial or non-financial interests in the Licensee or a related entity;
- self-review – no circumstance has occurred where:
 - the audit company or a member of the audit team has undertaken other non-audit work for the Licensee that is being evaluated in relation to the audit/review; or
 - when a member of the audit team was previously an officer or director of the Licensee; or

- where a member of the audit team was previously an employee of the Licensee who was in a position to exert direct influence over material that will be subject to audit during an audit/review.

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

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

3.6 SCOPE OF THE AUDIT

The audit was conducted in 3 phases.

1. RISK AND MATERIALITY ASSESSMENT

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

2. SYSTEM ANALYSIS, ASSERTION SETTING AND REVIEW

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

3. FIELDWORK: TESTING AND ANALYSIS

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

During this audit the Perth office and Worsley licence areas were visited.

There are no actions taken in response to recommendations in previous audit to follow up.

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
 Andy Wearmouth, Facilities Manager SWCJV (and Manager Engineering Services, Verve Energy); Tony Minards, BHP Billiton Worsley Alumina, Lead Engineer Power House for Operations.
- McGill Engineering Services Pty Ltd
 - Kevan McGill

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

3.7 AUDIT REQUIREMENTS

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

Nature of audit work conducted

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

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

Stage	Auditor	Standard
1. Risk & Materiality Assessment Outcome - Operational/ Performance Audit Plan	K McGill	ASA 300 Planning ASA 315: Risk Assessments and Internal Controls AUS 808: Planning Performance Audits AS/NZS 4360:2004: Risk Management ERA Guidelines
2. System Analysis	K McGill	AUS 810: Special Purpose Reports on Effectiveness of Control Procedures
3. Fieldwork Assessment and testing of; • The control	K McGill	AUS 502: Audit Evidence AUS 806: Performance Auditing

<ul style="list-style-type: none"> environment • Information system • Compliance procedures • Compliance attitude 		
4. Reporting	K McGill	ASA 300 Planning AUS 806: Performance Auditing

3.8 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 the detailed audit findings section (Page 12)

Item	Licence Clause/Condition reference (Cl.=clause, Sch.=schedule)	Obligations under condition	Consequences		Inherent Risk	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Licence Type (G=Generation)	Type	Review priority	Rating										
			(1=Minor, 2=Moderate, 3=Major)	Likelihood (A=unlikely, B=Probable, C=Unlikely)						1	2	3	4	5	N ^a	N ^r				
Licence Conditions – Licence Clause –Generation Obligations- Electricity Industry Act Section																				
81.	15.1	s ³ 13(1)	1	C	Low	M	G	NR	5					<input checked="" type="checkbox"/>						
82.	16.1	s14(1)(a)	1	C	Low	M	G	NR	5					<input checked="" type="checkbox"/>						
83.	16.1 & 16.2	s14(1)(b)	2	C	Medium	M	G	2	4					<input checked="" type="checkbox"/>						
84.	16.3	s14(1)(c)	1	C	Low	M	G	NR	5					<input checked="" type="checkbox"/>						
85.	4.1	s17(1)	1	C	Low	M	G	NR	5					<input checked="" type="checkbox"/>						
86.	5.1	s31(3)	1	C	Low	M	G	NR	5					<input checked="" type="checkbox"/>						
87.	5.1	s41(6)	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>				
Licence Conditions – Electricity Industry Act Section Obligations- Licence Clause – Distribution/Transmission/Generation/Retail																				
103.	s11	15.2/12.2/12.2	2	B	Medium	W	G	2	3							<input checked="" type="checkbox"/>				
104.	s11	15.3/12.3/12.3	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>				
105.	s11	16.1/13.1/13.1/20.1	2	C	Medium	M	G	2	4					<input checked="" type="checkbox"/>						
106.	s11	17.4/14.4/14.4/21.4	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>				
107.	s11	18.2/15.2/15.2/22.2	2	C	Medium	M	G	2	4					<input checked="" type="checkbox"/>						
108.	s11	19.4/16.4/	2	C	Medium	M	G	2	4					<input checked="" type="checkbox"/>						

