



ERA License Audit and Asset Management System Review

Report

APA (Chichester) Pty Ltd

February 19, 2026

→ The Power of Commitment



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Executive Summary

APA (Chichester) Pty Ltd (referred to hereafter as the Licensee) engaged GHD Pty Ltd (referred to hereafter as GHD) to conduct a scheduled review of its Asset Management System (AMS) and audit of its Electricity Integrated Regional Licence.

The Licensee holds an Electricity Integrated Regional Licence (EIRL11) and is licensed to:

- Construct and operate generating works or operate generating works; and
- Sell electricity to customers other than small use customers.

This review and audit has been performed 3 years after the last audit/review was conducted in 2022 and covers the period 1 October 2022 to 30 September 2025. The Economic Regulation Authority (ERA) had granted the Licensee an extension to the minimum required two-yearly audit period.

During the audit/review period, on 1 November 2023, APA acquired Alinta Energy (Chichester) Pty Ltd and, as a result, the licence entity was updated from Alinta Energy (Chichester) Pty Ltd to APA (Chichester) Pty Ltd. It should be noted the acquisition included the transfer of asset management tasks from Alinta's asset management software to APA's.

After approval by the ERA of the Audit Plan, GHD carried out the review and audit during November and December 2025 as per the ERA 2025 Audit and Review Guidelines. This report provides the findings from the review and audit which assesses the Licensee's compliance with the conditions of its licence and the effectiveness of its AMS.

Licence Audit

GHD carried out a reasonable assurance engagement audit of 42 regulatory obligations with which the Licensee must comply. The specific obligations are listed in the report.

The audit interviews were conducted via Microsoft Teams with all required data provided via a secure data room. Of the 42 obligations applicable to the electricity generation licence, the Licensee was deemed to comply with 12 obligations. While 29 obligations were not rated, either because they did not apply to the Licensee or no event occurred over the 3-year assessment period for the Licensee to be assessed against.

For the 12 obligations the Licensee were deemed to comply with, the Licensee provided sufficient and timely evidence for GHD to conclude performance against those obligations were materially met for this review period.

For the 29 obligations not rated, GHD confirm that either these are not applicable to the Licensee or could not find evidence an event occurred that justified assessment.

One obligation was determined not to have been met for this review period and was resolved during the current audit period as a notice of intent of non-compliance was issued to the ERA.

The previous audit report identified one licence obligation to be non-compliant during the audit, however, processes established by the previous owner, Alinta, during the audit period to address the non-compliance ensured compliance requirements were met in subsequent years.

The Licensee's overall control environment operates well and shows compliance with the licensee's obligations to the Electricity Integrated Regional Licence. No recommendations were made as non-compliances during the audit period were resolved before the end of the period.

AMS Review

GHD carried out a reasonable assurance engagement review of the Licensee's AMS to assess the effectiveness of the Licensee's Asset Management System.

The Licensee was found to perform effectively against the criteria in the Guidelines. No recommendations were made as the Licensee did not perform under the threshold for any criterion during the review period.

The review interviews were conducted via an in-person meeting at the Licensee's main Perth office. Additionally, a site inspection was carried out at the Chichester Solar Farm.

The previous AMS review found two effectiveness criteria requiring corrective actions: items 4.2 and 5.6. The recommendations were in relation to systems utilised by the previous asset owner, and the Licensee's systems were not found to be performing under the threshold for recommendations in this review. Overall, due to no recommendations being needed it is GHD's opinion that the Licensee's AMS performs within the requirements of the ERA's guidelines.

This report is subject to, and must be read in conjunction with, the limitations set out in section 1.2 and the assumptions and qualifications contained throughout the Report.

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1. Introduction

ERA is Western Australia's independent economic regulator that is responsible for administering the licensing schemes for gas, electricity, and water services. This ensures Western Australian consumers and businesses operate in a fair, competitive, and efficient environment.

The Licensee holds an Electricity Integrated Regional Licence (EIRL11). This licence was issued by ERA under section 19 of the Electricity Industry Act 2004 and enables the Licensee to generate electricity.

1.1 Overview of APA (Chichester) Pty Ltd.

The Licensee is part of APA Group, based in Australia. The Licensee operates the Chichester Solar Farm (CHSF), a 60MW facility that generates electricity to supply Fortescue Metals Group Ltd.'s Chichester hub mining operations and the Roy Hill mine site.

1.2 Purpose of this Report

The purpose of this report is to:

- Describe the scope and objectives of the audit
- Present the audit findings, including the:
 - Auditor's observations
 - Auditor's recommendations
 - Status of the recommendations from the previous audit
- Describe the scope and objectives of the review
- Present the review findings, including the:
 - Reviewer's observations and findings
 - Reviewer's recommendations
 - Status of the recommendations from the previous review

1.3 Scope and Limitations

This report has been prepared by GHD for APA (Chichester) Pty Ltd and may only be used and relied upon by APA (Chichester) Pty Ltd for the purpose agreed between GHD and APA (Chichester) Pty Ltd as set out in section 1.1 of this report.

GHD otherwise disclaims responsibility to any person other than APA (Chichester) Pty Ltd arising in connection with this report. GHD also excludes implied warranties and conditions, to the extent legally permissible.

The services undertaken by GHD in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. GHD has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

The opinions, conclusions and any recommendations in this report are based on assumptions made by GHD described in this report (refer section(s) 4 of this report). GHD disclaims liability arising from any of the assumptions being incorrect.

Accessibility of documents

If this report is required to be accessible in any other format, this can be provided by GHD upon request and at an additional cost if necessary.

GHD has prepared this report on the basis of information provided by the Licensee and others who provided information to GHD (including Government authorities), which GHD has not independently verified or checked beyond the agreed scope of work. GHD does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

2. Methodology

2.1 Objectives

2.1.1 Licence Audit

The object of the reasonable assurance engagement audit is to provide the ERA an independent assessment of the effectiveness of measures taken by the Licensee to meet the conditions of their licence (EIRL11).

2.1.2 AMS Review

The objective of the limited assurance engagement review is to provide to the ERA an independent assessment of the effectiveness of the Licensee's AMS in relation to EIRL11 and provide recommendations to address identified non-compliances.

2.2 Methodology and Approach

GHD's approach involved working closely with the Licensee to identify actions and documents as soon as possible before the review report was finalised. This included:

- An initial discussion via teleconference with the Licensee to:
 - Identify the key processes and roles to be discussed
 - Discuss the Audit Plan
- Preparation of the draft Audit Plan for comment by the Licensee.
- Submission of the draft Audit Plan to the ERA for approval
- Meetings via in person and teleconference with business staff responsible for the audit/review area and assets. These involved:
 - Demonstration of key systems
 - Identifying documents to be sampled to confirm procedures and assess compliance with AMS criteria and license obligations
 - Review of procedures
- A site visit to CHSF
- Preparation of a draft Audit and Review Report for the Licensee's review and comment
- Preparation of a final report for submission to the ERA

2.2.1 Deviations from the Audit Plan

An extension to the delivery dates for the draft and final audit and review reports was requested by APA and approved by the ERA. Under the revised timeframes, the due dates for the draft report and final report were extended to 31 January 2026 and 28 February 2026, respectively. There were no other deviations from the Audit Plan submitted to the ERA.

3. Audit/Review Details

The audit undertaken by GHD was a reasonable assurance engagement to assess the performance of the Licensee's generation licence over the period October 2022 and September 2025.

The review undertaken by GHD was a limited assurance engagement to assess the performance of the Licensee's AMS over the period October 2022 and September 2025.

3.1 Previous Audit/Review Report Findings

The previous licence audit and AMS review reports, conducted over the period between 1 October 2019 and 30 September 2022, were used as a basis for assigning priority for the audit and review respectively. All outstanding recommendations were reviewed.

The previous (2022) audit report identified well managed compliance and integrity of reporting by the previous owner, Alinta against the standards and obligations prescribed in the licence throughout the 1 October 2019 to 30 September 2022 period. One licence obligation reviewed was found to be non-compliant during the audit, it was:

- Compliance Manual No 105

Recommendations were presented for further improvement against the non-compliant licence obligation, however, processes established by the previous owner, Alinta, during the audit period to address the non-compliance ensured compliance requirements were met in subsequent years.

The asset management system review found two effectiveness criteria requiring corrective actions, they were:

- Operational Environment 4.2 – performance required corrective action (B3 rating).
- Asset Operations 5.6 – performance required corrective actions (B3 rating).

The recommendations included:

- a) Schedule staff training to clear all overdue requirements with special emphasis given to site-specific emergency response drills.
- b) Ensure sufficient resources are allocated to maintaining key training requirements and emergency response drills.

3.2 Time Period Covered by the Audit/Review

The audit and review will cover the period from 1 October 2022 and 30 September 2025.

3.3 Time Period of the Audit/Review Process

The audit commenced in November 2025 after ERA approved the audit plan on the 13 November 2025.

A start-up meeting was held with the Licensee via Microsoft Teams with staff responsible for the audit.

Audit interviews with the Licensee were conducted on the following dates:

- 18 November – Licence audit in person and via teleconference call on Microsoft Teams
- 19 November – AMS review in person and via teleconference call on Microsoft Teams

Site visit to CHSF occurred on the 21 November.

Preparation of a draft audit report for ERA submitted by the 31 January 2026 was agreed.

Preparation of a final audit report for ERA submitted by the 28 February 2026 was agreed.

3.4 Details of the Licensee Representatives Participating in the Audit/Review

Details of representatives from the Licensee are tabulated below.

Table 1 Details of Licensee Attendees

Personnel	Role	Organisation
Regulatory Compliance Manager	Primary contact, interviewee	APA
Head of Operations – Pilbara Energy	Interviewee	APA
Operations Manager – Pilbara Energy	Interviewee	APA
Plant Manager – CHSF	Interviewee	APA
Power Business Operations Lead	Interviewee	APA

3.5 Details of Key Documents and Other Information Sources

A list of documents made available for the audit up to the end of the audit period is provided in Appendix B.

3.6 Details of Auditors Participating in the Audit/Review

The audit and review teams comprised of five (5) staff members from GHD. Details of their roles in the audit/review process are summarised in Table 2.

Table 2 Details of GHD Audit Team Members

Name	Role	Summary of Task	Hours Utilised (hrs)
Henry Le	Project Manager and Lead License Auditor	Project management Review of audit plan and audit report	16
Stuart Algera	Lead AMS Reviewer	AMS Review Review of audit report	8
Mackensie D’Alton	AMS Review Support	AMS Review Preparation of report	18
Emily Singleton	AMS Review Support	AMS Review Preparation of report	27
Kiersten Bell	Audit Review Support	Audit plan preparation Licence performance audit Preparation of report	50

4. Licence Performance Audit Performance Summary

Findings of the performance audit are summarised in a table with an adequacy of control and a compliance rating.

4.1 Assessment Rating Scales

In accordance with the Audit Guidelines, an assessment of the Licensee's performance was completed using a rating of adequacy of control and compliance, as summarised in Table 3.

Table 3 Audit Compliance and Control Rating Scale

Adequacy of Controls Rating		Compliance Rating	
Rating	Description	Rating	Description
A	Adequate controls - no improvement needed	1	Compliant
B	Generally adequate controls - improvement needed	2	Non-compliant – minor impact on customers or third parties
C	Inadequate controls – significant improvement required	3	Non-compliant – moderate impact on customers or third parties
D	No controls evident	4	Non-compliant – major impact on customers or third parties
NP	Not Performed – A control rating was not required	NR	Not rated – No activity took place during the audit period

4.2 Licence Conditions Compliance and Control Audit Ratings Summary

In accordance with the Audit Guidelines, an assessment of the Licensee's controls and compliance performance against its 42 EIRL11 licence obligations, that existed during this audit period was undertaken. Table 4 lists the number of licence obligations that were given each combination of control and compliance ratings. This table allows the Licensee and the ERA to confirm that we have rated all relevant licence obligations and provides a simple summary of the Licensee's performance during the audit period.

Table 4 Licence Conditions Compliance and Control Ratings Summary Table

	Rating	Compliance rating					Total
		1	2	3	4	N/R	
Controls rating	A	12					12
	B						
	C						
	D						
	N/P		1			29	30
	Total						42

The findings from the previous licence audit informed the audit priority ranking of these affected obligations and hence we assessed the Licensee's performance against both the control procedure and control environment criteria and compliance criteria for the Electricity Compliance Reporting Manuals. As the audit period covers 1 October 2022 to 30 September 2025, three versions of this manual (herein referred to as "Electricity Compliance Reporting Manuals") were applied:

- Electricity Compliance Reporting Manual February 2023: applied from 20 February 2023
- Electricity Compliance Reporting Manual January 2023: applied 3 January 2023 – 19 February 2023
- Electricity Compliance Reporting Manual February 2022: applied 1 October 2022 – 2 January 2023

GHD did not assess the Licensee's control procedures and control environment for those 30 licence obligations and have accordingly labelled them as 'not performed' or N/P as they were either not applicable to the Licensee, or some prescribed event did not occur, or activities or decisions were not undertaken during the audit period.

