

Electricity Networks
Corporation (Western Power)
Electricity Transmission
Licence (ETL 2)
Performance Audit Report

September 2011

Contents

Acronym List	1
1. Introduction	4
2. Objective	6
3. Scope	7
4. Our Approach and Methodology	8
5. Audit Team members and Hours Utilised in the Execution of the Audit	11
6. Compliance Summary	12
7. Review of Previous Findings	40
8. Audit Opinion	58
9. Detailed Findings – Compliance Elements which Require Corrective Measures	59
10. Detailed Findings – Compliance Elements which Require Minor Improvements	104
11. Detailed Findings – Compliance Elements which Do Not Require Further Action	114
Appendix 1 – Audit Evidence – Documents Examined	270
Appendix 2 - Audit Evidence – Additional Documents Examined	281
Appendix 3 – Audit Evidence – Personnel who Assisted in the Audit	283

Acronym List

Acronym / Reference	Description
AMRS	AMRS Pty Ltd
AS 4360:2004	Australian/New Zealand Standard 4360-2004 Risk Management
Authority	Economic Regulation Authority
B2B	Business to Business
Breach Register	Western Power's register of compliance failures
CBD	Central Business District
CFO	Connection Field Officers
COC	Code of Conduct for the Supply of Electricity to Small Use Customers 2004 and Code of Conduct for the Supply of Electricity to Small Use Customers 2008
CSR	Customer Service Representative
CT	Current Transformer
CTR	Customer Transfer Request used to transfer customers between retailers
Compliance Register	Western Power's listing of Licence Conditions with reporting type, risk analysis and internal controls for each condition
Culture of Compliance	The promotion of a positive attitude to compliance within Western Power

Acronym / Reference	Description
Customer Transfer Code	Electricity Industry Customer Transfer Code 2004
Customer Service Officer	Customer Service Representative
DFIS	Distribution Field Information System
DFMS	Distribution Facilities Management System
DMS	Western Power's document management system. Document numbers are prefixed with "DMS"
ELIS	Electrical Licensing and Inspection System
ENMAC	Electrical Network Management and Control
EOPS	Extended Outage Payments Scheme
ERG	Emergency Response Generators
ETAC	Electricity Transfer Access Contract
HV	High Voltage
IMO	Independent Market Operator
Incident	A situation or event if not addressed which may result in a regulatory breach
Internal Control	Process, policy or procedure that demonstrates a licence condition is met
LS	Life Support. Indicates a person who resides at a customer's premise who is registered as requiring life support equipment
MDV	Meter Data Verification
MBS	Western Power's Metering Business System
Metering Code	Electricity Industry Metering Code 2005
NetCIS	Western Power's Customer Information System used to record customer complaints

Acronym / Reference	Description
NMI	National Metering Identifier
SCADA	Supervisory Control and Data Acquisition
SLA	Service Level Agreement
SWIS	South West Interconnected System
TCS	Trouble Call System
TLS	Transmission Lines System
TPMS	Transmission Protection Equipment System
TRIS	Transmission Plant Management System
UMI	Unique Market Identifier
VT	Voltage Transformer
WAER	Western Australian Electrical Requirements
WADCM	Western Australian Distribution Connection Manual

1. Introduction

Western Power Background

The Electricity Networks Corporation (“Western Power”) operates the electricity grid within the South West Interconnected System (SWIS) and delivers power to more than 1.5 million people every day.

Since March 2006, Western Power has held an electricity transmission licence (“ETL 2”) granted by the Economic Regulation Authority (the “Authority”). ETL 2 provides Western Power with the legal right to transmit electricity to customers.

Audit Background

Western Power’s transmission licence is subject to a number of obligations contained within the licence itself, the Electricity Industry Act 2004 (the “Act”), regulations and industry codes of practice.

Section 13 of the Act requires Western Power to provide the Authority with a performance audit conducted by an independent expert approved by the Authority not less than once every 24 months from the grant of the licence (unless a shorter or longer period is approved by the Authority). The Authority approved Grant Thornton to conduct the performance audit for the period 1 November 2009 to 30 April 2011.

An audit plan was developed and approved by the Authority using a risk based approach to focus on key risk areas in accordance with the risk evaluation model, Australian/New Zealand Standard 4360:2004. Grant Thornton has assessed the controls and performance against those standards through a combination of interviews/enquiries, examination of documents and detailed testing.

The audit plan upon which the audit was completed was developed in accordance with ASAE 3000 and the Authority’s “Audit Guidelines: Electricity, Gas and Water Licences (August 2010)” (“Guidelines”). The performance audit plan outlined the approach for the nature, timing and extent of the evidence-gathering procedures to be performed and the reasons for selecting them.

The performance audit was conducted in a manner consistent with Standards on Assurance Engagements (ASAE) 3500 “Performance Engagements” and the Authority’s Guidelines.

Preliminary analysis was performed on the licensing framework for the electricity transmission licence to ascertain the performance and compliance audit requirements of Western Power and to determine the nature and extent of audit activity.

Culture of Compliance

Our audit identified numerous areas where there is scope to strengthen the systems, controls and procedures employed by Western Power to manage its compliance obligations. Improvements can be made through better documentation and communication of responsibilities to process owners.

Western Power's approach for process and system improvement surrounding the compliance obligations has been largely reactive and the identification of breaches relies primarily on audits and reviews conducted by external parties.

Although Western Power has established a control risk assessment matrix, there is a need to further evaluate the controls, risk ratings and process owners allocated to each compliance manual reference obligation and to reinforce the relevant mandates to staff within Western Power.

Further, consideration should be given to establishing dedicated compliance management responsibilities to various Branches across the organisation to assist in the maintenance of the organisation's compliance program and management systems.

This will assist managers and operational staff in understanding and fulfilling their roles and responsibilities within the organisations' compliance program framework.

2. Objective

The audit objective was to evaluate the adequacy and effectiveness of controls implemented by Western Power to fulfil its obligations in complying with the performance and quality standards referred to in the licence.

The audit focused on the systems and processes used to ensure compliance with the standards, outputs and outcomes required by the licence.

[Link to Risk Assessment](#)

Our approach to adopt the Australian/New Zealand Standard 4360:2004 risk assessment framework ensured a consistent approach to determining areas of higher risk. This allowed a greater focus and depth of testing to provide sufficient assurance of compliance and effective control.

As part of the risk evaluation methodology to assess Western Power's ability to manage its risks, Grant Thornton considered the following components:

- Control environment (corporate governance, organisation structure, assignment of authority and responsibility, documentation of policies and procedures, human resource practice, records management and compliance attitude);
- Western Power's risk assessment process (as demonstrated through the Compliance Register and Breach Register);
- information systems (MBS, ELIS, ENMAC & NetCIS);
- control activities (authorisation, segregation of duties, physical controls and security); and
- monitoring of controls (management review, internal audit, external audit).

During the conduct of the audit, as evidence was gathered on the effectiveness of the controls and where risks were determined to be high, extensive compliance and substantive testing was performed to provide adequate assurance that no major breaches of the relevant licence condition had occurred during the audit period.

3. Scope

The performance audit covers Western Power's Transmission Licence, ETL 2, for the 18 month period 1 November 2009 to 30 April 2011 and examined a total of 200 obligations from the July 2010 Electricity Reporting Compliance Manual ("Compliance Manual").

The time period over which the audit was conducted was from April to July 2011 which included planning, fieldwork, reporting and the presentation of results to Western Power management and the Economic Regulation Authority.

Subsequent to the performance audit, Western Power had stated management actions to address those Compliance Manual obligations that required corrective measures within a defined timeframe. Grant Thornton undertook a review to verify the status of management actions due for completion on or before 1 September 2011 for the Compliance Manual obligations that required corrective measures.

The review of the status of management actions due on or before 1 September 2011 was conducted between 5 September and 7 September 2011.

The key legislation governing the licensing of transmitters of electricity is the Electricity Industry Act 2004: Licence Conditions and Obligations. Grant Thornton have used the Authority's Compliance Manual to perform the audit.

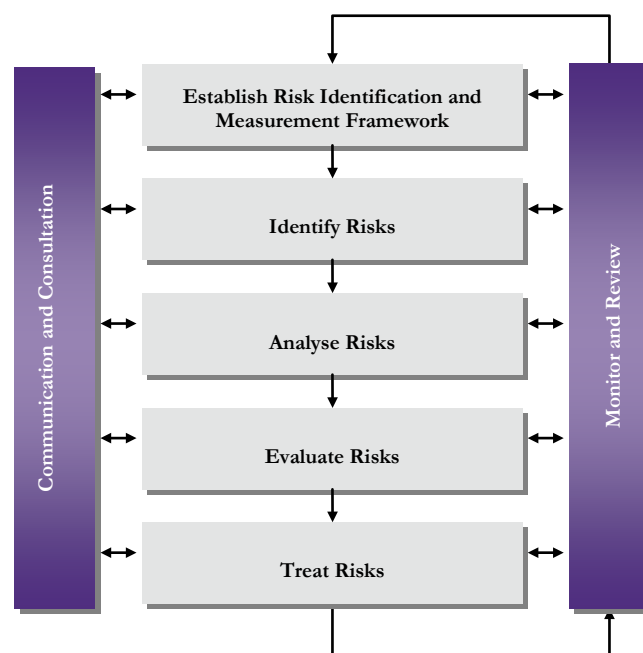
Where applicable, other regulatory requirements that supported the electricity transmission licence conditions were examined. Specifically, the relevant sections of the following regulatory industry codes were covered as part of this performance audit:

- Electricity Industry (Network Quality and Reliability of Supply) Code 2005 (WA);
- Electricity Industry Metering Code 2005 (WA); and
- Electricity Industry Customer Transfer Code 2004 (WA).

It is important to emphasise that not all obligations in the Compliance Manual are applicable to Western Power and accordingly the audit did not evaluate the performance of Western Power's compliance with those obligations.

4. Our Approach and Methodology

In performing the performance audit of Western Power's electricity transmission licence, Grant Thornton adopted a risk based audit approach based on the Australian/New Zealand Standard (AS/NZS) 4360:2004 as illustrated in the diagram below.



Establishing the context

The Authority granted Western Power a transmission licence on 30 March 2006.

The key legislation that governs the licensing of transmitters of electricity is the Electricity Industry Act 2004 and associated codes, regulations and licence obligations.

Risk identification and assessment

Grant Thornton analysed each licence compliance element in terms of the inherent risk level, the rated controls and assigned the audit priorities based on the risk level and controls which management exercised over those risks.

Furthermore, we have considered and adopted the Authority's "Audit Guidelines: Electricity, Gas and Water Licences (August 2010)" in conducting the performance audit.

Our fieldwork involved extensive interviews and discussions with the process owner or delegated representative to obtain an understanding of the business environment and organisation structure. Through examination of documents, policies and procedures, we identified key controls. We have undertaken substantive testing to confirm the operational effectiveness of those controls.

The risk assessment rating for each compliance manual reference obligation was reviewed during the fieldwork of the audit and, where applicable, was updated in accordance with the audit findings in this report.

Risk evaluation

Risk evaluation for Western Power involved Grant Thornton assessing compliance with the requirements of the licence by examining:

- The design effectiveness of the controls through the evaluation of the:
 - control environment;
 - information system;
 - control procedures; and
 - compliance attitude of management.
- The operating effectiveness of controls throughout the period.
 - Tests of operating effectiveness were concerned with how the controls were applied at relevant times during the period under audit, the consistency with which they were applied and by whom or by what means they were applied. The focus was on the systems and effectiveness of processes employed to ensure compliance with the standards, outputs and outcomes required by the licence obligation.

In accordance with the Authority's Guidelines, the following compliance rating scale measuring the extent of Western Power's compliance with the applicable licence obligations was employed.

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 of 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.

Risk treatment

If a control risk is identified, which in the Auditor's professional judgement, left untreated could cause Western Power to become non compliant with its obligation under the licence, Grant Thornton has provided recommendations to mitigate the risk to an appropriately low level. The treatment of risks either involves reducing the likelihood of the risk materialising or mitigating the impact of the risk.

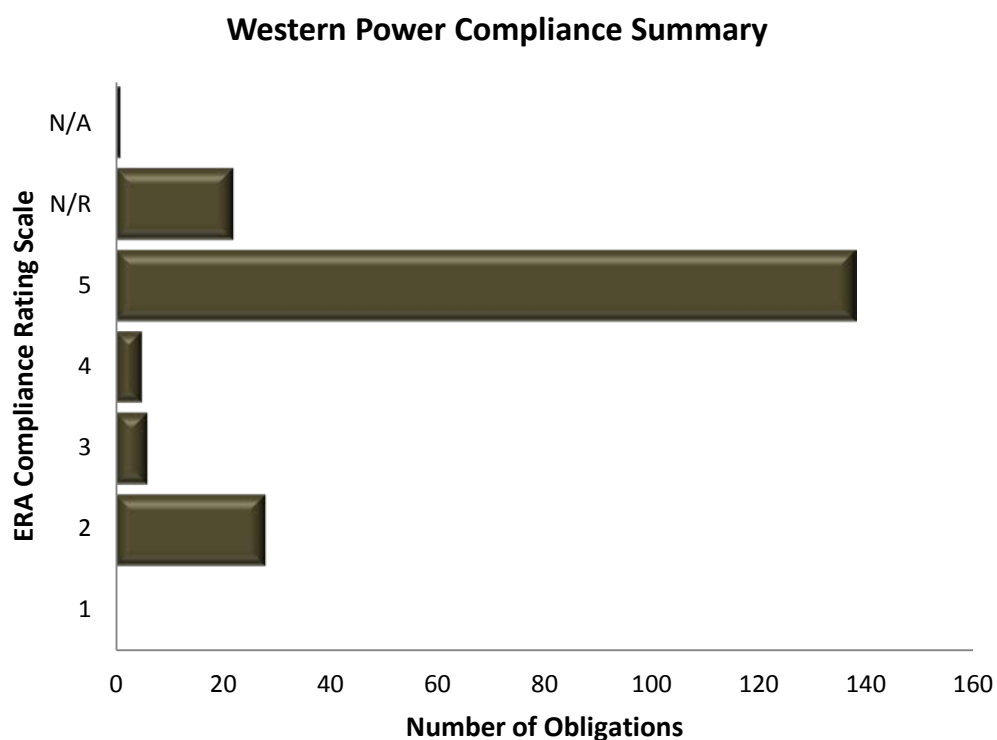
5. Audit Team members and Hours Utilised in the Execution of the Audit

Team Members	Hours
Cam Ansell, Director	55
Rudi James, Senior Consultant	300
Shukit Shah, Consultant	325
Kundai Mtsambiwa, Consultant	220
James Ng, Consultant	220
Total	1,120

6. Compliance Summary

The performance audit covers Western Power's Electricity Transmission Licence, ETL 2, for the 18 month period 1 November 2009 to 30 April 2011 and tested a total of 200 licence obligations.

The following graph illustrates the compliance profile of Western Power.



Compliance Rating Scale	1	2	3	4	5	N/R	N/A
Number of Obligations	0	28	6	5	138	22	1

The table presents the audit compliance summary for each manual reference obligation.

Key:

Font in red	Refer to 2008 Electricity Compliance Reporting Manual
Font in black	Refer to 2010 Electricity Compliance Reporting Manual

Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Electricity Industry Customer Transfer Code clause 2.2(1)(a)	1 1	Unlikely	Minor	Low	Strong							✓	
Electricity Industry Customer Transfer Code clause 2.2(1)(b)	2 2	Unlikely	Moderate	Medium	Strong							✓	
Electricity Industry Customer Transfer Code clause 3.1(1)(a)	3 3	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 3.1(1)(b)	4 4	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 3.1(2)	5 5	Unlikely	Moderate	Medium	Strong							✓	
Electricity Industry Customer Transfer Code clause 3.7(1)	10 10	Unlikely	Moderate	Medium	Strong					✓			

Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Electricity Industry Customer Transfer Code clause 3.7(2)	11 11	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 3.8(1)	12 12	Unlikely	Minor	Low	Strong					✓			
Electricity Industry Customer Transfer Code clause 3.8(2)(a)	13 13	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 3.8(2)(b)	14 14	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 3.8(3)	15 15	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 3.10(1)	20 20	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 3.10(2)	21 21	Unlikely	Moderate	Medium	Strong					✓			

Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Electricity Industry Customer Transfer Code clause 4.1	22 22	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 4.9(1)	31 31	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 4.9(2)	32 32	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 4.9(3)	33 33	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 4.9(6)	34 34	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 4.10(1)	35 35	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 4.10(2)	36 36	Unlikely	Moderate	Medium	Strong					✓			

Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Electricity Industry Customer Transfer Code clause 4.10(3)	37 37	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer clause 4.11(1)	38 38	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 4.11(3)	39 39	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 4.12(3)	40 40	Unlikely	Minor	Low	Strong					✓			
Electricity Industry Customer Transfer Code clause 4.13	41 41	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 4.14	42 42	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 4.15	43 43	Unlikely	Minor	Low	Strong					✓			
Electricity Industry Customer Transfer Code	46 46	Unlikely	Minor	Low	Strong						✓		

Obligations	Manual Reference Obligation	Likelihood	Consequence	Inherent Risk	Adequacy of Existing Controls	Compliance Rating							
		(A=Likely, B=Probable, C=Unlikely)	(1=Minor, 2=Moderate, 3=Major)	(Low, Medium, High)	(S=Strong, M=Moderate, W=Weak)	1	2	3	4	5	N / R	N / A	
clause 5.1(1)													
Electricity Industry Customer Transfer Code clause 5.1(3)	47 47	Unlikely	Minor	Low	Strong							✓	
Electricity Industry Customer Transfer Code clause 5.1(4)	48 48	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 6.2	49 49	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 6.3(1)	50 50	Unlikely	Minor	Low	Strong					✓			
Electricity Industry Customer Transfer Code clause 6.3(2)	51 51	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Customer Transfer Code clause 6.6	54 54	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code clause 7.1(1)	55 55	Unlikely	Minor	Low	Moderate			✓					

Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Electricity Industry Customer Transfer Code clause 7.1(2)	56 56	Unlikely	Minor	Low	Moderate			✓					
Electricity Industry Customer Transfer Code clause 7.1(3)	57 57	Unlikely	Moderate	Medium	Moderate			✓					
Electricity Industry Customer Transfer Code clause 7.2(4)	58 58	Unlikely	Minor	Low	Moderate			✓					
Electricity Industry Customer Transfer Code clause 7.3(2)	59 59	Unlikely	Minor	Low	Moderate			✓					
Electricity Industry Customer Transfer Code Annex 1	60 60	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code Annex 2	61 61	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code Annex 3	62 62	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer	63 63	Unlikely	Moderate	Medium	Strong					✓			

Obligations	Manual Reference Obligation	Likelihood	Consequence	Inherent Risk	Adequacy of Existing Controls	Compliance Rating							
		(A=Likely, B=Probable, C=Unlikely)	(1=Minor, 2=Moderate, 3=Major)	(Low, Medium, High)	(S=Strong, M=Moderate, W=Weak)	1	2	3	4	5	N / R	N / A	
Code Annex 4 clause A4.1													
Electricity Industry Customer Transfer Code Annex 4 clause A4.2	64 64	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code Annex 5 clause A5(5)	65 65	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code Annex 5 clause A5(6)	66 66	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code Annex 5 clause A5(7)	67 67	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Customer Transfer Code Annex 6 clause A6.2(a)	68 68	Unlikely	Minor	Low	Strong					✓			
Electricity Industry Customer Transfer Code Annex 6 clause A6.2(b)	69 69	Unlikely	Moderate	Medium	Strong					✓			

Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Electricity Industry Customer Transfer Code Annex 6 clause A6.6	70 70	Unlikely	Minor	Low	Strong					✓			
Electricity Industry Customer Transfer Code Annex 6 clause A6.7	71 71	Unlikely	Minor	Low	Strong					✓			
Electricity Industry Act section 13(1)	81 81	Unlikely	Minor	Low	Strong					✓			
Electricity Industry Act section 14(1)(a)	82 82	Unlikely	Minor	Low	Strong					✓			
Electricity Industry Act section 14(1)(b)	83 83	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Act section 14(1)(c)	84 84	Unlikely	Minor	Low	Strong						✓		
Electricity Industry Act section 17(1)	85 85	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Act section 31(3)	86 86	Unlikely	Minor	Low	Strong					✓			
Electricity Industry Act section 41(6)	87 87	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Act section 62(1)(b)	90 90	Unlikely	Minor	Low	Strong						✓		

Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Electricity Industry Act section 64(2)	91 91	Unlikely	Minor	Low	Strong							✓	
Electricity Industry Act section 65(d)	92 92	Unlikely	Moderate	Medium	Strong							✓	
Electricity Industry Act section 115(1)	95 95	Unlikely	Minor	Low	Strong							✓	
Electricity Industry Act section 115(2)	96	Unlikely	Moderate	Medium	Strong								✓
Distribution Licence condition 15.2 or 15.5 Transmissi on Licence condition 12.2 or 12.5	103 103	Unlikely	Moderate	Medium	Strong						✓		
Distribution Licence condition 15.3 or 15.6 Transmissi on Licence condition 12.3 or 12.6	104 104	Unlikely	Moderate	Medium	Strong						✓		
Distribution Licence condition 16.1 Transmissi on Licence condition 13.1	105 105	Unlikely	Moderate	Medium	Strong						✓		
Distribution Licence condition 17.4 Transmissi on Licence condition 14.4	106 106	Unlikely	Moderate	Medium	Strong							✓	

Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Distribution Licence condition 18.2 Transmissi on Licence condition 15.2	107 107	Unlikely	Moderate	Medium	Strong					✓			
Distribution Licence condition 19.4 Transmissi on Licence condition 16.4	108 108	Unlikely	Moderate	Medium	Strong					✓			
Distribution Licence condition 20.1 Transmissi on Licence condition 17.1	109 109	Unlikely	Moderate	Medium	Strong						✓		
Distribution Licence condition 21.1 Transmissi on Licence condition 18.1	110 110	Unlikely	Moderate	Medium	Strong					✓			
Distribution Licence condition 22.2 Transmissi on Licence condition 19.2	111 111	Unlikely	Moderate	Medium	Strong					✓			
Distribution Licence condition 23.1 Transmissi on Licence condition 20.1	112 112	Unlikely	Moderate	Medium	Strong					✓			

Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Electricity Industry Metering Code clause 2.2(1)(a)	317 300	Unlikely	Minor	Low	Strong					✓			
Electricity Industry Metering Code clause 2.2(1)(b)	318 301	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.1	319 302	Unlikely	Moderate	Medium	Strong				✓				
Electricity Industry Metering Code clause 3.2(1)	320 303	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.3(1)	321 304	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.3(3)	322 305	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.5(1) and (2)	323 306	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.5(3)	324 307	Unlikely	Moderate	Medium	Moderate				✓				

Obligations	Manual Reference Obligation	Likelihood	Consequence	Inherent Risk	Adequacy of Existing Controls	Compliance Rating							
		(A=Likely, B=Probable, C=Unlikely)	(1=Minor, 2=Moderate, 3=Major)	(Low, Medium, High)	(S=Strong, M=Moderate, W=Weak)	1	2	3	4	5	N / R	N / A	
Electricity Industry Metering Code clause 3.5(4)	325 308	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.5(6)	326 309	Likely	Moderate	High	Moderate		✓						
Electricity Industry Metering Code clause 3.5(9)	327 310	Probable	Moderate	Medium	Moderate				✓				
Electricity Industry Metering Code clause 3.7	328 311	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.8	329 312	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.9(3)	330 313	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.9(7)	331 314	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.9(9)	332 315	Unlikely	Moderate	Medium	Strong						✓		

Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Electricity Industry Metering Code clause 3.10	333 316	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.11(1)	334 317	Probable	Moderate	Medium	Moderate		✓						
Electricity Industry Metering Code clause 3.11(2)	335 318	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.11(3)	336 319	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.12(1)	337 320	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.12(2)	338 321	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.12(3)	339 322	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.12(4)	340 323	Unlikely	Moderate	Medium	Strong					✓			

Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Electricity Industry Metering Code clause 3.13(1)	341 324	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.13(c)	342 325	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.13(4)	343 326	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.14(3)	344 327	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.16(1)	345 328	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.16(2)	346 329	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.16(3)	347 330	Probable	Moderate	Medium	Moderate		✓						
Electricity Industry Metering Code clause 3.16(5)	348 331	Probable	Moderate	Medium	Moderate		✓						

Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Electricity Industry Metering Code clause 3.16(6)	349 332	Probable	Moderate	Medium	Moderate		✓						
Electricity Industry Metering Code clause 3.18(1)	350 333	Likely	Moderate	High	Moderate		✓						
Electricity Industry Metering Code clause 3.20(1)	351 334	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Metering Code clause 3.20(3)	352 335	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Metering Code clause 3.21(1)	353 336	Probable	Moderate	Medium	Moderate		✓						
Electricity Industry Metering Code clause 3.21(2)	354 337	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.22	355 338	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.23(a)	356 339	Unlikely	Moderate	Medium	Strong					✓			

Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Electricity Industry Metering Code clause 3.23(b)	357 340	Unlikely	Moderate	Medium	Strong				✓				
Electricity Industry Metering Code clause 3.25	358 341	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 3.29	360 343	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 4.1(1)	361 344	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 4.1(2)	362 345	Unlikely	Moderate	Medium	Strong				✓				
Electricity Industry Metering Code clause 4.1(3)	363 346	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 4.2(1)	364 347	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 4.3(1)	365 348	Unlikely	Moderate	Medium	Strong					✓			

Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Electricity Industry Metering Code clause 4.4(1)	366 349	Unlikely	Minor	Low	Strong					✓			
Electricity Industry Metering Code clause 4.5(1)	367 350	Unlikely	Minor	Low	Strong					✓			
Electricity Industry Metering Code clause 4.6(1)	369 352	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 4.6(2)	370 353	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 4.7	371 354	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 4.8(3)	372 355	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 4.8(4)	373 356	Probable	Moderate	Medium	Moderate		✓						
Electricity Industry Metering Code clause 4.8(5)	374 357	Probable	Moderate	Medium	Moderate		✓						

Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Electricity Industry Metering Code clause 4.9	375 358	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.1 (1)	376 359	Unlikely	Minor	Low	Strong					✓			
Electricity Industry Metering Code clause 5.1(2)	377 360	Unlikely	Minor	Low	Strong					✓			
Electricity Industry Metering Code clause 5.3	378 361	Probable	Moderate	Medium	Moderate		✓						
Electricity Industry Metering Code clause 5.4(1)	379 362	Unlikely	Minor	Low	Strong					✓			
Electricity Industry Metering Code clause 5.5(2)	381 364	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.6(1)	383 366	Probable	Moderate	Medium	Moderate		✓						
Electricity Industry Metering Code clause 5.7	384 367	Probable	Moderate	Medium	Moderate		✓						
Electricity Industry Metering Code clause 5.8	385 368	Unlikely	Moderate	Medium	Strong					✓			

Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Electricity Industry Metering Code clause 5.9	386 369	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.10	387 370	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.11	388 371	Unlikely	Moderate	Medium	Strong		✓						
Electricity Industry Metering Code clause 5.12(1)	389 372	Unlikely	Moderate	Medium	Strong		✓						
Electricity Industry Metering Code clause 5.13	390 373	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.14(3)	391 374	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.15	392 375	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.19(5)	400 383	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.20(1)	402 385	Unlikely	Moderate	Medium	Strong					✓			

Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Electricity Industry Metering Code clause 5.20(2)	403 386	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.20(4)	404 387	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.21(2)	405 388	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.21(4)	406 389	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.21(8)	409 392	Probable	Moderate	Medium	Moderate		✓						
Electricity Industry Metering Code clause 5.21(9)	410 393	Probable	Moderate	Medium	Moderate		✓						
Electricity Industry Metering Code clause 5.21(11)	411 394	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.21(12)	412 395	Unlikely	Moderate	Medium	Strong					✓			

Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Electricity Industry Metering Code clause 5.22(1)	413 396	Probable	Moderate	Medium	Moderate		✓						
Electricity Industry Metering Code clause 5.22(2)	414 397	Probable	Moderate	Medium	Moderate		✓						
Electricity Industry Metering Code clause 5.22(3)	415 398	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.22(4)	416 399	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.22(5)	417 400	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.22(6)	418 401	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.23(1)	419 402	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.23(3)	420 403	Unlikely	Moderate	Medium	Strong					✓			

Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Electricity Industry Metering Code clause 5.24(1)	421 404	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.24(2)	422 405	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.24(3)	423 406	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.24(4)	424 407	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.25	425 408	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.29	427 410	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Metering Code clause 5.30(1)	428 411	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 5.31(1)	429 412	Probable	Moderate	Medium	Moderate		✓						

Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Electricity Industry Metering Code clause 5.31(2)	430 413	Probable	Moderate	Medium	Moderate		✓						
Electricity Industry Metering Code clause 5.34(2)	431 414	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry Metering Code clause 6.1(1)	432 415	Probable	Moderate	Medium	Moderate		✓						
Electricity Industry Metering Code clause 6.20(4)	434 417	Unlikely	Minor	Low	Strong						✓		
Electricity Industry Metering Code clause 7.2(1)	435 418	Unlikely	Minor	Low	Strong					✓			
Electricity Industry Metering Code clause 7.2(2)	436 419	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry Metering Code clause 8.1(1)	441 424	Probable	Minor	Low	Moderate		✓						
Electricity Industry Metering Code clause 8.1(2)	442 425	Probable	Minor	Low	Moderate		✓						

Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Electricity Industry Metering Code clause 8.1(3)	443 426	Probable	Minor	Low	Moderate		✓						
Electricity Industry Metering Code clause 8.1(4)	444 427	Probable	Moderate	Medium	Moderate		✓						
Electricity Industry Metering Code clause 8.3(2)	445 428	Probable	Minor	Low	Moderate		✓						
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 5(1)	446 429	Unlikely	Minor	Low	Strong					✓			
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 8	447 430	Unlikely	Minor	Low	Strong					✓			
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 9	448 431	Likely	Moderate	High	Moderate					✓			
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 10(1)	449 432	Unlikely	Minor	Low	Strong					✓			

Obligations	Manual Reference Obligation	Likelihood	Consequence	Inherent Risk	Adequacy of Existing Controls	Compliance Rating							
		(A=Likely, B=Probable, C=Unlikely)	(1=Minor, 2=Moderate, 3=Major)	(Low, Medium, High)	(S=Strong, M=Moderate, W=Weak)	1	2	3	4	5	N / R	N / A	
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 10(2)	450 433	Unlikely	Minor	Low	Strong					✓			
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 13(2)	452 435	Likely	Moderate	High	Moderate			✓					
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 13(3)	453 436	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 14(8)	454 437	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 15(2)	455 438	Unlikely	Moderate	Medium	Strong						✓		
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 23(1)	461 444	Unlikely	Minor	Low	Strong					✓			

Obligations	Manual Reference Obligation	Likelihood	Consequence	Inherent Risk	Adequacy of Existing Controls	Compliance Rating							
		(A=Likely, B=Probable, C=Unlikely)	(1=Minor, 2=Moderate, 3=Major)	(Low, Medium, High)	(S=Strong, M=Moderate, W=Weak)	1	2	3	4	5	N / R	N / A	
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 23(2)	462 445	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 24(3)	463 446	Likely	Moderate	High	Moderate		✓						
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 24(4)	464 447	Likely	Minor	Medium	Moderate		✓						
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 25(2)	465 448	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 25(3)	466 449	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 26	467 450	Unlikely	Moderate	Medium	Strong						✓		

Obligations	Manual Reference Obligation	Likelihood (A=Likely, B=Probable, C=Unlikely)	Consequence (1=Minor, 2=Moderate, 3=Major)	Inherent Risk (Low, Medium, High)	Adequacy of Existing Controls (S=Strong, M=Moderate , W=Weak)	Compliance Rating							
						1	2	3	4	5	N / R	N / A	
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 27(1)	468 451	Unlikely	Moderate	Medium	Strong					✓			
Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 27(3)	469 452	Unlikely	Moderate	Medium	Strong					✓			

7. Review of Previous Findings

Our review revealed that there previous audit findings which had not been addressed or had been found to be non-compliant within the current audit. These observations are further discussed in the Detailed Findings Section of the report.

Licence Condition Reference (March 2008 Electricity Compliance Reporting Manual)	Issue	Recommendation	Observation
31	<p>Sample testing of customer transfers identified 1 instance where Western Power should have objected to a customer transfer request but did not due to unusual circumstances.</p> <p>The commercial customer needed an alternative supply as their existing retailer (Alinta) was unable to supply gas as a result of the gas crisis. Western Power consulted with the incoming retailer (Synergy) and agreed to complete the transfer immediately. Western Power notified the Authority of this breach on 17 June 2008. This breach occurred because of the potential significant impact to the customer and is not expected to occur again.</p>	<p>In exceptional circumstances where Western Power will breach its obligations for the benefit of a customer, Western Power should discuss the matter with the Authority.</p>	<p>Our enquiry with the Metering Analyst confirmed that the non-compliance was due to an emergency situation where there was a limited energy supply due to the 'gas crisis'.</p> <p>The Metering Analyst is aware of the requirement to discuss exceptional circumstances for a breach with the Authority.</p> <p>This recommendation has been addressed.</p>

Licence Condition Reference (March 2008 Electricity Compliance Reporting Manual)	Issue	Recommendation	Observation
32	Customer transfer requests in large country towns were incorrectly rejected by the Metering Business System (MBS) because some streets were classified as metropolitan instead of a country area. Therefore when incoming retailers nominated a transfer date, MBS recognised them as metropolitan and rejected the transfer request because the date did not meet the requirements of the Code.	Modify the Metering Business System configuration to enable compliance with this obligation.	<p>Western Power Metering Business System functionality has been modified to correct a problem whereby Customer Transfer Requests were failing where the address location was within a “Town” zone.</p> <p>We observed correspondence between Western Power’s Metering Branch and IT Branch to rectify and confirm that the issue has been resolved.</p> <p>This recommendation has been addressed.</p>
85	<p>The 2008 Licence fee was not paid within 1 month after the anniversary date of the Licence. Licence fee paid: 27 May 2008 Anniversary of Licence: 30 March 2008</p> <p>The breach from the 2008 performance audit has not been corrected and the recommendation to</p>	Set up calendar reminders in Lotus Notes to trigger payment of Licence fees before the anniversary date of Western Power’s Licence.	<p>Western Power has incorporated calendar reminders to trigger the payment of licence fees within one month after each anniversary of that day during the term of the licence.</p> <p>Our testing has also confirmed that the licence fees were paid within one month after each anniversary of that day during</p>

Licence Condition Reference (March 2008 Electricity Compliance Reporting Manual)	Issue	Recommendation	Observation
	have automatic reminders set up in Lotus Notes calendar has not been implemented.		the term of the licence This recommendation has been addressed.
302	Western Power selected a sample of three-phase, whole current meters in March 2009 which identified non-compliant meters. The Metering Management Plan requires in-service meters to record energy consumption within their prescribed limits. Based on projected failure rates, approximately 320,000 direct connect meters were non-compliant. Western Power did not notify the Authority of the above non-compliant meters.	Investigate, identify and implement process and system improvements to achieve complete compliance with this obligation.	Whilst this recommendation remains outstanding, Western Power has developed an action plan, which has been approved by the Office of Energy Safety, to replace the meters by 1 December 2015.
307	Western Power selected a sample of three-phase, whole current meters in March 2009 which identified non-compliant meters. The Metering Management Plan requires in-service	Investigate, identify and implement process and system improvements to achieve complete compliance with this obligation.	Whilst this recommendation remains outstanding, Western Power has developed an action plan, which has been approved by the Office of Energy Safety, to replace the meters by 1

Licence Condition Reference (March 2008 Electricity Compliance Reporting Manual)	Issue	Recommendation	Observation
	meters to record energy consumption within their prescribed limits. Based on projected failure rates, approximately 320,000 direct connect meters were non-compliant.		December 2015.
310	Western Power selected a sample of three-phase, whole current meters in March 2009 which identified non-compliant meters. The Metering Management Plan requires in-service meters to record energy consumption within their prescribed limits. Based on projected failure rates, approximately 320,000 direct connect meters were non-compliant. Western Power did not notify the Authority of the above non-compliant meters.	Investigate, identify and implement process and system improvements to achieve complete compliance with this obligation.	<p>Whilst this recommendation remains outstanding, Western Power has developed an action plan, which has been approved by the Office of Energy Safety, to replace the meters by 1 December 2015.</p> <p>Western Power communicated the non compliant meters to the Authority in February 2009.</p>

Licence Condition Reference (March 2008 Electricity Compliance Reporting Manual)	Issue	Recommendation	Observation
317	<p>Western Power reported less than 95% data collection timeliness and availability from April 2008 to January 2009. Therefore, the minimum required availability level of 95% prescribed by the Code was not achieved throughout the audit period. This was caused by poor availability results reported in February 2008 as a result of significant contractor resourcing issues (25% staff turnover in January 2008) which led to service failure.</p> <p>Western Power intervened to resolve the availability issue and assisted with the recovery plan during February 2009. This enabled the schedule to be corrected by March 2009 and regular updates were provided to retailers throughout the process. The meter reading cycle has returned to schedule</p>	<p>Investigate, identify and implement process and system improvements to achieve complete compliance with this obligation</p> <p>Consider establishing key performance indicators in the service level agreements and imposing penalties on the contractor for failing to meet the specified service levels.</p>	<p>Western Power has implemented penalties as part of the AMRS contract. The contract states that penalties will be imposed for the meter reading routes that are read late.</p> <p>Our enquiries with the Metering Administrator revealed that there was a number of late meter reading rounds during the audit period, which resulted in penalties imposed by Western Power.</p> <p>Although Western Power had implemented this recommendation in the last performance audit, our review determined that a number of energy data was not transferred from the metering installation to its metering database within the timeframes specified in the Code. Further, our review of the SLA reports revealed that the required availability was not reported in accordance with the requirements</p>

Licence Condition Reference (March 2008 Electricity Compliance Reporting Manual)	Issue	Recommendation	Observation
	and Western Power has requested the contractor to report its mitigation strategies to prevent the incident from reoccurring.		<p>stipulated in the Electricity Industry Metering Code.</p> <p>Please refer to the Detailed Findings Section, page 65 which outlines our observations in connection with this compliance obligation.</p>
330	<p>Western Power does not collect metering data in 30 minute intervals in accordance with the Metrology Procedure. However formal agreements have been established with each Code Participant, with the exception of Synergy, to collect metering data at an alternative interval of 15 minute intervals.</p> <p>Western Power has not established an agreement with Synergy to collect energy data in sub-multiples (i.e. 15 minutes) rather than the 30 minute intervals prescribed by the Code.</p>	Establish and formalise an agreement with Synergy to collect metering data in 15 minute intervals.	<p>Western Power has not formalised an agreement with Synergy to collect metering data in 15 minute intervals.</p> <p>Our review noted that Western Power, since July 2010, has purchased and installed meters that collect data in 30 minute intervals.</p> <p>This recommendation remains outstanding.</p>

Licence Condition Reference (March 2008 Electricity Compliance Reporting Manual)	Issue	Recommendation	Observation
	Discussions with the Synergy Networks Manager identified that Synergy has requested additional information from Western Power before signing off on the service level agreement. As at the time of drafting this report, Synergy was awaiting a response from Western Power.		
346	<p>Western Power implemented a Metering Business System (MBS) Disaster Recovery Plan by December 2008. The plan was tested and the results validated that MBS can be recovered within 2 business days. Therefore Western Power was compliant for only a portion of the audit period</p> <p>The breach from the 2008 performance audit has been corrected and the post audit action plan has been implemented.</p>	No recommendations made. Western Power achieved compliance during the audit period.	<p>Western Power has implemented a Disaster Recovery Plan, which is tested on an annual basis to ensure that MBS can be recovered within 2 business days.</p> <p>This recommendation has been addressed.</p>

Licence Condition Reference (March 2008 Electricity Compliance Reporting Manual)	Issue	Recommendation	Observation
355	<p>Western Power provides the customer with a read only password to download meter data to their computer. Large volume users such as power stations will submit a request through their Western Power Accounts Manager. This is subsequently forwarded to the Data Management team, who will issue a service order requesting for a read only password. Metering Provision will then complete the service order and return it to Metering Data who will inform the Account Manager of the password. We noted that access rights and passwords are not reviewed annually. We acknowledge that this is not a compliance requirement however it is an opportunity for improvement.</p>	<p>Management should review access rights and passwords on an annual basis.</p>	<p>Our discussions with the Metering Strategist revealed that access rights and passwords are not reviewed on an annual basis due to the low number of users that have read only passwords.</p> <p>Although this recommendation remains outstanding, our review did not reveal any exceptions pertaining to this compliance manual reference obligation.</p>

Licence Condition Reference (March 2008 Electricity Compliance Reporting Manual)	Issue	Recommendation	Observation
358	The Metering Business System (MBS) retains metering data live within the system for 2 years and subsequently archives data for 5 years. Legislative and regulatory requirements prescribe that interval data must be retained online for 15 months and 5 years and 9 months offline (total 7 years). MBS has been configured to retain data for the prescribed timeframes. We noted that Procedures for metering data retention periods and archiving have not been developed. Improvement opportunity noted.	Western Power should develop and formally document metering data retention and archiving procedures. Documented procedures should be approved by management and communicated to the relevant metering personnel.	Our enquiries with the Metering Administrator revealed no documented metering data retention and archiving procedures have been developed during the audit period. Although this recommendation remains outstanding, our review did not reveal any exceptions pertaining to this compliance manual reference obligation. .
361	Western Power reported less than 95% data collection timeliness and availability from April 2008 to January 2009. Therefore, the minimum required availability level of 95% prescribed by the Code was not achieved throughout the audit period,	Investigate and identify process improvement opportunities to achieve complete compliance with this obligation. Consider establishing key performance indicators in the service level agreements and imposing penalties on the contractor for failing to meet the specified service	Western Power has implemented penalties as part of the AMRS contract. The contract states that penalties will be imposed for the meter reading routes that are read late. Our enquiries with the Metering Administrator revealed that there was a

Licence Condition Reference (March 2008 Electricity Compliance Reporting Manual)	Issue	Recommendation	Observation
	<p>causing data transfers to exceed the prescribed timeframes. This was caused by poor availability results reported in February 2008 as a result of significant contractor resourcing issues (25% staff turnover in January 2008) which led to service failure by the contractor.</p> <p>Refer to the finding identified for Electricity Compliance Reporting Manual No. 317.</p>	<p>levels.</p>	<p>number of late meter reading rounds during the audit period, which resulted in penalties imposed by Western Power.</p> <p>Although Western Power had implemented this recommendation in the last performance audit, our review revealed that a number of energy data was not transferred from the metering installation to its metering database within the timeframes specified in the Code. Further, our review of the SLA reports revealed that the required availability was not reported in accordance with the requirements stipulated in the Electricity Industry Metering Code.</p> <p>Please refer to the Detailed Findings Section, page 77 which outlines our observations in connection with this compliance obligation.</p>

Licence Condition Reference (March 2008 Electricity Compliance Reporting Manual)	Issue	Recommendation	Observation
362	Sample testing performed identified one instance where an actual meter reading was not taken within a 12 month period to provide an actual value.	Investigate, identify and implement process and system improvements to achieve complete compliance with this obligation.	<p>Western Power has engaged AMRS to support the compliance of this obligation. Enquiries with the Readings Operations Coordinator revealed that AMRS is contracted to meet this obligation by scheduling actual readings for each accumulation meter.</p> <p>Metering Services is provided with regular updates and Annual Read schedules to notify Western Power of meter reading targets. Actual reading that was not taken during the period would be recorded and auctioned in the next reading cycle.</p> <p>This recommendation has been addressed.</p>
387	Sample testing identified 4 instances where verification results and energy data were not provided within 5 business days as prescribed by the	Investigate, identify and implement process and system improvements to achieve complete compliance with this obligation.	Western Power has engaged extra staff to assist with the large volume of meter data verifications (MDV) and an agreement was put in place between

Licence Condition Reference (March 2008 Electricity Compliance Reporting Manual)	Issue	Recommendation	Observation
	<p>Code. The information was provided within 8 business days in 3 instances and 11 business days in 1 instance.</p> <p>Based on discussions, we noted that the underlying cause was due to a significant increase (approximately 25 times) in the number of requests submitted by Synergy because of an upgrade to their systems.</p>		<p>Western Power and Synergy to limit the number of MDV service orders from Synergy for processing.</p> <p>Enquiries with the Metering Administrator revealed that if field checks are returned late, there is regular liaison with contract managers to ensure services are provided within the expected timeframes.</p> <p>This recommendation has been addressed.</p>
389	<p>Customers may request for a test or audit of their meter through their retailer. The retailer will submit a Service Order to Western Power and the meter is tested in the Meter Provisions lab by a technician. The meter test results are documented in a report which is provided to the customer. However we noted that</p>	<p>Investigate, identify and implement methods to achieve complete compliance with this obligation.</p> <p>Western Power's Meter Management Plan provides that testing is required to be conducted four years from commencement of the plan, i.e. in September 2010.</p>	<p>Western Power had purchased testing equipment for CT and HV metering installation in May 2010.</p> <p>Western Power was able to undertake testing of meter samples in accordance with the Metering Management Plan. Further, from May 2010 Western Power had the capability to undertake a test or an audit of meter base on a request from</p>

Licence Condition Reference (March 2008 Electricity Compliance Reporting Manual)	Issue	Recommendation	Observation
	<p>Western Power's Metering Services do not have the equipment to test Type 1 – Type 4 meters.</p> <p>The breach from 2008 has not been rectified because Western Power's Metering Services do not have the equipment to test Type 1 – Type 4 meters.</p> <p>Discussions with the Metering Strategist identified that Western Power has not received any requests, by a Code Participant of Type 1 – 4 meters, to undertake a test on the accuracy of the metering installation or the energy or standing data of the metering installation. We noted that it would be unlikely for Type 1 – 4 customers to request for a test or audit of its meter or energy data because of the significant impact on their business operations (e.g. financial</p>		<p>a customer.</p> <p>This recommendation has been addressed.</p>

Licence Condition Reference (March 2008 Electricity Compliance Reporting Manual)	Issue	Recommendation	Observation
	loss).		
392	<p>Sample testing of metering installation tests (non-Type 1-4 meters) performed or auditing of information from the meters associated with the metering installations, or both, identified the following exceptions:</p> <ul style="list-style-type: none"> • 5 instances of undercharging to Synergy; and • 1 instance of charging for a faulty meter, contravening clause 5.21(8) of the Metering Code. 	<p>Investigate, identify and implement process and system improvements to achieve complete compliance with this obligation.</p> <p>Charges imposed for the testing of metering installations or auditing of information from the metering should be reviewed by appropriate senior personnel.</p>	<p>Although, Commercial Officers undertake manual review of the completion comment and charges, our sample based testing revealed incorrect charges for the test or audit of metering installations.</p> <p>This recommendation remains outstanding. Please refer to the Detailed Findings, page 87 for our observations and recommendations in connection with this obligation.</p>
393	<p>Sample testing of metering installation tests performed or auditing of information from the meters associated with the metering installations, or both, identified 1 instance of a charging for a faulty meter.</p> <p>This contravenes clause 5.21(8) of the</p>	<p>Investigate, identify and implement process and system improvements to achieve complete compliance with this obligation.</p> <p>Charges imposed for the testing of metering installations or auditing of information from the metering should be reviewed by appropriate senior personnel.</p>	<p>Although, Commercial Officers undertake manual review of the completion comment and charges, our sample based testing revealed incorrect charges for the test or audit of metering installations.</p> <p>This recommendation remains outstanding. Please refer to the Detailed</p>

Licence Condition Reference (March 2008 Electricity Compliance Reporting Manual)	Issue	Recommendation	Observation
	Metering Code.		Findings, page 87 for our observations and recommendations in connection with this obligation.
411	<p>A Memorandum of Understanding (MOU) was established between Western Power and Horizon Power upon disaggregation, effective from 1 April 2006. The MOU broadly covers the scope of services to be provided by Western Power, however there is insufficient detail to satisfy the requirements of this obligation.</p> <p>Horizon Power formally elected Western Power as its meter data agent effective from 1 October 2009. The services elected are specified within the Service Level Contract Metering Services with Horizon Power, executed as an agreement on 12 October 2009. Therefore Western Power achieved compliance during the</p>	No recommendations made. Western Power achieved compliance during the audit period.	<p>Western Power entered into meter data agent agreement with Horizon effective from 1 October 2009. The services elected between the parties are specified within the Service Level Contract.</p> <p>This recommendation has been addressed</p>

Licence Condition Reference (March 2008 Electricity Compliance Reporting Manual)	Issue	Recommendation	Observation
	audit period.		
415	Western Power selected a sample of three-phase, whole current meters in March 2009 which identified non-compliant meters. The Metering Management Plan requires in-service meters to record energy consumption within their prescribed limits. Based on projected failure rates, approximately 320,000 direct connect meters were non-compliant.	Investigate, identify and implement process and system improvements to achieve complete compliance with this obligation.	<p>Whilst this recommendation remains outstanding, Western Power has developed an action plan, which has been approved by the Office of Energy Safety, to replace the meters by 1 December 2015.</p> <p>However, our review has revealed that Western Power had not met its obligations under the model SLA.</p> <p>Please refer to the Detailed Findings, page 94 for our observations and recommendations in connection with this obligation.</p>
432	Sample testing identified one instance where an outage period was 8 hours, exceeding the 6 hours prescribed by the Code for customers south of the 26th parallel of latitude.	Investigate, identify and implement process and system improvements to achieve complete compliance with this obligation.	Western Power has implemented processes in place, so far as reasonably practicable, to reduce the effect of planned and unplanned interruptions on a customer.

Licence Condition Reference (March 2008 Electricity Compliance Reporting Manual)	Issue	Recommendation	Observation
			<p>Western Power has detailed processes in place for the submission of applications to do work (DNAR) and the resulting planning of the outages and the steps required. For un-planned outages, there are various options for reducing the effect of the interruptions. This includes assessing the priority ratings, as well as re-routing power supplies to isolate problem areas and restore power to as many properties as possible.</p> <p>The ENMAC system enables Western Power to focus efforts to restore outages to priority areas.</p> <p>This recommendation has been implemented.</p>

8. Audit Opinion

In our opinion, except for the matters identified in Section 9 – Compliance Obligations Elements which Require Corrective Measures and any effects thereof, we are satisfied that Western Power had policies, procedures and systems in place to support compliance with the licence conditions and associated regulations and codes, for the period 1 November 2009 to 30 April 2011.