³ s = Section

		16.4															<input checked="" type="checkbox"/>		
109.	s11	20.1/17.1/ 17.1/24.1	2	C	Medium	M	G	2	4								<input checked="" type="checkbox"/>		
110.	s11	21.1/18.1/ 18.1/24.1	2	C	Medium	M	G	2	4				<input checked="" type="checkbox"/>						
111.	s11	22.2/19.2/ 19.2/25.2	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
112.	s11	23.1/20.1/ 20.1/26.1	2	C	Medium	M	G	2	4								<input checked="" type="checkbox"/>		
Licence Conditions – Licence clause																			
Obligations- Electricity Industry Metering Code Clause																			
319.	5.1	3.11(3)	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
331.	5.1	3.16(5)	2	C	Medium	M	G	2	4									<input checked="" type="checkbox"/>	
342.	5.1	3.27	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
349.	5.1.	4.4(1)	1	C	Low	M	G	NR	5										<input checked="" type="checkbox"/>
350.	5.1	4.5(1)	1	C	Low	M	G	NR	5										<input checked="" type="checkbox"/>
351.	5.1	4.5(1)	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
363.	5.1	5.4(2)	1	C	Low	M	G	NR	5										<input checked="" type="checkbox"/>
365.	5.1	5.5(3)	2	C	Medium	M	G	2	4									<input checked="" type="checkbox"/>	
376.	5.1	5.16	2	C	Medium	M	G	2	4									<input checked="" type="checkbox"/>	
377.	5.1	5.17(1)	2	C	Medium	M	G	2	4									<input checked="" type="checkbox"/>	
378.	5.1	5.18	2	C	Medium	M	G	2	4									<input checked="" type="checkbox"/>	
379.	5.1	5.19(1)	1	C	Low	M	G	NR	5									<input checked="" type="checkbox"/>	
380.	5.1	5.19(2)	1	C	Low	M	G	NR	5									<input checked="" type="checkbox"/>	
381.	5.1	5.19(3)	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
382.	5.1	5.19(4)	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
384.	5.1	5.19(6)	1	C	Low	M	G	NR	5									<input checked="" type="checkbox"/>	
390.	5.1	5.21(5)	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
391.	5.1	5.21(6)	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
409.	5.1	5.27	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
416.	5.1	6.1(2)	2	C	Medium	M	G	2	4									<input checked="" type="checkbox"/>	
418.	5.1	7.2(1)	1	C	Low	M	G	NR	5									<input checked="" type="checkbox"/>	
420.	5.1	7.2(4)	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
421.	5.1	7.2(5)	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
422.	5.1	7.5	2	C	Medium	M	G	2	4									<input checked="" type="checkbox"/>	
423.	5.1	7.6(1)	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
424.	5.1	8.1(1)	1	C	Low	M	G	NR	5										<input checked="" type="checkbox"/>
425.	5.1	8.1(2)	1	C	Low	M	G	NR	5										<input checked="" type="checkbox"/>
426.	5.1	8.1(3)	1	C	Low	M	G	NR	5										<input checked="" type="checkbox"/>
427.	5.1	8.1(4)	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
428.	5.1	8.3(2)	1	C	Low	M	G	NR	5										<input checked="" type="checkbox"/>

3.9 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.

3.9.1 AUDIT RESULTS AND RECOMMENDATIONS

Summary of significant results

There is a non-compliance. As the process improvement is already in place there is no further action required.

3.9.2 COMPLIANCE ELEMENTS REQUIRING CORRECTIVE MEASURES

No issues to require further corrective action.