5. Licence Performance Audit Observations and Recommendations

5.1 Licence Conditions Compliance and Control Audit

Table 5 summarises the audit findings of the Licensee's performance against its Electricity Integrated Regional Licence (EIRL11) licence obligations and corresponding recommendations where non-control and/or non-compliance were identified during the audit period. This table does not provide the observation commentary against the control rating and compliance rating for the sake of brevity in the body of the report. Our assessment observations are detailed in Appendix A.

Table 5 Licence condition compliance and control audit – summary finding table and recommendations

No	Obligation under Licence conditions	Description	Control rating					Compliance rating					Recommendations	
			A	B	C	D	N/P	1	2	3	4	N/R		
101	Electricity Industry Act, section 13(1)	A licensee must provide the ERA with a performance audit conducted by an independent expert acceptable to the ERA, not less than once every 24 months.	✓					✓						None
102	Electricity Industry Act, section 14(1)(a)	A licensee must provide for an asset management system.	✓					✓						None
103	Electricity Industry Act, section 14(1)(b)	A licensee must notify details of the asset management system and any substantial changes to it to the ERA.	✓					✓						None
104	Electricity Industry Act, section 14(1)(c)	A licensee must provide the ERA with a report by an independent expert about the effectiveness of its asset management system every 24 months, or such longer period as determined by the ERA.	✓					✓						None
105	Economic Regulation Authority (Licensing Funding) Regulations 2014	A licensee must pay the prescribed licence fees to the ERA according to clauses 6, 7 and 8 of the Economic Regulation Authority (Licensing Funding) Regulations 2014.	✓					✓						None

No	Obligation under Licence conditions	Description	Control rating					Compliance rating					Recommendations	
			A	B	C	D	N/P	1	2	3	4	N/R		
106	Electricity Industry Act, section 31(3)	A licensee must take reasonable steps to minimise the extent, or duration, of any interruption, suspension or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause.	✓					✓						None
107	Electricity Industry Act, section 41(6)	A licensee must pay the costs of taking an interest in land or an easement over land.					✓						✓	None
119	Electricity Industry Act, section 11	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.	✓					✓						None
120	Electricity Industry Act, section 11	A licensee must comply with any individual performance standards prescribed by the ERA.					✓						✓	None
121	Electricity Industry Act, section 11	A licensee must comply, and require its auditor to comply, with the ERA's standard audit guidelines for a performance audit.	✓					✓						None
122	Electricity Industry Act, section 11	A licensee must comply, and must require the Licensee's expert to comply, with the relevant aspects of the ERA's standard audit guidelines for an asset management system review.	✓					✓						None
123	Electricity Industry Act, section 11	In the manner prescribed, a licensee must notify the ERA, if it is under external administration or if there is a significant change in the circumstances that the Licence was granted which may affect the Licensee's ability to meet its obligations.					✓						✓	None

No	Obligation under Licence conditions	Description	Control rating					Compliance rating					Recommendations	
			A	B	C	D	N/P	1	2	3	4	N/R		
124	Electricity Industry Act, section 11	A licensee must provide the ERA, in the manner prescribed, with any information that the ERA requires in connection with its functions under the Electricity Industry Act.					✓						✓	None
125	Electricity Industry Act, section 11	A licensee must publish any information as directed by the ERA to publish, within the timeframes specified.					✓						✓	None
126	Electricity Industry Act, section 11	All notices must be in writing, unless otherwise specified.	✓					✓						None
324	Electricity Industry Metering Code, clause 3.3B	If a user is aware of bi-directional electricity flows at a metering point that was not previously subject to a bi- directional flows or any changes in a customer's or user's circumstances in a metering point that will result in bi- directional flows, the user must notify the network operator within 2 business days.					✓						✓	None
339	Electricity Industry Metering Code, clause 3.11(3)	A Code participant who becomes aware of an outage or malfunction of a metering installation must advise the network operator as soon as practicable.					✓						✓	None
371	Electricity Industry Metering Code, clause 4.4(1)	If there is a discrepancy between energy data held in a metering installation and in the metering database, the affected Code participants and the network operator must liaise to determine the most appropriate way to resolve the discrepancy.					✓						✓	None
372	Electricity Industry Metering Code, clause 4.5(1)	A Code participant must not knowingly permit the registry to be materially inaccurate.					✓						✓	None

No	Obligation under Licence conditions	Description	Control rating					Compliance rating					Recommendations	
			A	B	C	D	N/P	1	2	3	4	N/R		
373	Electricity Industry Metering Code, clause 4.5(2)	Subject to subclause 5.19(6), if a Code participant, other than a network operator, becomes aware of a change to, or inaccuracy in, an item of standing data in the registry, then it must notify the network operator and provide details of the change or inaccuracy within the timeframes prescribed.					✓						✓	None
388	Electricity Industry Metering Code, clause 5.4(2)	A user must, when reasonably requested by a network operator, assist the network operator to comply with the network operator's obligation under subclause 5.4(1).					✓						✓	None
401	Electricity Industry Metering Code, clause 5.16	If a user collects or receives energy data from a metering installation then the user must provide the network operator with the energy data (in accordance with the communication rules) within the timeframes prescribed.	✓					✓						None
402	Electricity Industry Metering Code, clause 5.17(1)	A user must provide standing data and validated, and where necessary substituted or estimated, energy data to the user's customer to which that information relates where the user is required by an enactment or an agreement to do so for billing purposes or for the purpose of providing metering services to the customer.	✓					✓						None
405	Electricity Industry Metering Code, clause 5.18	If a user collects or receives information regarding a change in the energisation status of a metering point then the user must provide the network operator with the prescribed information, including the stated					✓						✓	None

No	Obligation under Licence conditions	Description	Control rating					Compliance rating					Recommendations	
			A	B	C	D	N/P	1	2	3	4	N/R		
		attributes, within the timeframes prescribed.												
406	Electricity Industry Metering Code, clause 5.19(1)	A user must, when requested by the network operator acting in accordance with good electricity industry practice, use reasonable endeavours to collect information from customers, if any, that assists the network operator in meeting its obligations described in the Code and elsewhere, and provide that information to the network operator.					✓						✓	None
407	Electricity Industry Metering Code, clause 5.19(2)	A user must, to the extent that it is able, collect and maintain a record of the prescribed information in relation to the site of each connection point with which the user is associated.					✓						✓	None
408	Electricity Industry Metering Code, clause 5.19(3)	Subject to subclauses 5.19(3A) and 5.19(6), the user must, within 1 business day after becoming aware of any change in an attribute described in subclause 5.19(2), notify the network operator of the change.					✓						✓	None
410	Electricity Industry Metering Code, clause 5.19(6)	The user must use reasonable endeavours to ensure that it does not notify the network operator of a change in an attribute described in subclause 5.19(2) that results from the provision of standing data by the network operator to the user.					✓						✓	None
416	Electricity Industry Metering Code, clause 5.21(5)	A Code participant must not request a test or audit under subclause 5.21(1) unless the Code participant is a user and the test or audit relates to a time or times at which the user was the current user or the Code participant is the AEMO.					✓						✓	None

No	Obligation under Licence conditions	Description	Control rating					Compliance rating					Recommendations	
			A	B	C	D	N/P	1	2	3	4	N/R		
417	Electricity Industry Metering Code, clause 5.21(6)	A Code participant must not make a request under subclause 5.21(1) that is inconsistent with any access arrangement or agreement.					✓						✓	None
435	Electricity Industry Metering Code, clause 5.27	Upon request from a network operator, the current user for a connection point must provide the network operator with customer attribute information that it reasonably believes are missing or incorrect within the timeframes prescribed.					✓						✓	None
448	Electricity Industry Metering Code, clause 6.1(2)	A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed.					✓						✓	None
451	Electricity Industry Metering Code, clause 7.2(1)	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.					✓		✓					During 2024-2025, APA was unable to send or receive notice by facsimile. Notice of intent of non-compliance was issued to the ERA.
453	Electricity Industry Metering Code, clause 7.2(4)	If requested by a network operator with whom it has entered into an access contract, the Code participant must notify its contact details to a network operator within 3 business days after the request.					✓						✓	None
454	Electricity Industry Metering Code, clause 7.2(5)	A Code participant must notify any affected network operator of any change to the contact details it notified to the network operator under subclause 7.2(4) at least 3 business days before the change takes effect.					✓						✓	None

No	Obligation under Licence conditions	Description	Control rating					Compliance rating					Recommendations	
			A	B	C	D	N/P	1	2	3	4	N/R		
455	Electricity Industry Metering Code, clause 7.5	A Code participant must subject to subclauses 5.17A and 7.6 not disclose, or permit the disclosure of, confidential information provided to it under or in connection with the Code and may only use or reproduce confidential information for the purpose for which it was disclosed, or another purpose contemplated by the Code.					✓						✓	None
456	Electricity Industry Metering Code, clause 7.6(1)	A Code participant must disclose or permit the disclosure of confidential information that is required to be disclosed by the Code.					✓						✓	None
457	Electricity Industry Metering Code, clause 8.1(1)	If any dispute arises between any Code participants, then (subject to subclause 8.2(3)) 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 by negotiations in good faith.					✓						✓	None
458	Electricity Industry Metering Code, clause 8.1(2)	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.					✓						✓	None
459	Electricity Industry Metering Code, clause 8.1(3)	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					✓						✓	None

No	Obligation under Licence conditions	Description	Control rating					Compliance rating					Recommendations	
			A	B	C	D	N/P	1	2	3	4	N/R		
		party who must meet and attempt to resolve the dispute by negotiations in good faith.												
460	Electricity Industry Metering Code, clause 8.1(4)	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.					✓						✓	None
461	Electricity Industry Metering Code, clause 8.3(2)	The disputing parties must at all times conduct themselves in a manner which is directed towards achieving the objective in subclause 8.3(1).					✓						✓	None

5.2 Recommendations of current audit

Audit recommendations from the current audit period are described below. All recommendations have been resolved during the audit period.

Table 5 Status of recommendations addressing non-compliances from the current audit

Resolved during current audit Period			
Recommendation reference (no./year): 1/2025	License obligation number: 451 Controls and Compliance Rating: N/P, 2 Obligation description: Metering Code Clause 7.2(1) Details of inadequate controls or non-compliance: During 2024-2025, APA was unable to send or receive notice by facsimile.	Date Resolved: Notice of intent of non-compliance was issued to the ERA.	Further action required (Yes/No/Not applicable): No Details of Further Action Required (Including Current Recommendation Reference, if Applicable): N/A

6. AMS Review Performance Summary

Findings of the performance audit are summarised in a table with an adequacy of control and a compliance rating.

6.1 Assessment Rating Scales

In accordance with the 2025 Audit and Review Guidelines, the review of the asset management effectiveness was completed using the rating scales outlined in Table 6 and Table 7.

Table 6 Asset Management Process and Policy Definition Rating

Rating	Description	Criteria
A	Adequately defined	<ul style="list-style-type: none"> Processes and policies are documented. Processes and policies adequately document the required performance of the assets. Processes and policies are subject to regular reviews and updated where necessary. The asset management information system(s) are adequate in relation to the assets being managed.
B	Requires some improvement	<ul style="list-style-type: none"> Processes and policies require improvement. Processes and policies do not adequately document the required performance of the assets. Reviews of processes and policies are not conducted regularly enough. The asset management information system(s) requires minor improvements (taking into consideration the assets being managed).
C	Requires significant improvement	<ul style="list-style-type: none"> Processes and policies are incomplete or require substantial improvement. Processes and policies do not document the required performance of the assets. Processes and policies are considerably out of date. The asset management information system(s) requires substantial improvements (taking into consideration the assets being managed).
D	Inadequate	<ul style="list-style-type: none"> Processes and policies are not documented. The asset management information system(s) is not fit for purpose (taking into consideration the assets being managed).

Table 7 Performance Rating Scale (Reviews)

Rating	Description	Criteria
1	Performing effectively	<ul style="list-style-type: none"> The performance of the process meets or exceeds the required levels of performance. Process effectiveness is regularly assessed, and corrective action taken where necessary.
2	Improvement required	<ul style="list-style-type: none"> The performance of the process requires some improvement to meet the required level. Process effectiveness reviews are not performed regularly enough. Recommended process improvements are not implemented.
3	Corrective action required	<ul style="list-style-type: none"> The performance of the process requires substantial improvement to meet the required level. Process effectiveness reviews are performed irregularly, or not at all. Recommended process improvements are not implemented
4	Serious action required	<ul style="list-style-type: none"> Process is not performed, or the performance is so poor the process is considered to be ineffective.

6.2 AMS Review Effectiveness Summary

The AMS review assessed the effectiveness in delivering the services required under the operating license.

The review was conducted using the asset management adequacy and performance ratings as described in Table 6 and Table 7. A summary of outcomes of the review is provided in Table 8.