Grant Thornton Australia Ltd



Campbell George Ansell

Partner
Perth

15 September 2011

9. Detailed Findings – Compliance Elements which Require Corrective Measures

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 7.1(1)	
	Electricity Industry Customer Transfer Code clause 7.1(2)	
	Electricity Industry Customer Transfer Code clause 7.1(3)	
	Electricity Industry Customer Transfer Code clause 7.2(4)	
	Electricity Industry Customer Transfer Code clause 7.3(2)	
Compliance Manual Reference	55, 56, 57, 58 & 59	55, 56, 57, 58 & 59
Obligation Description		
55	For a dispute in respect of a matter under or in connection with the Electricity Industry Customer Transfer Code, any disputing party must meet within five business days of a request from another disputing party and attempt to resolve the dispute by negotiations in good faith.	
56	If the negotiations in 7.1(1) of the Electricity Industry Customer Transfer Code do not resolve the dispute within 10 days after the first meeting, the dispute must be referred to the senior executive officer of each disputing party who must attempt to resolve the dispute by negotiations in good faith.	
57	If the dispute is resolved, the disputing parties must prepare a written and signed record of the resolution and adhere to the resolution	
58	A disputing party that refers a dispute to the Authority must give notice to the Authority of the nature of the dispute, including specified details.	
59	A disputing party must at all times conduct itself in a manner which is directed towards achieving the objectives in clause 7.3(1) of the Electricity Industry Customer Transfer Code.	
Reporting Type	NR, NR, 2, NR and NR	
Compliance Rating	3	

Audit Observations	<p>Through our enquiries, we found that Western Power does not have a dispute resolution framework that provides a methodology for identifying, classifying, recording, resolving and communicating a dispute.</p> <p>Discussions with the Metering Branch and the Customer Solutions Branch revealed that personnel follow the guidelines in the Electricity Customer Transfer Code if a dispute were to occur, complete online compliance training and use the B2B Steering Committee Terms of Reference document with Synergy as an escalation path for issue and resolution. However, these do not identify the dispute process and the management of a dispute as per the requirements in the Electricity Customer Transfer Code. This level of interaction has not been established with other retailers.</p> <p>Western Power advised that there was no dispute in connection with the Electricity Industry Customer Transfer Code. However, in 2010, Synergy and Western Power entered into a dispute in respect of an installation of interval meters which was a dispute under the Electricity Industry Metering Code (Please refer to manual reference obligation 441).</p>
Recommendation	<p>That Western Power develops a dispute resolution framework and ensures that it be communicated across the various Branches directly involved with all retailers.</p>
Management Response	<p>Western Power maintains that there were no disputes in connection with the Electricity Industry Customer Transfer Code during the audit period. Western Power however recognises an improvement opportunity to develop a documented resolution procedure.</p> <p>Western Power notes, the example dispute cited by the auditors related to an issue under the Model SLA and not the Electricity Industry Metering Code 2005 as is suggested.</p>
Management Actions	<p>Western Power will develop and implement a documented dispute resolution procedure.</p>
Implementation Date	<p>01/11/2011</p>
Responsible Person	<p>Tony Shanahan, Manager Metering</p>

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.5(6)	
Compliance Manual Reference	326	309
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<p>Sample based testing revealed that there were instances where Synergy and Alinta were not charged in accordance with the charges as specified within the model SLA for the replacement of meters.</p> <p>Discussions with the Commercial Administrator revealed that Western Power only charges for the replacement of meters as per the model SLA and does not charge for any other metering installation related activities.</p> <p>There were instances where a request to replace a CT meter was not charged. Interviews with Meter Asset & Distribution Team revealed that a replacement of a CT meter was not charged as the system is defaulted not to charge for a CT meter, as the CT Connection Process would form part of a project.</p> <p>Further, Synergy was charged cancellation fees for a meter replacement, which has not been established within the model SLA. Our enquiries revealed that there is an implicit agreement between Synergy and Western Power for the cancellation fees.</p>	
Recommendation	<ol style="list-style-type: none"> 1. That Western Power review and update the current system set up of charges within MBS; 2. That a secondary review of the charges be undertaken by another Commercial Officer. 	
Management Response	Acknowledged. Western Power notes it has a process in place enabling Synergy to dispute charges imposed by it. In regards to the imposition of cancellation fees, Western Power and Synergy have an in principle agreement allowing this charge and are	

	negotiating a new SLA which will capture this detail. Western Power notes, Synergy did not dispute payment of any charged cancellation fees during the audit period.
Management Action	<ol style="list-style-type: none"> 1. Western Power is in the process of negotiating a new SLA with Synergy which will include a cancellation fee provision based on the current in principle agreement. 2. A secondary review of the charges will now be undertaken by another Commercial Officer before billing.
Implementation Date	<ol style="list-style-type: none"> 1. 30/06/2012 2. 31/08/2011
Responsible Person	Tony Shanahan, Manager Metering
Status of Management Actions	<ol style="list-style-type: none"> 2. Western Power has completed the proposed management action.

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.11(1)	
Compliance Manual Reference	334	317
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<p>Sample based testing of energy data that has been obtained and transferred was found to have not been done within the specified timeframe of the licence condition or in accordance with the applicable SLA. We identified late transfers through exception reports and noted that the primary cause of the delay was due to the inability for MV90 to automatically substitute interval data reads.</p> <p>Enquiries with the Metering Administrator revealed that for basic data, there was a number of late meter reading rounds during the audit period and that penalties have been imposed on AMRS in accordance with the contract agreement.</p> <p>Additional enquiries with the Commercial Administrator revealed that Western Power does not report on metering installation to permit collection of data to the level of availability specified. Western Power only reports on the requirements specified in the model SLA, which does not capture the requirements under clause 3.11(1) of the Electricity Industry Metering Code.</p>	
Recommendation	<p>That Western Power:</p> <ol style="list-style-type: none"> 1. Where feasible to program the MBS functionality to allow auto-substitution of interval data in accordance with the rules of the Metering Code; and 2. Establish reports for monitoring the level of availability for instrument transformers and other components of the metering installation (99%) and metering installations that have communication links (95%). 	

Management Response	Acknowledged. The manual process Western Power has in place can be prone to human error therefore Western Power will explore the possibility of allowing MBS to auto-substitute interval data.
Management Actions	<ol style="list-style-type: none"> 1. Investigate the feasibility of MBS and MV90 functionality to allow auto substitution of interval data. 2. If feasible, implement the solution. 3. Enhance the current manual process to identify any missing data by establishing additional reporting from MBS. 4. Investigate the feasibility of establishing reports for monitoring the level of availability for instrument transformers and other components of the metering installation (99%) and metering installations that have communication links (95%). 5. If feasible, implement the solution.
Implementation Date	<ol style="list-style-type: none"> 1. 31/12/2011 2. 31/03/2012 3. 01/04/2012 4. 31/12/2011 5. 31/03/2012
Responsible Person	Tony Shanahan, Manager Metering

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.16(3)	
Compliance Manual Reference	347	330
Obligation Description	If a device is used as a data logger, the energy data for a metering point on the network must be collated in trading intervals within the metering installation unless it has been agreed between the network operator and the Code participant that energy data may be recorded in sub- multiples of a trading interval.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<p>Discussions with Metering Strategist revealed that Western Power's data loggers collected energy data in 15 minute intervals as opposed to the stipulated trading interval in the Electricity Industry Metering Code.</p> <p>Enquiries with the Metering Branch Manager, indicated that Western Power had not entered into an agreement with Synergy such that energy data may be recorded in sub- multiples of a trading interval (30 minutes).</p> <p>However, from 1 July 2010, Western Power had purchased and installed data loggers that collect energy data in 30 minute interval as required by the Electricity Industry Metering Code.</p>	
Recommendation	That Western Power establishes and formalise an agreement with Synergy such that energy data may be collected in 15 minute intervals.	
Management Response	Acknowledged.	
Management Actions	<p>Western Power met with Synergy on a number of occasions during the audit period to resolve the issue, but Synergy advised that it does not support Western Power collecting metering data in 15 minute intervals.</p> <p>Synergy are waiting for the Office of Energy to conclude its review of the Electricity Industry Metering Code with the understanding that this issue will be resolved on a regulatory level.</p>	

	Western Power presented the Office of Energy with a submission that would allow Western Power to record in sub intervals and publish in trading interval without retailer approval. Western Power received positive response to its submission.
Implementation Date	Western Power awaits the outcome of the Electricity Industry Metering Code review which is expected by 30/06/2012.
Responsible Person	Tony Shanahan, Manager Metering

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.16(5)	
	Electricity Industry Metering Code clause 3.16(6)	
Compliance Manual Reference	348 & 349	331 & 332
Obligation Description		
348	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.	
349	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.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<p>Discussions with the Metering Strategist and the Metering Branch Manager revealed that the metrology procedure does not deal with the requirements under clause 3.16(4) of the Electricity Industry Metering Code.</p> <p>Clause 3.16(4) of the Electricity Industry Metering Code requires that the metrology procedure must specify how Western Power is to produce the “Notional Wholesale Meter” value for the purposes of, and as defined in, the market rules. However, the model SLA does not contain the matters in the metrology procedure dealt with under clause 3.16(4) of the Electricity Industry Metering Code.</p> <p>Our enquiries with the Metering Branch Manager revealed that the Notional Wholesale Meter value is determined by the IMO.</p>	
Recommendation	That Western Power incorporates the Notional Wholesale Meter value in the metrology procedure and establishes how it will be dealt with in the model SLA.	
Management Response	Western Power maintains this obligation is not applicable as the Notional Wholesale Meter is officially calculated by the Independent Market Operator (IMO), not Western Power.	

Management Actions	No further action required. Western Power is awaiting the outcome of as the Metering Code Review Recommendation Report which identified the removal of this requirement from the distributor.
Implementation Date	30/06/2012
Responsible Person	Tony Shanahan, Manager Metering

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.18(1)	
Compliance Manual Reference	350	333
Obligation Description	If the Electricity Retail Corporation supplies electricity to a contestable customer at a connection point under a non- regulated contract, and in circumstances where immediately before entering into the contract, the electricity retail corporation supplied electricity to the contestable customer under a regulated contract, then the metering installation for the connection point must comply with the prescribed wholesale market metering installation requirements.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<p>We noted that Western Power is not fully compliant with the requirements under the prescribed wholesale market metering installation requirements as Western Power did not fully comply with the requirements under compliance manual reference 347, 348 and 349.</p> <p>Our enquiries with the Metering Strategist revealed that Western Power did not have visibility over the customer contracts as the obligation for managing contracts resides with the Electricity Retail Corporation.</p> <p>However, the responsibility for monitoring compliance of metering installation with the prescribed wholesale market metering installation requirements resides with Western Power.</p>	
Recommendation	That Western Power incorporates those recommendations under compliance manual reference 347, 348 and 349 to ensure Western Power complies with the prescribed wholesale market metering installation requirements.	
Management Response	The Metering Code and Metrology Procedure prescribe that the network operator determines the metering installation type. This has been confirmed in the Electricity Industry Metering Code Review Recommendations Report available from the Office of Energy.	

Management Actions	Western Power will document its current processes for the determination of meter installation types for each connection point. In addition, Western Power will develop reporting to enable annual review of correct determination of meter installation types.
Implementation Date	01/12/2011
Responsible Person	Tony Shanahan, Manager Metering

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.21(1)	
Compliance Manual Reference	353	336
Obligation Description	Meters containing an internal real time clock must maintain time accuracy as prescribed. Time drift must be measured over a period of 1 month.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<p>Our enquiries with the Interval Metering Analyst and testing of time drift revealed that the time drift for metering installations was not monitored on a monthly basis.</p> <p>We noted that the time drift of metering installations with communication links are adjusted by MV90 and the system flags metering installations that are not within the time accuracy. However, our enquiries with Interval Metering Analyst revealed that MV90 may not pick up time drift where the MV90 server itself is out of time sync. Also, time drift for manually read meters were not monitored by meter readers.</p> <p>Further, the time drift parameter setting within the MV90 had been incorrectly set up. Our review revealed that a 10 second time drift parameter has been set up within MV90. Therefore, time drift for Type 1 and 2 metering installation will never be adjusted.</p>	
Recommendation	<p>That Western Power:</p> <ol style="list-style-type: none"> 1. Establish time drift monitoring mechanisms for all types of metering installations on a monthly basis; and 2. Implement correct system parameters to ensure the time accuracy for its meters to reflect the requirements under the Electricity Industry Metering Code. 	
Management Response	Acknowledged.	
Management Actions	Western Power will develop and implement a documented process for monthly monitoring and correction of time drift in MV90, to meet the prescribed requirements.	

Implementation Date	01/11/2011
Responsible Person	Tony Shanahan, Manager Metering

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 4.8(4)	
	Electricity Industry Metering Code clause 4.8(5)	
Compliance Manual Reference	373 & 374	356 & 357
Obligation Description		
373	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.	
374	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.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<p>1. Although Landis and Gyr have measures in place to prevent tampering of metering installations and Western Power has the electronic security measure Western Power has in place to restrict access, our review of the electronic password levels noted that the Reading Management Team had full access rights to the metering installation. The meter software (EMPWin) was installed on the Interval Metering Analyst's computers. We observed that this enables the Readings Management Team, who primarily validates energy data, to reprogram the meters and delete the interval energy data. The Metering Strategist indicated that the installation of the software was a result of legacy processes.</p> <p>Our review also revealed that Western Power inadvertently provided "read only" passwords to a "non-user", which did not have authorised access to the metering installation. Metering Dynamics, an Eastern States metering data provision company that have customer consent to access this data but do not hold an access contract with Western Power had assumed that Metering Dynamics was acting on behalf of a number of</p>	

	<p>users. Western Power had removed the read only password in October 2010.</p> <p>2. Discussion with Metering Service Support personnel and the review of relevant documentation indicated that Western Power do have processes in place to restrict access to the metering database (MBS) to only approved users through:</p> <ul style="list-style-type: none"> • New user authorisation process where access levels and access is approved by a supervisor and MBS Service Support personnel; • MBS passwords required to be changed every 30 days; and • MBS user accounts locked if a password is attempted wrongly after 3 times. <p>Further, the metering database is contained within a locked secure environment preventing any access from unauthorised personnel.</p>
Recommendation	That Western Power considers restricting user access rights to the correct password level and removing the meter software from the Reading Management Team, who have full access to the energy data within the meters.
Management Response	Acknowledged.
Management Actions	A formal matrix of authority levels for MV90 and EMPWin access will be developed and implemented to ensure appropriate access is provided to users.
Implementation Date	01/09/2011
Responsible Person	Tony Shanahan, Manager Metering
Status of Management Actions	Western Power has completed the proposed management action.

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.3	
Compliance Manual Reference	378	361
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<p>Sample based testing of energy data that has been obtained and transferred was found to have not been done within the specified timeframe of the licence condition or in accordance with the applicable SLA. We identified late transfers through exception reports and noted that the primary cause of the delay is due to the inability for MV90 to automatically substitute interval data reads.</p> <p>Enquiries with the Metering Administrator identified that for basic data, there was a number of late meter reading rounds during the audit period and that penalties have been imposed on the AMRS in accordance with the contract agreement.</p> <p>Our review revealed that Western Power reported the non compliance during the audit period to the Economic Regulatory Authority.</p>	
Recommendation	Western Power should examine the feasibility of programming the MBS functionality to allow auto-substitution of interval data in accordance with the rules of the Metering Code.	
Management Response	Acknowledged. The manual process Western Power has in place can be prone to human error therefore Western Power will explore the possibility of allowing MBS to auto-substitute interval data.	
Management Actions	<ol style="list-style-type: none"> 1. Investigate the feasibility of MBS and MV90 functionality to allow auto substitution of interval data. 2. If feasible, implement the solution. 3. Enhance the current manual process to identify any missing data by establishing additional reporting from MBS. 	

Implementation Date	<ol style="list-style-type: none">1. 31/12/20112. 31/03/20123. 01/04/2012
Responsible Person	Tony Shanahan, Manager Metering

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.6(1)	
Compliance Manual Reference	383	366
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<p>Our review of Western Power's Internal Notification Report revealed that Western Power performed a system upgrade during the audit period which produced a number of unforeseen errors. As a result, Western Power failed to publish energy data to market for a number of metering points within the prescribed timeframes.</p> <p>Whilst Western Power has a process in place for the Substitution and MV90 Estimation, review of exception reports confirmed that Western Power did not provide validated and substituted energy data for a metering point to the user for the metering point and the IMO within the timeframes specified.</p> <p>However, we noted that Western Power reported the non compliance to the Economic Regulatory Authority during the audit period.</p>	
Recommendation	Western Power should examine the feasibility of programming the MBS functionality to allow auto-substitution of interval data in accordance with the rules of the Metering Code.	
Management Response	Acknowledged. The manual process Western Power has in place can be prone to human error therefore Western Power will explore the possibility of allowing MBS to auto-substitute interval data.	
Management Actions	<ol style="list-style-type: none"> Recent upgrades of MBS (release 6.3) enabled manual data substitution. Western Power will investigate the feasibility of MBS and MV90 functionality to allow auto substitution of interval data. Western Power's current manual process to identify any missing data will be enhanced by establishing additional 	

	reporting from MBS to monitor and remedy any non-compliance on a daily basis.
Implementation Date	<ol style="list-style-type: none"> 1. 01/12/2011 2. 01/04/2012
Responsible Person	Tony Shanahan, Manager Metering

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.7	
Compliance Manual Reference	384	367
Obligation Description	A network operator must provide replacement energy data to the user for the metering point and the IMO within the timeframes prescribed.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<p>Our review of Western Power's Internal Notification Report revealed that Western Power performed a system upgrade during the audit period which produced a number of unforeseen errors. As a result, Western Power failed to publish energy data to market for a number of metering points within the prescribed timeframes.</p> <p>Whilst Western Power has a process in place for the Substitution and MV90 Estimation, review of exception reports confirmed that Western Power did not supply replacement energy data to the user for the metering point and the IMO within the timeframes prescribed by the Metering Code.</p> <p>However, we noted that Western Power had reported the non compliance to the Economic Regulatory Authority during the audit period.</p>	
Recommendation	Western Power should examine the feasibility of programming the MBS functionality to allow auto-substitution of interval data in accordance with the rules of the Metering Code.	
Management Response	Acknowledged. The manual process Western Power has in place can be prone to human error therefore Western Power will explore the possibility of allowing MBS to auto-substitute interval data.	
Management Actions	<ol style="list-style-type: none"> 1. Recent upgrades of MBS (release 6.3) enabled manual data substitution. Western Power will investigate the feasibility of MBS and MV90 functionality to allow auto substitution of interval data. 2. Western Power's current manual process to identify any missing data will be enhanced by establishing additional reporting from MBS to monitor and remedy any non-compliance on a daily basis. 	

Implementation Date	1. 01/12/2011 2. 01/04/2012
Responsible Person	Tony Shanahan, Manager Metering

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.11	
Compliance Manual Reference	388	371
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<p>Our review of Western Power's Internal Notification Report revealed that Western Power performed a system upgrade during the audit period which produced a number of unforeseen errors. As a result, Western Power failed to publish energy data to market for a number of metering points within the prescribed timeframes.</p> <p>Discussions with the Readings Management Administrator revealed that the breach was identified when Western Power was notified by Synergy, Alinta and Perth Energy of data issues. The data issues occurred when the retailers system user acceptance testing did not detect incoming metering data from Western Power after the system upgrade.</p> <p>Western Power reported the non compliance to the Economic Regulatory Authority during the audit period.</p>	
Recommendation	To implement the remediation tasks as identified in the Western Power Internal Notification Report.	
Management Response	Acknowledged. Recent upgrades of MBS (release 6.3) remedied this non compliance. These system changes were implemented in June 2011.	
Management Actions	No further action required.	
Implementation Date	Addressed.	
Responsible Person	Not applicable.	


Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.12(1)	
Compliance Manual Reference	389	372
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<p>Our review of Western Power's Internal Notification Report revealed that Western Power performed a system upgrade during the audit period which produced a number of unforeseen errors. As a result, Western Power failed to publish energy data to market for a number of metering points within the prescribed timeframes.</p> <p>Discussions with the Readings Management Administrator revealed that the breach was identified when Western Power was notified by Synergy, Alinta and Perth Energy of data issues. The data issues occurred when the retailers system user acceptance testing did not detect incoming metering data from Western Power after the system upgrade.</p> <p>Western Power reported the non compliance to the Economic Regulatory Authority during the audit period.</p>	
Recommendation	That Western Power implements the remediation tasks as identified in the Western Power Internal Notification Report.	
Management Response	Acknowledged. Recent upgrades of MBS (release 6.3) remedied this non compliance. These system changes were implemented in June 2011.	
Management Actions	No further action required.	
Implementation Date	Addressed.	

Responsible
Person

Not applicable.

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.21(8)	
	Electricity Industry Metering Code clause 5.21(9)	
Compliance Manual Reference	409 & 410	392 & 393
Obligation Description		
409	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.	
410	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.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<p>Our sample based testing revealed that there were instances where Western Power had incorrectly charged for the testing of metering installations that did not correspond to the model SLA.</p> <p>We noted that once the meter test report was completed by the Meter Infrastructure Team, the report was provided to a Commercial Officer in the Meter Asset and Distribution Team, who closed off the job and determined if the meter test had failed or passed based on the report. MBS has been set up to flag charges if the meter has been recorded as a pass by the Commercial Officer.</p> <p>A secondary review of the completion comments of the billing extract related to meter tests is undertaken by another Commercial Officer who prepares the invoicing for the relevant retailer. However, our discussions revealed that there may be instances where the Commercial Officer may not be able to verify the completion comments due to the manner in which the completion</p>	

	<p>notes were recorded i.e. it may not flag a pass or a fail of the meter test. Our testing revealed that billing extract for the period November 2009 to April 2010 did not contain completion comments for the outcome of meter tests and therefore did not enable the Commercial Officer to review the completion comments for accuracy.</p> <p>We noted that Synergy had been charged for the cancellation of meter tests, which is not outlined in the model SLA.</p>
Recommendation	<p>That Western Power:</p> <ol style="list-style-type: none"> 1. Consider personnel within the Metering Infrastructure Team to complete the results of the meter test against the service order within MBS; 2. Continue the review by the Commercial Officer for the accuracy of the records and charges related to meter tests; and 3. Review and update the current system set up of charges within MBS.
Management Response	Acknowledged.
Management Actions	<ol style="list-style-type: none"> 1. Western Power will consider the possibility of personnel within the Metering Infrastructure Team to complete the results of the meter test against the service order within MBS. 2. Process put in place for Commercial Officer review at time of service order closure and secondary review by Commercial Officer before billing. 3. Western Power will align the current system set up of charges within MBS against the applicable SLA.
Implementation Date	<ol style="list-style-type: none"> 1. 31/08/2011 2. 30/09/2011 3. 31/10/2011
Responsible Person	Tony Shanahan, Manager Metering
Status of Management Actions	<ol style="list-style-type: none"> 1. Western Power has completed the proposed management action. <p>Metering Branch have retained the role to close the service order of a meter test within the Meter Asset and Distribution Team due to the skill set and knowledge of MBS.</p>



Further, the process has been formalised to ensure that the outcome of the meter test are accurately captured and therefore ensure correct charges are applied.

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.22(1)	
Compliance Manual Reference	413	396
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<p>Our discussions with the Interval Metering Analyst revealed that Western Power does not have all necessary processes in place to ensure compliance with this manual reference obligation.</p> <p>We performed a walkthrough of the energy data validation process and found that energy data was not validated through a check against a nominated maximum value and a comparison of revenue and check metering data was not conducted.</p> <p>Based on our discussions and walkthrough performed, Western Power does not meet the requirements stipulated in the prescribed rules and procedures of the Metering Code.</p>	
Recommendation	<p>That Western Power should program the MBS functionality to allow the validation of energy data using:</p> <ul style="list-style-type: none"> • The check meter to verify revenue meter data accuracy; and • A nominated maximum value for screening purposes. 	
Management Response	Acknowledged.	
Management Actions	<ol style="list-style-type: none"> 1. Western Power will investigate the feasibility of the MBS system change with possible inclusion in MBS 6.5 release. 2. If feasible, Western Power will implement the MBS system change. If not feasible, Western Power will establish an alternative action. 	

Implementation Date	1. 31/10/2011 2. 30/04/2012
Responsible Person	Tony Shanahan, Manager Metering

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.22(2)	
Compliance Manual Reference	414	397
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<p>Discussion with the Interval Metering Analyst revealed that Western Power does not have the necessary process in place to ensure compliance with this manual reference obligation.</p> <p>We performed a walkthrough of the process, and confirmed that check metering data was available but was not used to validate energy data provided.</p>	
Recommendation	That Western Power should program the MBS functionality to allow the validation of energy data against the check metering data.	
Management Response	Acknowledged.	
Management Actions	<ol style="list-style-type: none"> 1. Western Power will investigate the feasibility of the MBS system change with possible inclusion in MBS 6.5 release. 2. If feasible, Western Power will implement the MBS system change. If not feasible, Western Power will establish an alternative action. 	
Implementation Date	<ol style="list-style-type: none"> 1. 31/10/2011 2. 30/04/2012 	
Responsible Person	Tony Shanahan, Manager Metering	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.31(1)	
	Electricity Industry Metering Code clause 5.31(2)	
Compliance Manual Reference	429 & 430	412 & 413
Obligation Description		
429	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.	
430	Electricity Industry Metering Code clause 5.31(2) 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.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<p>Our discussions with Metering Branch revealed that in May 2009, Western Power Metering personnel and Horizon Metering personnel verbally agreed that Western Power as the metering data agent will no longer assess the compliance of the metering installation or upgrade non compliant meters. However, our review of the SLA found that it did contain this arrangement.</p> <p>In the absence of the exemption within the SLA, Western Power should be performing the compliance review of Horizon's metering installation as required by the Electricity Industry Metering Code.</p>	
Recommendation	That Western Power revises and updates the current SLA with Horizon to include the requirement that Western Power does not assess the compliance of Horizon's metering installations or upgrade a non-compliant metering installation.	

