

# Esperance Power Station Pty Ltd

ABN 24 086 409 949

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23<sup>rd</sup> March 2017

The Assistant Director Monitoring  
Economic Regulation Authority WA  
Level 4, 469 Wellington Street, Perth WA 6000  
PO Box 8469, Perth BC WA 6849

Dear Paul,

## **GDL 10 LICENCE AUDIT – EPS (PERFORMANCE AUDIT AND AMS) IMPLEMENTATION PLAN**

In accordance with the Authority's GDL 10 Performance Audit and Asset Management System Review requirements, Esperance Power Station's post audit implementation plan is shown below.

### **Performance Audit**

<b>Item</b>	<b>Action</b>	<b>By Whom</b>	<b>When</b>
1/2016 28	Make changes required by Energy Safety to remove the Inspectors Orders (IO)	Esperance Area Manager	July 2017
2/2016 89	Issue 4 day's notices when accessing the supply address for inspections, repairs, testing or maintenance to remove ESWA IO	Esperance Area Manager	July 2017

### **Asset Management System Review**

<b>Item</b>	<b>Action (2013 unresolved)</b>	<b>By Whom</b>	<b>When</b>
4.0 (01/2013) Environmental Analysis	Actions to resolve ESWA IO to be completed (utilise the outcome of the Safety Case audit to improve the asset management system)	Esperance Area Manager	July 2017
5.0 (3/2013) Asset Operations	Actions to resolve metering issues and ESWA IO (consider introducing a process to monitor UFG to ensure it remains within the KPI figure of 2.5%)	Esperance Area Manager	July 2017
12.0 (6/2013) Review of AMS	Undertake an annual audit of the Safety Case as required under the GSSSR 2000 and an independent review of the Asset Management Plan (ensure all asset management docs are reviewed and updated for currency).	Business and Regulatory Manager	November 2017

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Item	Action (2016 unresolved)	By Whom	When
4.3 (1/2016) Environmental Analysis	Complete the writing of the policies and procedures to obtain the removal of the IOs	Esperance Area Manager	July 2017
4.4 (2/2016) Environmental Analysis	Resolve metering issues to ESWA satisfaction (MLV 4 PRS Coriolis meter).	Esperance Area Manager	November 2017
5.1 (3/2016) Asset Operations	Complete work on revision of policies and procedures and actions necessary to complete the ESWA requirements to service levels required and to remove IO.	Esperance Area Manager	July 2017
5.2 (4/2016) Asset Operations	Complete work on revision of policies and procedures and actions necessary to complete the ESWA requirements and to remove IO/CAs (risks are identified but not managed correctly).	Esperance Area Manager	July 2017
5.3 (5/2016) Asset Operations	Complete work on revision of policies and procedures and actions necessary to complete the ESWA requirements and to remove IO/CAs (address non complying equipment).	Esperance Area Manager	July 2017
5.5 (6/2016) Asset Operations	Complete work on training and testing of the competency of employees and actions necessary to complete the ESWA requirements and to remove IO/CAs (review staffing levels and training other personnel, including Manager).	Esperance Area Manager	July 2017
6.2 (7/2016) Asset Maintenance	Undertake leakage surveys in accordance with the revised frequency and in accordance with the revised procedures to remove IO/CAs (review adequacy of methodology).	Esperance Area Manager	July 2017
6.3 (8/2016) Asset Maintenance	Make corrective actions required by ESWA to remove IO/CAs.	Esperance Area Manager	July 2017
6.5 (9/2016) Asset Maintenance	Make corrective actions required by ESWA Align documentation of dial before you dig with correct field practice to remove IO/CAs.	Esperance Area Manager	September 2017
7.1 (10/2016) Asset Management Info System	Complete IT system user documentation related to customer metering and billing.	Esperance Area Manager	December 2017
8.1 (11/2016) Risk Management	Implement the changes required for ESWA to remove the IO/CAs (requires separation of emergency plan for gas distribution from KEGP in AMS)	Esperance Area Manager	July 2017

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Item	Action (2016 unresolved)	By Whom	When
8.2 (12/2016) Risk Management	Ensure that the risks identified by the ESWA audit have treatment plans and they are actioned and monitored in accordance with the treatment plan (implement the changes required for ESWA to remove the IO/CAs).	Esperance Area Manager	July 2017
9.1 (13/2016) Contingency Planning	Make the corrective actions required by ESWA to remove IO/CAs (make improvements to emergency responses).	Esperance Area Manager	July 2017
12.2 (14/2016) Review of AMS	Undertake an annual audit of the Safety Case as required under the GSSSR 2000 and an independent review of the Asset Management Plan (AMP) to remove IO/CAs (undertake internal audit of Safety Case and an independent review of the AMP).	Business and Regulatory Manager	November 2017

Yours faithfully,



James Arthur  
Director  
Esperance Power Station Pty Ltd