Table 8 AMS Review Results Summary

AMS Component	Adequacy Rating	AMS Performance Rating
1. Asset Planning	A	1
Asset management plan covers the processes in this table	B	1
Planning processes and objectives reflect the needs of all stakeholders and are integrated with business planning	A	1
Service levels are defined in the asset management plan	A	1
Non-asset options (e.g. demand management) are considered	A	1
Lifecycle costs of owning and operating assets are assessed	A	1
Funding options are evaluated	A	1
Costs are justified and cost drivers identified	A	1
Likelihood and consequences of asset failure are predicted	A	1
Asset management plan is regularly reviewed and updated	A	1
2. Asset creation and acquisition	A	1
Full project evaluations are undertaken for new assets, including comparative assessment of non-asset options	A	1
Evaluations include all life-cycle costs	A	1
Projects reflect sound engineering and business decisions	A	1
Commissioning tests are documented and completed	A	1
Ongoing legal / environmental / safety obligations of the asset owner are assigned and understood	A	1
3. Asset Disposal	A	1
Under-utilised and under-performing assets are identified as part of a regular systematic review process	A	1
The reasons for under-utilisation or poor performance are critically examined and corrective action or disposal undertaken	A	1
Disposal alternatives are evaluated	A	1
There is a replacement strategy for assets	A	1
4. Operational Environment	A	1
Opportunities and threats in the Asset Management System environment are assessed	A	1
Performance standards (availability of service, capacity, continuity, emergency response, etc.) are measured and achieved	A	1
Compliance with statutory and regulatory requirements	A	1
Service standard (customer service levels etc) are measured and achieved.	A	1

AMS Component	Adequacy Rating	AMS Performance Rating
5. Asset operations	A	1
Operational policies and procedures are documented and linked to service levels required	A	1
Risk management is applied to prioritise operations tasks	A	1
Assets are documented in an asset register including asset type, location, material, plans of components, and an assessment of assets' physical/structural condition	A	1
Accounting data is documented for assets	A	1
Operational costs are measured and monitored	A	1
Staff resources are adequate and staff receive training commensurate with their responsibilities	A	2
6. Asset maintenance	A	1
Maintenance policies and procedures are documented and linked to service levels required	A	1
Regular inspections are undertaken of asset performance and condition	A	1
Maintenance plans (emergency, corrective, and preventative) are documented and completed on schedule	B	1
Failures are analysed and operational/maintenance plans adjusted where necessary	A	1
Risk management is applied to prioritise maintenance tasks	A	1
Maintenance costs are measured and monitored	A	1
7. Asset management information system	A	1
Adequate system documentation for users and IT operators	A	1
Input controls include suitable verification and validation of data entered into the system	A	1
Security access controls appear adequate, such as passwords	A	1
Physical security access controls appear adequate	A	1
Data backup procedures appear adequate, and backups are tested	A	1
Computations for licensee performance reporting are accurate	A	1
Management reports appear adequate for the Licensee to monitor licence obligations	A	1
Adequate measures to protect asset management data from unauthorised access	A	1
8. Risk management	A	1
Risk management policies and procedures exist and are applied to minimise internal and external risks	A	1
Risks are documented in a risk register and treatment plans are implemented and monitored	A	1
Probability and consequences of asset failure are regularly assessed	A	1
9. Contingency planning	A	1
Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks	A	1

AMS Component	Adequacy Rating	AMS Performance Rating
10. Financial planning	A	1
The financial plan states the financial objectives and identifies strategies and actions to achieve those	A	1
The financial plan identifies the source of funds for capital expenditure and recurrent costs	A	1
The financial plan provides projections of operating statements (profit and loss) and statement of financial position (balance sheets)	A	1
The financial plan provides firm predictions on income for the next five years and reasonable predictions beyond this period	A	1
The financial plan provides for the operations and maintenance, administration and capital expenditure requirements of the services	A	1
Large variances in actual/budget income and expenses are identified and corrective action taken where necessary	A	1
11. Capital expenditure planning	A	1
There is a capital expenditure plan covering works to be undertaken, actions proposed, responsibilities and dates	A	1
The capital expenditure plan provides reasons for capital expenditure and timing of expenditure	A	1
The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan	A	1
There is an adequate process to ensure the capital expenditure plan is regularly updated and implemented	A	1
12. Review of AMS	A	1
A review process is in place to ensure the asset management plan and the Asset Management System described in it remain current	B	1
Independent reviews (e.g. internal audit) are performed of the Asset Management System	A	1

7. AMS Review Observations and Recommendations

7.1 Asset Management System Review

The AMS review conducted is in Table 9. As per the ERA guidelines, recommendations are only given to performance ratings of 3 and 4 or process and policy ratings of C and D.