Management Response	The Electricity Industry Metering Code review recommendation has identified the need to amend this provision limiting this clause within the SWIS. Once the review is finalised, this requirement for Horizon meters will be removed.
Management Actions	Continue Western Power's participation in the Metering Code review process. The Office of Energy has advised that the final report will be published in August 2011, with the recommended changes being gazetted in December 2011.
Implementation Date	31/12/2011
Responsible Person	Tony Shanahan, Manager Metering

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 6.1(1)	
Compliance Manual Reference	432	415
Obligation Description	A network operator must, in relation to its network, comply with the agreements, rules, procedures, criteria and processes prescribed.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<p>Western Power does not have reporting capabilities across all elements of the model SLA. Our discussions with the Commercial Administrator revealed that the system did not have reporting capabilities for some of the service line items within the model SLA. We also noted that internal monitoring reports of the SLA commenced in November 2010.</p> <p>Prior to November 2010, Western Power had only reported to Synergy on the SLA, however, some of the line elements in the report within the SLA incorporated other parameters which did not accurately reflect the performance of the service line items within the model SLA.</p> <p>Due to the inaccuracies of the timeframes for energising a premises or reconnecting after a disconnection, the reporting of the SLA will not be accurate.</p> <p>Through our enquiries with the Metering Branch Manager and review of documentation, we noted that Western Power has mechanisms in place to ensure compliance with the communication rules, metrology procedure and mandatory link criteria. The Metering Branch Manager indicated that Western Power does not have a registration process that has been approved by the Authority.</p>	
Recommendation	We recommend that Western Power seek to establish reporting capabilities for those items within the model SLA that are not reported.	
Management Response	Acknowledged.	

Management Actions	<ol style="list-style-type: none"> 1. MBS system changes for enhanced reporting to be scoped and business case prepared. 2. To be included in planned MBS system release 6.5.
Implementation Date	30/04/2012
Responsible Person	Tony Shanahan, Manager Metering

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 8.1(1)	
	Electricity Industry Metering Code clause 8.1(2)	
	Electricity Industry Metering Code clause 8.1(3)	
	Electricity Industry Metering Code clause 8.1(4)	
	Electricity Industry Metering Code clause 8.3(2)	
Compliance Manual Reference	441, 442, 443, 444 & 445	424, 425, 426, 427 & 428
Obligation Description		
441	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.	
442	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	
443	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.	
444	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.	
445	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.	

Reporting Type	NR, NR, NR, 2 & NR
Compliance Rating	2
Audit Observations	<p>Through our enquiries, we found that Western Power does not have a dispute resolution framework that provides a methodology for identifying, classifying, recording, resolving and communicating a dispute.</p> <p>During the audit period, we noted that Western Power had entered into a dispute with Synergy over the service requirements under the model SLA, which is mandated under the Electricity Industry Metering Code and the dispute was not resolved in the manner stipulated in Part 8 of the Electricity Industry Metering Code. The dispute was in relation to a charge for the installation of interval meters. An official notice of the dispute had been issued by Synergy on 18 February 2010.</p> <p>However, senior management from Synergy and Western Power had been negotiating the matter from February 2010 to September 2010 during the monthly B2B meetings. The matter was escalated to CEO negotiations in September 2010, where a resolution was reached, however, there was no written and signed record of the resolution. Our enquiries revealed that there was a verbal agreement.</p> <p>Discussions with Metering Branch and Customer Solutions Branch revealed that personnel followed the guidelines in the Electricity Industry Metering Code if a dispute were to occur. Personnel also provided that they would complete online compliance training which captures the dispute process within the Electricity Metering Code.</p>
Recommendation	That Western Power develops a dispute resolution framework and ensures that it be communicated across the various Branches directly involved with all Code Participants.
Management Response	Western Power maintains no dispute occurred in relation to this obligation during the audit period. However, Western Power recognised this as an improvement opportunity. The example dispute cited by the auditors related to an issue under the Model SLA, not the Metering Code.
Management Actions	Western Power will develop and implement a documented dispute resolution procedure.
Implementation Date	01/11/2011

Responsible
Person

Tony Shanahan, Manager Metering

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 13(2)	
Compliance Manual Reference	452	435
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	3	
Audit Observations	<p>Whilst we acknowledge that Western Power has implemented processes and action plans to ensure that the average duration of interruption of supply in particular areas does not exceed the times specified in the table of clause 13(2) of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005, review of standard for average total length of interruptions noted that for the audit period:</p> <ul style="list-style-type: none"> • Perth CBD average was met; • Urban areas other than CBD average was not met; and • Any other area of the State average was not met. <p>In accordance with the Electricity Industry (Network Quality and Reliability of Supply) Code 2005 consideration was given to the calculation of Average Total Length of Interruptions for 4 years ending June 30 as calculated in accordance with clause 13(3) of the Network and Reliability Code, it was revealed that:</p> <ul style="list-style-type: none"> • Perth CBD standard was not met; • Urban areas other than CBD average was not met; and • Any other area of the State average was not met. <p>Western Power indicated that the contributing factors that impacted the organisations ability to meet the average total length of interruptions identified in the table were;</p> <ul style="list-style-type: none"> • Availability of resources; • Logistics; and • Significant natural events. <p>Based on a review of interruptions it was observed that Western Power implemented corrective actions to so far as reasonably</p>	

	practicable to ensure that customers in specified areas do not have a total average length of interruption greater than the times specified in the table of clause 13(2) of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.
Recommendation to the Authority	That the Authority considers reviewing the appropriateness of the time of average total length of interruptions for those areas excluding the CBD as stipulated under the table in clause 13(2) Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 13(2).

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 24(3)	
Compliance Manual Reference	463	446
Obligation Description	A distributor or transmitter must complete a quality investigation requested by a customer in accordance with specified requirements.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<p>Sample based testing revealed instances where Western Power did not complete quality investigations requested by customers within the 20 business day period specified in the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.</p> <p>Our enquiries with the Network Performance Branch noted that due to the complexities of the investigations requested by customers, this required the Power Quality team to perform various minor and major works, therefore resulting in time delays in completing the investigations.</p>	
Recommendation	<p>In instances where a quality investigation requested by a customer cannot be completed within the 20 business day period specified in the Electricity Industry (Network Quality and Reliability of Supply) Code 2005, Western Power should:</p> <ol style="list-style-type: none"> 1. Contact the relevant customer and extend the due date for the completion of the investigation; and 2. Retain corresponding records to confirm that the customer has acknowledged the due date extension. 	
Management Response	Acknowledged.	
Management Actions	<ol style="list-style-type: none"> 1. Review the procedure/s associated with the measurement and investigation of power quality complaints to ensure clear articulation of activities and required timeframes for those complaints that are determined likely to exceed the 20 day period for investigation. 	

	<ol style="list-style-type: none"> Review the application of the process in terms of resourcing and understanding of the requirements for investigation of power quality complaints Implement the revised procedure. Establish and maintain regular meetings with stakeholders relevant to the application of the procedure/s.
Implementation Date	<ol style="list-style-type: none"> 30/11/2011 31/12/2011 31/05/2012 31/08/2011
Responsible Person	Ankur Maheshwari, Manager Network Performance
Status of Management Actions	<ol style="list-style-type: none"> Western Power has completed the proposed management action.

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 24(4)	
Compliance Manual Reference	464	447
Obligation Description	A distributor or transmitter must report the results of an investigation to the customer concerned.	
Reporting Type	2	
Compliance Rating	2	
Audit Observations	<p>Sample based testing revealed instances where Western Power did not retain records to substantiate that customers had been informed of the outcomes of an investigation.</p> <p>Our enquiries with the Network Performance Branch revealed that the identified instances were in relation to completed minor and major works on the customers' site, therefore it was assumed that the customer had been notified of the outcome in person. However, in the absence of records, testing could not confirm that all customers had been advised of the outcome of an investigation as a result of a request.</p>	
Recommendation	That Western Power retains records to confirm that a customer has been informed of the outcome of an investigation.	
Management Response	Acknowledged.	
Management Actions	<ol style="list-style-type: none"> 1. Review the procedure/s associated with the measurement and investigation of power quality complaints to ensure that the advice to the customer of the findings is recorded in terms of when, what was advised and what was discussed. 2. Implement the revised procedure. 3. Establish and maintain regular meetings with stakeholders relevant to the application of the procedure/s. 	
Implementation Date	<ol style="list-style-type: none"> 1. 30/11/2011 2. 31/12/2011 	

	3. 31/08/2011
Responsible Person	Ankur Maheshwari, Manager Network Performance
Status of Management Actions	3. Western Power has completed the proposed management action.

10. Detailed Findings – Compliance Elements which Require Minor Improvements

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 2.2(1)(b)	
Compliance Manual Reference	2	2
Obligation Description	A network operator must ensure that no retailer which is its associate receives a benefit in respect of the Electricity Industry Customer Transfer Code unless the benefit is either attributable to the arms-length application of the Electricity Industry Customer Transfer Code or the benefit is made available to all other retailers.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<p>Through enquiries with the Metering Branch and the Customer Solutions Branch and review of the Electricity Networks Access Code, Western Power does not have retailers that are its associates.</p> <p>We noted that Western Power conduct B2B meetings with Synergy on a monthly basis to address issues in relation to the delivery of market, however, this has not been established with other retailers.</p>	
Recommendation	We recommend that Western Power consider establishing B2B meetings with other retailers to ensure that the same benefit are provided to all retailers.	
Management Response	This recommendation is noted but not relevant to this obligation.	
Management Actions	Western Power will initiate discussions with other retailers to determine their needs regarding regular forums.	
Implementation Date	30/09/2011	
Responsible Person	Tony Shanahan, Manager Metering	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.1	
Compliance Manual Reference	319	302
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	4	
Audit Observations	<p>Although, Western Power had undertaken a technical evaluation of meters supplied by Landis & Gyr as part of the tender in 2002 and the tender for an upgrade of direct connect meters in 2004, we established that the Meter Infrastructure Team does not undertake sample based testing of batches of the supplied meters on an ongoing basis to ensure that the supplier's meters are appropriately accredited and comply with the applicable metrology procedure.</p> <p>Further, through our discussions with the Metering Strategist, meters have been assigned serial numbers and are recorded within MBS. However, we observed that the Meter Infrastructure Teams were aware and familiar with the accuracy class of the meter when they undertake testing of meters as part of the Meter Management Plan and tender evaluation. There was no list to verify the accuracy class of the meter, as specified in the metrology procedure, against the meter serial number within MBS.</p> <p>As per the Metering Management Plan, Western Power undertook a test of class 0.2 meters and did not reveal any exceptions. The Metering Strategist revealed that the testing of the other class of meters will be undertaken this year in accordance with the Metering Management Plan. Although, Western Power has processes in place for the reporting of results of the testing for samples of meter classes, there are no timeframes or key milestones for the administrative and reporting practices to ensure Western Power meets its in-service compliance period.</p>	

Recommendation	<p>That Western Power:</p> <ol style="list-style-type: none"> 1. Establish timeframes and milestones within the Metering Management Plan for reporting of results of the testing for samples of meter classes; 2. Undertake sample based testing of batches of meters supplied on an ongoing basis to ensure meters conform to the requirements specified in the applicable metrology procedure; and 3. Create and maintain a list that classifies the meter serial numbers into the relevant meter class within MBS.
Management Response	<p>Western Power does not agree that this is a valid recommendation. There are already significant testing requirements under Australian Standards which our suppliers are obligated to meet under their supply contracts with Western Power. Therefore Western Power does not see the need to allocate scarce resources to meter re-testing.</p>
Management Actions	<p>Not applicable.</p>
Implementation Date	<p>Not applicable.</p>
Responsible Person	<p>Not applicable.</p>

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.5(3)	
Compliance Manual Reference	324	307
Obligation Description	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).	
Reporting Type	2	
Compliance Rating	4	
Audit Observations	Our review determined that Western Power only replaces meters as part of maintaining meter installations that do not function in accordance to the metrology requirements. The replacement of direct connect meters is undertaken by AMRS contractors or Connection Field Officers (CFOs), who generally do not have electrical qualifications compared to electrical contractors or metering officers. There are no audits undertaken of CFOs and AMRS to evaluate whether replacement is conducted in line with relevant Australian Standards. Our enquiries revealed that the current audits of AMRS primarily focused on job safety rather than the installation.	
Recommendation	That Western Power undertakes audits by qualified personnel of CFOs and AMRS for the replacement of meters to ensure the meters are replaced in accordance with the relevant Australian Standards and to minimise any safety incidents.	
Management Response	Acknowledged.	
Management Actions	Western Power will develop and coordinate a field audit plan with Western Power's Operational Technical Excellence Branch.	
Implementation Date	31/12/2011	
Responsible Person	Tony Shanahan, Manager Metering	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.5(9)	
Compliance Manual Reference	327	310
Obligation Description	If a network operator becomes aware that a metering installation does not comply with the Code, the network operator must advise affected parties of the non-compliance and arrange for the non-compliance to be corrected as soon as practicable.	
Reporting Type	2	
Compliance Rating	4	
Audit Observations	<p>Our review of the Metering Management Plan established that the Metering Branch Manager is responsible for communicating the non-compliances of metering installations to the Authority and other affected parties. However, the Metering Management Plan does not specifically articulate how the non-compliances of metering installations will be communicated to the Authority and affected parties, such as Code Participants. Further, there are no timeframes or key milestones for communicating reported non-compliances of metering installations to the Authority and affected parties.</p> <p>During the audit period, we noted that Western Power had tested class 0.2 meters in accordance with the Metering Management Plan and the test did not reveal any exceptions.</p>	
Recommendation	<p>That Western Power:</p> <ol style="list-style-type: none"> 1. Establish timeframes and milestones within the Metering Management Plan for reporting non-compliances to the Authority and affected parties; and 2. Detail the manner in which Western Power will communicate the non-compliances of the metering installations to the Authority and the affected parties within the Metering Management Plan. 	
Management Response	Acknowledged.	

Management Actions	Western Power will include timeframes and milestones and the manner in which Western Power will communicate the non-compliances of metering installations to the Authority and the affected parties in the next review of the Metering Management Plan.
Implementation Date	31/08/2012
Responsible Person	Tony Shanahan, Manager Metering

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.23(b)	
Compliance Manual Reference	357	340
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	4	
Audit Observations	<p>Our testing of service orders and discussions with the Metering Strategist revealed that the provision of the information on signals to customers was not recorded on the service order.</p> <p>Our discussions with the Metering Strategist revealed that Western Power provides the relevant information to a user detailing the signal specification to enable compliance with clause 3.23(c) of the Electricity Industry Metering Code. We noted that the information detailing the signal specification is contained within a pamphlet and a customer must submit a request through the retailer for enabling a signal.</p>	
Recommendation	That Western Power metering officers records the provision of information relating to signal specification to the customer on the service order.	
Management Response	Acknowledged. At this stage, due to other priorities, Western Power will not be considering the Auditors' recommendation.	
Management Actions	Not applicable.	
Implementation Date	Not applicable.	
Responsible Person	Not applicable.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 4.1(2)	
Compliance Manual Reference	362	345
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	4	
Audit Observations	<p>Discussion with the Metering Service Support personnel and the review of relevant documentation indicated that although Western Power do have processes in place to restrict access to approved users, a weakness in the approval process was identified where the supervisor signature on the Access to MBS Application form was not checked against an approved authority list.</p> <p>IT security policy and the MBS Functional Specification Manual for Security were reviewed and have concluded that overall there are adequate and effective controls in place to support compliance with the manual reference obligation.</p> <p>Based on our discussions and review of documentation we have concluded that there are minor improvements to be made, however, Western Power have adequate and effective controls in place to support compliance with this manual reference obligation</p>	
Recommendation	That Western Power develops a signature authority list should be developed for MBS and an approval officer should check prior to authorisation.	
Management Response	Acknowledged.	
Management Actions	<ol style="list-style-type: none"> 1. Western Power will investigate with IT if there are any further system checks that can be implemented. 2. Any further system checks, if applicable, will be implemented. 	

Implementation Date	1. 01/11/2011 2. 30/03/2012
Responsible Person	Tony Shanahan, Manager Metering