Item 110 Electricity Industry Act section 11	Compliance rating Not Compliant 2
Licence: <i>Generation</i>	
<i>Generation Licence condition 18.1</i> A Licensee must provide the Authority, in the manner prescribed, any information the Authority requires in connection with its functions under the Electricity Industry Act.	
Issues	
The 2008 report was late but a process was put in place to ensure that subsequent reports are on time. The last 2 reports have been on time supporting the process improvement.	
Recommendations	
No further action is required as the process has been improved.	

3.9.3 SUGGESTIONS FOR IMPROVEMENT

There are no suggestions for improvement.

3.9.4 POST AUDIT IMPLEMENTATION PLAN

The Licensee was to provide a post audit plan however as there are no issues to implement and a plan is not therefore required.

3.10 DETAILED FINDINGS

3.10.1 AUDIT WORK UNDERTAKEN

We conducted interviews and enquiries

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

- In reviewing the procedures and protocols for managing provision of services within a licensed area, where applicable, we obtained flowcharts of the processes and assessed the reasonableness of the decision matrix and the adequacy of the control points implemented by the Licensee.

3.10.2 AUDIT EVIDENCE

The following audit evidence was obtained:

- Generation Licence
- Asset management plan
- Monthly plant activity report
- Fuel Nozzle inspection reports /site reports
- Generator condition report
- Technical information letter from GE Energy
- Financial statements
- Licence fee invoices, journal entries
- Outage reports
- Availability/ downtime reports
- ERA annual returns

3.11 DETAILED AUDIT FINDINGS

The following sets out the audit findings

3.11.1 ELECTRICITY INDUSTRY ACT – LICENCE CONDITIONS AND OBLIGATIONS

Item 81 Generation Licence condition 15.1	Compliance rating Compliant 5
Licence: <i>Generation</i>	
<i>Electricity Industry Act section 13(1)</i> A Licensee must, not less than once every 24 months, provide the Authority with a performance audit conducted by an independent expert acceptable to the Authority.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee advised the Authority of the contract arrangements with the approval of the auditor.	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The Licensee has contracted with the auditor in accordance with the requirements.	
Issues	
None	
Recommendations	
None	

Item 82 Generation Licence condition 16.1	Compliance rating Compliant 5
Licence: <i>Generation</i>	
<i>Electricity Industry Act section 13(1)</i> A Licensee must provide for an asset management system.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: Include Asset Management plan, Generator condition report, Outage reports, inspection reports, Financial statements.	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The Licensee has provided an asset management system and the review will examine the efficacy of the system.	
Issues	
None	
Recommendations	
None	

Item 83 Generation Licence condition 16.1 & 16.2	Compliance rating Compliant 5
Licence: <i>Generation</i>	
<i>Electricity Industry Act section 13(1)</i> A Licensee must notify details of the asset management system and any substantial changes to it	

to the Authority.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: Include Documents: Include Asset Management plan, Generator condition report, Outage reports, inspection reports, Financial statements.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The Licensee advised the Authority of the asset management system with the approval of the licence. There have been no substantial changes since.									
Issues									
None									
Recommendations									
None									

Item 84								Compliance rating	
Generation Licence condition 16.3								Compliant 5	
Licence: <i>Generation</i>									
<i>Electricity Industry Act section 14(1)(c)</i> A Licensee must provide the Authority with a report by an independent expert as to the effectiveness of its asset management system every 24 months, or such longer period as determined by the Authority.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: Include Documents: Include Asset Management plan, Generator condition report, Outage reports, inspection reports, Financial statements.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The Licensee has contracted with the reviewer in accordance with the requirements.									
Issues									
None									
Recommendations									
None									

Item 85								Compliance rating	
Generation Licence condition 4.1								Compliant 5	
Licence: <i>Generation</i>									
<i>Electricity Industry Act section 17(1)</i> A Licensee must pay to the Authority the prescribed licence fee within one month after the day of grant or renewal of the licence and within one month after each anniversary of that day during the term of the licence.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: Licence invoices, journal entries.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The Licensee paid the fees and on time.									
Issues									
None									
Recommendations									
None									