Table 9 Asset Management Review Observations and Recommendations

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
1	Asset planning Asset planning strategies focuses on meeting customer needs in the most effective and efficient manner (delivering the right service at the right price).			A	1
1.1	Asset management plan covers the processes in this table	2	<p>The Licensee has evidenced each of the applicable processes with respect to asset planning. See individual effectiveness criteria for detailed observations.</p> <p>The Asset Management Plan (AMP) is currently being updated and brought across to the Licensee's documentation standard. The previous Alinta AMP that was effective during the audit period and the draft FY26 version were provided as evidence. The 2026 draft version shows the previous iterations of the document including the rebranding that occurred on 9th December 2024.</p> <p>The AMP has been found to require minor improvement, as both the current AMP and draft AMP provided by the Licensee refer to Ellipse as the enterprise resource system used to track OEM and risks. Ellipse is the legacy Asset Management software that was used by Alinta and was in use under ownership of the Licensee until the system could be migrated to Maximo and Vigilant, which has since been accomplished. It is noted that the AMP is currently under review and undergoing major updates, and it is the AMP effective from the end date of the audit period that has been reviewed.</p>	B	1
1.2	Planning processes and objectives reflect the needs of all stakeholders and are integrated with business planning	4	<p>Section 2.2 (Consultation) of the AMP states that the AMP has been developed in consultation with key Licensee stakeholders and personnel, as well as external stakeholders where applicable and appropriate. Section 7.2 (Regulatory Compliance Summary) provides a summary of all the regulatory compliances, as well as who is responsible for managing and upkeeping the compliances.</p> <p>The Licensee also evidenced their Operational Excellence Standard, which ensures they will run their business effectively, efficiently and consistently, in order to extract maximum value for their customers and stakeholders. The standard provides a framework of six pillars to achieving operational excellence, then expands on what is required for Strategic Asset Reviews, Performance Monitoring and Management, Asset Risk and Opportunity Management, and Continuous Improvement.</p>	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
1.3	Service levels are defined in the asset management plan	4	<p>Section 3 (Performance Monitoring and Management) of the Licensee's Operational Excellence Standard outlines the performance requirements required for business processes.</p> <p>The AMP section 4.3 records the actual and forecast historical asset performance of generation sent out, capacity factor, availability, forced outage factor and planned outage factor metrics.</p> <p>The power performance dashboard was also witnessed, demonstrating that the performance of the different assets is monitored. The dashboard takes data from Maximo, and was witnessed to include asset health, process safety, finance, maintenance, integrity, regulatory compliance, reliability and maintenance strategy, risk and opportunity and optimisation.</p>	A	1
1.4	Non-asset options (e.g. demand management) are considered	4	<p>This finding is unchanged from previous audit.</p> <p>There is no requirement to consider non-asset options since the asset's primary purpose is to provide power to customers per the PPA.</p>	A	1
1.5	Lifecycle costs of owning and operating assets are assessed	2	<p>Section 6 of the AMP provides a 5-year capital expenditures forecast for the asset, as well as the capital expenditure of projects related to the asset in FY24.</p> <p>A Lifecycle Interface Tool was also witnessed, showing all the projects and budgeting associated with the asset for each financial year. Maximo third party software provides ten-year forecasts and feeds into an in-house program for lifecycle plans. More detailed budget planning is conducted annually, covering OPEX, CAPEX, asset refurbishment and renewals for a rolling 3-year period.</p> <p>The Asset Lifecycle Planning Procedure was also evidenced, which shows the key management practices used in asset lifecycle planning, as well as a 3-year ESPP Divisional Strategic Plan incorporating lifecycle costs from across the Licensee's Operations division.</p> <p>Dashboards providing a financial breakdown of each asset were also witnessed.</p>	A	1
1.6	Funding options are evaluated	2	<p>Refer to criteria 1.5</p> <p>The Licensee's Asset Lifecycle Planning Procedure describes the requirement for individual financial models for each asset, including carrying value (CV) models, and long-term (20 year) CAPEX forecast. A CV Summary Updates SOP (Standard Operating Procedure) was also provided as evidence.</p> <p>Risk assessments in Maximo were witnessed. These allocate risk rankings to each project which helps assess the available budget.</p> <p>The Licensee's Project Management Framework (PMF) also includes requirements around consideration of funding options.</p>	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
1.7	Costs are justified and cost drivers identified	2	<p>Contractual obligations are defined in the PPA. The Operational Excellence Standard also provides a breakdown of the main drivers behind the business, including, but not limited to, health and safety, strategic growth, operation risk and opportunity, infrastructure planning, and compliance and assurance.</p> <p>The project risk rankings, generated for each proposal through the Project Proposal Tool (PPT), are used internally to assess and prioritise projects. Information about a proposal is entered into the PPT, and then used by another system to assign a risk value per the risk template shown in the PPT. This value is then used to prioritise projects in the PPT. This system was demonstrated by the Licensee during the interview, with screenshots also provided as evidence.</p> <p>Separate risk assessments are also conducted during lifecycle workshops to confirm risk rankings.</p>	A	1
1.8	Likelihood and consequences of asset failure are predicted	4	<p>Refer to criteria 1.7 regarding risk ranking of each project.</p> <p>Inspections are conducted to assess the condition of assets and contribute to predicting potential failure. Asset health is regularly monitored via the Operational Performance Dashboard (OPD), using input data from Maximo.</p> <p>A risk register is maintained for the asset in Vigilant; this was witnessed and a sample provided for evidence. The AMP also includes documentation of asset risks and how these are incorporated into the asset's management system.</p> <p>The Licensee's Risk Management Standard was also evidenced, which outlines the minimum requirements for risk management to standardise it across the Licensee's assets.</p>	A	1
1.9	Asset management plan is regularly reviewed and updated	1	<p>The AMP has a history of regular reviews documented within. It is reviewed annually, as well as being updated when major changes happen in the AMS. The AMP revision history shows that the last review within the audit period was completed on the 9 December 2024, with four previous reviews in 2023.</p> <p>The Licensee has provided a draft of the new AMP revision being prepared for FY2026.</p> <p>The Licensee's AMS and Asset Management Planning Business Process Definitions are reviewed every three years, with the last reviews within the audit period being completed on the 22 and 23 April 2025 respectively.</p>	A	1
2	<p>Asset creation and acquisition Asset creation/acquisition is the provision or improvement of assets</p>			A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
2.1	Full project evaluations are undertaken for new assets, including comparative assessment of non-asset options	2	<p>The Licensee's PMF is evidenced, which describes the key components for project management over the lifetime of the project starting at feasibility and finishing at decommissioning.</p> <p>The Project Proposal Tool (PPT) was also witnessed showing details for the project proposal such as required approvers, financial details and risk assessment. The Licensee's prioritisation of project and proposals is also witnessed, showing the priority assigned to each.</p> <p>The only project undertaken for this asset during the review period was the installation of a new filtration system on the solar farm. This project was initiated under the previous licence holder, and the Licensee is unable to acquire a copy of the full project evaluation. However, the decision-making process that was undertaken was described verbally by the Licensee, including analysis of maintenance on inverters which deemed the existing filtration system inadequate, and NPV analysis.</p>	A	1
2.2	Evaluations include all life-cycle costs	2	<p>See criteria 1.5 and 2.1</p> <p>Part of the Project Proposal Tool provides a look ahead of inflows along with CAPEX and OPEX outflows.</p> <p>The PMF also says a financial model will be developed for the business case as part of the feasibility study.</p>	A	1
2.3	Projects reflect sound engineering and business decisions	2	<p>See criteria 2.1</p> <p>The PMF provides an adequate basis for making sure projects follow good engineering practices and investigating the effects for the Licensee's business. The Licensee also provided their Asset Integration Business Process Definition, which ensures projects are integrating into the business as seamlessly as possible, as well as the ESPP Divisional Strategic Plan, which incorporates costs, priorities, risks and activities across the Operations division.</p> <p>The Licensee's Project Completion Register Template is also evidenced, which demonstrates a checklist with the requirements for projects, acceptance criteria, required reference documents and who is responsible for the item.</p>	A	1
2.4	Commissioning tests are documented and completed	2	<p>The Licensee's PMF details requirements for commissioning testing, including performance and reliability acceptance testing. The Licensee also provided their Asset Commissioning and Handover Business Process Definition, which further documents this process.</p> <p>During this review period, the only relevant acquisition for this asset was the installation of a new filtration system. A report documenting the testing of this new system was evidenced.</p>	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
2.5	Ongoing legal / environmental / safety obligations of the asset owner are assigned and understood	2	See criteria 1.2 regarding Section 7.2 of the AMP. See criteria 2.3 with reference to the Project Completion Register Template. Obligations are also stored and monitored in the Vigilant system, including assigning an owner and linking controls. Screenshots of this system have been provided by the Licensee.	A	1
3	Asset disposal Asset disposal is the consideration of alternatives for the disposal of surplus, obsolete, under-performing or unserviceable assets.			A	1
3.1	Under-utilised and under-performing assets are identified as part of a regular systematic review process	4	The Licensee's OPD was witnessed to provide an overview of the asset's actual performance against the target performance. This is reviewed in monthly Asset Performance Meetings to monitor asset performance. Also evidenced was the Licensee's Power Performance Dashboard (PPD), which provides several metrics for assessing an asset's performance. Lifecycle Workshops are also held annually for each asset, and the Licensee provided evidence of an example agenda for one of these workshops, which listed Asset Performance as an agenda item.	A	1
3.2	The reasons for under-utilisation or poor performance are critically examined and corrective action or disposal undertaken	4	The Licensee's Asset Management Procedure for Suspension of Operating Assets was evidenced. The procedure has been developed to be flexible so that it can be applied to a range of project cases and provides a guide to the decision making behind the suspension of an asset as well as the process to suspend an asset. Any failures are flagged in operational incident reports and are also highlighted in the OPD, where they are discussed in weekly meetings. Reports are generated through scheduled maintenance and inspections, ensuring that any issues are promptly identified and addressed. Additionally, suspended equipment is tracked in Maximo, providing a comprehensive overview of the status and condition of all assets.	A	1
3.3	Disposal alternatives are evaluated	2	No assets were disposed of during the audit period. The Licensee provided evidence of their Asset Decommissioning Business Process Definition, which ensures decommissioned assets follow a set of procedures, including deactivation operations, archiving asset records, planning and execution of asset removal, re-purposing or recycling, regulatory notification, land rehabilitation and monitoring, and sale or divestiture.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
3.4	There is a replacement strategy for assets	4	<p>Refer to criteria 3.2 and 3.3</p> <p>The AMP contains a section on the spares for the asset, including a list of key maintenance spares held by the Licensee, and a description of the decision-making process behind which spares to hold.</p> <p>A spares register is kept in the Maximo system, which includes descriptions, quantities, and storage locations. Replacements are predicted and overlaid with the spares register.</p> <p>The Licensee projects lifecycle costs of the asset as mentioned in criteria 1.5.</p>	A	1
4	<p>Operational Environment</p> <p>Operational Environment examines the Asset Management System environment and assesses all external factors affecting the Asset Management System.</p>			A	1
4.1	Opportunities and threats in the Asset Management System environment are assessed	1	<p>The Licensee evidences their Operational Excellence Framework section 1.1 Operations Risk & Opportunities. The purpose of this document is to ensure strategic objectives of Operations are met. The framework outlines that the external and internal environment should be analysed in a structured process to identify emerging risks and opportunities. Identified risks are managed with appropriate controls and treatments in place.</p> <p>Recurring maintenance and maintenance strategies are managed in Maximo in conjunction with the PM (Preventative Maintenance) schedules, if a defect is discovered a CM (Corrective Maintenance) is flagged in Maximo for the faulty equipment to be fixed. Maintenance levels are tracked in operational performance dashboards which were witnessed and screen shots provided.</p> <p>Maintenance completion is also tracked in Pilbara Energy Systems O&M Weekly Meetings and monthly operational performance meetings assess changes to external and internal environment; the Licensee has provided minutes for weekly meeting for 2024 and 2025 as evidence. The Licensee weekly meetings provide week on week assessment of maintenance, operations, resourcing and health & safety. Monthly look ahead is also discussed including upcoming leave, tasks and outages.</p>	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
4.2	Performance standards (availability of service, capacity, continuity, emergency response, etc.) are measured and achieved	1	<p>The Licensee's Power Performance Report dashboard allows them to track performance of the asset. The dashboard breaks down performance of assets into trackable metrics such as availability. Availability tracks outages due to forced trips, planned outages, maintenance and forced outages.</p> <p>During the interviews it was witnessed through the dashboard that on an asset level availability was slightly lower during the audit period, this was mostly attributed to a major inspection on one of the frames at Newman Power Station which was significantly delayed. Commercially the Licensee has achieved the required availability through the audit period as its purpose according to the AMP is to supply as much solar power to customers as possible and any decrease in availability from CHSF is filled by Newman Power Station.</p> <p>The dashboard also provides a historical list of outages. List item provides details including the plant name, outage type, out of service time, return to service time along with any comments on outage and corrective actions taken. Trips are uploaded to Safeguard part the Licensee's Maximo environment.</p> <p>The Licensee has an Emergency Management Plan for CHSF (dated 28 May 2024) which provides a detailed description of emergency response procedures and how to classify emergencies as level 1 through 4. See item 6.4 with reference to a major failure which occurred at CHSF.</p>	A	1
4.3	Compliance with statutory and regulatory requirements	2	<p>The Licensee's Compliance Management Policy (dated 27 August 2024) outlines objectives and responsibilities for compliance management.</p> <p>Business Process Definition section 5.3 Regulatory Compliance (dated 29 July 2025) is also provided which describes the deliverables to ensure assets are operated in accordance with legislative obligations. The document also provides the KPIs for measuring compliance and criteria for each KPI to assess its performance.</p> <p>Vigilant software is a web-based platform that allows an organisation to manage and track compliance, regulatory and risk items. The Licensee provided samples of their Regulations, Obligations & Controls dashboard (managed in Vigilant) which shows the number of obligations per asset. Detailed views of each obligation and control provide details including description, status, obligation owner, last certified date and priority.</p> <p>Along with obligations and controls tracking it can be seen, CHSF Annual Compliance reports have been provided to ERA as required.</p>	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
4.4	Service standard (customer service levels etc) are measured and achieved.	4	<p>The PPA (Power Purchase Agreement) for FMG is outlined in section 3 Basis of Operation and Maintenance Program in the AMP, in which the FMG requires the Licensee to ensure CHSF is well maintained, the farm was designed to provide 40% of FMG forecast load. The completion of the PPAs is used as a basis to determine the required long-term service for each asset to ensure they remain in operation for the extent of the PPAs.</p> <p>Customer service levels are tracked in Power Performance dashboards (see item 4.2) and have been satisfactory throughout the audit period. Commercial and Operations Performance meetings are held with the customers (FMG) which discuss safety, asset performance, outages, summary of good and bad news. Samples of weekly operation & maintenance meetings minutes have also been provided (see item 4.1), which include discussions on the current state of operations.</p>	A	1
5	<p>Asset operations Asset operations is the day-today running of assets (where the asset is used for its intended purpose).</p>			A	1
5.1	Operational policies and procedures are documented and linked to service levels required	2	<p>See Item 4.4 with reference to PPA for FMG being outlined in section 3 of the AMP. All operational procedures are linked in Maximo, auditors witnessed a workorder where the procedures to conduct maintenance had been detailed within the work order. Internal reporting of outages planned and unplanned are document in the POD (Plant Outage Database), maintenance plans can then be linked to these outages.</p> <p>The CHSF AMP section 3 outlines the Operation and Maintenance Regime. Which provides a general overview of operations and a high-level look at maintenance procedures conducted for assets. The AMP also references APA Maintenance Standards along with APA Asset Management Policy.</p>	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
5.2	Risk management is applied to prioritise operations tasks	2	<p>Discussions with the Licensee personnel during interviews found that risk is inherently linked to the prioritisation of tasks through Maximo. The Licensee has detailed policy and procedures describing how risk management is performed.</p> <p>The Licensee's Risk Management System – Procedures is evidenced which provides generalised risk management approach for all operations to assess risks and risk management activities. Management of emerging risks is also considered in which depending on the predicted impact and timeframe of the risk they can be assigned as:</p> <ul style="list-style-type: none"> • Act (3-5 years, Level 4 and 5) • Monitor (3–5 years, Level 3 / >5 years, Level 4 and 5) • Do Nothing (>5 years, Level 3) <p>Work orders also have priority ratings assigned when they are created. Priority ratings determine who is notified when the work order is created as well as influence how work orders are prioritised. The priority rating ranges from 1 to 5 with 1 being the highest priority.</p> <p>The Priority designation was witnessed in a workorder being created, samples from within Maximo were also provided showing the allocated priority for different work orders.</p>	A	1
5.3	Assets are documented in an asset register including asset type, location, material, plans of components, and an assessment of assets' physical/structural condition	1	<p>Maximo is used as a live asset register; it tracks spare quantities and can create purchase orders to ensure adequate spares are maintained. Spares are assigned to work orders and then tagged out by maintenance staff which is then reflected in the inventory. Auditors witnessed the CHSF inventory register while onsite. The inventory showed detailed list of items stored at CHSF including description, balance of items and location. Auditors also witnessed the storerooms showing that spares are well organised and have individual barcodes and item numbers.</p> <p>Asset locations are tracked in Maximo, samples show asset description, operational status, location and links to additional asset details tracked within Maximo.</p> <p>Asset condition isn't directly kept within the asset register, but historical and planned inspections are kept under job plans which are linked to individual assets. Job plans also provide location and status details of the asset.</p> <p>The Licensee conducts regular inspections on assets to ensure operability this can be seen in weekly O&M meeting minutes, and the job plans for assets.</p>	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
5.4	Accounting data is documented for assets	4	<p>The Licensee's Accounting Policy has been provided as evidence; the policies aim is to ensure consistent and appropriate accounting practices throughout the business. The policy covers the Licensee's position on accounting, the Licensee's assurance of compliance with Australian standards, identifies keys roles and their associated responsibilities. The policy also mentions other relevant the Licensee documents relevant to the businesses accounting.</p> <p>Accounting data is managed and tracked through Workday, a cloud based financial management software. Cost information originates in Maximo which is then sent to be processed by Workday. Operating costs can be viewed at an asset level with "to date" and "planned" costs per month and year.</p> <p>Work orders created in Maximo, which include expected labour efforts as well as parts/equipment costs.</p>	A	1
5.5	Operational costs are measured and monitored	4	See item 5.4, with respect to operations costs tracked through workday.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
5.6	Staff resources are adequate and staff receive training commensurate with their responsibilities	1	<p>Through discussions during the interview stage of the audit and site visits, personnel are on rosters and labour resourcing is split between CHSF, Newman Power Station and Cloudbreak Mine to Roy Hill Mine transmission line. Allocation of resourcing is driven by the priority of works that are required to be completed.</p> <p>The Licensee evidenced their WA O&M Competency Matrix_2025, this document provides a breakdown of the required training for different job roles and different regions. The document denotes what trainings are mandatory, optional and not required enabling the Licensee employees to understand the required training for their job role. Changes to trainings are also tracked within this document, changes to trainings go through the Licensee's Operations and Maintenance Learning Advisory Group (OMLAG) and require stakeholder consultation and analysis before being implemented. Once a change is made the rational, affected job role and date endorsed are added to the competency matrix.</p> <p>The previous audit stated that some site personnel training was overdue, in particular training requirements for site emergency response. Discussions with the Licensee have found that emergency response trainings were delivered in two separate sessions during March and April in 2025. The licensee also provided an excerpt from the Newman personnel training matrix (this is inclusive of CHSF) showing majority of personnel are up to date on the training, but a few personnel still show to have not refreshed the training since 2024.</p> <p>The Licensee provided a sample of their Training Report dashboard which shows an overview of the training status at CHSF. The dashboard can provide a per asset training certification status, the status of training for the Licensee is 62.56% of training being current with 34.18% being not yet attained and leaving approximately 3% of training being expired. The 34.18% was mentioned during the interviews and attributed to new employees and employees who don't require certain trainings for the asset.</p> <p>Training compliance is also seen as being tracked during weekly O&M meetings. Meeting minutes also show that new mandatory trainings are being pushed to be completed. Overall based on the O&M meeting minutes compliance with the Licensee training remained at 100% for majority of the audit period and compliance with site training remained close to 80%.</p> <p>Overall based on the evidence provided the licensee's training completion has improved significantly, but a low number of personnel still show to have not completed training or haven't refreshed training within the required time period.</p>	A	2
6	Asset maintenance Asset maintenance is the upkeep of assets.			A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
6.1	Maintenance policies and procedures are documented and linked to service levels required	3	<p>The Licensee evidences their Major Maintenance Management Standard; the standard is in place to provide a comprehensive way to manage maintenance on critical assets to mitigate unplanned outages. The process for managing major maintenance starts with long range plan then the core processes of Concept, Development, Planning, Delivery and Closeout. The process shows that risk, high level budgeting and resource planning are considered at an early stage which helps the Licensee conduct major maintenance events efficiently.</p> <p>The Licensee also provides the Asset Lifecycle Planning document which is part of the long-range planning stage outlined in the Major Maintenance Management Standard. The plan helps develop a 20-year look ahead of asset activities, which link back to the Licensee's Operational Excellence Standard to ensure accountable teams plan activities appropriately.</p> <p>The Licensee's Life Cycle Plan Interface Tool shows planned maintenance events and states which core process stage the maintenance is at, as described in the Major Maintenance Management Standard. The tool also provides the predicted budget for each financial year.</p> <p>An example workorder within Maximo was also witnessed showing the procedure required to conduct works. Interview discussions also stated that work orders will either have a standard procedure attached (for common maintenance items) or will have the required procedure described within the work order itself.</p>	A	1
6.2	Regular inspections are undertaken of asset performance and condition	2	<p>The O&M Weekly Meeting minutes show the planning and execution of multiple inspections throughout the audit period some mentioned include Meteorological Station inspections. Multiple equipment tests can be tracked in O&M meetings including fire system testing.</p> <p>Planned outages are tracked within the Licensee's Planned Outage Database (POD). Recurring planned outages for inspections could be seen in the calendar view with the POD, we witnessed the previously completed inspections as well as the upcoming inspections on various assets. The POD also provides the details around the outages including outage date and time, the return to service time, incident number and the workorder number.</p> <p>Work Order Completion dashboard was also witnessed showing the historical list of completed work orders for the Newman assets. The list showed that multiple inspections have taken place not only on major assets but safety equipment and site security infrastructure.</p>	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
6.3	Maintenance plans (emergency, corrective, and preventative) are documented and completed on schedule	1	<p>Some improvements discussed during interviews suggested the transition from Ellipse (management system used by Alinta) to Maximo require improvements on sequencing. The issue arose due to Ellipse working based on scheduled dates whereas Maximo works on target dates, meaning all planned work orders would need to be rescheduled to re-align with planned outages. This issue resulted in unfavourable performance for maintenance execution and integrity metrics showing on the Licensee's Operations Performance Dashboard. Based on the O&M meetings, compliance with scheduled work orders was shown to be much lower according to the dashboard. A planner's report mentioned in the O&M meeting dated 29th June 2025 stated that actual compliance was sitting above 90%. Based on the interview discussions maintenance is performing well at the shortfall of man hours being attributed to re-sequencing planned maintenance.</p> <p>See item 6.2 with reference to the POD, which is used for planned and forced outages in which inspections and maintenance could be performed. POD also provides tracking of how long assets were out of service during the inspections and maintenance. The order completion register also shows completion of maintenance on CHSF.</p>	B	1
6.4	Failures are analysed and operational / maintenance plans adjusted where necessary	2	<p>One major failure occurred during the audit period which required reporting to the regulator. The failure resulted in asset damage, an investigation was launched to determine the cause, and the resultant report was provided as evidence for the audit. The report showed an in-depth analysis of the events that lead to the failure, including an extensive root cause analysis and final recommendations/actions.</p> <p>The Licensee utilizes their Operational Incidents dashboard to track incidents. The dashboard provides high level details on each incident including the date the incident occurred, risk, asset affected and the status.</p> <p>The Licensee evidences their Incident Management Standard. The standard describes how to classify an incident emergency response; 1 being minimal through to 5 being catastrophic. The standard also describes a means of classifying the incidents effect on HSEH (Health Safety Environment & Heritage), technology and enterprise security. Activities related to incident management are also allocated to job roles, depending on the activity the job role would be responsible, accountable, support, consulted or informed about the activity. An activity can come under Crisis Management, Incident Management or Emergency management and can consist of creating a management plan or performance reporting for example. The standard also describes that part of continuous improvement identifying root causes of the incident are investigated and if improvements can be made actions are made and tracked in the Licensee enterprise technology system.</p> <p>O&M meeting minutes show investigations occurring on for various parts of the asset throughout the audit period. During the O&M meetings an inspection with reference to inverter investigation can be seen being tracked for example.</p>	A	1
6.5	Risk management is applied to prioritise maintenance tasks	4	See item 5.2 with reference to the Licensee priority designation to work orders and risk management.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
6.6	Maintenance costs are measured and monitored	4	See item 5.4, with reference to costs originating in Maximo then being processed by Workday.	A	1
7	Asset management information system An asset management information system is a combination of processes, data and software supporting the asset management functions.			A	1
7.1	Adequate system documentation for users and IT operators	4	See criteria 5.6 Training provided by the Licensee helps users navigate and operate various systems associated with the business – for example, Maximo and Workday, which are key pieces of software that form a large part the AMS. The Licensee provides standards, user guides and SharePoint support hubs to help users comply with business operations. Evidence was provided of guides and the support hub for the Workday system, as well as a manual for the Redeye EDMS. The Licensee's Enterprise Security Policy, Information Security Classification and Handling Standard, and Physical Access Management Standard are examples of standards that were provided as evidence. These standards clearly state their purpose, scope, relevant key contacts, and a detailed description of how to apply the standard.	A	1
7.2	Input controls include suitable verification and validation of data entered into the system	2	Part of the Licensee's Operational Excellence Framework is the Asset Data and Records Business Process Definition; the purpose of this document is to ensure all information and data is complete, correct, current, and available to help maintain assets. It covers the requirements to ensure data is accurate and current. It is also stated that fit-for-purpose systems will be used for accurate generation, collection, storage and preservation of all required data. The Maximo system is used for generating and storing asset data, and the Licensee has a robust process for validating data, with an approval flow tied to adding or changing data, and a dedicated team for ensuring data is accurate. Different data access levels are granted to staff depending on their role (see criteria 7.3), with associated mandatory trainings as described in criteria 7.1. Work order requests are raised by operational staff and go through an approvals process involving operations management.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
7.3	Security access controls appear adequate, such as passwords	2	<p>The Maximo Role Security Groups spreadsheet was evidenced, demonstrating the different data access types assigned to each job role within the Maximo system. Two-factor authentication is required to access different systems.</p> <p>The Information Security Classification and Handling Standard was evidenced, detailing how different types of data are classified and managed. The standard describes requirements for handling the organisation's information, confidentiality and IT practises.</p> <p>Also provided was the Licensee's Acceptable Use of Technology Standard, which defines the use principles all staff must adhere to when interacting with the Licensee's devices and network. This includes rules regarding reporting responsibilities, the transfer of data to and from third parties, remote working, monitoring and surveillance, and the acceptable use of information, technology, and storage media belonging to the Licensee.</p>	A	1
7.4	Physical security access controls appear adequate	2	<p>The Licensee's Physical Access Management Standard was evidenced, which discusses the physical controls put in place to restrict physical access to the Licensee's assets.</p> <p>Security controls were also witnessed onsite.</p> <p>Physical access to the solar farm and associated substation requires passing through secure perimeter fencing and lockable gates. The switchrooms can only be accessed with an operator key. Furthermore, a manned checkpoint for the externally owned Cloudbreak and Roy Hill Mine sites also restricts access to the asset site.</p>	A	1
7.5	Data backup procedures appear adequate, and backups are tested	4	<p>See criteria 7.2</p> <p>The Licensee's Service Continuity Management Standard was evidenced, which covers how they will protect their IT and OT environments from incidents, failures and disruptions. It details requirements for Service Continuity Plans, including procedures for creating, storing, maintaining and testing data backups. Per the standard, Service Continuity Plans must be tested, including the testing of data backups, every one or two years depending on the system category, and a review for compliance with recovery targets must also take place following any backup restoration. The IT Owner is responsible for ensuring accurate retention and disposal of backups.</p>	A	1
7.6	Computations for licensee performance reporting are accurate	4	<p>Dashboards receive data directly from the software (such as Maximo) that processes the data to ensure system monitoring is accurate. The Licensee's Power Performance Report Calculation Document was evidenced, which provides a breakdown of the calculations for calculating availability and generation statistics.</p> <p>Technicians can query data in Maximo if they believe it may be incorrect.</p>	A	1
7.7	Management reports appear adequate for the Licensee to monitor licence obligations	4	<p>See criteria 4.2 and 6.1</p> <p>Annual compliance reports for FY23, FY24, and FY25 were also evidenced.</p>	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
7.8	Adequate measures to protect asset management data from unauthorised access	4	See criteria 7.2, 7.3 and 7.4	A	1
8	Risk management Risk management involves the identification of risks and their management within an acceptable level of risk.			A	1
8.1	Risk management policies and procedures exist and are applied to minimise internal and external risks	2	See criteria 1.8 and 5.2 The Licensee has provided documentation of their Risk Management Framework (RMF), including a Risk Management Policy, Risk Management Procedure and Risk Management Standard.	A	1
8.2	Risks are documented in a risk register and treatment plans are implemented and monitored	1	See criteria 1.8, 5.2 and 8.1 Risks are recorded in the Vigilant system; screenshots of the Vigilant risk register have been provided by the Licensee. These show that risks can be sorted on a per asset basis, and that details shown include the assigned risk ID, approval status, risk title and residual risk rating. Additionally, trends in the risks are monitored and can be indicated as increasing, decreasing or steady. Actions and controls for each risk are also recorded in Vigilant, and each risk, action and control is assigned an owner. Any risks needing review or action can be seen in Vigilant, and the system will automatically raise notifications to relevant personnel. Risks can also be seen in the OPD, which gives a clear overview of total, reviewed, overdue and upcoming risks for the asset, and is reviewed in monthly meetings. Evidence provided of the OPD risk and opportunity summary for this asset shows that, as of the end of the audit period, there are no overdue risk reviews for this asset, and all risks have been reviewed within the last 12 months. Per the Licensee's risk management process, owners of a risk must ensure that it is adequately managed by the nominated controls or that control gaps are identified and escalated and must maintain a plan of actions and mitigation treatments if the risk sits outside the targets defined in the RMF. If the target risk cannot be achieved, the owner must provide information on why this is, and – depending on the level of the risk – different levels of personnel are assigned to manage and approve whether to accept this residual risk. This is done through the Vigilant system as described above.	A	1
8.3	Probability and consequences of asset failure are regularly assessed	3	See criteria 1.7 and 1.8	A	1
9	Contingency planning Contingency plans document the steps to deal with the unexpected failure of an asset.			A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
9.1	Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks	1	<p>The Licensee has well-established systems for responding to incidents; these are categorised into emergency response, business continuity management, or crisis management, based on the level of severity and type of the incident. The Enterprise Resilience Policy defines the principles, objectives and high-level roles and responsibilities for each of these categories.</p> <p>The Licensee's structured approach for business continuity is documented in their Business Continuity Management Business Process Definition and their Business Continuity Handbook. The handbook defines the procedures involved in preparing, maintaining, activating, and executing business continuity plans, including detailed requirements for creating, reviewing, and testing these plans.</p> <p>The Operations and Maintenance Business Continuity Plan provides a checklist to be followed in the event of an incident, as well as key internal and external contacts, a list of critical business processes, scenario checklists, and an impact assessment tool. Furthermore, a Chichester Solar Farm Business Continuity Plan (18th – 25th Sept 2025) was evidenced, detailing the situation and remedial actions for a catastrophic PCS failure incident that occurred during the review period. It documents the incident, investigation, emergent risks (including mitigating controls), and the status of repair and return-to-service works.</p> <p>An enterprise Emergency Response Management Plan was evidenced, which provides a general procedure to be followed in response to emergency incidents that threaten to disrupt energy supply or to harm people, environment or property, and that call for immediate action. It includes documentation of incident level classification, emergency threats and scenarios, and the emergency response process and phases. It does not include detailed response procedures for specific incidents; this is covered by the Licensee's Operations Emergency Response Manual, which provides specific information for field-based operations personnel, including a summary of consolidated threats and associated comprehensive emergency management and action plans. A site Emergency Management Plan was also evidenced, which documents response procedures for specific emergency scenarios, as well as site-specific details and emergency contacts.</p> <p>The Licensee was unable to provide evidence of any testing of emergency response or business continuity management plans during the audit period. However, they have described a new emergency management team Exercise Walkthrough template that is being introduced to provide structure and prompts for short, informal discussions to test team understanding, and have also confirmed that an emergency response exercise is scheduled for November 2026 for Newman Power Station. The Licensee is currently in the process of ascertaining if this exercise will be combined with one for Chichester Solar Farm, or whether a separate one will be organised via the new walkthrough template.</p>	A	2
10	Financial planning Financial brings together the financial elements of the service delivery to ensure its financial viability over the long term.			A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
10.1	The financial plan states the financial objectives and identifies strategies and actions to achieve those	5	<p>The Licensee evidence section 2.6 Asset Financial Performance, part of their Asset Management Framework Process Definition. The purpose of this document is to aid in financial decision making to extract maximum value from assets owned by the Licensee. To be able to quantify financial performance of assets deliverables are provided concerning budgeting, forecasting, monitoring and management actions. KPI table is provided to identify how assets a financially performing by comparing the KPI with the year-to-date budget or re-forecast.</p> <p>The Licensee also evidences section 1.2 Operations Strategy & Business Objectives, also part of the Asset Management Framework Process Definition. The document provides the expected deliverables for the Licensee to provide a clear business direction for the Licensee operations. Deliverables include annual review/refresh of strategy, this could be achieved through multiple means such as review of external business environment and emerging risks.</p>	A	1
10.2	The financial plan identifies the source of funds for capital expenditure and recurrent costs	4	<p>Part of the Asset Financial Performance document is the deliverable of a board approved budget. This ensures an annual budget is approved by management and ready for submission to the April board meeting each year. Another key deliverable is stakeholder engagement to ensure review and sign off at key stages of the budget process.</p> <p>The Licensee also evidences their Timetable for Financial Year 2025 Budget & Financial Year 2026-2027 Forecast. The timetable shows an extensive budgeting process, showing the required tasks, who is responsible and when is it required by.</p> <p>The template power point of the Licensee's ESPP (Enterprise Strategic Planning Process) Divisional Strategic Plan is evidenced. This shows the 6-step process in which the Licensee takes for strategic planning for the business. Key parts of this include reviewing major priorities, providing a financial summary for next 3 years and identifying growth projects/activities.</p> <p>The Licensee's Long Term Financial Capital and Expense Plan is also evidenced providing projected capex costs up to 2050 for each piece of key equipment at CHSF.</p> <p>Recurring work orders were also witnessed in Maximo for various maintenance tasks, and the AMP provides an overview of the works required for key equipment over its lifetime.</p> <p>The Adaptive finance application platform is used to document operating financial information for assets. The platform, which integrates input data from Workday, was witnessed, providing a detailed breakdown of labour costs, direct costs, and revenue for the asset.</p>	A	1