11. Detailed Findings – Compliance Elements which Do Not Require Further Action

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 2.2(1)(a)	
Compliance Manual Reference	1	1
Obligation Description	A network operator must treat all retailers which are its associates on an arms-length basis.	
Reporting Type	NR	
Compliance Rating	N/R	
Audit Observations	Through enquiries with Metering and Customer Solutions Branches, and review of the Electricity Networks Access Code, we noted that Western Power does not have retailers that are its associates.	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 3.1(1)(a)	
Compliance Manual Reference	3	3
Obligation Description	A network operator must publish a request for standing data form which must comply with Annex 1 of the Electricity Industry Customer Transfer Code.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Review of the forms published on the Metering Web Service Portal pertaining to request for standing data by Western Power found that they complied with Annexure 1 of the Electricity Industry Customer Transfer Code.</p> <p>Based on our inspection we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 3.1(1)(b)	
Compliance Manual Reference	4	4
Obligation Description	A network operator must publish a request for historical data form which must comply with Annex 2 of the Electricity Industry Customer Transfer Code.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>We inspected the request for historical data form available on Western Power's Metering Service Web Portal and confirmed that it complies with the requirements of the Electricity Industry Customer Transfer Code.</p> <p>Based on our inspection we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 3.1(2)	
Compliance Manual Reference	5	5
Obligation Description	If a network operator publishes an amended data request form it must comply with Annex 1 or Annex 2 of the Electricity Industry Customer Transfer Code, as applicable.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<p>Discussion with Information Services Analyst revealed that data request form had not been amended during the audit period, however, Western Power have processes in place to amend a data request form in accordance with the requirements under Annex 1 or Annex 2 of the Electricity Industry Customer Transfer Code.</p> <p>Based on our discussions and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 3.7(1)	
Compliance Manual Reference	10	10
Obligation Description	A network operator must, subject to clause 3.7(3) of the Electricity Industry Customer Transfer Code, electronically notify a retailer if its data request is not valid.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with Information Services Analyst and the review of the Metering Business System (MBS) functionality identified that Western Power's MBS is configured to automatically reject invalid data request, the retailer is notified automatically through MBS.</p> <p>Based on our discussions and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 3.7(2)	
Compliance Manual Reference	11	11
Obligation Description	A network operator must comply with clause 3.7(1) of the Electricity Industry Customer Transfer Code within defined timeframes depending on the number of standing or historical data requests that the retailer submits.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with Information Services Analyst and the review of the Metering Business System (MBS) functionality identified that Western Power MBS has been configured to automatically reject those data requests which exceed the permissible number as specified within clause 3.7(2) of the Electricity Industry Customer Transfer Code. The retailer is notified electronically of the invalid data request as part of an automated notification process within MBS.</p> <p>Based on our discussions and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 3.8(1)	
Compliance Manual Reference	12	12
Obligation Description	A network operator must use all reasonable endeavours to provide to the retailer the requested data under a valid data request.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<p>Discussion with Information Services Analyst and the review of the Metering Business System (MBS) functionality identified the availability of the Western Power Metering Services Centre online portal that links directly to the MBS, the portal allows for data to be provided to retailers upon valid data request. Our enquiries also revealed that Western Power would undertake all reasonable endeavours to facilitate the provision of requested data under a valid data request.</p> <p>Based on our discussions and walkthrough we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 3.8(2)(a)	
Compliance Manual Reference	13	13
Obligation Description	A network operator must provide the requested data under a valid data request electronically in a format in accordance with the communication rules if they have been approved or otherwise in accordance with the metering code.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Information Services Analyst and our review performed over data provided by Western Power as a result of valid data requests determined that the data had been provided in an electronic format in accordance with the manner prescribed under clause 3.8(2)(a) of the Electricity Industry Customer Transfer Code.</p> <p>Enquiries were made with the Information Services Analyst as to the process by which a retailer submits a request for data and the methodology used to provide a response to a valid request. We understand that MBS has been designed with business rules that reflect the Customer Transfer Code requirements and it is system functionality that enables the provision of an electronic response as required by the Code.</p> <p>Based on our discussions and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 3.8(2)(b)	
Compliance Manual Reference	14	14
Obligation Description	A network operator must provide the requested data under a valid data request in accordance with a specified timetable.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with Information Services Analyst and review of MBS records revealed that Western Power has system controls and processes in place to provide requested data under a valid data request.</p> <p>Sample based testing confirmed that Western Power provided data in an electronic format as a response to valid requests it received from a retailer within the prescribed timeframes as tabled under clause 3.8(2)(b) of the Electricity Industry Customer Transfer Code.</p> <p>Based on our sample testing, walkthrough performed of the procedures for the provision of data upon receipt of a valid data request, we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 3.8(3)	
Compliance Manual Reference	15	15
Obligation Description	A network operator must electronically notify the retailer of the most likely exit points to which a data request relates, up to a maximum of 10, if a retailer submits a data request under clause 3.4 and the network operator has not allocated a UMI for the exit point and it is unable to determine a single exit point to which the data request relates.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with Information Services Analyst revealed that upon receipt of a valid data request, MBS automatically provides a retailer of the exit points to which it is most likely that the data request relates. MBS functionality has been designed to provide a retailer with up to the identified maximum of likely exit points.</p> <p>Sample based testing confirmed that Western Power electronically notified the retailer of the UMI (exit points) in response to a retailer's valid data request submission and that the responses were determined to be supplied within the timeframe specified.</p> <p>Based on our discussions we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 3.10(1)	
Compliance Manual Reference	20	20
Obligation Description	A network operator must not charge for the provision of standing data.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Interval Metering Analyst and review of the MBS revealed that the MBS is configured to provide standing data automatically through the Western Power Metering Services Centre Web Portal.</p> <p>We performed a walkthrough of the process and inspected the provision of standing data and noted that Western Power did not charge for the provision of standing data. Enquiries made with the Interval Metering Analyst of the MBS system functionality surrounding the provision of standing data and review of the charges preferred to a retailer indicated that it did not have a set of business rules that initiated a charge for this compliance manual obligation.</p> <p>Based on our discussions, walkthrough and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 3.10(2)	
Compliance Manual Reference	21	21
Obligation Description	A network operator must not charge more for historical consumption data than the defined amounts.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Interval Metering Analyst and review of the MBS revealed that the MBS is configured to provide historical consumption data automatically through the Western Power Metering Services Centre Web Portal.</p> <p>We performed a walkthrough of the process and inspected the provision of standing data and noted that Western Power did not charge for the provision of historical data. Enquiries made with the Interval Metering Analyst of the MBS system functionality surrounding the provision of historical consumption data and review of charges preferred to a retailer, we did not observe any charges that related to the provision of historical consumption data.</p> <p>Based on our discussions, walkthrough and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 4.1	
Compliance Manual Reference	22	22
Obligation Description	A network operator must publish a customer transfer request form which must comply with Annex 3 of the Electricity Industry Customer Transfer Code.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Review of the forms made available on Western Power's Metering Services Centre Web Portal, specifically the customer transfer request form and we found that the form complied with Annex 3 of the Electricity Industry Customer</p> <p>Discussions held with the Interval Metering Analyst revealed that the prior to a form being made available on its web portal, it is reviewed to ensure that it meets the requirements specified within the relevant code, Act or regulations.</p> <p>Based on our discussions and review of the customer transfer request form we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 4.9(1)	
Compliance Manual Reference	31	31
Obligation Description	A network operator must object to a customer transfer request in certain circumstances as set out in clause 4.9(1) of the Electricity Industry Customer Transfer Code.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Interval Metering Analyst and review of the business rules revealed that the MBS has been configured to object a customer transfer request in circumstances specified in clause 4.9(1) of the Electricity Industry Customer Transfer Code.</p> <p>Sample based testing of CTR from retailers through the metering services web portal confirmed that MBS had objected those customer transfer request in accordance with the circumstances specified within clause 4.9(1) of the Electricity Industry Customer Transfer Code.</p> <p>Based on our discussions, sample based testing and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 4.9(2)	
Compliance Manual Reference	32	32
Obligation Description	A network operator must not object to a customer transfer request otherwise than in accordance with clause 4.9(1) of the Electricity Industry Customer Transfer Code.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Interval Metering Analyst, MBS had been configured to object customer transfer requests in those circumstances specified under clause 4.9(1) of the Electricity Industry Customer Transfer Code.</p> <p>Sample based testing of CTR from retailers confirmed that Western Power only objected to those customer transfer requests which met the circumstance criteria as specified in the Electricity Industry Customer Transfer Code.</p> <p>Based on our discussions, sample based testing and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 4.9(3)	
Compliance Manual Reference	33	33
Obligation Description	A network operator that objects to a customer transfer request must give an electronic notice detailing specified information to a retailer within the timeframe prescribed.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Metering Analyst and review of the MBS functionality identified that Western Power have controls and processes in place to ensure notifications are provided to the retailer if the CTR is rejected.</p> <p>A walkthrough of the process revealed that MBS automatically provides a notification for the reason the CTR has been rejected. This automatic notification function of the MBS provides feedback on the same day the CTR was submitted.</p> <p>Sample based testing confirmed that Western Power automatically provides a notification and reason for the rejection within the prescribe timeframe of this licence condition.</p> <p>Based on our discussions, walkthrough and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 4.9(6)	
Compliance Manual Reference	34	34
Obligation Description	A network operator and retailer must agree to a revised nominated transfer date in certain circumstances.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Metering Analyst revealed the different circumstances where a nominated transfer data needs to be revised and it was determined that the Analyst and Account Managers would liaise directly with customers to nominate a revised transfer date.</p> <p>A walkthrough of the processes, sample based testing of rejected CTRs and review of email correspondences pertaining to revised transfer dates, confirmed that Western Power and the retailer had agreed to revised nominated transfer dates.</p> <p>Based on our discussions, process walkthrough and review of correspondence we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 4.10(1)	
Compliance Manual Reference	35	35
Obligation Description	A network operator must take certain action in accordance with a defined timetable following the receipt of a valid customer transfer request, subject to clauses 4.10(2) and 4.10(3) of the Electricity Industry Customer Transfer Code and using all reasonable endeavours to affect the transfer.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Metering Analyst revealed that Western Power has controls and processes in place to ensure compliance with this compliance manual obligation.</p> <p>We performed a walkthrough of the process and identified that meter reads are conducted at midnight on the night before the nominated transfer date, however for type 5 meter reads, the meter will be read the day after the transfer. Type 5 meter reads are meters which are required to be manually read, and cannot be remotely read as per Types 1 - 4.</p> <p>Sample based testing confirmed that Western Power provides electronic notifications on the same business day and that valid customer transfer request noted that a meter read was performed in accordance with the timeframes prescribed in accordance with the Electricity Industry Customer Transfer Code.</p> <p>Based on our discussions, process walkthrough and sample based testing we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 4.10(2)	
Compliance Manual Reference	36	36
Obligation Description	A network operator must take certain action if it considers that it is unlikely to be able to meet its obligations under clause 4.10(1) of the Electricity Industry Customer Transfer Code within the defined timetable.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Metering Analyst and walkthrough of the procedures revealed that Western Power has MBS systems and processes in place to electronically notify retailers in the event that the timeframes cannot be met.</p> <p>Discussions with the Metering Analyst revealed that generally, customer transfers will occur on the nominated date. However, if it the transfer request can not be facilitated on the nominated date MBS will automatically notify retailers of a new proposed timetable and its reason in accordance with the timeframes specified under clause 4.10(1) of the Electricity Industry Customer Transfer Code.</p> <p>Sample based testing confirmed that electronic notifications had been sent within 1 business day notifying retailers of the change to the nominated transfer date as specified in the Code.</p> <p>Based on our discussions, process walkthrough and sample based testing we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 4.10(3)	
Compliance Manual Reference	37	37
Obligation Description	In certain circumstances a network operator must electronically notify the retailer of the most likely exit points to which a customer transfer request relates, up to a maximum of 10, if the network operator has not allocated the exit point a UMI and it is unable to determine a single exit point to which the customer transfer request relates, within the specified timeframe.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Metering Analyst and the Information Services Analyst revealed that Western Power has processes in place to enable the identification of exit points if the exit point did not have a UMI.</p> <p>Enquiries revealed that all exit points are provided with a UMI through an automated function within the MBS.</p> <p>Sample based testing confirmed that each exit point had been assigned a UMI and review of the sampled CTRs noted no exceptions relating to an exit points not containing a UMI.</p> <p>Based on our discussions and sample based testing we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer clause 4.11(1)	
Compliance Manual Reference	38	38
Obligation Description	A transfer may only occur on a day the contestable customer's meter is actually read.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Metering Analyst and review of the MBS functionality revealed that Western Power have MBS processes in place to automatically schedule meter reads on the same date that the customer transfer is to be made. The process is facilitated by the use of online forms and system controls.</p> <p>We performed a walkthrough of the process and observed that the MBS automatically schedules the meter read date to the same date that the customer transfer is to be made.</p> <p>Sample based testing confirmed that customer transfers only occurred on the day that the meter is read and an automated notification is provided to the relevant parties of when the transfer status has been completed within MBS.</p> <p>Based on our discussions, walkthrough and sample based testing we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 4.11(3)	
Compliance Manual Reference	39	39
Obligation Description	A network operator and the retailer must take certain action if the contestable customer's meter is not read on the nominated transfer date.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Metering Analyst and review of the MBS functionality revealed that Western Power has processes and controls in place to ensure compliance with this manual reference obligation.</p> <p>We performed a walkthrough of the process and observe that if the meter is not read on the nominated transfer date, Western Power will liaise with the incoming retailer to set a new nominated transfer date as close as possible to the initial nominated date.</p> <p>Sample based testing confirmed that the MBS generated electronic notifications to notify the current retailer that the meter was not read on the nominated transfer date and of the new nominated transfer date.</p> <p>Based on the discussion, walkthrough and sample based testing we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 4.12(3)	
Compliance Manual Reference	40	40
Obligation Description	The parties to an access contract must negotiate in good faith any necessary amendments to the access contract arising from certain circumstances.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<p>Through a walkthrough of the process in a scenario where an access contract is to be amended, we confirmed that Western Power undertakes best endeavours to negotiate in good faith any necessary amendments to the access contract arising from any consequential amendments noted in a process is in place to support compliance with this compliance manual reference.</p> <p>Discussion with the Metering Analyst revealed that there were no access contracts modified during the audit period.</p> <p>Based on the discussion, walkthrough of the processes in place, we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 4.13	
Compliance Manual Reference	41	41
Obligation Description	A network operator must within two business days after the transfer date give an electronic notice of the transfer and the transfer date to the incoming retailer, the previous retailer and, if applicable, the independent market operator.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Metering Analyst and review of MBS functionality revealed that Western Power have inbuilt notifications in the MBS with automatic system process to notify the Code participants in accordance with this manual reference obligation.</p> <p>We performed a walkthrough of the process and conducted sample based testing, we were able to confirm that the Western Power Metering Service Web Portal provided instant notification to the incoming and previous retailer and the where applicable the independent market operator. The notification is sent once the transfer status changes to 'Complete' in the MBS.</p> <p>Based on our discussions, walkthrough and sample based testing we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 4.14	
Compliance Manual Reference	42	42
Obligation Description	A network operator must, following a transfer, do all that is necessary to ensure that charges up to the transfer time are paid by or charged to the previous retailer and charges from the transfer time are paid by or charged to the incoming retailer.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Metering analyst and Readings Management Administrator revealed that Western Power have processes and controls in place to ensure compliance with this manual reference obligation.</p> <p>Through a walkthrough of the process we determined that a meter read is taken on the nominated customer transfer date and recorded on the MBS prior to a customer transfer. We noted that on completion of a customer transfer the customer's billing details for the metering point is changed from the current to incoming retailer. The process enables for Western Power to direct charges to be paid up to the transfer time to the previous and incoming retailers.</p> <p>Based on our discussions and process walkthrough we have concluded that there are adequate and effective controls in place to support compliance this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 4.15	
Compliance Manual Reference	43	43
Obligation Description	In the case of a transfer to reverse an erroneous transfer, a network operator and all affected retailers (and the independent market operator if applicable) must act in good faith to ensure that the rights and obligations of the affected contestable customer are as they would have been had the erroneous transfer not occurred.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Metering Analyst and review of the MBS revealed that there were system controls and processes in place to identify an error and to reverse an erroneous transfer in accordance to the requirements of the manual reference obligation.</p> <p>We performed a walkthrough of the process and concluded that the MBS identifies the error customer transfer and were promptly followed up by both the Metering Analyst and System Support staff who were responsible to make the necessary changes to the metering route and MV90 file.</p> <p>Discussions with the Metering Analyst revealed that there were 2 instances of error transfers within the audit period. We have obtained evidence of the communication log that evidence the process identified during the walkthrough to reverse an erroneous transfer.</p> <p>Through the review of MBS records and communication logs, we confirmed that the customer's rights and obligations were not affected by the erroneous transfer because data records and details were returned to the state prior to customer transfer.</p> <p>Base on our discussions and walkthrough we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 5.1(1)	
Compliance Manual Reference	46	46
Obligation Description	A network operator must submit communication rules to the Authority within six months after the commencement of the Electricity Industry Customer Transfer Code.	
Reporting Type	NR	
Compliance Rating	N/R	
Audit Observations	<p>Discussion with the Metering Analyst revealed that the Communication Rules were developed in 2005 in accordance with the obligations from the Electricity Industry Metering and Customer Transfer Codes. Enquiries revealed that there had been no changes to the Communication Rules during the audit period.</p> <p>Western Power has communication rules published on the Western Power web site. The rules are provided in accordance with Part 6 of the Electricity Industry Metering Code 2005 (Metering Code) and Part 5 of the Electricity Industry Customer Transfer Code 2004 (Customer Transfer Code).</p> <p>The Western Power communication rules came into operation in 2005 following their approval by the Economic Regulation Authority.</p> <p>Based on our enquiries and review of documentation we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 5.1(3)	
Compliance Manual Reference	47	47
Obligation Description	A network operator must take certain action before submitting the communication rules to the Authority.	
Reporting Type	NR	
Compliance Rating	N/R	
Audit Observations	<p>Through our discussions with the Metering Branch Manager and review of the approval notice from the Authority in February 2006, Western Power had undertaken the actions before submitting the communication rules to the Authority.</p> <p>Further, there has been no change to the communication rule since they were approved by the Authority.</p> <p>Based on our enquiries and review of documentation, Western Power had processes in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 5.1(4)	
Compliance Manual Reference	48	48
Obligation Description	A network operator and a retailer must comply with approved communication rules.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Through our discussions with the Metering Branch Manager Western Power's MBS functional specifications address the key processes and intent of the communication rules.</p> <p>The Build Pack defines the procedures, processes and methods used to communicate between the Western Power and retailers.</p> <p>We reviewed a sample of B2B transactions that relate to the requirements of the communication rules and did not find any exceptions.</p> <p>Based on our enquiries and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 6.2	
Compliance Manual Reference	49	49
Obligation Description	A licensee's notice in relation to a data request or customer transfer request must identify the exit point to which it relates.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with Information Services Analyst revealed that all exit points have been allocated a NMI.</p> <p>Sample based testing confirmed that each meter have a NMI and that no meters with unallocated exit points were found.</p> <p>Based on our discussions and sample based testing we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 6.3(1)	
Compliance Manual Reference	50	50
Obligation Description	A network operator must use its reasonable endeavours to ensure that a retailer can give it a notice by post, facsimile or electronic communication and notify the retailer of a telephone number for voice communication.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<p>Through discussions with the Metering Analyst, review of Western Power's website and Metering Portal, we determined that retailers can give notice by post, facsimile or electronic communication.</p> <p>A walkthrough of the Metering Service Centre Web Portal and communication process confirmed that Western Power notifies the retailer of a telephone number for voice communication.</p> <p>Based on our discussions and walkthrough we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 6.3(2)	
Compliance Manual Reference	51	51
Obligation Description	A network operator must notify each retailer of its initial contact details, and any amended contact details at least three business days before the change takes effect.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<p>Discussions with the Metering Analyst revealed that if contact changes were to occur, Western Power will electronically notify each retailer of its amended contact details. Enquiries revealed that there had been no changes to the initial contact details during the audit period.</p> <p>Further, Western Power's Account Managers in Customer Solutions Branch would provide any changes to the contact details to the retailers.</p> <p>Based on our discussions and enquiries we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code clause 6.6	
Compliance Manual Reference	54	54
Obligation Description	A network operator or a retailer must send required electronic communications to the applicable electronic communication address, in accordance with Annex 6.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Metering Analyst revealed that Western Power communication process and controls is base on the communication rules in accordance with the Customer Transfer Code.</p> <p>Enquiries and sample based testing confirmed that when Western Power sends an electronic communication, the electronic communication sent consists of an adequate information format, signatures and location of the sender.</p> <p>Sample based testing of electronic communication confirmed that Western Power has automated response messages. These includes automatic notifications for:</p> <ul style="list-style-type: none"> • Metering Services Web Portal transactions; and • Western Power staff email communications i.e. rejection notification if email is sent to an invalid address or could not be sent. <p>Based on our discussions and sample based testing we have concluded that there were adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code Annex 1	
Compliance Manual Reference	60	60
Obligation Description	A network operator's request for standing data must require a retailer to provide certain information.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Information Services Analyst revealed that Western Power standing data request forms are designed in accordance with the Electricity Industry Customer Transfer Code Annex 1. The standing data request forms prompt retailers to provide information in accordance with the Customer Transfer Code. Further, MBS business rules have been developed to validate standing data requests.</p> <p>We performed a review of the procedures maintained by Western Power's Build Pack and Metering Services Centre Web Portal User Guide and determined the existence of the requirement for the alignment of standing data request form to the Customer Transfer Code Annex 1.</p> <p>We performed a walkthrough of the process and upon inspection of the standing data request form available on the Web Portal, we confirmed that Western Power's request for standing data requires a retailer to provide information specified within the Customer Transfer Code. If a retailer does not provide the specified information, MBS will not allow the retailer's request for standing data to proceed.</p> <p>Based on our discussions, walkthrough and review of documentation, we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code Annex 2	
Compliance Manual Reference	61	61
Obligation Description	A network operator's request for historical consumption data must require a retailer to provide certain information.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Information Services Analyst revealed that Western Power have forms designed to meet the requirements identified in Annex 2 of the Electricity Industry Customer Transfer Code. The MBS functionality has a set of business rules which governs the provision of historical transaction consumption data request and requires retailers to provide the specified information and procedures are documented in the Western Power's Build Pack and Metering Services Centre Web Portal User Guide.</p> <p>We performed a review of the procedures maintained by Western Power's Build Pack and Metering Services Centre Web Portal User Guide and determined the existence of the requirement for the alignment of standing data request form to the Customer Transfer Code Annex 2.</p> <p>We confirmed that Western Power's request for historical data requires a retailer to provide certain information, if not, the system will not allow the retailer's request for standing data to proceed.</p> <p>Based on our discussions, walkthrough and review of documentation, we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code Annex 3	
Compliance Manual Reference	62	62
Obligation Description	A network operator's customer transfer request form must require a retailer to provide certain information.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Information Services Analyst and review of the CTR form revealed that Western Power has designed the form to meet the requirements of Annex 3 of the Electricity Industry Customer Transfer Code. Further as the form is electronic, MBS has inbuilt functionality that requires a retailer to provide the specified information as determined by the Customer Transfer Code.</p> <p>Our review of the Metering Services Centre User Task Manual confirmed the requirement for the CTR form to align with the Customer Transfer Code.</p> <p>We performed a walkthrough of the process and upon inspection of the CTR form available on the Web Portal, we confirmed that Western Power's request for customer transfer must require a retailer to provide certain information. If a retailer does not provide the specified information, MBS will not allow the retailer's CTR to proceed.</p> <p>Based on the discussions, walkthrough and review of documentation, we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code Annex 4 clause A4.1	
Compliance Manual Reference	63	63
Obligation Description	A network operator must provide certain information, if available, to a retailer who submits a request for standing data.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Information Services Analyst revealed that through the MBS, Western Power automatically provides the required information in response to a valid standing data request form.</p> <p>We performed a walkthrough of the process for the provision of standing data and conducted sample based testing, we confirmed that the specified standing data information was provided the information as required to the retailer upon receipt of a valid standing data request.</p> <p>Based on our discussions and walkthrough of the procedures for the provision of standing data to a retailer, we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code Annex 4 clause A4.2	
Compliance Manual Reference	64	64
Obligation Description	A network operator must provide certain metering data, if available, in a prescribed manner to a retailer who submits a request for historical consumption data.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Information Services Analyst revealed that through the MBS, Western Power automatically provides the required information in response to the validated request for historical consumption data forms.</p> <p>Sample based testing of historical consumption data request confirmed that the historical consumption data were provided through the MBS on the following business day.</p> <p>Based on our discussions, walkthrough of the procedures for the provision of historical consumption data and sample based testing we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code Annex 5 clause A5(5)	
Compliance Manual Reference	65	65
Obligation Description	A network operator must respond to a request from a retailer for a UMI and checksum for an exit point within one business day of receiving a retailer's request.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Information Services Analyst and review of the MBS functionality revealed that, Western Power has procedures, processes and systems in place to ensure compliance with this compliance manual reference obligation.</p> <p>We performed a walkthrough of the process to enable understanding and confirm that MBS automatically generates a response to a request from a retailer for a UMI and checksum for an exit point.</p> <p>Sample based testing determined that the UMI and checksum were provided to the retailer within 1 business day of receiving a retailer's request.</p> <p>Based on our discussions, sample based testing and review of documentation provided, we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code Annex 5 clause A5(6)	
Compliance Manual Reference	66	66
Obligation Description	A network operator must provide the most likely matches to the retailer, up to a maximum of 99, if a request does not return a single UMI and checksum.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Information Services Analyst and review of MBS functionality revealed that, Western Power has processes and system in place to ensure compliance with this compliance manual reference obligation.</p> <p>Through the review of MBS functionality, we confirmed that a retailer has the capability to request Western Power to provide discovery information for a request made by reference to a meter number or service address. If a request made by a retailer does not return a UMI, Western Power is able to facilitate through the automated functionality developed within MBS the provision of the most likely matches to the retailer up to a maximum of 99 likely matches.</p> <p>Based on our discussions and review of documentation we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code Annex 5 clause A5(7)	
Compliance Manual Reference	67	67
Obligation Description	A network operator must, unless otherwise advised by the retailer, provide the UMI and checksum for the relevant exit point if a request returns a single UMI and checksum.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Information Services Analyst and review of MBS functionality revealed that Western Power has processes and systems in place to ensure compliance with this compliance manual reference obligation.</p> <p>We performed a walkthrough of the process for the provision of a UMI and checksum to a retailer and identified that the data was provided through UMI discovery within the Western Power Metering Services Web Portal. The UMI and checksum for the relevant exit point could be viewed on the Web Portal from the NMI (UMI) Discovery Request screen.</p> <p>Sample based testing confirmed that Western Power provides the UMI and checksums for the relevant exit point if a request returns a single UMI and checksum.</p> <p>Based on our discussions, sample based testing and review of documentation we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code Annex 6 clause A6.2(a)	
Compliance Manual Reference	68	68
Obligation Description	A network operator and a retailer must use reasonable endeavours to ensure that its information system on which electronic communications are made is operational 24 hours a day and 7 days a week.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Information Services Analyst revealed that Western Power have processes and controls by system backups and MBS Disaster Recovery Plans to facilitate compliance with this manual reference obligation.</p> <p>Through enquiries with the Services Analyst we found that there were no instances of system unavailability during the audit period. In the event of a disaster, Western Power has business continuity plans in place which has identified the requirement to ensure that electronic communications are made operational 24 hours a day, 7 days a week and review of the disaster recovery plans noted that Western Power has identified its ability to place the disaster recovery plan into action if required and facilitate the requirement of undertaking reasonable endeavours to ensure the information system on which the electronic communications are made is operational as required by Annex 6 clause A6.2(a) of the Electricity Industry Customer Transfer Code.</p> <p>Based on our discussions, enquiries and documentation review, we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code Annex 6 clause A6.2(b)	
Compliance Manual Reference	69	69
Obligation Description	A network operator and a retailer must establish a mechanism to generate an automated response message for each electronic communication (other than an automated response message) received at the electronic communication address.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Information Services Analyst revealed that Western Power has established functionality within MBS to generate an automated response for each electronic communication received at the electronic communication address.</p> <p>We performed a walkthrough of the process which were responsible for the generation of an automated response message for each electronic communication received and confirmed that upon receipt of an electronic communicated message an acknowledgement is provided to the message originator.</p> <p>We performed a test enquiry by entering contact details into the electronic communication form and noted that an automated response message was received acknowledging the enquiry.</p> <p>Based on our discussions and walkthrough, we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code Annex 6 clause A6.6	
Compliance Manual Reference	70	70
Obligation Description	The originator of an electronic communication must identify itself in the communication.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Information Services Analyst revealed that Western Power staff include the sender's name, position, email and contact address in the their email signature block.</p> <p>Sample based testing confirmed that the sender's identification is provided in the communication. Electronic signatures and information contained within the signature block are established by Western Power's IT services to facilitate identification of the originator of the communication. In the event that the email is an automated response, Western Power identifies itself within the email address details of which are made known by Western Power to those parties with which Western Power communicates.</p> <p>Based on our discussions and sample based testing, we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	
Obligations Under	Electricity Industry Customer Transfer Code Annex 6 clause A6.7	
Compliance Manual Reference	71	71
Obligation Description	The originator of an electronic communication must use reasonable endeavours to adopt a consistent data format for information over time, to facilitate any automated processing of the information by the addressee.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Information Services Analyst revealed that Western Power have a process in place to ensure a consistent data format for information sent through electronic communication.</p> <p>We inspected electronic communications sent by metering staff to retailers to confirm that efforts have been made to follow a consistent format facilitates any automated processing of the information by the addressee. Western Power has established communication guidelines and protocols to ensure a consistent data format for information sent to the addressee.</p> <p>Based on our discussions and inspections we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 18.1 Transmission Licence condition 15.1	
Obligations Under	Electricity Industry Act section 13(1)	
Compliance Manual Reference	81	81
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<p>The Risk and Compliance Branch advised reporting requirements are monitored through ongoing communications with the Authority and through a regulatory calendar and work programs.</p> <p>The engagement of the current performance audit occurred within 24 months of the previous audit. The Authority had approved the current auditors.</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 19.1 Transmission Licence condition 16.1	
Obligations Under	Electricity Industry Act section 14(1)(a)	
Compliance Manual Reference	82	82
Obligation Description	A licensee must provide for an asset management system.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Asset Business Systems Manager and walkthrough of processes revealed that Western Power maintains and manages an asset management system.</p> <p>Our review noted that Western Power has an Asset Management Policy, Distribution Asset Management Plan and Transmission Asset Management Plan and performs an independent review of the effectiveness of its asset management system to monitor and manage its asset management system. Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 19.1 and 19.2 Transmission Licence condition 16.1 and 16.2	
Obligations Under	Electricity Industry Act section 14(1)(b)	
Compliance Manual Reference	83	83
Obligation Description	A licensee must notify details of the asset management system and any substantial changes to it to the Authority.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<p>Through our discussions with the Asset Business Systems Manager revealed that there have not been any substantial changes to the asset management system.</p> <p>Our review confirmed that if there were any changes to the asset management system, Western Power had processes in place to inform the Authority.</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 19.3 Transmission Licence condition 16.3	
Obligations Under	Electricity Industry Act section 14(1)(c)	
Compliance Manual Reference	84	84
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<p>The Risk and Compliance Branch advised reporting requirements are monitored through ongoing communications with the Authority and through a regulatory calendar and work programs.</p> <p>Our review of correspondence confirmed that the Authority was provided a report on the effectiveness of Western Power's asset management system in April 2010, which was within 24 months of the previous audit (June 2008). The review was undertaken by an independent expert (Lloyds Register).</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 4.1 Transmission Licence condition 4.1	
Obligations Under	Electricity Industry Act section 17(1)	
Compliance Manual Reference	85	85
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<p>The Risk and Compliance Branch is responsible for receiving notification for payment and sending confirmation of payment of the prescribed licence fee.</p> <p>Our review revealed that the Risk and Compliance Branch have reminders set up within Lotus Notes to trigger the payment of the licence fees. Sample based testing revealed that the licence fee was paid within the prescribed timeframe.</p> <p>Based on our enquiries and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Act section 31(3)	
Compliance Manual Reference	86	86
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<p>Enquiries made with the Network Operations Branch revealed the Western Power has established number of processes in place including the ability to deploy emergency response generators to facilitate the restoration of supply of electricity to a customer.</p> <p>Walkthrough conducted with Network Operations Branch of the network interruption to full restoration (Fault Process) revealed that Western Power has plans in place 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.</p> <p>Sample based testing of interruptions revealed that Western Power had deployed ERGs to reduce the effect of an interruption to the affected area and its customers.</p> <p>Enquiries also revealed that Western Power had provided an alternative supply of electricity to those areas that had been experiencing interruptions or a change in the quality of supply such as re-routing excess capacity from nearby distributors.</p> <p>Based on our enquiries, review of documentation and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Act section 41(6)	
Compliance Manual Reference	87	87
Obligation Description	A licensee must pay the costs of taking an interest in land or an easement over land.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Our enquiries with the Environment, Community Engagement and Approvals Branch and walkthrough for managing payments for interests in land or easement over land revealed that Western Power has mechanisms in place to determine whether an easement over land is required.</p> <p>Western Power only secures an easement in land for power lines that operate 200kV and above as required by the Energy Operators (Power) Act 1979. Currently, Western Power secure easement for power lines that operate more than 132kV. No easements are secured or compensation is paid for distribution lines. Further, Western Power acquires land to meet its operational needs for facilities such as substations, which is achieved through a forward planning process.</p> <p>Our review noted that Western Power provides a draft standard easement document and copies of the survey plan to the landowner if the construction of the power line affects the landowner. Western Power will determine the compensation amount based on the assessment from the Valuer General's Office.</p> <p>An offer of compensation is made to the landowner, who is also provided a copy of the Valuer General's Office report. Western Power negotiates and agrees the compensation amount with the landowner. The amount is subsequently paid to the landowner.</p> <p>Based on our enquiries and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Act section 62(1)(b)	
	Electricity Industry Act section 64(2)	
	Electricity Industry Act section 65(d)	
Compliance Manual Reference	90, 91 & 92	90, 91 & 92
Obligation Description		
90	Electricity Networks Corporation and Regional Power Corporation must comply with a direction given by the Coordinator in relation to a draft extension and expansion policy.	
91	Electricity Networks Corporation and Regional Power Corporation must comply with a direction given by the Coordinator in relation to an amendment to an extension and expansion policy.	
92	Electricity Networks Corporation and Regional Power Corporation must implement arrangements set out in an approved extension and expansion policy.	
Reporting Type	NR	
Compliance Rating	N/R	
Audit Observations	<p>Discussions with the Regulation Branch revealed that the Coordinator has not required Western Power to produce a replacement extension and expansion policy during the audit scope period.</p> <p>Our review identified that Western Power submitted a draft Extension and Expansion Policy to the Coordinator on 26 February 2007. However, in response, on 23 August 2007 the Coordinator notified Western Power that the organisation was not required to produce a replacement extension and expansion policy during the audit scope period.</p> <p>The draft Extension and Expansion Policy submitted to the Coordinator by Western Power, and the corresponding response from the Coordinator were obtained.</p>	