Item 86	Compliance rating
Generation Licence condition 5.1	Compliant 5
Licence: <i>Generation</i>	
<i>Electricity Industry Act section 31(3)</i> A Licensee must take reasonable steps to minimise the extent or duration of any interruption, suspension or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee provided outage logs, sighted reports on major failure in last audit period.	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The plant had a major failure but the report indicated that a systemic manufacturing failure was the likely cause and the plant was returned to service as soon as reasonably practicable. The Licensee took all reasonable steps to minimize the outage.	
Issues	
None	
Recommendations	
None	

Item 87	Compliance rating
Generation Licence condition 5.11	Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Act section 41(6)</i> A Licensee must pay the costs of taking an interest in land or an easement over land.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: Lease payment journal entries.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There has been no purchase of land in the audit period.	
Issues	
None	
Recommendations	
None	

3.11.2 ELECTRICITY LICENCES – LICENCE CONDITIONS AND OBLIGATIONS

Item 103	Compliance rating
Electricity Industry Act section 11	Not Rated
Licence: <i>Generation</i>	
<i>Generation Licence condition 12.2</i> A Licensee must amend the asset management system before an expansion or reduction in generating works, distribution systems and transmission systems and notify the Authority in the manner prescribed, if the expansion or reduction is not provided for in the asset management system.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>

Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: Not applicable.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There has been no expansion or reduction in the audit period.									
Issues									
None									
Recommendations									
None									

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

Item 105								Compliance rating	
Electricity Industry Act section 11								Compliant 5	
Licence: <i>Generation</i>									
<i>Generation Licence condition 13.1</i>									
A Licensee and any related body corporate must maintain accounting records that comply with the Australian Accounting Standards Board Standards or equivalent International Accounting Standards.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents Auditor General's Financial report summary.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The Licensee complies with Australian accounting standards.									
Issues									
None									
Recommendations									
None									

Item 106								Compliance rating	
Electricity Industry Act section 11								Not Rated	
Licence: <i>Generation</i>									
<i>Generation Licence condition 14.4</i>									
A Licensee must comply with any individual performance standards prescribed by the Authority.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						

Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: Not applicable.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There are no individual performance standards.									
Issues									
None									
Recommendations									
None									

Item 107	Compliance rating								
Electricity Industry Act section 11	Complaint 5								
Licence: <i>Generation</i>									
<i>Generation Licence condition 15.2</i>									
A Licensee must comply, and require its auditor to comply, with the Authority's standard audit guidelines dealing with the performance audit.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee provided contracting arrangements to the Authority with the approval of the auditor.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The Licensee has contracted with the auditor in accordance with the requirements.									
Issues									
None									
Recommendations									
None									

Item 108	Compliance rating								
Electricity Industry Act section 11	Compliant 5								
Licence: <i>Generation</i>									
<i>Generation Licence condition 16.4</i>									
A Licensee must comply, and must require the Licensee's expert to comply, with the relevant aspects of the Authority's standard guidelines dealing with the asset management system.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee provided contracting arrangements to the Authority with the approval of the reviewer.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The Licensee has contracted with the reviewer in accordance with the requirements.									
Issues									
None									
Recommendations									
None									

Item 109	Compliance rating
Electricity Industry Act section 11	Compliant 5
Licence: <i>Generation</i>	
<i>Generation Licence condition 17.1</i>	
A Licensee must report to the Authority, in the manner prescribed, if a Licensee is under external administration or there is a significant change in the circumstances upon which the licence was granted which may affect a Licensee's ability to meet its obligations.	

Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: Generation licence.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The Licensee is not under external administration nor any change to the partnership occurred in the audit period.									
Issues									
None									
Recommendations									
None.									