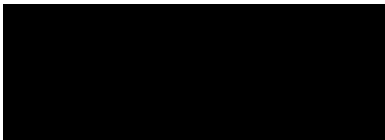
No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
10.3	The financial plan provides projections of operating statements (profit and loss) and statement of financial position (balance sheets)	4	<p>The Licensee evidences their Interim Financial Results for half year ended 31 December 2024. This provides a financial summary of all the Licensee's assets for the period along with a high-level description of each asset as well as profit and loss. Similarly, the Licensee has provided annual reports which provides in depth information on how all aspects of the business are performing.</p> <p>The Licensee's AMP provides the projected costs at CHSF for the next 5 years, as well as the Capex costs of projects planned for the financial year with associated risk rating to help prioritise the workload for the associated financial year.</p> <p>Financial Performance dashboard is also provided, showing that the Licensee can track the financial performance of overall business as well as down to the asset level.</p>	A	1
10.4	The financial plan provides firm predictions on income for the next five years and reasonable predictions beyond this period	4	<p>Reviewing the Licensee's financial management systems found they provides a 5 year look ahead on maintenance, operation costs and profit which is reviewed yearly. This is summarised in section 6 of the AMP along with Newman Asset P&L (Profit and Loss) summary spread sheet which shows the P&L for the that financial year, and a detailed three year look ahead.</p> <p>See item 10.2, the Licensee provides a long term look ahead of costs currently up to 2050.</p>	A	1
10.5	The financial plan provides for the operations and maintenance, administration and capital expenditure requirements of the services	4	<p>Review of the Licensee's financial plan found that the AMP provides a detailed breakdown of the maintenance required per major equipment at CHSF. The Service agreements with manufacturers of turbines, batteries and Jenbacher Recipes also outline the required service to be completed allowing capital expenditure for required servicing to be forecast easily.</p> <p>See item 10.2, the Licensee's long term look ahead provides a long-term projection of all capital expenditure for major equipment including operations and maintenance.</p>	A	1
10.6	Large variances in actual/budget income and expenses are identified and corrective action taken where necessary	2	<p>Monthly Performance meetings pickup large variances in actual/budget income and expenses. Parts of the presentation slides for one of these performance meetings were witnessed during the interviews. From these meetings actions are put in place to correct for variances in budget.</p> <p>It was seen on the dashboard that the past 12-month health showed low Financial Performance, discussions with ATRH found that this is due to post-acquisition balance sheet alignment. This metric was back on target in June 2025.</p>	A	1
11	<p>Capital expenditure planning</p> <p>The capital expenditure plan provides a schedule of new works, rehabilitation and replacement works, together with estimated annual expenditure for these works over the next five or more years.</p>			A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
11.1	There is a capital expenditure plan covering works to be undertaken, actions proposed, responsibilities and dates	2	See item 10.3 with reference to the AMP projected capex costs and item 10.2 with reference to the Licensee long term look ahead. Under the Licensee's Asset Lifecycle Management Plan Dashboard, a project list is provided showing a long-term projection of upcoming projects and what stage they are currently in (concept, delivery, planning or recurring). The Lifecycle interface tool is also evidenced providing a more detailed year by year capital expenditure expected per project.	A	1
11.2	The capital expenditure plan provides reasons for capital expenditure and timing of expenditure	4	See item 10.5, the AMP provides a breakdown of maintenance and see item 11.1 with reference to the Asset Lifecycle Management Dashboard which provides a timeline for all the projects and allocates a risk ranking to each project. A sample development report has also been provided for a Control System Replacement. The document provides a full breakdown of the including timeline, expected costs and reasoning behind why the upgrade is required.	A	1
11.3	The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan	4	The Asset Lifecycle Management Plan Dashboard provides a detailed plan for the lifetime of the assets; this is reflected in the AMP which provides a breakdown of required major maintenance over the life of the asset but doesn't provide details such as execution time for individual maintenance items. If condition of assets is seen to be degrading capital expenditure plan could be adjusted and higher priority work orders opened to address and corrective maintenance issues. Asset condition and required works are also discussed in weekly O&M meeting and monthly asset performance meetings.	A	1
11.4	There is an adequate process to ensure the capital expenditure plan is regularly updated and implemented	2	Monthly asset performance meetings ensure plans concerning assets are up to date and assets remain in working order to meet the demand of the Licensee's customers. Yearly budgeting cycles also ensure capital expenditure is managed well with proper scrutiny from relevant stake holders. The Licensee updates the Asset Financial Performance document every three years the last update occurred in July 2025, and revision history is tracked within the document.	A	1
12	Review of AMS The Asset Management System is regularly reviewed and updated.			A	1
12.1	A review process is in place to ensure the asset management plan and the Asset Management System described in it remain current	1	See criteria 1.1 and 1.9 The AMP is reviewed annually, and – as described in criteria 1.9 – the review history evidenced in the AMP demonstrates a satisfactory frequency of reviews. Minor improvement is required to ensure that these reviews are effective as – per criteria 1.1 observations – the current AMP references the Ellipse system which is no longer in use. The Licensee's policy, procedure and standard documents all have revision history recorded. Per criteria 1.9, the AMS and Asset Management Planning Business Process Definitions are reviewed every three years, and the revision history evidenced in these documents is satisfactory.	B	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
12.2	Independent reviews (e.g. internal audit) are performed of the Asset Management System	1	<p>The Licensee's AMS Business Process Definition references the requirement of regular reviews as per the Operational Excellence Framework, and the Business Process Review Procedure details the triggers and procedures for both internal and external reviews of the Licensee's Business Processes.</p> <p>Annual compliance reports are provided to the Economic Regulation Authority (ERA); these reports provide an overview of the Licensee's adherence to regulatory requirements.</p> <p>The Licensee also provided their Integrated Assurance Asset Management Framework Process Definition, which requires internal audits for independent assurance. The Licensee conducts internal audits of their AMS in accordance with ERA requirements.</p>	A	1