Recommendation	Nil.
----------------	------

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Act section 115(1)	
Compliance Manual Reference	95	95
Obligation Description	A licensee that is a network service provider or an associate of a network service provider, in relation to network infrastructure covered by the Code, must not engage in conduct for the purpose of hindering or prohibiting access by any person to services in accordance with the Code, the making of access agreements or any particular agreement in respect of those facilities, or the access to which a person is entitled under an access agreement or a determination made by way of arbitration.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<p>Through discussions with the Team Leader Networks Division and Access Solutions Manager, Customer Solutions Branch, we noted that Western Power has not engaged in conduct for the purpose of hindering or prohibiting access arrangements.</p> <p>Our review identified that Western Power has monitoring mechanisms in place to ensure that the organisation does not engage in conduct for the purpose of hindering or prohibiting access arrangements.</p> <p>We noted that Western Power did not receive any complaints during the audit scope period in relation to conduct prohibiting or hindering access arrangements.</p> <p>Based on our enquiries and review of documentation, we have concluded that there were adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Act section 115(2)	
Compliance Manual Reference	96	(No old reference as it is new)
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	N/A	
Audit Observations	<p>Discussions with the Team Leader Networks Division and Access Solutions Manager, Customer Solutions Branch revealed that Western Power is a network service provider, and not a person/associate of a person that has access to services under an access agreement.</p> <p>Based on our enquiries, we have concluded that this manual reference obligation is not applicable.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry Act section 11	
Obligations Under	Distribution Licence condition 15.2 or 15.5 Transmission Licence condition 12.2 or 12.5	
Compliance Manual Reference	103	103
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Standards, Policy & Data Quality Branch Manager and review of the Data Management Information Pack document revealed that Western Power has processes in place for updating the asset management system due to an expansion or reduction of Western Power's distribution and transmission network.</p> <p>The Data Service team is responsible for the input and maintenance of computer data (specifically DFIS/DFMS and TPMS/TLS/TRIS) for projects or work covering design, installation, commission, construction, operation and maintenance of Western Power or customer facilities.</p> <p>Notification of work is provided to the Data Service team, who enters the jobs in the Data Services Works Management System, where the job can be tracked through to completion. Data is stored in DFIS/DFMS and TPMS/TLS/TRIS once the construction documents have been provided to the Data Services Team.</p> <p>Our enquiries with the Standards, Policy & Data Quality Branch Manager revealed that there was no expansion or reduction of Western Power's distribution or transmission network that was not provided in the asset management system.</p> <p>Further, Western Power undertakes an annual review of its Asset Management Plan, which outlines plans for network development, including asset upgrade and capacity expansion. The asset management plan directs the works forward into replacement, maintenance, contingencies for ensuring the asset management system is accurate.</p>	

	Based on our enquiries and review of documentation, we have concluded that there were adequate and effective controls in place to support compliance with this manual reference obligation.
Recommendation	Nil.

Licence Condition	Electricity Industry Act section 11	
Obligations Under	Distribution Licence condition 15.3 or 15.6 Transmission Licence condition 12.3 or 12.6	
Compliance Manual Reference	104	104
Obligation Description	A licensee must not expand the generating works, distribution systems or transmission systems outside the licence area.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Regulation Branch revealed that Western Power utilises the DFIS/DFMS and TPMS/TLS/TRIS as a monitoring mechanism, to ensure that the organisation does not expand the distribution systems or transmissions systems outside the licence area.</p> <p>In the event that Western Power seeks to expand the distribution or transmission system outside the licence area, the organisation is required to notify the Authority through the submission of project reports.</p> <p>Based on our enquiries and review, we have concluded that there were adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry Act section 11	
Obligations Under	Distribution Licence condition 16.1 Transmission Licence condition 13.1	
Compliance Manual Reference	105	105
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Our review of financial statements year ending 30 June 2010 and attestation by management noted accounting records are compliant with the Australian Accounting Standards Board Standards.</p> <p>Western Power have accounting policies and procedures in place to support that transactions are required to be conducted in accordance with the Australian Accounting Standards Board Standards</p> <p>Western Power financial statements are subject to an independent audit, which was undertaken by the Officer of the Auditor General and are available publicly on Western Power's web site.</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry Act section 11	
Obligations Under	Distribution Licence condition 17.4 Transmission Licence condition 14.4	
Compliance Manual Reference	106	106
Obligation Description	A licensee must comply with any individual performance standards prescribed by the Authority.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<p>Discussions with the Regulation Branch revealed that the Authority has not prescribed any individual performance standards on Western Power during the audit scope period.</p> <p>In the event that the Authority imposes individual performance standards on Western Power, the organisation has processes in place to address the individual performance standards.</p> <p>Based on our enquiries and review, we have concluded that this manual reference obligation is not applicable.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry Act section 11	
Obligations Under	Distribution Licence condition 18.2 Transmission Licence condition 15.2	
Compliance Manual Reference	107	107
Obligation Description	A licensee must comply, and require its auditor to comply, with the Authority's standard audit guidelines dealing with the performance audit.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>The requirement to comply with the Authority's audit guidelines is also explicitly stated in the request for tender for which the auditor is contractually bound after becoming the successful tender applicant.</p> <p>Comprehensive audit plans are provided to the Authority for approval. The performance audit cannot be commenced without audit plan approval from the Authority.</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry Act section 11	
Obligations Under	Distribution Licence condition 19.4 Transmission Licence condition 16.4	
Compliance Manual Reference	108	108
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>The requirement to comply with the Authority's standard guidelines is explicitly stated in the "Request For Tender" for which the expert is contractually bound after becoming the successful tender applicant.</p> <p>Comprehensive audit plans are provided to the Authority for approval. The asset management review cannot be commenced without audit plan approval from the Authority.</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry Act section 11	
Obligations Under	Distribution Licence condition 20.1 Transmission Licence condition 17.1	
Compliance Manual Reference	109	109
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<p>Interviews held with the Risk and Compliance Branch revealed that Western Power is a Western Australian Government owned entity, it is unlikely that they would be placed under external administration.</p> <p>However, discussions with Risk and Compliance Branch indicated that there is policy in place to advise the Authority of any significant change in status.</p>	
Recommendation	Nil.	

Licence Condition	Electricity Industry Act section 11	
Obligations Under	Distribution Licence condition 21.1 Transmission Licence condition 18.1	
	Distribution Licence condition 22.2 Transmission Licence condition 19.2	
	Distribution Licence condition 23.1 Transmission Licence condition 20.1	
Compliance Manual Reference	110, 111 & 112	110, 111 & 112
Obligation Description		
110	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.	
111	A licensee must publish any information it is directed by the Authority to publish, within the timeframes specified.	
112	Unless otherwise specified, all notices must be in writing.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Through discussions with the Regulation and Risk and Compliance Branch, we noted that Western Power has processes and controls in place to ensure that information is provided to the Authority, when required. This includes Western Power's utilisation and maintenance of a Register to track all correspondences exchanged between Western Power and the Authority.</p> <p>Sample based testing of notifications issued by the Authority, revealed that Western Power provided the Authority with the relevant information required, in the manner prescribed and within the timeframes specified. We also noted that all responses were in writing.</p> <p>Based on our enquiries and review, we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	