Item 110 Electricity Industry Act section 11								Compliance rating Not Compliant 2	
Licence: <i>Generation</i>									
<i>Generation Licence condition 18.1</i> A Licensee must provide the Authority, in the manner prescribed, any information the Authority requires in connection with its functions under the Electricity Industry Act.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: Annual returns. Performance and financial spreadsheets.									
Process	<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 reports for 2009 (and 2010) were made in accordance with the requirements. The report for 2008 met the form and manner but was late. Consistent with the scope limitation an inspection of the source data showed no apparent errors and are accurate.									
Issues									
The 2008 report was late but a process was put in place to ensure that subsequent reports are on time. The last 2 reports have been on time supporting the process improvement.									
Recommendations									
No further action is required as the process has been improved.									

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

Item 112 Electricity Industry Act section 11	Compliance rating Compliant 5
Licence: <i>Generation</i>	
<i>Generation Licence condition 20.1</i> Unless otherwise specified, all notices must be in writing.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: Sample communication with ERA.	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The Authority did not require any notices. All material communication with the Authority is in writing.	
Issues	
None	
Recommendations	
None	

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

Item 319 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 3.11(3)</i> A Code participant who becomes aware of an outage or malfunction of a metering installation must advise the network operator as soon as practicable.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee has no meters and Western Power meters at their substation.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
The Licensee is not aware of any outages.	
Issues	
None	
Recommendations	
None	

Item 331 Licence condition 5.1	Compliance rating Not Applicable
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 3.16(5)</i> A network operator or a user may require the other to negotiate and enter into a written service level agreement in respect of the matters in the metrology procedure dealt with under clause 3.16(4) of the Code.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee has no meters and Western Power provides metering services at their substation.	
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 to be modelled therefore 3.16(4) does not apply and	

consequently 3.16(5) which depends on 3.16(4) also does not apply.
Issues
None
Recommendations
None

Item 342	Compliance rating
Licence condition 5.1	Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 3.27</i>	
A person must not install a metering installation on a network unless the person is the network operator or a registered metering installation provider for the network operator doing the type of work authorised by its registration.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee has no meters and Western Power provides metering services at their substation.	
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. The licensee understands that meter installations can only be by the network operator or a registered metering installation provider.	
Issues	
None	
Recommendations	
None	

Item 349	Compliance rating
Licence condition 5.1	Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 4.4(1)</i>	
A network operator and affected Code participants must liaise together to determine the most appropriate way to resolve a discrepancy between energy data held in a metering installation and data held in the metering database.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee has no meters and Western Power provides metering services at their substation.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
No metering discrepancies have been identified by the Licensee. The Network operator has not sought to liaise	
Issues	
None	
Recommendations	
None	

Item 350	Compliance rating
Licence condition 5.1	Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 4.5(1)</i>	
A Code participant must not knowingly permit the registry to be materially inaccurate.	

Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee has no meters and Western Power provides metering services at their substation.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The Licensee's details have not changed and that is the only registry item that they can observe.									
Issues									
None									
Recommendations									
None									

Item 351 Licence condition 5.1								Compliance rating Not Rated	
Licence: <i>Generation</i>									
<i>Electricity Industry Metering Code clause 4.5(2)</i> If a Code participant (other than a network operator) becomes aware of a change to or an inaccuracy in an item of standing data in the registry, then it must notify the network operator and provide details of the change or inaccuracy within the timeframes prescribed.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee has no meters and Western Power provides metering services at their substation.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The Licensee has not become aware of any inaccuracy in the standing data. The Licensee has not initiated any change to its standing data.									
Issues									
None									
Recommendations									
None									

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

Item 365 Licence condition 5.1	Compliance rating Not Applicable
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 5.5(3)</i> A user must not impose any charge for the provision of the data under this Code unless it is permitted to do so under another enactment.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee has no meters and Western Power provides metering services at their substation.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
The Licensee has not raised a charge for metering data.	
Issues	
None	
Recommendations	
None	

Item 376 Licence condition 5.1	Compliance rating Not Applicable
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 5.16</i> A user that collects or receives energy data from a metering installation must provide the network operator with the energy data (in accordance with the communication rules) within the timeframes prescribed.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee has no meters and Western Power provides metering services at their substation.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There are no meters to collect information or data from.	
Issues	
None	
Recommendations	
None	