8. Confirmation of the Audit and Review

I confirm that the audit and review carried for the Licensee from November 2025 to January 2026 and recorded in this report is an accurate presentation of our findings and opinions.



Marcel Oosthuizen

GHD Pty Ltd

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Appendix A

License Performance Audit

Compliance Manual No	Obligation under Licence conditions	Description	Type (1, 2 or 3)	Audit Priority (1=highest, 5=lowest)	Control rating					Compliance rating									
					A	B	C	D	N/P	Control observation					Compliance observation				
					1	2	3	4	N/R										
101	Electricity Industry Act, section 13(1)	A licensee must provide the ERA with a performance audit conducted by an independent expert acceptable to the ERA, not less than once every 24 months.	2	4	✓						The previous independent licence audit (2022) was conducted according to an approved audit plan. As well as GHD conducting the current licence audit, in line with the audit plan approved by the ERA. Demonstrates the implementation of actions needed to address this licence condition.	✓					Assurance Advisory Group (AAG) prepared the 2022 Performance Audit report in April 2023. With the ERA's approval, a 36-month audit period was agreed, and GHD was appointed to undertake the Licensee's performance audit for the period 1 October 2022 to 30 September 2025. Therefore, it is concluded that the Licensee complied with this obligation.		
102	Electricity Industry Act, section 14(1)(a)	A licensee must provide for an asset management system.	2	4	✓						The previous independent AMS review (2022) was conducted on schedule confirming the Licensee's AMS. Concurrent with the licence audit GHD is conducting AMS review, in line with an ERA approved audit plan. The current review confirms the Licensee has a valid AMS in place.	✓					Through discussions with APA's Regulatory Compliance Manager, Head of Power Operations, and observation of their asset management plans and review of their AMS, we determined that during the audit period the Licensee had provided for a functioning asset management system. Therefore, it is concluded that the Licensee complied with this obligation.		
103	Electricity Industry Act, section 14(1)(b)	A licensee must notify details of the asset management system and any substantial changes to it to the ERA.	2	4	✓						The previous owner Alinta's Asset Management Plan was effective during the audit period and is currently being updated and brought across to the Licensee's documentation standard. APA notified the ERA of the organisational restructure from Alinta to APA.	✓					The previous owner Alinta's Asset Management Plan was effective during the audit period and is currently being updated and brought across to the Licensee's documentation standard. APA notified the ERA of the organisational restructure from Alinta to APA. Therefore, it is concluded that the Licensee complied with this obligation.		
104	Electricity Industry Act, section 14(1)(c)	A licensee must provide the ERA with a report by an independent expert about the effectiveness of its asset management system every 24 months, or such longer period as determined by the ERA.	2	4	✓						The current review of the AMS is being conducted by GHD within the ERA's agreed time frame. It is being run in parallel with the licence audit. The AMS review has concluded that the Licensee has an effective AMS.	✓					Assurance Advisory Group (AAG) prepared the 2022 asset management system review report in April 2023. With the ERA's approval, a 36-month audit period was agreed, and GHD was appointed to undertake the Licensee's performance audit for the period 1 October 2022 to 30 September 2025. Therefore, it is concluded that the Licensee complied with this obligation.		
105	Economic Regulation Authority (Licensing Funding) Regulations 2014	A licensee must pay the prescribed licence fees to the ERA according to clauses 6, 7 and 8 of the Economic Regulation Authority (Licensing Funding) Regulations 2014.	2	4	✓						The Licensee has provided copies of invoices that demonstrate they have paid the prescribed licence fees by their due date during the audit period. Evidence supplied for EIRL11 include tax invoices for payments made to the ERA as well as customer statements.	✓					The Licensee has provided copies of invoices that demonstrate they have paid the prescribed licence fees by their due date during the audit period. Evidence supplied for EIRL11 include tax invoices for payments made to the ERA as well as customer statements. Therefore, it is concluded that the Licensee complied with this obligation.		
106	Electricity Industry Act, section 31(3)	A licensee must take reasonable steps to minimise the extent, or duration, of any interruption, suspension or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause.	NR	5	✓						Through discussions with APA's Regulatory Compliance Manager, Head of Power Operations, it was determined that the Licensee has controls in place to minimise the extent, or duration, of any interruptions, suspension, or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause. These include the APA Emergency Response Management Plan and Business Continuity Management Standard.	✓					Through discussions with APA's Regulatory Compliance Manager, Head of Power Operations, it was determined that the Licensee has controls in place to minimise the extent, or duration, of any interruptions, suspension, or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause. These include the APA Emergency Response Management Plan and Business Continuity Management Standard. Therefore, it is concluded that the Licensee complied with this obligation.		