Recommendation	Nil.
----------------	------

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.2(1)	
Compliance Manual Reference	320	303
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Our review of the meters within the testing laboratory confirmed that the meters display, or permit access to a display of, the accumulated electricity production or consumption at the metering point in the manner prescribed.</p> <p>Western Power uses the approved Western Australia Electricity Market Metrology Procedure for Metering Installations as the metrology standard. The metrology procedure makes reference to the Australian Standards.</p> <p>Our review of Landis & Gyr certifications noted that the meters supplied are pattern approved under NMI M6, which meet Australian Standards. Further, the meters supplied had undergone a technical evaluation by Western Power to ensure the accumulation meters conform to the requirements specified in the applicable metrology procedure.</p> <p>Based on our enquiries and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.3(1)	
Compliance Manual Reference	321	304
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Through our review and discussions with the Metering Strategist, we confirmed that all meters have the capacity to download interval energy data through a portable hand held device or laptop computers.</p> <p>We noted that meters that have communications links, the interval energy data is downloaded remotely through MV90. Manually read meters have ports that allow probing devices to download interval data on to a laptop.</p> <p>Western Power uses the approved Western Australia Electricity Market Metrology Procedure for Metering Installations as the metrology standard. The metrology procedure makes reference to the Australian Standards.</p> <p>Our review of Landis & Gyr certifications, the meters supplied are pattern approved under NMI M6, which meet Australian Standards. Further, the meters supplied had undergone a technical evaluation by Western Power to ensure the meters have an interface compatible with the requirements specified in the applicable metrology procedure.</p> <p>Based on our enquiries and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.3(3)	
Compliance Manual Reference	322	305
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Through our discussions with the Metering Strategist, the current supplier of meters Landis & Gyr supplies the modems from a third party provider (Maxon Electronics Australia Pty Ltd). A certificate of conformance has been issued to Maxon which ensures the communications link complies with the telecommunications regulations, which makes reference to the Australian Standards.</p> <p>Further, our testing of metering installation with a communication link, confirmed that a MBS records the telephone line number to allow the interval energy data to be downloaded in the manner prescribed.</p> <p>Based on our enquiries and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.5(1) and (2)	
Compliance Manual Reference	323	306
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Our enquiries with Metering Strategist provided that Western Power has policies and procedures in place to govern the installation of meters for every connection point.</p> <p>Western has processes in place to ensure that a connection point has a metering installation. Our enquiries noted that a NMI has to be generated for every meter installation within MBS. Our review of the processes and testing of metering installations provided that there was a NMI for each connection point.</p> <p>Further, the meter tender specification in 2002 and the tender for an upgrade of direct connect meters in 2004 had a requirement of ensuring that all meters have the functionalities prescribed.</p> <p>The current supplier's (Landis & Gyr) meters had undergone a technical evaluation which incorporates the testing of those functionalities prescribed.</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.5(4)	
Compliance Manual Reference	325	308
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Through enquiries with the Metering Strategist, Western Power has processes and guidelines in place to ensure that the metering point for a revenue metering installation is located as close as practicable.</p> <p>Western Power has guidelines and work instructions that are in line with the Wiring Rules, WA Electrical Requirements, which correspond to AS/NZS 3000.</p> <p>Western Power undertakes inspections by electrical inspectors of those meters installed by approved electrical contractors under the contractor connect and services connect schemes on a sample basis to ensure the installation is accordance with the Wiring Rules, WA Electrical Requirements.</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.7	
Compliance Manual Reference	328	311
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Our enquiries with Metering Strategist indicated that all communication devices are compatible with the telecommunications network (Telstra) and comply with the all applicable State and Commonwealth enactments.</p> <p>The telecommunications that Western Power purchases include an A-tick mark , which means that the modems are compliant with the mandatory technical standards and can legally be connected to a telecommunications network</p> <p>A certificate of conformance with the Australian Standards has been provided by the supplier (Maxon) of modems.</p> <p>Further, Metering Strategist advised that the modems used on metering installations are tested for compatibility with telecommunications network.</p> <p>Based on our enquiries and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.8	
Compliance Manual Reference	329	312
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Through our enquiries with the Metering Strategist, we noted that all meters are required to have a seal as part of the original manufacture design. The seal is surrounded by panel, to prevent any interference or tampering. We also noted that CT and HV metering installations are contained within a locked panel box.</p> <p>Further, there is an investigation procedure if a meter has been tampered with i.e. if the seal is broken. Reports of suspected meter or service apparatus interference are generally received from members of public, electrical contractors, WA Police, AMRS or Western Power field staff. The Customer Inspection Revenue Protection team is responsible for undertaking and coordinating the investigation. The Meter & Service Apparatus Interference document provides guidance on the various signs of meter tampering.</p> <p>Based on our enquiries and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.9(3)	
Compliance Manual Reference	330	313
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Metering Branch indicated that through the metering management plan, Western Power undertakes a test of the metering installation to meet the requirements in Table 3 in Appendix 1 of the Electricity Industry Metering Code.</p> <p>Western Power undertook a test of class 0.2 meters and did not reveal any exceptions. The Metering Strategist revealed that the testing of the other class of meters will be undertaken this year in accordance with the metering management plan.</p> <p>Western Power uses the approved Western Australia Electricity Market Metrology Procedure for Metering Installations as the metrology standard. The metrology procedure makes reference to the Australian Standards.</p> <p>Further, the meters supplied had undergone a technical evaluation by Western Power to ensure the supply of meters meet the requirements for the type of metering installation specified in Table 3 of Appendix 1 of the Electricity Industry Metering Code.</p> <p>Based on our enquiries and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.9(7)	
Compliance Manual Reference	331	314
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Enquiries with the Metering Strategist and sample based testing of metering installations noted that Western Power installs, as a minimum, the accuracy requirements of Type 3 metering installation for CT/VT meters.</p> <p>Discussions with Metering Branch noted that through the metering management plan, Western Power undertakes a test of the metering installation to meet the requirements in Table 3 in Appendix 1 of the Electricity Industry Metering Code.</p> <p>Western Power undertook a test of class 0.2 meters and did not reveal any exceptions. The Metering Strategist revealed that the testing of the other class of meters will be undertaken this year in accordance with the metering management plan.</p> <p>Our review of Landis & Gyr certifications noted that the meters supplied are pattern approved under NMI M6, which meet Australian Standards. Further, the meters supplied had undergone a technical evaluation by Western Power as part of the tender in 2002 and the tender for an upgrade of direct connect meters in 2004 to ensure meters conform to the requirements specified in the applicable metrology procedure.</p> <p>Based on our enquiries and review we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.9(9)	
Compliance Manual Reference	332	315
Obligation Description	If compensation is carried out within the meter then the resultant metering system error must be as close as practicable to zero.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	Our enquiries with the Metering Strategist noted that Western Power does not carry out any compensation on its meters.	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.10	
Compliance Manual Reference	333	316
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Our review of the Australian Standards and enquiries with the Metering Strategist revealed that the programmable settings only refer to the display of whole numbers (“zero” to “nine”).</p> <p>All meters have the capability of displaying whole numbers and are capable of being reprogrammed to the tariff rate requested by the retailer.</p> <p>Our review of Landis & Gyr certifications noted that the meters supplied are pattern approved under NMI M6, which meet Australian Standards. Further, the meters supplied had undergone a technical evaluation by Western Power as part of the tender in 2002 and the tender for an upgrade of direct connect meters in 2004 to ensure meters conform to the requirements specified in the applicable metrology procedure.</p> <p>Based on our enquiries and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.11(2)	
	Electricity Industry Metering Code clause 3.11(3)	
Compliance Manual Reference	335 & 336	318 & 319
Obligation Description		
335	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.	
336	A Code participant who becomes aware of an outage or malfunction of a metering installation must advise the network operator as soon as practicable.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Our enquiries with the Metering Strategist provided that Western Power only replaces metering installation if an outage or malfunction occurs and therefore does not repair the metering installation.</p> <p>Discussions with the Metering Strategist provided that customers contact their retailers to provide notification to Western Power for meters that are not functioning or experiencing outages.</p> <p>Code Participants can make a request for a replacement of a meter through the market gateway or web portal. A service order will be issued through MBS and allocated to Metering Officers, AMRS or CFOs depending on the type of metering installation.</p> <p>Based on our enquiries and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.12(1)	
Compliance Manual Reference	337	320
Obligation Description	A network operator must ensure that each metering installation complies with, at least, the prescribed design requirements.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Our enquiries with the Metering Strategist noted that the design requirements only applied to CT and HV metering installations.</p> <p>We noted that metering officers have work instructions and guidelines in place as references to ensure that the metering installation complies with the prescribed design requirements.</p> <p>Further, Western Power undertakes post connect audits of each metering installation by different metering officers. Discussions with Metering Strategist provided that they were revising the processes to undertake audits on a sampling basis rather than auditing every installation.</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.12(2)	
Compliance Manual Reference	338	321
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Metering Strategist revealed that the WADC and the High Voltage Transmission and Generation Metering guidelines provides the requirements to ensure that instrument transformers installed by customers comply with the metrology procedure and the Australian Standards. The documents are used as a reference for any metering installations.</p> <p>Sample based testing of the completion advice on which the metering officer records the metrology of the instrument transformers in accordance with the requirements as specified in the metrology procedures.</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.12(3)	
Compliance Manual Reference	339	322
Obligation Description	A network operator must provide isolation facilities, to the standard of good electricity industry practice, to facilitate testing and calibration of the metering installation.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Metering Strategist provided that the every metering installation is required to have isolation facilities.</p> <p>The isolation facility is part of every metering installation design and drawing. The practice is in accordance with the WA Electrical Requirement guide which is aligned to AS/NZS 3000.</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.12(4)	
Compliance Manual Reference	340	323
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Our enquiries with the Metering Strategist and review of documentation provided that Western Power maintains drawings and supporting information detailing the metering installation for maintenance and auditing purposes.</p> <p>We noted that generic drawings are maintained for CT and HV metering installations on the Technical Information Management System. Further, the WADCM has drawings for direct connect metering installations. We obtained copies of the drawings for the metering installations specified above.</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.13(1)	
Compliance Manual Reference	341	324
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Our enquiries with the Metering Strategist provided that Western Power only install full check meters. Further, check meters only apply to HV metering projects.</p> <p>We noted that Western Power has a HV metering project process to determine if a check metering installation is required.</p> <p>Testing of metering installation during the audit period confirmed that the Western Power installed a full check meter in accordance with the prescribed requirements.</p> <p>Based on our enquiries and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.13(c)	
Compliance Manual Reference	342	325
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Metering Strategist provided that Western Power only install full check meters.</p> <p>We noted that metering officers use generic single diagrams as guidance to physically arrange the check meter installations, which are based on the AS/NZS 3000 and AS 2067 requirements.</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.13(4)	
Compliance Manual Reference	343	326
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Our enquiries with the Metering Strategist revealed that the specification of the revenue metering installation must be the same as the check metering installation. Further, the Metering Technical Requirements document provides guidance for metering officers in the manner in which the revenue meter and check must be installed to ensure that the meter measure the same load condition.</p> <p>Testing of metering installation during the audit period revealed that Western Power had installed revenue and check metering installation consistent with the prescribed requirements.</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.14(3)	
Compliance Manual Reference	344	327
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Our enquiries with the Metering Strategist revealed that Western Power metering officers do not undertake a metering installation if the CT and VT, which is installed by a customer, does not comply the prescribed requirements.</p> <p>Discussions with Metering Strategist noted that they will be able to identify the accuracy class based on the project technical information supplied by the Western Power Project Manager.</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.16(1)	
Compliance Manual Reference	345	328
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Our enquiries with the Metering Strategist and testing of metering installations confirmed that all meters have the facilities and functionality prescribed.</p> <p>The meter tender specification in 2002 and the tender for an upgrade of direct connect meters in 2004 had a minimum metrology requirement of ensuring that all meters have the facilities and functionality prescribed.</p> <p>The current supplier's (Landis & Gyr) meters had undergone a technical evaluation which incorporates the testing of those facilities and functionality prescribed.</p> <p>Based on our enquiries and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.16(2)	
Compliance Manual Reference	346	329
Obligation Description	A network operator must ensure that a Type 1 metering installation to Type 4 metering installation on the network includes a communications link.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Through our enquiries with the Metering Strategist and Market Transactions Team noted that the communications links are recorded within MBS against the type of installation.</p> <p>Communication links are primarily installed for CT and HV connection processes. A completion advice is sent from the metering officer to the Commercial Officer, based on the service order request for a meter install with communications link from the Project Manager. The completion advice records communication link set up and the associated line number. The Commercial Officer records the line number and installation type within MBS.</p> <p>Sample based testing of Type 1 to 4 metering installations revealed that a line number was recorded against the metering installation which confirmed that a communication link was installed.</p> <p>Based on our enquiries and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.20(1)	
	Electricity Industry Metering Code clause 3.20(3)	
Compliance Manual Reference	351 & 352	334 & 335
Obligation Description		
351	A network operator must, if reasonably requested by a Code participant, provide enhanced technology features in a metering installation.	
352	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.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	Our enquiries with the Metering Strategist revealed that Western Power has not received a request from a Code participant for enhanced technology features in a metering installation. Further, the model SLA does not provide a charge for enhanced technology features.	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.21(2)	
Compliance Manual Reference	354	337
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Metering Strategist and testing of metering installations noted that the meters had facilities for storing interval energy data.</p> <p>The meter tender specification in 2002 and the tender for an upgrade of direct connect meters in 2004 had a minimum metrology requirement of ensuring facilities have minimum storage capacity of 220 days for interval data.</p> <p>The current supplier's (Landis & Gyr) meters had undergone a technical evaluation which incorporates the testing of storing the interval energy data for the periods prescribed.</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.22	
Compliance Manual Reference	355	338
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Our enquiries with the Metering Strategist and review of documentation noted that Western Power has a licence agreement with Landis & Gyr for the use and accessing the metering software applicable (EMPWin).</p> <p>We noted that the Metering Infrastructure Team is responsible for programming and setting the parameters for all devices.</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.23(a)	
Compliance Manual Reference	356	339
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Our enquiries with the Metering Strategist revealed that the meters were installed with electronic buffers and relays.</p> <p>The current supplier's (Landis & Gyr) had undergone a technical evaluation which ensured meters have relays or electronic buffers.</p> <p>The requirement had been stipulated with the tender for the supply of meters in 2002 and the tender for an upgrade of direct connect meters in 2004.</p> <p>Our observation of the meter reference manual supplied by Landis & Gyr confirmed that meters had relays or electronic buffers.</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.25	
Compliance Manual Reference	358	341
Obligation Description	A network operator that operates and maintains a pre- payment meter on its network must operate and maintain the pre-payment meter in accordance with good electricity industry practice and, as far as reasonably practicable, minimise any departure from what the requirements of the Code would have been in respect of the pre-payment meter if clause 3.24 were deleted.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Our enquires with the Metering Strategist provided that the operation and maintenance of a pre-payment meter would be dealt in the same manner as other metering installations. The pre-payment meters would be subject to a replacement if a retailer has submitted a request for a change due to a malfunction or outage. Further, the pre-payment meters would be subject to testing under the metering management plan.</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 3.29	
Compliance Manual Reference	360	343
Obligation Description	A network operator must publish a list of registered metering installation providers, including the prescribed details, and at least annually, update the list.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Our enquiries with the Technical Administrator noted that a list of registered metering installation providers is published on Western Power' web site.</p> <p>The registered metering installation providers are only registered on ELIS once they have fulfilled certain criteria (Service Connect Scheme Guidelines and Contractor Connect Scheme Guidelines) including validation from Energy Safety's database of licensed electrical contractors (ELIS downloads latest update records from the Energy Safety Site daily).</p> <p>Western Power's website and MBS is interfaced with ELIS, which details any changes to registered metering installation providers. The web site is updated on a daily basis. We validated that the Western Power publishes a list of registered metering installation providers on its web site.</p> <p>Based on our enquiries and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 4.1(1)	
Compliance Manual Reference	361	344
Obligation Description	A network operator must establish, maintain and administer a metering database containing standing data and energy data for each metering point on its network.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Readings Management Administrator, Commercial Officers and the review of the MBS functionality indicated that Western Power have established a metering database, and have processes in place to maintain and administer a metering database containing standing data and energy data for each metering point on its network.</p> <p>Our review of two performance reports contained sufficient information that would facilitate monitoring compliance with the Metering Code. The performance standards are in accordance with the various service standard timeframes.</p> <p>Base on our discussions and review of documentation we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 4.1(3)	
Compliance Manual Reference	363	346
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Through our discussions with the IT Service Manager we observed that Western Power had developed a disaster recovery plan. Further, IT has a detailed Emergency Crisis Management Recovery Manual, which forms part of the Disaster Recovery Plan. This details the actions that IT Branch will undertake in the event of a crisis.</p> <p>Western Power has replicated the MBS database to an offsite location to ensure that it can rebuild the metering database within 2 business days and provide energy data to Code participants. Western Power undertakes testing of the disaster recovery plan on annual basis, which includes the testing of the replicate database, to ensure it can fulfil the requirements of this licence obligation. Our review of the Disaster Recovery Report confirmed that Western Power were able to replicate the MBS database within 2 business days after the day of any disaster.</p> <p>Based on our enquiries and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 4.2(1)	
Compliance Manual Reference	364	347
Obligation Description	A network operator must ensure that its registry complies with the Code and the prescribed clause of the market rules.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Readings Management Administrator and review of the MBS functionality, we determined that the MBS functional specifications have been configured against the Metering Code having inbuilt business rules, validation checks and data fields.</p> <p>We performed a walkthrough of the MBS and identified that adequate processes exist for data recording and that consumption data and historical data are recorded and maintained in the MBS.</p> <p>Based on our discussions and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 4.3(1)	
Compliance Manual Reference	365	348
Obligation Description	The standing data for a metering point must comprise at least the items specified.	
Reporting Type	2	
Compliance Rating		
Audit Observations	<p>Discussion with the Commercial Officer and review of the MBS functionality identified that the MBS has been configured with functional specifications, validation checks and specific data fields required by the Metering Code.</p> <p>Through inspection of the standing data for one metering point, we confirmed that the Metering Business System records the minimum information required by the Metering Code.</p> <p>Based on our discussions and inspection of standing data available we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 4.4(1)	
Compliance Manual Reference	366	349
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Commercial Officer confirmed that Western Power has a process in place to resolve a discrepancy of data held in the metering database.</p> <p>We performed a walkthrough of the process and determined that a MDV is raised by the Code participant for Western Power to action. The MDV is managed by the Readings Management Group Commercial Officers on a daily basis where the issue is either resolved on system and or by a field inspector to investigate the data discrepancy.</p> <p>Discussions with the Commercial Officer revealed that ongoing liaison occurs with Western Power and the Code participant through B2B processes, where the Commercial Officer will discuss data discrepancy issues with the Code participant directly to resolve issues.</p> <p>Based on our discussions and walkthrough of the process we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 4.5(1)	
Compliance Manual Reference	367	350
Obligation Description	A Code participant must not knowingly permit the registry to be materially inaccurate.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Readings Management Administrator, review of the MBS functional specifications and a walkthrough of the processes and controls in relation to the registry, we confirm that Western Power does not knowingly permit the registry to be materially inaccurate.</p> <p>Through enquiries and documentation review, we identified there is regular exception reporting, performance reports and security access restrictions in place to direct Western Power staff to comply with this licence condition.</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 4.6(1)	
Compliance Manual Reference	369	352
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Commercial Officer confirm that there was a process for Western Power to be notified of a change to or inaccuracy in an item of standing data by a Code Participant.</p> <p>We performed a walkthrough of the process and identified that there exist B2B processes where customer standing data can be automatically updated in addition to the availability of MDV request process if it concerns data issues.</p> <p>Sample based testing of valid notices received for a change to or inaccuracy in the standing data registry during the audit scope period, revealed that Western Power updated the registry and notified affected users in accordance with the licence condition.</p> <p>Based on our discussions, walkthrough and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 4.6(2)	
Compliance Manual Reference	370	353
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Readings Management Administrator and Commercial Officer confirmed that there is a process in place to follow up and action upon Code participant notifications. Reading Management Group will update the standing data details base on the notifications.</p> <p>Sample based testing of notifications received of a change to or inaccuracy in standing data during the audit scope period confirmed that Western Power conducted an investigation to determine whether the registry should be updated where applicable, the registry is updated where required and that the notification was provided to affected users in accordance with the licence condition.</p> <p>Based on our discussions and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 4.7	
Compliance Manual Reference	371	354
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Commercial Officer and the walkthrough of the process, we confirmed that there was a process to notify affected users for a metering point of the updated standing data.</p> <p>We observed that the affected users are notified upon closure of the service order once the registry is updated through the Metering Business System (MBS) instantly. The MBS functionality allows a notification to be sent once the service order has been completed.</p> <p>Sample based testing of notifications made to users in regard to the updates performed of registry confirmed that the date of the notifications is in accordance with the requirements of the licence condition.</p> <p>Based on our enquiries, sample based testing and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 4.8(3)	
Compliance Manual Reference	372	355
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Metering Strategist demonstrated that Western Power had established systems and processes to permit “read only” passwords for accessing the energy data at the metering points for users who supplies, purchases or generates electricity.</p> <p>The Customer Solutions Branch Account Managers obtains a request from a user for a read only password. The Account Managers submitted the request to the Reading Management Team, who would issue a service order to the Meter Infrastructure Team for creating and providing the read only password for the user. We also noted that the Metering Strategist would seek clarification with the Accounts Manager if the user holds an access contract.</p> <p>Based on our discussions and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 4.9	
Compliance Manual Reference	375	358
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Commercial Officer identified that the Metering Business System have been configured to retain data for 24 months from the date it was obtained, and subsequently archived for 5 years.</p> <p>Sample based testing of metering points confirmed that the energy data has been retained in the metering data base for the period and in the format prescribed in accordance with this manual reference obligations.</p> <p>Based on our discussions and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.1 (1)	
Compliance Manual Reference	376	359
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Readings Management Administrator revealed that Western Power has regular meetings with the relevant Code participants to negotiate metering service and requirements in connection with the negotiation of the SLA.</p> <p>Our enquiries made with the Commercial Officer revealed that during the period when Synergy was experiencing system issues, the problem would be discussed with Western Power to review or make exclusions where required for the SLA. We have reviewed electronic correspondence between Western Power and Synergy to confirm that reasonable endeavours have been taken to meet the requirements of this manual reference obligation.</p> <p>Our review of the SLA and discussions with the Readings Management Administrator revealed that there have been ongoing developments of a separate SLA with Synergy throughout the audit period. Enquiries made confirmed that, Western Power have facilitated discussions by holding meetings with key personnel from Western Power's Metering Services Branch and Synergy.</p> <p>Based on our enquiries and review we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.1(2)	
Compliance Manual Reference	377	360
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Readings Management Administrator revealed that Western Power may provide services to a Code Participant by completing a formal agreement through a Meter Data Agent Letter. The services to be provided in the SLA will be negotiated by Western Power to ensure that the agreed SLA will be in accordance with the Code.</p> <p>Discussions with the Readings Management Administrator revealed that there have been ongoing developments of a separate SLA with Synergy throughout the audit period.</p> <p>Through enquires with the Readings Management Administrator and by review of the proposed Synergy SLA for October 2010, we confirmed that Western Power have been actively involved in meetings to negotiate the terms of the SLA. Our review noted that there were a number of different versions created during the audit period which revealed that regular revisions have occurred.</p> <p>Based on our enquiries and review we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.4(1)	
Compliance Manual Reference	379	362
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Reading Operation Coordinator confirm that Western Power do have a process in place to undertake a meter reading that provides an actual value at least once in any 12 month period.</p> <p>Enquiries and document review identified that Western Power contracted AMRS to meet this licence condition and that the progress, forecast and update is provided to Western Power on a monthly basis by B2B.</p> <p>Based on our enquiries and review of documentation we have concluded that Western Power have taken reasonable endeavours, and has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.5(2)	
Compliance Manual Reference	381	364
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Commercial Administrator revealed that no charges for the provision of data have been imposed on Code participants during the audit period.</p> <p>Sample based testing of data provided to Code participants confirmed that no charges were applied for the provision of data.</p> <p>Based on our discussions and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.8	
Compliance Manual Reference	385	368
Obligation Description	A network operator must provide a user with whatever information the network operator has that is necessary to enable the user to comply with its obligations under the Code of Conduct, within the time necessary for the user to comply with the obligations.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Commercial Officer confirmed that Western Power has both system and manual processes in place to provide necessary information for the user to comply with obligations under the Code of Conduct.</p> <p>We performed a walkthrough of the process and identified that information can be provided through the variety of means:</p> <ul style="list-style-type: none"> • B2B transactions; • Metering Services Web Portal; • Western Power contact centre communications; and • Direct response to customer enquiries by email or telephone. <p>Based on our discussions and walkthrough we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.9	
Compliance Manual Reference	386	369
Obligation Description	A network operator must provide standing data, provided to or obtained by it under this Code, to users where required to do so under any enactment.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Refer to Compliance Manual Reference Number 14 and 63.</p> <p>Discussions with Commercial Officer confirmed that Western Power have a process to provide to or obtain standing data in accordance with the Code.</p> <p>We performed a walkthrough of the process, identified that the process to provide standing data information to customers and retailers upon request were an automated process configured through MBS functionality.</p> <p>Other processes available were the request through email on the Lotus Notes and Case ID logs by the Western Power Contact Centre can also facilitate such request and provision of standing data.</p> <p>Sample based testing confirmed that where standing data was requested for, Western Power provided the relevant standing data.</p> <p>Based on our discussions, sample based testing and walkthrough of the process, we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.10	
Compliance Manual Reference	387	370
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Refer to Compliance Manual Reference Number 14 and 63.</p> <p>Discussions with Commercial Officer confirmed that Western Power have a process to provide to or obtain standing data in accordance with the Code.</p> <p>We performed a walkthrough of the process, identified that the process to provide sub sets of standing data information to retailers upon request were an automated process configured through MBS functionality.</p> <p>Other processes available were the request through email on the Lotus Notes and Case ID logs by the Western Power Contact Centre can also facilitate such request and provision of subsets of standing data.</p> <p>Sample based testing confirmed that where standing data was requested for, Western Power provided the relevant subsets of standing data.</p> <p>Based on our discussions, sample based testing and walkthrough of the process, we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.13	
Compliance Manual Reference	390	373
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Interval Metering Analyst and Information Services Analyst revealed that Western Power have a process in place supported by the MBS and B2B processes.</p> <p>Sample based testing confirmed that Western Power provided a current user with the current set of standing data and communication link details in accordance with the requirements and timeframe of this compliance manual obligation.</p> <p>Based on our discussions and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.14(3)	
Compliance Manual Reference	391	374
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Commercial Officer and review of Standing Data Procedures determined that Western Power have processes in place to support the manual reference obligation.</p> <p>A walkthrough of the process revealed that when a Bulk Standing Data Request is submitted to the retailer, the retailer will then send a request to Western Power who will validate it in accordance with the submission rules established in the Build Pack for Customer Transfer and Standing Data Procedures. On successful validation, Western Power will inform the retailer that the request has been accepted and that the bulk standing data will be provided.</p> <p>Sample based testing confirmed that Western Power acknowledged the receipt of bulk standing data request and provided the requested standing data within the timeframes specified by the Metering Code.</p> <p>Based on our discussions and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.15	
Compliance Manual Reference	392	375
Obligation Description	A network operator that provides energy data to a user or the IMO must also provide the date of the meter reading.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Commercial Officer, Metering Business System (MBS) functionality review and the walkthrough of the process identified that Western Power have adequate processes in place to provide the date of the meter reading with energy data to a user or the IMO.</p> <p>Our review of energy data provided confirmed that the MBS automatically inputs the date of the meter reading when data is provided.</p> <p>Based on our discussions and system review we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.19(5)	
Compliance Manual Reference	400	383
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Information Service Analyst revealed that Western Power has MBS and manual processes in place to support compliance with the manual reference obligation.</p> <p>Sample based testing confirmed that Western Power gave notice to a user to acknowledge receipt of customer attributes or site attributes within 1 business day after receiving the information and address attributes from the user within 15 business days after receiving the information.</p> <p>Based on our sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.20(1)	
Compliance Manual Reference	402	385
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Information Services Analyst revealed that that the Energy Data Verification Request form was developed when the Metering Code applied to Western Power in 2005, which was within 6 months from the date the Metering Code applied.</p> <p>There has been no changes to the Metering Code since 2005 and therefore Energy Data Verification Request form has not changed during the audit period and.</p> <p>Based on our discussions and inspection of the form, we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.20(2)	
Compliance Manual Reference	403	386
Obligation Description	An Energy Data Verification Request Form must require a Code participant to provide the information prescribed.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Commercial Officer revealed that the Energy Data Verification Forms have been designed to meet the requirements of the manual reference obligation.</p> <p>Review of the electronic Energy Data Verification Form outlined the requirement for:</p> <ul style="list-style-type: none"> • Metering point's NMI and checksum; • The reason for the request; • Information related to interval and accumulation meters such as period in which the request relates; and • Where practicable information as the Code participant is reasonably able to provide to assist Western Power to comply with verification request. <p>In the absence of the above information the Energy Data Verification Form would be rejected.</p> <p>Based on validation and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.20(4)	
Compliance Manual Reference	404	387
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Readings Management Administrator, Commercial Officer and walkthrough revealed that Western Power has adequate processes and controls in place to respond to the verification of energy data request.</p> <p>We observed that MDVs requests are communicated through the B2B process between Western Power and Synergy. A service order request for a MDV may involve a manual check through the system or a field inspection where a field inspector is required to perform a manual reading. Once the read is obtained and verified, the service order is closed.</p> <p>Enquiries with the Readings Management Administrator revealed that if field checks were returned late due to mitigating circumstances such as restricted access to the meter. The field officer is required to reschedule the meter inspection if the meter data could not be verified at the time.</p> <p>Discussions with the Commercial Officer and Readings Management Administrator revealed that Western Power use their best endeavours to ensure that MDV occurs.</p> <p>Based on our discussions, walkthrough and sample based testing we have concluded that Western Power has used reasonable endeavours, and has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.21(2)	
Compliance Manual Reference	405	388
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Metering Strategist revealed that customers would make a request through the retailer for a test or an audit of the accuracy of the metering installation. The retailer will make request on behalf of the customer, through a service order, to undertake a test or an audit of the accuracy of the metering installation or the energy or standing data of the metering installation. A report is provided to the retailer detailing the outcome of the test or audit.</p> <p>Sample based testing of the retailers request for a test or an audit of the accuracy or energy data or standing data of the metering installation revealed that a report was provided to retailers detailing the outcome of the test or audit of the metering installation.</p> <p>Based on our enquiries and walkthrough of processes we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.21(4)	
Compliance Manual Reference	406	389
Obligation Description	A test or audit is to be conducted in accordance with the metrology procedure and the applicable service level agreement.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>The test or audit of metering installations is a service standard that Western Power must fulfil to the user as required by the model SLA. Walkthrough of the process for testing or auditing meter installations, Western Power has a mechanism in place to meets its obligation under the model SLA and requirements under the metrology procedure.</p> <p>Our discussions with the Metering Strategist revealed that customers will contact the retailers for any test or audit of meters. Once the an outcome has been determined, a report is forwarded to a Commercial Officer within the Meter Asset & Distribution Team who submit the report to the retailer as per the model SLA.</p> <p>Through our testing, we observed that the meters were tested in accordance with the metrology procedure, which refers to the applicable Australian Standards.</p> <p>Based on our enquiries and walkthrough of processes we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.21(11)	
Compliance Manual Reference	411	394
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Metering Strategist and Commercial Administrator, we noted the Metering Technician would undertake a test of the meter based on the service order issued by the retailer. A report is prepared by the Metering Technician for the testing of the meter. Once the an outcome has been determined, the report is forwarded to a Commercial Officer within the Meter Asset & Distribution Team who submit the report to the retailer.</p> <p>The model SLA stipulates that if discrepancies are discovered in the meter installation, the meter installation repair will be ordered Western Power replaces all meters rather than repairing the meter installation.</p> <p>Based on our enquiries and walkthrough of processes we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.21(12)	
Compliance Manual Reference	412	395
Obligation Description	The original stored error correction data in a meter must not be altered except during accuracy testing and calibration of a metering installation.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Interval Metering Analyst and the review of the MBS confirmed that Western Power alters original stored error correction data during accuracy testing and calibration of a metering installation.</p> <p>A walkthrough of the accuracy testing and calibration of a metering installation process revealed that any changes made to a meter are recorded on the data records.</p> <p>Our observations of the error correction process confirmed that data had only been altered as a result of accuracy testing and calibration of a metering installation. The correction information was readily identifiable on the system.</p> <p>Based on our discussions and walkthrough we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.22(3)	
Compliance Manual Reference	415	398
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Commercial Officer, Interval Metering Analyst and review of the MV90 Estimation Process document identified that Western Power have adequate processes in place to substitute values as required by clause 5.22(3) of the Electricity Industry Metering Code.</p> <p>Sample based testing confirmed that where check meter energy data is not available or when the energy data cannot be recovered from the metering installation within the time required under this Code, Western Power provided substituted values which have been prepared utilising the method contained in Appendix 3 of the Electricity Industry Metering Code.</p> <p>Based on our discussions and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.22(4)	
Compliance Manual Reference	416	399
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Interval Metering Analyst revealed that Western Power have automatic MBS functionality processes and controls in place to notify the affected Code participant of the loss of energy data or incorrect energy data in accordance with this manual reference obligation.</p> <p>Sample based testing found instances where data error occurs when the meter required reprogramming which caused a resulted loss of meter data. Western Power sends notification directly to the retailer within a 24 hour period to advise that substitutes are to be provided due to loss of metering data.</p> <p>Sample based testing confirmed that notifications to the affected Code participant of the loss or error of energy data were provided within 24 hours after detection.</p> <p>Based on our discussions, walkthrough and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.22(5)	
Compliance Manual Reference	417	400
Obligation Description	Substitution or estimation of energy data is to be required when energy data is missing, unavailable or corrupted, including in the circumstances described.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Commercial Officer, Interval Metering Analyst and the review of the MBS functionality confirmed that Western Power has a process in place to substitute energy data where required under clause 5.22(5) of the Electricity Industry Metering Code.</p> <p>We determined that the MBS automatically generate substitutes for basic data and that Interval data substitutes was entered manually where the data was found to be missing or unavailable data.</p> <p>Western Power has established an exception report energy data that is missing or unavailable or corrupted. We obtained and reviewed the information contained in the exception report to confirm the identification of a substitution requirement.</p> <p>Based on our discussions and walkthrough we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.22(6)	
Compliance Manual Reference	418	401
Obligation Description	A network operator must review all validation failures before undertaking any substitution.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Commercial Officer, Interval Metering Analyst and the review of the MBS functionality confirmed that Western Power has a process in place to review all validation failures before undertaking any substitution.</p> <p>We performed a walkthrough of the review process and determined that energy data proceeds through an automatic validation process from batch to system. We confirmed that the Commercial Officers from the Readings Management team reviewed all validation failures prior to undertaking any substitutions.</p> <p>Based on our discussions, walkthrough and review of MBS functionality we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.23(1)	
Compliance Manual Reference	419	402
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Commercial Officer confirmed that Western Power has a process in place to designate an estimated or substituted value for the metering point to be deemed actual under the circumstance of this manual reference obligation.</p> <p>We performed a walkthrough of instances where communications attached to meters have failed, meters are faulty or loss of meter data, confirmed that a final substitute read would be provided in circumstances where a meter is removed or when exception reporting identify an error with the actual energy data.</p> <p>Based on our discussions and walkthrough we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.23(3)	
Compliance Manual Reference	420	403
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Commercial Officer confirmed that Western Power has a process in place to replace or repair a meter when a designated deemed actual value is provided.</p> <p>We performed a walkthrough of the process and inspected data records, identified that meters were replaced or repaired based on meter inspection results and the MBS meter read reasons identified through field inspection checks.</p> <p>Based on our discussions and walkthrough we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.24(1)	
Compliance Manual Reference	421	404
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Commercial Officer confirmed that Western Power has a process in place to replace the first value with the second value where applicable under the requirement of this manual reference obligation.</p> <p>We performed a walkthrough of the process and inspected data records, identified that the Metering Business System automatically generate exception readings to identify erroneous actual values, a deemed actual value is used to replace the actual value in accordance with good electricity industry practice.</p> <p>Based on our discussions and walkthrough we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.24(2)	
Compliance Manual Reference	422	405
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Commercial Officer confirmed that Western Power has a process in place to replace the deemed actual value with a better quality deemed actual value where applicable under the requirement of clause 5.24(2) of the Electricity Industry Metering Code.</p> <p>We determined that MBS automatically generate exception reading reports to identify erroneous deemed actual values. We confirmed that the erroneous deemed actual value is investigated by the Commercial Officer, and that upon evaluation another better deemed actual value exists.</p> <p>Sample based testing confirmed that where a better quality actual value, the first value had been replaced in accordance with good electricity industry practice.</p> <p>Based on our discussions and walkthrough we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.24(3)	
Compliance Manual Reference	423	406
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Commercial Officer confirmed that Western Power has a process in place to replace the estimated or substituted value where applicable in accordance with this licence condition.</p> <p>We performed a walkthrough of the process and inspected data records, identified that the Metering Business System automatically generate exception readings to identify erroneous estimated or substituted values, another better quality actual, deemed, estimated or substituted value upon investigation is used to replace the estimated or substituted value in accordance with good electricity industry practice.</p> <p>Based on our discussions and walkthrough we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.24(4)	
Compliance Manual Reference	424	407
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Commercial Officer confirmed that Western Power has a process in place to replace the estimated or substituted value upon reasonable request from a Code participant. The process is performed through the Metering Business System and B2B processes with Synergy.</p> <p>A walkthrough of the request consideration process confirmed that the Commercial Officer reviews historical consumption records. Sample based testing confirmed that Western Power replaced estimated or substituted values where requested by a Code participant.</p> <p>Based on our discussions and walkthrough we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.25	
Compliance Manual Reference	425	408
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussion with the Commercial Officer, review of Australian Energy Market Operator Metrology Procedures and the Metering Business System functionality confirmed that Western Power has a process in place to ensure compliance with this manual reference obligation.</p> <p>A walkthrough of the process determined that estimation of energy data was generated in accordance with the Metrology Procedures. Western Power performed MBS validation and exception reporting checks on a daily basis to ensure accuracy of the estimated energy data and transformation or processing data in accordance with the quality requirements of the metrology procedure.</p> <p>Based on our discussions and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.29	
Compliance Manual Reference	427	410
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<p>Our enquiries with the Metering Branch Manager and Commercial Administrator, Western Power had entered into a metering data agency agreement with Horizon (electing network operator) on 1 October 2009.</p> <p>The metering data agency agreement was established outside the scope period. Therefore, there were no activities undertaken outlined in clauses 5.29 of the Electricity Metering Industry Code.</p> <p>Based on our enquiries and walkthrough of processes we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.30(1)	
Compliance Manual Reference	428	411
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Through our enquiries with the Metering Branch Manager and Commercial Administrator, we noted that Western Power, as the electricity networks corporation has a metering data agency agreement since 1 October 2009.</p> <p>The services elected are fully detailed in the Service Level Contract between Western Power and Horizon, which outlines the services that elected between both parties.</p> <p>We observed that the Service Level Contract does not include some of the matters prescribed under clause 5.30(1) of the Electricity Industry Metering Code as the services within the Service Level Contract have ceased from 30 September 2009.</p> <p>Based on our enquiries and walkthrough of processes we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 5.34(2)	
Compliance Manual Reference	431	414
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Through our discussions with the Commercial Administrator and sample based testing, we noted that the costs charged were in accordance with the Service Level Contract between Western Power (electricity networks corporation) and Horizon (electing network operator).</p> <p>Based on our enquiries, walkthrough of processes and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 6.20(4)	
Compliance Manual Reference	434	417
Obligation Description	A network operator must amend any document in accordance with the Authority's final findings.	
Reporting Type	NR	
Compliance Rating	N/R	
Audit Observations	Our enquiries with the Metering Branch Manager and review of the Authority's web site indicated that Western Power did not receive any advice from the Authority to amend any listed documents under the Electricity Industry Metering Code.	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 7.2(1)	
Compliance Manual Reference	435	418
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<p>We performed a walkthrough of Western's Power webpage and sighted the availability of contact information through email, postal address and facsimile.</p> <p>Further, the ETAC has the relevant contact details of representatives of Western Power and the Code Participant so that Code participants can send and receive a notice by post, facsimile and electronic communication.</p> <p>Based on our walkthrough we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry Metering Code clause 7.2(2)	
Compliance Manual Reference	436	419
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<p>Discussion with the Information Services Analyst revealed that Western Power did not change its contact details during the audit period.</p> <p>We performed the walkthrough of the Web Portal and identified that Western Power automatically notifies each retailer electronically of its contact details. Contact details are also available on Western Power website.</p> <p>Further, Western Power's Account Managers in Customer Solutions Branch would provide any changes to the contact details to the Code participant.</p> <p>Based on our discussions and walkthrough we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 5(1)	
Compliance Manual Reference	446	429
Obligation Description	A distributor or transmitter must, as far as reasonably practicable, ensure that electricity supply to a customer's electrical installations complies with prescribed standards.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Network Operations Branch revealed that Western Power has processes in place to ensure that electricity supplied to a customer's electrical installations, does not fluctuate outside of the standard harmonic voltage levels.</p> <p>Enquiries with the Network Operations Branch revealed that Western Power utilise the Flicker and Harmonic Allocation Models to test for any voltage fluctuations or load issues that may arise from electricity supplied to a customer's new connection. A walkthrough of the process was performed with the Networks Branch, and confirmed that Western Power had processes in place to comply with the prescribed standards under clause 6(2) and 7 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.</p> <p>Sample based testing of customer complaints relating to voltage fluctuations or harmonic voltage distortions revealed that Western Power had undertaken the necessary investigations to complete the work programs required.</p> <p>Based on our enquiries and sample based testing, we have concluded that there are adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 8	
Compliance Manual Reference	447	430
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Network Operations Branch, walkthrough of ENMAC, TCS, review and walkthrough of faults, investigations and emergency management processes and procedures revealed that Western Power has the capability to disconnect the supply of electricity to the installations or property, unless it is in the interest of the customer to maintain supply.</p> <p>Sample based testing of customer contacts made to Western Power concerning quality or reliability of supply demonstrated that field officers undertook preliminary investigations to determine the quality and reliability of supply. In the instance that a possible issue was detected, Western Power deployed and attached instruments to monitor quality and reliability of supply. Western Power undertook the necessary corrective actions. Upon reaching a conclusion of the investigation customers were updated that they have the option for the supply of electricity to be disconnected.</p> <p>Further, the Network Operations personnel indicated that in the event of an emergency where property or life may be threatened, Western Power has the capability to disconnect supply and has done so in such situations.</p> <p>Based on our enquiries, review of documentation and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 9	
Compliance Manual Reference	448	431
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Network Performance Branch and review of the policies, procedures and documentation for maintaining the supply of electricity revealed that Western Power as far as reasonably practicable maintained and managed the distribution system to minimise the occurrence and duration of interruptions.</p> <p>Policies and procedures reviewed included Western Power's Emergency Management Plans and Fault Processing. These documents outlined action plans that could be implemented to address planned and unplanned interruptions. Further, Western Power has indicated that the organisation is able to source alternative means of generating and supplying electricity to its customers.</p> <p>Western Power has a number of monitoring systems including ENMAC and SCADA to assist with the identification of interruptions. Western Power also utilises customer contacts as a source of intelligence to assist with planning and maintenance of its distribution system.</p> <p>Based on our enquiries and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 10(1)	
Compliance Manual Reference	449	432
Obligation Description	A distributor or transmitter must, so far as reasonably practicable, reduce the effect of any interruption on a customer.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<p>Enquiries made with the Network Performance Branch revealed the Western Power a number of processes in place including the ability to deploy ERGs to re-route excess capacity of electricity to a customer.</p> <p>Walkthrough conducted with Network Performance Branch of the network interruption to full restoration (Fault Process) revealed that Western Power has plans in place to reduce the effect of any interruptions on a customer as far as reasonably practicable.</p> <p>Sample based testing of interruptions revealed that Western Power had deployed ERGs to reduce the effect of an interruption to the affected area and its customers.</p> <p>Enquiries also revealed that Western Power had provided an alternative supply of electricity areas that had been experiencing interruptions or a change in the quality of supply.</p> <p>Based on our enquiries, review of documentation and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 10(2)	
Compliance Manual Reference	450	433
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<p>Review of Western Powers planning documentation for proposed interruptions demonstrated consideration for the provision of alternative means of supply of electricity to a customer where the planned outage was expected to exceed the period specified under Clause 11(2) of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.</p> <p>Enquiries made with Network Performance, Customer Assist and Network Operations Branch revealed that the planned outage planning process involved the review of TCS to identify sensitive customers. The planning team also investigates whether business may be adversely affected by a significant interruption.</p> <p>Discussion with the aforementioned Branches has also revealed that Western Power undertakes community consultation to identify any special events that the community may have been planned that may be affected as a result of the proposed interruption.</p> <p>Western Power was found to work with the community groups, identified business and sensitive customers in this regard and where appropriate provided alternative supply of electricity to the customer(s).</p> <p>Based on our enquiries, review of documentation and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 13(3)	
Compliance Manual Reference	453	436
Obligation Description	The average total length of interruptions of supply is to be calculated using the specified method.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Review of both the calculation report containing data extracted from TCS and the methodology utilised to calculate the average total length of interruption Western Power calculated the average total length of interruptions of supply in accordance with the manner prescribed under clause 13(3) of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.</p> <p>Discussions with the Network Operations Branch revealed that the calculation methodology is a set of business rules within TCS and the calculation of total average length of interruptions is an automated process. The business rules were designed against the Electricity Industry (Network Quality and Reliability of Supply) Code 2005 requirements.</p> <p>Based on our enquiries, review of documentation and walkthrough of the TCS we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 14(8)	
Compliance Manual Reference	454	437
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<p>Enquiries made with the Network Operations Branch revealed that Western Power did not apply for an exemption or replacement of a provision during the audit period. Subsequently, there was no application made to the Minister to provide regard to advice from the Authority.</p> <p>Discussions with Network Operations indicated that if an instrument had been provided by the Minister, a copy of the instrument would be made available to customers at no charge.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 15(2)	
Compliance Manual Reference	455	438
Obligation Description	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.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	Discussions with the Network Operations Branch revealed that Western Power did not enter into any agreements that required an exclusion or modification of certain provisions with a customer during the audit period. Network Operations Branch indicated that Western Power current practice does allow for it to enter into agreements with a customer that requires variation of Western Power's obligations.	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 23(1)	
Compliance Manual Reference	461	444
Obligation Description	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.	
Reporting Type	NR	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Networks Branch revealed that Western Power has processes in place to monitor the operation of its network to ensure compliance with the provisions of the Electricity Industry Code.</p> <p>Enquiries with the Networks Branch revealed that Western Power's monitoring mechanism is primarily reactive as it relates to measuring voltage fluctuations in response to customer complaints, with the data being maintained on the individual customer file. A sample of customer files was reviewed and we confirmed that the measurement data was captured.</p> <p>Additionally, Western Power has a pilot program for pro-actively monitoring network performance for various Western Power sites, which constantly monitors power quality and reliability, and is stored on the Western Power database PI Historian. Data on these sites is captured in the 2009/2010 Annual Reliability and Power Quality Report, which is produced by Western Power to monitor compliance with the reporting requirements under section 7 of the Electricity Industry Code.</p> <p>Our review of 2009/2010 Annual Reliability and Power Quality Report confirmed that the data contained was in regards to compliance and non-compliance to the Electricity Industry Code.</p> <p>Based on our enquiries and sample based testing, we have concluded that there were adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 23(2)	
Compliance Manual Reference	462	445
Obligation Description	A distributor or transmitter must keep records of information regarding its compliance with specific requirements for the period specified.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Networks Branch revealed that Western Power has processes in place to ensure that records of information regarding its compliance are retained for at least 5 years.</p> <p>Enquiries with the Network's Branch revealed that Western Power's corporate database, PI Historian, retains records of proactive data regarding its compliance for periods up to 5 years. We obtained a copy of Western Power's Policy for storage of proactive data on the PI Historian. All reactive data on customers is retained on Western Power's electronic Document Management System.</p> <p>Sample based testing confirmed that records of information regarding its compliance, are retained for at least 5 years.</p> <p>Based on our enquiries and sample based testing, we have concluded that there were adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 25(2)	
Compliance Manual Reference	465	448
Obligation Description	A distributor or transmitter must make available, at no cost, a copy of a document setting out its complaint handling processes to a small customer who makes a complaint to the distributor or transmitter or who asks to be given such information.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Discussions with the Customer Assist Branch and review of Western Power's complaint resolution processes and website revealed that the organisation does make available its complaint handling process at no cost.</p> <p>Walk through of the process of the complaints handling process noted that Western Power staff can provide a customer its complaints handling processes through mail out. Further, the staff may direct the customer to its website, where the complaint handling process can be accessed and downloaded at no charge.</p> <p>Enquiries made with Customer Assist Branch revealed that call centre staff are trained and provided information relating to complaints handling process. The customer service centre representative can inform the customer of the complaints process during the call to the call centre.</p> <p>Based on our enquiries, review information accessible on Western Power's website and documentation provided, we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 25(3)	
Compliance Manual Reference	466	449
Obligation Description	A document setting out a distributor's or transmitter's complaint handling process must contain the specified information.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Review of the information made available at no cost to a customer in regard to the complaint handling process determined that Western Power has included the required information under Clause 25(3) of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 25(3).</p> <p>Western Power's website page detailing customer service processes focusing on customer complaints indicates that if a customer was dissatisfied with the Western Power's approach and investigation outcome, the customer may contact the Energy Ombudsman. The webpage also provided a hyperlink to the Energy Ombudsman's website and contact numbers, including the free call number.</p> <p>Sample based testing of responses provided by Western Power revealed that customers may have the complaint referred to the Energy Ombudsman if they remain dissatisfied. The Energy Ombudsman's contact information was also provided.</p> <p>Based on our enquiries, review information accessible on Western Power's website and documentation provided, we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 26	
Compliance Manual Reference	467	450
Obligation Description	A distributor or transmitter must arrange for an independent audit and report on its systems for monitoring, and its compliance with specific requirements. This is to be carried out in respect of the operation of such systems during each year ending on 30 June.	
Reporting Type	2	
Compliance Rating	N/R	
Audit Observations	<p>We obtained a copy of the 2010 report issued by Stantons International title “Review of Network Quality and Reliability of Supply Performance Reporting.”</p> <p>The independent review was observed to have covered the period and topics specified under clause 26 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005. Discussions with Risk and Compliance revealed that planning had commenced for the 2011 review of the operation of the systems that Western Power has in place for monitoring its compliance with Part 3 or an instrument made under section 14(3) by an independent expert.</p> <p>The Risk and Compliance Branch has established a schedule that identifies key reporting requirements and their milestones. Discussions with Manager Risk and Compliance revealed that processes had been established to enable the management and delivery of reporting obligations.</p> <p>Based on our enquiries and review documentation provided, we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 27(1)	
Compliance Manual Reference	468	451
Obligation Description	A distributor or transmitter must prepare and publish a report about its performance in accordance with specified requirements.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>Review of the report titled “Review of the Network Quality and Reliability of Supply Performance Reporting” dated September 2010 authored by Stantons International, revealed that the scope period was for the financial year ending June 2010.</p> <p>The report was noted to address the operations of Western Power during the period under review.</p> <p>Review of the Western Power’s website publication log (upload) revealed that the report was published on 30 September 2010 on its website.</p> <p>Based on our enquiries and review documentation provided, we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Licence Condition	Distribution Licence condition 5.1 Transmission Licence condition 5.1	
Obligations Under	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 27(3)	
Compliance Manual Reference	469	452
Obligation Description	A distributor or transmitter must give a copy of its report about its performance to the Minister and the Authority within the specified period.	
Reporting Type	2	
Compliance Rating	5	
Audit Observations	<p>We confirmed through correspondence that the Minister and the Authority received Western Power's report about its performance 7 days before it is published on Western Power's site.</p> <p>The report was published on 30 September 2010 on Western Power's website. The Minister and the Authority received the report on 23 September 2010.</p> <p>Based on our enquiries and testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>	
Recommendation	Nil.	