Item 377 Licence condition 5.1	Compliance rating Not Applicable
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 5.17(1)</i> A user must provide standing data and validated (and where necessary substituted or estimated) energy data to the user's customer, to which that information relates, where the user is required by an enactment or an agreement to do so for billing purposes or for the purpose of providing metering services to the customer.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee has no meters and Western Power provides metering services at their substation.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There are no meters to collect information or data from for billing or for the purpose of providing	

metering services to the customer. The Licensee does not collect data for customers as that is done by the network operator.
Issues
None
Recommendations
None

Item 378 Licence condition 5.1	Compliance rating Not Applicable
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 5.18</i> A user that collects or receives information regarding a change in the energisation status of a metering point must provide the network operator with the prescribed information, including the stated attributes, within the timeframes prescribed.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee has no meters and Western Power provides metering services at their substation.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There are no meters on site to be aware of energisation status. The Licensee's installation is metered by Western Power on the Western Power substation.	
Issues	
None	
Recommendations	
None	

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

Item 380 Licence condition 5.1	Compliance rating Not Applicable
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 5.19(2)</i>	

A user must, to the extent that it is able, collect and maintain a record of the address, site and customer attributes, prescribed in relation to the site of each connection point, with which the user is associated.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee has no meters and Western Power provides metering services at their substation.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The only connection point is with Western Power and there is no meter information to be collected.									
Issues									
None									
Recommendations									
None									

Item 381 Licence condition 5.1							Compliance rating Not Rated		
Licence: <i>Generation</i>									
<i>Electricity Industry Metering Code clause 5.19(3)</i> A user must, after becoming aware of any change in a site's prescribed attributes, notify the network operator of the change within the timeframes prescribed.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee has no meters and Western Power provides metering services at their substation.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no changes in attributes.									
Issues									
None									
Recommendations									
None									

Item 382 Licence condition 5.1							Compliance rating Not Rated		
Licence: <i>Generation</i>									
<i>Electricity Industry Metering Code clause 5.19(4)</i> A user that becomes aware that there is a sensitive load at a customer's site must immediately notify the network operator's Network Operations Control Centre of the fact.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee has no meters and Western Power provides metering services at their substation.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There are no sensitive loads.									
Issues									
None									
Recommendations									
None									

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

Item 390 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 5.21(5)</i> A Code participant must not request a test or audit unless the Code participant is a user and the test or audit relates to a time or times at which the user was the current user or the Code participant is the IMO.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee has no meters and Western Power provides metering services at their substation.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
The Licensee does not own meters to test and has not requested Western Power to test.	
Issues	
None	
Recommendations	
None	

Item 391 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 5.21(6)</i> A Code participant must not make a test or audit request that is inconsistent with any access arrangement or agreement.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee has no meters and Western Power provides metering services at their substation.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
The Licensee does not own meters to test and has not requested Western Power to test.	

Issues
None
Recommendations
None

Item 409 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 5.27</i> Upon request, a current user must provide the network operator with customer attribute information that it reasonably believes are missing or incorrect within the timeframes prescribed.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee does not own meters to test and has not requested Western Power to test.	
Process	<input type="checkbox"/> Outcome
Output	<input type="checkbox"/> Reporting
Compliance	<input type="checkbox"/>
There have been no requests.	
Issues	
None	
Recommendations	
None	

Item 416 Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 6.1(2)</i> A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee has no meters and Western Power provides metering services at their substation.	
Process	<input checked="" type="checkbox"/> Outcome
Output	<input checked="" type="checkbox"/> Reporting
Compliance	<input checked="" type="checkbox"/>
The Licensee has complied with Western Power’s requirements and there have been no complaints.	
Issues	
None	
Recommendations	
None	

Item 418 Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 7.2(1)</i> Code participants must use reasonable endeavours to ensure that they can send and receive a notice by post, facsimile and electronic communication and must notify the network operator of a telephone number for voice communication in connection with the Code.	

Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee has no meters and Western Power provides metering services at their substation.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Western Power has the Licensee's relevant addresses and has facilities to receive communications..									
Issues									
None									
Recommendations									
None									

Item 420 Licence condition 5.1						Compliance rating Not Rated			
Licence: <i>Generation</i>									
<i>Electricity Industry Metering Code clause 7.2(4)</i> A Code participant must notify its contact details to a network operator with whom it has entered into an access contract within 3 business days after the network operator's request.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee has no meters and Western Power provides metering services at their substation.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Western Power has the Licensee's relevant addresses. There was no request in the audit period.									
Issues									
None									
Recommendations									
None									

Item 421 Licence condition 5.1						Compliance rating Not Rated			
Licence: <i>Generation</i>									
<i>Electricity Industry Metering Code clause 7.2(5)</i> A Code participant must notify any affected network operator of any change to the contact details it notified to the network operator at least 3 business days before the change takes effect.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee has no meters and Western Power provides metering services at their substation.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no address changes.									
Issues									
None									
Recommendations									
None									

Item 422 Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 7.5</i> A Code participant must not disclose, or permit the disclosure of, confidential information provided to it under or in connection with the Code and may only use or reproduce confidential information for the purpose for which it was disclosed or another purpose contemplated by the Code.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee has no meters and Western Power provides metering services at their substation.	
Process	<input checked="" type="checkbox"/> Outcome
Output	<input checked="" type="checkbox"/> Reporting
Compliance	<input checked="" type="checkbox"/>
There has been no disclosure of confidential information.	
Issues	
None	
Recommendations	
None	

Item 423 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 7.6(1)</i> A Code participant must disclose or permit the disclosure of confidential information that is required to be disclosed by the Code.	
Observations	
Documents	<input type="checkbox"/> Compliance
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee has no meters and Western Power provides metering services at their substation.	
Process	<input type="checkbox"/> Outcome
Output	<input type="checkbox"/> Reporting
Compliance	<input type="checkbox"/>
There has been no confidential information to be disclosed.	
Issues	
None	
Recommendations	
None	

Item 424 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 8.1(1)</i> Representatives of disputing parties must meet within 5 business days after a notice given by a disputing party to the other disputing parties and attempt to resolve the dispute under or in connection with the Electricity Industry Metering Code by negotiations in good faith.	
Observations	
Documents	<input type="checkbox"/> Compliance
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee has no meters and Western Power provides metering services at their substation.	
Process	<input type="checkbox"/> Outcome
Output	<input type="checkbox"/> Reporting
Compliance	<input type="checkbox"/>
There have been no disputes (the Licensee has no meter information to dispute and has no disputes with Western Power).	

Issues
None
Recommendations
None

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

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

Item 427 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 8.1(4)</i>	

If the dispute is resolved by representative negotiations, senior management negotiations or CEO negotiations, the disputing parties must prepare a written and signed record of the resolution and adhere to the resolution.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: The Licensee has no meters and Western Power provides metering services at their substation.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no disputes (the Licensee has no meter information to dispute and has no disputes with Western Power).									
Issues									
None									
Recommendations									
None									

Item 428 Licence condition 5.1							Compliance rating Not Rated		
Licence: <i>Generation</i>									
<i>Electricity Industry Metering Code clause 8.3(2)</i> The disputing parties must at all times conduct themselves in a manner which is directed towards achieving the objective of dispute resolution with as little formality and technicality and with as much expedition as the requirements of Part 8 of the Code and a proper hearing and determination of the dispute, permit.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
The Licensee has no meters and Western Power provides metering services at their substation.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Evidence: Interviewed Andy Wearmouth, listed staff on site. Documents: There have been no disputes (the Licensee has no meter information to dispute and has no disputes with Western Power).									
Issues									
None									
Recommendations									
None									