Compliance Manual No	Obligation under Licence conditions	Description	Type (1, 2 or 3)	Audit Priority (1=highest, 5=lowest)	Control rating					Compliance rating								
					A	B	C	D	N/P	Control observation					Compliance observation			
107	Electricity Industry Act, section 41(6)	A licensee must pay the costs of taking an interest in land or an easement over land.	2	4						✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that the Licensee had not acquired an interest in land or an easement over land during the audit period.						✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that the Licensee had not acquired an interest in land or an easement over land during the audit period.
119	Electricity Industry Act, section 11	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.	2	4	✓						APA has provided annual reports and methodology that shows compliance to the Australian Accounting Standards Board Standards. Compliance reports were provided for each year within the audit period. The reports state that they have prepared in accordance with Australian Accounting Standards Board Standards.	✓						APA has provided annual reports and methodology that shows compliance to the Australian Accounting Standards Board Standards. Compliance reports were provided for each year within the audit period. The reports state that they have prepared in accordance with Australian Accounting Standards Board Standards. Therefore, it is concluded that the Licensee complied with this obligation.
120	Electricity Industry Act, section 11	A licensee must comply with any individual performance standards prescribed by the ERA.	2	4						✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there were no individual performance standards prescribed by the ERA during the audit period. Therefore, assessment of the established control environment and control procedure was not performed.						✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there were no individual performance standards prescribed by the ERA during the audit period. Performance against this obligation was not rated.
121	Electricity Industry Act, section 11	A licensee must comply, and require its auditor to comply, with the ERA's standard audit guidelines for a performance audit.	2	4	✓						The Licensee selected an independent auditor, GHD. GHD compiled an Audit Plan in compliance with the ERA's guidelines. GHD's Audit plan for the period 1 October 2022 to 30 September 2025 has been approved by the ERA.	✓						ERA requirements including the need for independent licence auditing in accordance with its guideline and compliance manual. These requirements were included in the Licensee's RFQ for auditor selection and engagement. GHD's performance audit plan for the period 1 October 2022 to 30 September 2025 have been approved by the ERA. The audits have been conducted as per the audit plan. Therefore, it is concluded that the Licensee complied with this obligation.
122	Electricity Industry Act, section 11	A licensee must comply, and must require the Licensee's expert to comply, with the relevant aspects of the ERA's standard audit guidelines for an asset management system review.	2	4	✓						The Licensee selected an independent auditor, GHD. GHD compiled an Audit Plan in compliance with the ERA's guidelines. GHD's Asset Management System Review Plan for the period 1 October 2022 to 30 September 2025 have been approved by the ERA.	✓						GHD's Asset Management System Review Plan for the period 1 October 2022 to 30 September 2025 has been approved by the ERA. The review has been conducted as per the audit plan. Therefore, it is concluded that the Licensee complied with this obligation.
123	Electricity Industry Act, section 11	In the manner prescribed, a licensee must notify the ERA, if it is under external administration or if there is a significant change in the circumstances that the Licence was granted which may affect the	2	4						✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there had been no significant change in circumstances which would affect the Licensee's ability to meet their obligations. Therefore, assessment of the established control environment and control procedure was not performed.						✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there had been no significant change in circumstances which would affect APA's ability to meet their obligations. Performance against this obligation was not rated.

Compliance Manual No	Obligation under Licence conditions	Description	Type (1, 2 or 3)	Audit Priority (1=highest, 5=lowest)	Control rating					Compliance rating										
					A	B	C	D	N/P	Control observation					Compliance observation					
		Licensee's ability to meet its obligations.																		
124	Electricity Industry Act, section 11	A licensee must provide the ERA, in the manner prescribed, with any information that the ERA requires in connection with its functions under the Electricity Industry Act.	2	4						✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there was no request from the ERA to provide additional information outside of annual reporting and standard fees in connection with its functions under the Electricity Industry Act. Therefore, assessment of the established control environment and control procedure was not performed.							✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there was no request from the ERA to provide additional information outside of annual reporting and standard fees in connection with its functions under the Electricity Industry Act. Performance against this obligation was not rated.	
125	Electricity Industry Act, section 11	A licensee must publish any information as directed by the ERA to publish, within the timeframes specified.	2	4						✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that the Licensee were not required to publish any information as directed by the ERA during the audit period. Therefore, assessment of the established control environment and control procedure was not performed.							✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that the Licensee were not required to publish any information as directed by the ERA during the audit period.	
126	Electricity Industry Act, section 11	All notices must be in writing, unless otherwise specified.	2	4	✓						Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was stated that all verbal communication between the ERA and the Licensee was followed up via email. All communication between the ERA and the Licensee has been saved for record keeping. Note, conversations between the ERA and APA not captured in writing cannot be validated.	✓							Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was stated that all verbal communication between the ERA and the Licensee was followed up via email. All communication between the ERA and the Licensee has been saved for record keeping. Note, conversations between the ERA and APA not captured in writing cannot be validated.	
324	Electricity Industry Metering Code, clause 3.3B	If a user is aware of bi-directional electricity flows at a metering point that was not previously subject to a bi-directional flows or any changes in a customer's or user's circumstances in a metering point that will result in bi-directional flows, the user must notify the network operator within 2 business days.	2	4						✓	Audit interviews conducted with the Head of Power Operations and Regulatory Compliance Manager revealed that there was no awareness of any bi-directional electricity flows that was previously not subject to bi-directional flows. Therefore, assessment of the established control environment and control procedure was not performed.							✓	Audit interviews conducted with the Head of Power Operations and Regulatory Compliance Manager revealed that there was no awareness of any bi-directional electricity flows that was previously not subject to bi-directional flows. Hence this obligation has been rated as non-applicable.	
339	Electricity Industry Metering Code, clause 3.11(3)	A Code participant who becomes aware of an outage or malfunction of a metering installation must advise the network operator as soon as practicable.	2	4						✓	No incidents of outages or malfunctions to a metering installation occurred during the audit period. Therefore, assessment of the established control environment and control procedure was not performed. Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no discrepancies between energy							✓	No incidents of outages or malfunctions to a metering installation occurred during the audit period. Performance against this obligation was not rated.	
371	Electricity Industry Metering Code, clause 4.4(1)	If there is a discrepancy between energy data held in a	NR	5						✓	Operations and Regulatory Compliance Manager reveal that no discrepancies between energy							✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no discrepancies between energy data held in metering installation and database occurred.	

Compliance Manual No	Obligation under Licence conditions	Description	Type (1, 2 or 3)	Audit Priority (1=highest, 5=lowest)	Control rating					Compliance rating									
					A	B	C	D	N/P	Control observation					Compliance observation				
										1	2	3	4	N/R					
		and the test or audit relates to a time or times at which the user was the current user or the Code participant is the AEMO.									Therefore, assessment of the established control environment and control procedure was not performed.								
417	Electricity Industry Metering Code, clause 5.21(6)	A Code participant must not make a request under subclause 5.21(1) that is inconsistent with any access arrangement or agreement.	2	4					✓		Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that no requests of this nature were made during the applicable audit period. Therefore, assessment of the established control environment and control procedure was not performed.						✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that no requests of this nature were made during the applicable audit period. Performance against this obligation was not rated.	
435	Electricity Industry Metering Code, clause 5.27	Upon request from a network operator, the current user for a connection point must provide the network operator with customer attribute information that it reasonably believes are missing or incorrect within the timeframes prescribed.	NR	5					✓		Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no instances where customer attribute information was requested. Therefore, assessment of the established control environment and control procedure was not performed.						✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that no requests of this nature were made during the applicable audit period. Performance against this obligation was not rated.	
448	Electricity Industry Metering Code, clause 6.1(2)	A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed.	2	4					✓		Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that the network is a private network. Therefore, assessment of the established control environment and control procedure was not performed.						✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that the network is a private network and therefore no such obligations were relevant during the audit period.	
451	Electricity Industry Metering Code, clause 7.2(1)	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.	NR	5					✓		The Licensee does not currently have devices capable of transmitting and receiving facsimiles and does not support facsimile as a means of communication on the basis that it is an outdated mode of communication and not currently in use in relation to any of the Licensee's assets. The Licensee issued a notice of intent of non-compliance to the ERA.					✓		Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there are multiple ongoing communication links between the ERA and the Licensee. All forms of communication required in obligation 451 are accounted for with the exception of facsimile. The non-compliance has been documented in the provided compliance report.	
453	Electricity Industry Metering Code, clause 7.2(4)	If requested by a network operator with whom it has entered into an access contract, the Code	2	4					✓		Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that no contact detail requests were made during the audit period. Therefore, assessment of the established						✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that no contact detail requests were made during the audit period. Performance against this obligation was not rated.	

Compliance Manual No	Obligation under Licence conditions	Description	Type (1, 2 or 3)	Audit Priority (1=highest, 5=lowest)	Control rating						Compliance rating									
					A	B	C	D	N/P	Control observation					Compliance observation					
					1	2	3	4	N/R											
		participant must notify its contact details to a network operator within 3 business days after the request.									control environment and control procedure was not performed.									
454	Electricity Industry Metering Code, clause 7.2(5)	A Code participant must notify any affected network operator of any change to the contact details it notified to the network operator under subclause 7.2(4) at least 3 business days before the change takes effect.	2	4					✓	As the Licensee operate a private network this obligation was not relevant during the audit period. Therefore, assessment of the established control environment and control procedure was not performed.					✓ As the Licensee operate a private network this obligation was not relevant during the audit period. Performance against this obligation was not rated.					
455	Electricity Industry Metering Code, clause 7.5	A Code participant must subject to subclauses 5.17A and 7.6 not disclose, or permit the disclosure of, confidential information provided to it under or in connection with the Code and may only use or reproduce confidential information for the purpose for which it was disclosed, or another purpose contemplated by the Code.	2	4					✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there were no instances where confidential information had been disclosed or reproduced. Therefore, assessment of the established control environment and control procedure was not performed.					✓ Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there were no instances where confidential information had been disclosed or reproduced. Performance against this obligation was not rated.					
456	Electricity Industry Metering Code, clause 7.6(1)	A Code participant must disclose or permit the disclosure of confidential information that is required to be disclosed by the Code.	2	4					✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there were no instances where confidential information was required to be disclosed. Therefore, assessment of the established control environment and control procedure was not performed.					✓ Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there were no instances where confidential information was required to be disclosed. Performance against this obligation was not rated.					
457	Electricity Industry Metering Code, clause 8.1(1)	If any dispute arises between any Code participants, then (subject to subclause 8.2(3)) representatives of disputing parties must meet within 5 business days after a notice given by a disputing party to the other disputing	NR	5					✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there were no instances of a formal dispute being raised. The Licensee confirmed that there is a protocol in place for disputes regarding PPAs and connection agreements. Therefore, assessment of the established control environment and control procedure was not performed.					✓ Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there were no instances of a formal dispute being raised. The Licensee confirmed that there is a protocol in place for disputes regarding PPAs and connection agreements. Performance against this obligation was not rated.					

Compliance Manual No	Obligation under Licence conditions	Description	Type (1, 2 or 3)	Audit Priority (1=highest, 5=lowest)	Control rating					Compliance rating								
					A	B	C	D	N/P	Control observation					Compliance observation			
		parties and attempt to resolve the dispute by negotiations in good faith.																
458	Electricity Industry Metering Code, clause 8.1(2)	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.	NR	5						✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there were no instances of a formal dispute being raised. The Licensee confirmed that there is a protocol in place for disputes regarding PPAs and connection agreements. Therefore, assessment of the established control environment and control procedure was not performed.						✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there were no instances of a formal dispute being raised. The Licensee confirmed that there is a protocol in place for disputes regarding PPAs and connection agreements. Performance against this obligation was not rated.
459	Electricity Industry Metering Code, clause 8.1(3)	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.	NR	5						✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there were no instances of a formal dispute being raised. The Licensee confirmed that there is a protocol in place for disputes regarding PPAs and connection agreements. Therefore, assessment of the established control environment and control procedure was not performed.						✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there were no instances of a formal dispute being raised. The Licensee confirmed that there is a protocol in place for disputes regarding PPAs and connection agreements. Performance against this obligation was not rated.
460	Electricity Industry Metering Code, clause 8.1(4)	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.	2	4						✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there were no instances of a formal dispute being raised. The Licensee confirmed that there is a protocol in place for disputes regarding PPAs and connection agreements. Therefore, assessment of the established control environment and control procedure was not performed.						✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there were no instances of a formal dispute being raised. The Licensee confirmed that there is a protocol in place for disputes regarding PPAs and connection agreements. Performance against this obligation was not rated.
461	Electricity Industry Metering Code, clause 8.3(2)	The disputing parties must at all times conduct themselves in a manner which is directed towards	NR	5						✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there were no instances of a formal dispute being raised. The Licensee confirmed that there is a protocol in place for disputes regarding PPAs and						✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there were no instances of a formal dispute being raised. The Licensee confirmed that there is a protocol in place for disputes regarding PPAs and

Compliance Manual No	Obligation under Licence conditions	Description	Type (1, 2 or 3)	Audit Priority (1=highest, 5=lowest)	Control rating					Compliance rating										
					A	B	C	D	N/P	Control observation					Compliance observation					
					1	2	3	4	N/R											
		achieving the objective in subclause 8.3(1).									connection agreements. Therefore, assessment of the established control environment and control procedure was not performed.					connection agreements. Performance against this obligation was not rated.				