Appendix 1 – Audit Evidence – Documents Examined

Compliance Manual Reference	Documents Examined
4	Metering Business System Historical Form
5	Metering Business System Functionality Specifications
10	Metering Business System Functionality Specifications
11	Metering Business System Functionality Specifications
12	Metering Business System Functionality Specifications
13	Metering Business System Functionality Specifications
15	NMI Allocation Procedure for the Western Australian Electricity Market Metering Business System Functionality Specifications
20	Metering Business System Functionality Specifications
21	Metering Business System Functionality Specifications
22	Customer Transfer Request Form Metering Business System Functionality Specifications

Compliance Manual Reference	Documents Examined
31	Customer Transfer Process Charts Metering Business System Functionality Specifications
32	Customer Transfer Request Form Customer Transfer Process Charts Metering Business System Functionality Specifications
33	Build Pack - WA B2B Procedure, Customer and Site Details Notification Process Customer Transfer Process Charts Metering Business System Functionality Specifications
34	B2B Correspondence Customer Transfer Process Charts
35	Customer Transfer Process Charts Metering Business System Functionality Specifications
36	Customer Transfer Process Charts Metering Business System Functionality Specifications
37	Customer Transfer Process Charts NMI Allocation Procedure for the Western Australian Electricity Market Metering Business System Functionality Specifications
38	Customer Transfer Process Charts Service Order Management Process Charts Metering Business System Functionality Specifications
39	Customer Transfer Process Charts Service Order Management Process Charts Metering Business System Functionality Specifications
41	Customer Transfer Process Charts Metering Business System Functionality Specifications

Compliance Manual Reference	Documents Examined
42	Metering Business System Functionality Specifications
43	Metering Business System Functionality Specifications Internal Correspondence
46	Western Power Electricity Industry Communication Rules
49	NMI Allocation Procedure for the Western Australian Electricity Market Metering Business System Functionality Specifications
50	Western Power Electricity Industry Communication Rules Western Power Electronic Correspondence
54	Western Power Electronic Correspondence Western Power Electricity Industry Communication Rules
60	Metering Service Centre User Task Manual Build Pack – Customer Transfer and Standing Data Procedure
61	Customer Transfer Request Form Metering Business System Functionality Specifications
62	Metering Business System Functionality Specifications
63	Standing Data Request Form Metering Service Centre User Task Manual Build Pack – WA B2B Procedure, Meter Data Process Metering Business System Functionality Specifications
64	Historical Data Request Form Metering Service Centre User Task Manual Metering Business System Functionality Specifications
65	Metering Business System Functionality Specifications
66	Metering Business System Functionality Specifications
67	Metering Business System Functionality Specifications

Compliance Manual Reference	Documents Examined
68	Metering Business System Disaster Recovery Plan
69	Western Power Electricity Industry Communication Rules
70	Western Power Electronic Correspondence Western Power Electricity Industry Communication Rules
71	Western Power Electronic Correspondence Western Power Electricity Industry Communication Rules
82	Asset Management Policy Asset Management System Document- DMS#6168891 Network Performance Asset Management Procedure – DMS#7733751 DMS#5329240v1
84	Asset Management System Review Report, Lloyds Register – April 2010
85	Licence Fee Correspondence
87	Acquisition of Land and Easements document – DMS#2289205v3 Transmission Line Easement Compensation Assessment and Negotiation Process – DMS#3943320v1
90	Draft Extension and Expansion Policy of Electricity Networks Corporation
91	Draft Extension and Expansion Policy of Electricity Networks Corporation
92	Draft Extension and Expansion Policy of Electricity Networks Corporation
95	Access Solutions Flowchart Code of Conduct Policy Conflict of Interest Policy
96	Code of Conduct Policy Conflict of Interest Policy

Compliance Manual Reference	Documents Examined
105	Financial Statements – 30 June 2019 Accounting Policies and Procedures
106	Controls and Residual Risk Register – Regulation and Sustainability March 2011
110	ERA Data Room Document Tracker – DMS#4816355V2
111	ERA Data Room Document Tracker – DMS#4816355V2
112	ERA Data Room Document Tracker – DMS#4816355V2
319	Metering Management Plan – September 2006 Metrology Procedure for Metering Installations – September 2006 Western Power Accreditation of Metering Services Section from NATA Western Power In-Service Meter Compliance Program Correspondence DMS#5541075v1 Submission to Energy Safety, Department of Commerce document – March 2009
321	Revenue Meters Technical Specifications – DMS#8117564 Technical Evaluation Report – DMS#8021172 Provided Meters For Tender – DMS#7772415v7
322	Metering Technical Requirements – High Voltage Transmissions & Generation (Types 1 & 2) Metering – DMS#7560244 High Voltage Metering Project – DMS#5198086v2 Customer Solutions Branch – Project Planning Definition Report – DMS#6671903v1 Certificate from Supplier of Remote Communication Modules
323	CT Metering Connection Process High Voltage Metering Project – DMS#5198086v2 Overall Process for Market Transactions document – DMS#5249201v1

Compliance Manual Reference	Documents Examined
	<p>Overall Process for New Connections Meter Installation Stage – DMS#5249201v1</p> <p>Service Connect Scheme Guidelines – DMS#3285499v4</p>
324	<p>Western Australian Distribution Connections Manual 2011 – DMS#7159802v2</p> <p>Metering Technical Requirements – High Voltage Transmissions & Generation (Types 1 & 2) Metering – DMS#7560244</p> <p>Meter Replacement – Operational Work Procedure – DMS#5456264v5</p> <p>Contractor Connect Scheme – DMS#3747498</p> <p>High Voltage Metering Project – DMS#5198086v2</p>
325	<p>Western Australian Distribution Connections Manual 2011– DMS#7159802v2</p> <p>Metering Technical Requirements – High Voltage Transmissions & Generation (Types 1 & 2) Metering – DMS#7560244</p> <p>High Voltage Metering Project – DMS#5198086v2</p> <p>Customer Solutions Branch – Project Planning Definition Report – DMS#6671903v1</p>
328	<p>Metering Compliance Marks document</p> <p>NETCOMM Userguide</p>
329	<p>Meter Service Apparatus Interference – Operational Work Procedure – DMS#6718579v1</p> <p>Inspection Procedures – DMS#6962903v1</p>
330	<p>Western Australian Distribution Connections Manual 2011– DMS#7159802v2</p> <p>Revenue Meters Technical Specifications – DMS#8117564</p> <p>Technical Evaluation Report – DMS#8021172</p> <p>Provided Meters For Tender – DMS#7772415v7</p> <p>Metering Technical Requirements – High Voltage Transmissions & Generation (Types 1 & 2) Metering – DMS#7560244</p>
331	<p>Landis and Gyr Certification</p>

Compliance Manual Reference	Documents Examined
	Metering Business System Functional Specifications
340	Western Australian Distribution Connections Manual – DMS#7159802v2
347	Sample of Agreements to collect Energy data in sub-Multiples of a Trading Interval
356	Metering Pulse Outputs and Inputs document
357	DMS#3825365v3
361	Metering Services Performance Reports Metering Business System Functionality Specifications ERRATA Report
362	Access to Metering Business System Form Information Technology Security Policy
363	Crisis Management Plan – April 2011
364	Metering Business System Functionality Specifications
365	Readings Management Process Charts Metering Business System Functionality Specifications
366	Readings Management Process Charts Metering Business System Functionality Specifications
367	Readings Management Process Charts Information Technology Security Policy
369	Readings Management Process Charts
370	Readings Management Process Charts RE023 Reading Exceptions Metering Business System Functionality Specifications
371	Metering Business System Functionality Specifications
374	Western Power Compliance Failures Report 2010/32

Compliance Manual Reference	Documents Examined
375	Metering Business System Functionality Specifications
376	Metering Code Model Service Level Agreement, Western Power Corporation
377	Metering Code Model Service Level Agreement, Western Power Corporation B2B Correspondence
378	Metering Business System Functionality AMRS Metering Services Contract Contract
379	Readings Management Process Charts AMRS Progress and Forecast Report AMRS Metering Services Contract Metering Business System Functionality Specifications
381	Metering Code Model Service Level Agreement, Western Power
383	Interpreting the TIM Return Codes Interval Exceptions List Metering Business System Functionality
384	Readings Management Process Charts Metering Business System Functionality
385	Metering Business System Functionality Specifications
386	Metering Business System Functionality Specifications
387	Metering Business System Functionality Specifications
388	Western Power Compliance Failures Report 2010/28
389	Western Power Compliance Failures Report 2010/28
390	Metering Business System Functionality Specifications
391	Metering Business System Functionality Specifications

Compliance Manual Reference	Documents Examined
392	Metering Business System Functionality Specifications
400	Metering Business System Functionality Specifications
402	Energy Data Verification Request Form Metering Business System Functionality Specifications
403	Energy Data Verification Request Form
404	DMS: 5249201v1 Readings Management Process Charts Metering Business System Functionality Specifications
412	Metering Business System Functionality Specifications
413	Readings Management Process Charts Metering Business System Functionality
414	Readings Management Process Charts Metering Business System Functionality
415	MV90 Estimation Process Metering Business System Functionality Specifications
416	DMS: 5249201v1 Metering Business System Functionality Specifications
417	Metering Business System Functionality Specifications
418	RE023 Reading Exceptions Metering Business System Functionality Specifications
419	RE023 Reading Exceptions Readings Management Process Charts Metering Business System Functionality Specifications
420	DMS: 5249201v1 RE023 Reading Exceptions

Compliance Manual Reference	Documents Examined
	Daily Exception (Maintenance) Report Metering Business System Functionality Specifications
421	RE023 Reading Exceptions Metering Business System Functionality Specifications
422	RE023 Reading Exceptions Metering Business System Functionality Specifications
423	RE023 Reading Exceptions Metering Business System Functionality Specifications
424	B2B Correspondence RE023 Reading Exceptions Metering Business System Functionality Specifications
425	RE023 Reading Exceptions Metering Business System Functional Specifications Metrology Procedure for Substitution and Estimation M-Type 1-7, Australian Energy Metering Market Operator (AEMO)
427	Service Level Contract Metering Services – DMS#4783627
428	Service Level Contract Metering Services – DMS#4783627
435	Western Power Electricity Industry Communication Rules Western Power Electronic Correspondence
436	Western Power Electricity Industry Communication Rules
446	DMS#5183964v3 DMS#5273956v1
449	NWI -73 Emergency Response Generators – DMS#2123938v8 NWI – 102 Fault Process – DMS#4471544v1
461	Sample of Customer Files relating to Complaints to Voltage Fluctuations and Distortions 2009/2010 Annual Reliability and Power Quality Report

Compliance Manual Reference	Documents Examined
462	Western Power Policy for Storage of Data Sample of Data/Information retained for periods up to 5 years
463	Sample of completed minor and major works requested by customers
465	Complaints Handling Process FlowChart – DMS 7840035v1 Complaints and Resolutions Procedures Manual 2010 – DMS#6032241v2
466	Complaints Handling Process FlowChart – DMS 7840035v1 Complaints and Resolutions Procedures Manual 2010 – DMS#6032241v2

Appendix 2 - Audit Evidence – Additional Documents Examined

Documents Examined
APUG02 Meter Tender – Technical Recommendations – DMS#1269365v1
Customer Contact Centre Group Mailbox & EE's document – DMS#6458221
Disconnection and Reconnection of Customer Supply Course Notes
Major Customers Account Managers Portfolio Document – DMS#4834474
Electricity Transfer - Access Contract – DMS#2589745v1
Electricity Industry Metering Code Training Material
Electricity Industry Customer Transfer Code Training Material
Electricity Industry Transaction Gateway – DMS#7940339v2
Metering Code Model Service Level Agreement - SLA
Western Power Metering Manual
CT Metering Connection Process -
NMI Allocation Procedure for the Western Australia Electricity Market
Commissioning Work Instruction – HV Metering for 3Ph4W System –

Documents Examined
DMS#8167476v1
Compliance Failure Notification form – DMS#4104000
High Voltage Revenue Metering Project Design Report for Namarkkon Power Station – January 2011
Metering Provision- Connection Field Officer Role Description – DMS#3139931v1
Metering Provision – Metering Officer Technical Services Role Description – DMS#6971765v1
Service Management Work Procedures – DMS#7029888v1, DMS#6685744v1, DMS#7040084v1
Inspection Work Procedure – ELIS Job Creation/Job Closure Process
Inspection Work Procedure – Filing of Inspection Records
Inspection Work Procedure – Workflow Job Creation/Completion Process
Inspection Work Procedure – Inspectors Orders – DMS#7205232v1
Administrative Work Procedure – Revenue Protection Legal Process – DMS#6685744v1
Operational Work Procedure – Electrical Installation Inspections – DMS#7030041v1
Operational Work Procedure – High Voltage Installation Inspections – DMS#7195212
DMS#3952432v1
Metering Services – Contractors List – Contractor Connect
DMS#1158321v6
Australian Standard – Electricity Metering Equipment – AS62052.11-2005
Department of Consumer and Employment Protection – WA Electrical Requirements – July 2008
2010 Annual Performance Report
DMS#4513972v40
Claim Process for Non-Compliant Reconnections and Wrongful disconnections – DMS#5424575v2

Appendix 3 – Audit Evidence – Personnel who Assisted in the Audit

Positions of Western Power Personnel	Branch
AA3 Focus Engineer	Network Performance
Commercial Administrator	Metering
Interval Metering Analyst	Metering
Access Solutions Manager	Customer Solutions
IT Applications Service Delivery Manager	IT
Reading Operations Team Leader	Metering
Energisation Administrator Team Leader	Customer Assist
Commercial Officer	Metering
Laboratory Services Control	Metering
Engineering Team Leader	Network Performance
Interval Metering Analyst	Metering
Customer Relationship Officer	Customer Assist
Standards, Policy & Data Quality Branch Manager	Standards, Policy & Data Quality
Asset Business Systems Manager	Network Performance
IT Service Manager	IT
Major Customer Account Manager	Customer Solutions
Customer Assist Branch Manager	Customer Assist
Senior Editor - Complaints and Small Claims	Customer Assist
Customer Service Centre Team Leader	Customer Assist
Risk and Compliance Branch Manager	Risk & Compliance

Positions of Western Power Personnel	Branch
Customer Service Centre Team Leader	Customer Assist
Reliability Analysis & Reporting Team Leader	Network Performance
Analyst	Metering
Reading Operations Coordinator	Metering
Information Services Analyst	Metering
Network Engineer	Network Performance
Team Leader	Customer Solutions
Regulation & Pricing Branch Manager	Regulation & Pricing
Reading Management Administrator	Metering
Principal Distribution Policy Development Officer	Standards, Policy & Data Quality
Project Officer	Environment, Community & Approvals
Environment, Community & Approvals Branch Manager	Environment, Community & Approvals
Major Customer Account Manager	Customer Solutions
Compliance Advisor	Risk & Compliance
Commercial Officer	Metering
Customer Service Centre Manager	Customer Assist
Operational Standards and Development Manager	Standards, Policy & Data Quality
Technical Administrator	Metering
Metering Branch Manager	Metering
Complaints and Dispute Resolution Officer – Complaints and Small Claims	Customer Assist
Metering Strategist	Metering
Operations Support & Document Control	Network Operations