Appendix B

List Of Documents Provided

Filenames:

Table 10 File names table

Index	File Name
1	1.3 Asset Management System v3.0.pdf
2	2.5 Asset Management Planning v3.0.pdf
3	Asset Life-cycle Planning Procedure V5.2.pdf
4	Maximo.png
5	Power Performance Report - NPS.jpg
6	1. 20190809 - Chichester PPA.pdf
7	Asset Life-cycle Planning Procedure V5.2 (2).pdf
8	7.3 Asset Management Planning (Asset Lifecycle Procedure).jpg
9	1.6 - 202408_CF_SOP_Carrying Value Summary Update v1.0 (CLEAN).pdf
10	1.6 - Carrying Value Model.pdf
11	PES - TG404 Control System Upgrade - Gate 2.pdf
12	1.7 screen shot.png
13	APA Group Standard - Risk Management (2).pdf
14	2.1 project proposal .png
15	3.2 Projects and Shutdowns v3.0.pdf
16	AEME-0000-000-FRM-002 Project Management Framework.docx
17	APA Group Standard - Project Assurance.pdf
18	Prioritisation Process.jpg
19	Project Delivery Framework.jpg
20	Project Proposal tool extract 001.jpg
21	Project Proposal tool extract 002.jpg
22	Project Proposal tool extract 003.jpg
23	Project Proposal tool extract 004.jpg
24	Project Proposal tool extract 005.jpg
25	Project Proposal.jpg
26	2.2A - Prioritisation Process.png
27	2.2B - Stage Gate Documents and NPV Analysis.png
28	PES - TG404 Control System Upgrade - Gate 2 (1).pdf
29	2.3 Prioritisation Power App Guide.pdf
30	2.3 screen shot.png
31	2.3 Visio-TX Prioritisation Drivers.pdf
32	3.1 Asset Integration v3.0.pdf
33	2.4 - Pressure drop report - Chichester.pdf
34	2.4 - TF-002- 9589 - Transmittal Letter.pdf
35	2.4a - AEME-0000-000-FRM-002 Project Management Framework (1).docx
36	2.4b & 2.5 - Project Delivery Framework.png
37	3.3 Asset Commissioning and Handover v3.0.pdf
38	530-TP-A-0021 - Project Completion_Closeout Register Template.xlsx
39	2.1 Asset Optimisation v3.4.pdf

Index	File Name
40	2.2 Reliability and Maintenance Strategy v3.0.pdf
41	Asset lifecycle agenda.png
42	Screenshot 2025-11-14 010430.png
43	Screenshot 2025-11-14 010502.png
44	3.2 Power Performance Dashboard.png
45	ATP-PR-AM-0003 - Suspension of Operating Assets.pdf
46	3.6 Asset Decommissioning v2.0.pdf
47	1.1 Operations Risk & Opportunities v3.0.pdf
48	2.3 Asset Risks and Opportunities v1.3.pdf
49	4.2 & 4.2a Power Performance Dashboard.png
50	4.2 Power Performance Report screen shot .png
51	5.3 Regulatory Compliance v4.0.pdf
52	APA Group Procedure - Compliance Management System Handbook (4).pdf
53	APA Group Standard - Risk and Compliance.pdf
54	APA Policy - Compliance Management.pdf
55	Assets - compliance plan view - EIRL11.xlsx
56	Assets - compliance plan view - EIRL6.xlsx
57	Compliance Obligations in Vigilant.pdf
58	EIRL 10 Example - Obligation, Control & Action.pdf
59	Vigilant - Obligations, controls & actions .pdf
60	4.4a Power Performance Dashboard.png
61	4.4B - Customer Survey Example.pdf
62	OPD Asset Performance Dashboards - NPS.docx
63	4.3 Integrated Operations v2.0.pdf
64	4.5 Incident Management v1.0 2025-05.docx.pdf
65	4.6 Maintenance Execution v3.0.pdf
66	6.3 Safe Work System v3.0.pdf
67	6.4 Process Safety v4.1 2025-09-15.pdf
68	5.3 - Maximo Locations Extract.png
69	Asset list .xlsx
70	Screenshot 2025-11-19 111136.png
71	Screenshot 2025-11-19 115839.png
72	5.4 5.5 budget tracking of operational costs .png
73	APA Policy - Accounting.pdf
74	5.6 Training example being tracked.png
75	5.6 Training Status Dashboard.png
76	6.6 Training and Competency v1.0.pdf
77	Maximo Maintenance System Training.jpg
78	Maximo O&M eLearn screenshot.jpg
79	WA O&M Competency Matrix_2025.xlsx
80	Workday - Getting Started Toolkit.pdf

Index	File Name
81	Workday eLearning screenshot.jpg
82	Workday Support Hub sharepoint site.jpg
83	APA Group Standard - Major Maintenance Management.pdf
84	work order completing_tracking dashboard extract.jpg
85	Work order completion history extract 001.jpg
86	Work Order completion tracking extract.jpg
87	6.3 screen shot.png
88	6.4A - Operational Incidents Dashboard.png
89	6.4b APA HSE GD 07.01 T1 Incident, Near Miss & Hazard Management Guideline.pdf
90	APA Group Standard - Incident Management.pdf
91	Chichester Solar farm Inverter 401 Investigation Report - ICAM Final V03 Docusign_Signed.pdf
92	6.5a - Work Order Dashboard - Priority Levels.png
93	6.5b - Work Order Dashboard - Priority Levels.png
94	7.1 maximo training.png
95	APA Policy - Enterprise Security.pdf
96	EKTIMO Report.pdf
97	Physical Access Management Standard.pdf
98	Power Performance Report Detailed Requirements - As Built.docx
99	Power Performance Report Detailed Requirements - As Built.pdf
100	RedEye Operations and Service Manual - V0.1.pdf
101	Service Continuity Management Standard (2).pdf
102	Workday & Adaptive SOC 1 Type 2_ 10_1_24 - 3_31_25.pdf
103	Workday Enterprise SOC 2 Type 2_ 10_1_23 - 9_30_24.pdf
104	5.1 Asset Data and Records v3.0.pdf
105	Acceptable Use of Technology Standard.pdf
106	Creating Strong Passwords FAQs.pdf
107	Information Security Classification and Handling Standard.pdf
108	Maximo Role Security Groups (2).xlsx
109	APA Group Standard - Physical Security and Natural Hazards Risk Management.pdf
110	7.6 - EKTIMO Report.pdf
111	Reg Compliance - OPD.jpg
112	Service Continuity Management Standard (2) (1).pdf
113	APA Group Procedure - Risk Management (3).pdf
114	APA Group Standard - Risk Management (1).pdf
115	APA Policy - Risk Management (3).pdf
116	8.2 - Risk Extract for CSF.jpg
117	Risk Monitoring via OPD - Newman Power Station.jpg
118	Vigilant - Risk Registers.pdf
119	RSK1687 - Loss of turbine or generator.pdf
120	1.6 Business Continuity Management v3.0.pdf
121	2026 Emergency Management exercise schedule - Power West.jpg

Index	File Name
122	9.1 - Chichester Solar Farm BCP Report Sept 2025.pdf
123	APA Group Procedure - Business Continuity Handbook.pdf
124	APA Policy - Enterprise Resilience (1).pdf
125	BCP - O&M (2).pdf
126	Business Continuity Plan 2024 extract Pilbara Sites.docx
127	EMT ER Management Plan.pdf
128	ERT ER Field Manual.pdf
129	Newman SERP (inclusive of Chichester SF) Draft.pdf
130	NW PS SERP (Draft).pdf
131	Operations Business Continuity Procedure (2).pdf
132	Pilbara_Energy_Newman_Power_Station_WA_Version_No3.3 (1).pdf
133	1.2 Operations Strategy and Business Objectives.pdf
134	10.2 - 10.3A - APA ESPP - Divisional Strategic Plan_v.1.1 - Operations.pptx
135	10.2 - 10.3B - FY25 Budget_FY26-FY27 Forecast Timetable.xlsx
136	10.4 - Asset PL - FY25F#2 and FY26B v2 A641 Newman Power Station and Battery.xlsx
137	10.4 - Asset PL - FY25F#2 and FY26B v2 A642 Chichester Solar Farm.xlsx
138	27. PES June.pptx
139	Long term financial capital and expense plan.xlsx
140	10.6B - Financial Performance (OPD).png
141	2.6 Financial Performance v2.0.pdf
142	2024_25-BSF - Annual Plan (Rev. 1).pdf
143	APA 1H25 Interim Results.pdf
144	APA Annual Report FY2023.pdf
145	APA Annual Report FY2024.pdf
146	APA Annual Report FY21.pdf
147	APA Annual Report FY22.pdf
148	APA Annual Report FY23.pdf
149	APA Annual Report FY24.pdf
150	202408_CF_SOP_CV Summary Update v1.0 (CLEAN).docx
151	24083-RP-A-0002_1_TG404 Develop Report.pdf
152	Asset Life-cycle Management Plan - Excerpt PES.jpg
153	Lifecycle Interface Tool Extract.PNG
154	11.4 - SIB FY26 Screenshot.png
155	Asset Life-cycle Planning Procedure V5.2 (1).pdf
156	12.1 – Commentary on controls in place for annual updates to AMP.pdf
157	1.4 Integrated Assurance v3.0.pdf
158	APA-Procedure---Business-Process-Review (1).pdf
159	APA Group Standard - Operational Excellence (3).pdf
160	Business Processes under Operational Excellence.zip
161	Intro - Ops Ex.pptx
162	EIRL10 - 2022 Performance Audit Report.pdf

Index	File Name
163	EIRL11 - 2022 Performance Audit Report.pdf
164	EIRL6 - 2022 Performance Audit Report.pdf
165	Notice---2022-audit-and-review---EIRL006---Alinta-Energy-Transmission-Roy-Hill-Pty-Ltd - Audit Frequency.pdf
166	Notice---2022-Audit-and-Review---EIRL010---Alinta-Energy-Transmission-Chichester-Pty-Ltd - Audit Frequency.pdf
167	Notice---2022-Audit-and-Review---EIRL011---Alinta-Energy-Chichester-Pty-Ltd - Audit Frequency.pdf
168	APA - Notification of Organisational Restructure.eml
169	ERA - Notification of Organisational Restructure 29.07.2025.pdf
170	EIRL10 - 2022 AMS Review Report.pdf
171	EIRL11 - 2022 AMS Review Report.pdf
172	EIRL6 - 2022 AMS Review Report.pdf
173	APA_PROC_-_Supplier_Invoice_and_Payments_Detail.xlsx
174	EIRL6, 10 & 11 - Annual & Qrtly Invoices Paid - Financial Tracking Tool (2024).jpg
175	EIRL6, 10 & 11 - Annual & Qrtly Invoices Paid - Financial Tracking Tool (2025).jpg
176	Vigilant - Obligations, controls & actions (payment of fees).pdf
177	ARTRX_1005780.pdf
178	ARTRX_1006058.pdf
179	ARTRX_1006414.pdf
180	ARTRX_1007089.pdf
181	ARTRX_1007692.pdf
182	ARTRX_1007869.pdf
183	ARTRX_1005640.pdf
184	ARTRX_1006075.pdf
185	ARTRX_1006440.pdf
186	ARTRX_1007068.pdf
187	ARTRX_1007704.pdf
188	ARTRX_1007713.pdf
189	ARTRX_1005744.pdf
190	ARTRX_1006031.pdf
191	ARTRX_1006413.pdf
192	ARTRX_1007033.pdf
193	ARTRX_1007655.pdf
194	ARTRX_1007830.pdf
195	ERA_30-SEP-24_114182_274773.pdf
196	ERA_30-SEP-25_114182_274773.pdf
197	ERA_31-AUG-24_114182_274773.pdf
198	ERA_31-AUG-25_114182_274773.pdf
199	107 - 183-120020-ACCT 12000013__Remittance_2025-03-07.pdf
200	107 - 183-125467-LEASE_241910000133_Remittance_2024-07-10.pdf
201	107 - EIRL10 - L46-137 DMIRS Rent Notice 20.12.2024 - \$12,487.20.pdf
202	107 - EIRL10 - L46-139 DMIRS Rent Notice 10.01.2025 - \$13,120.80.pdf
203	107 - EIRL10 - L46-139 DMIRS Rent Notice 11.01.2024 - \$11,928.00.pdf

Index	File Name
204	107 - EIRL10 - L46-140 DEMIRS Rent Notice 10.01.2025 - \$3,801.60.pdf
205	107 - EIRL10 - L46-140 DEMIRS Rent Notice 11.01.2024 - \$3,456.00.pdf
206	107 - EIRL10 - L46-143 DEMIRS Annual Rent Notice 08.01.2024 - \$96.00.pdf
207	107 - EIRL10 - L46-143 DEMIRS Rent Notice 07.01.2025 - \$105.60.pdf
208	107 - EIRL11 - L46-138 DMIRS Annual Rent Notice 02.01.2024 - \$6,336.00.pdf
209	107 - EIRL11 - L46-138 DMIRS Rental Notice 02.01.2025 - \$6,969.60.pdf
210	107 - EIRL6 - DPLE Invoice_LD395952 - 01.07.2024 to 31.12.2024 - \$105,000.00.pdf
211	107 - Land Rent Notice - Payment Recon.xlsx
212	2025-annual-report.pdf
213	231101_asx_apa_completes_alinta_energy_pilbara_acquisition.pdf
214	240522_asx_apa_presentation_pilbara_energy_system_investor_site_visit.pdf
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