



Audit and Review Report

Port Hedland Power Station Electricity Retail Licence Performance Audit and Review

APA DEWAP Pty Ltd

28 October 2025

→ The Power of Commitment



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Executive summary

APA DEWAP Pty Ltd (ADEWAP) is an energy infrastructure company which holds an Electricity Integrated Regional Licence (EIRL7) and is licenced to:

- Construct and operate generating works or operate existing generating works
- Construct and operate a new transmission system or operate an existing transmission system
- Sell electricity to customers other than small use customers

The assets that relate to this audit include:

- Port Hedland Power Station – Boodarie Power Station Line
- Port Hedland Power Station – Murdoch Drive Substation Line (connecting to the Horizon Power network)
- Port Hedland Power Station – Wedgefield Substation Line (connecting to the Horizon Power network)

Changes to the business

ADEWAP's previous performance audit was conducted in 2022. The key changes to the business since the previous audit are:

- On 1 November 2023, APA acquired ALINTA DEWAP Pty Ltd and as a result, the licence entity was updated from ALINTA DEWAP Pty Ltd to APA DEWAP Pty Ltd
- Changes arising from the change in ownership, including transfer of asset management tasks to the software in use within APA (MAXIMO, Workday).

Audit

GHD conducted an Electricity Integrated Regional Licence Performance Audit to assess ADEWAP's compliance with the conditions of their electricity retail licence EIRL7 for the period **1 July 2022 to 30 June 2025**.

The objective of the audit was to assess the effectiveness of measures taken by the licensee, ADEWAP, to meet the conditions of their licence.

The audit was undertaken via documentation reviews, interviews with ADEWAP representatives and a site visit.

Response to recommendations from the previous report

In response to the recommendations from the previous audit report, ADEWAP has:

- Been granted an exemption to selected clauses of the metering code by Pilbara ISOC Co linked to the recommendations from the previous report [16]

Summary of findings and recommendations

Table 1 provides a summary of the findings and recommendations for the licence obligations where ADEWAP were identified as being non-compliant (compliance rating of 2, 3 or 4) or where control deficiencies were identified (controls rated C or D).

Table 1 **Summary of findings and recommendations**

Obligation No.	Licence obligation	Findings	Recommendation
319	Electricity Industry Metering Code, clause 3.1	No interim metrology procedure was in effect prior to exemption being grated during the audit period.	Seeing as an exemption to this clause was granted by Pilbara ISOCo, no recommendation has been made.
320	Electricity Industry Metering Code, clause 3.2(1)		
336	Electricity Industry Metering Code, clause 3.10		
343	Electricity Industry Metering Code, clause 3.29		
422	Electricity Industry Metering Code, clause 5.22(1)		
447	Electricity Industry Metering Code, clause 6.1(1)		
448A	Electricity Industry Metering Code, clause 6.2	No interim documentation was in effect prior to exemption being grated during the audit period as required under the Code.	
448C	Electricity Industry Metering Code, clause 6.19A(1)	No interim communication rules was in effect prior to exemption being grated during the audit period.	
365	Electricity Industry Metering Code, clause 3.29	A list of registered metering providers was not published in the interim prior to the exemption being granted	
451	Electricity Industry Metering Code, clause 7.2(1)	There was not a means of communication via facsimile during the audit period.	
366	Electricity Industry Metering Code, clause 4.1(1)	Licensee record of standing data did not contain all required information.	1/2025 Licensee to update register of standing data.
369	Electricity Industry Metering Code, clause 4.2(1)		
370	Electricity Industry Metering Code, clause 4.3(1)		
452	Electricity Industry Metering Code, clause 7.2(2)	Notification of contact details occurred after change took effect instead of 3 business days before as required by the code	2/2025 Licensee to update procedure or Vigilant configuration to account for timing requirements of notification for change of contact details as per the Code.

Control environment

In assessing the control environment and compliance operated by the licensee it was observed:

- For many aspects of their operation, ADEWAP currently works under established APA policies and procedures, which are generally aligned with typical industry documentation

The audit finds that the licensee overall has complied with the licence obligations under EIRL7 during the audit period between 1 July 2022 to 30 June 2025. With non-compliances being deemed to have a minor effect on customers or third parties, or are now subject to exemption by Pilbara ISOCo, the Independent System Operator applicable to this licence.

Overall assessment of compliance

The audit assessed the 174 licence obligations applicable for this audit period and rated ADEWAP, this audit found that the Licensee was:

- Compliant with 49 obligations
- Non-compliant with 12 obligations with minor effect to customers or third parties
- 113 licence obligations were not rated for compliance, as no relevant activity took place during the audit period or were subject to exemptions as granted by Pilbara Independent System Operator (ISOCo) on 22 March 2024 [16].

The audit finds that the overall controls environment to be effective to manage compliance with the licence obligations, in particular when considering the transitional period from acquisition of the asset by APA. The audit also confirmed that ADEWAP complied with their compliance reporting during the audit period (as per [29] and [30]).

Review

Review interviews were conducted through in-person meetings at APA's Perth office. Additionally, a site inspection was carried out at ADEWAP's Port Hedland and Boodarie power stations. The review conducted of ADEWAP's effectiveness of their Asset Management System, based on the assessment against the established criteria outlined in the Guidelines, is that the Asset Management System is performing effectively. No recommendations were issued.

The previous audit recommendation related to item 6.4 of the asset management system, in which failure analysis and asset maintenance plans were not effectively conducted and managed. Since the acquisition of the asset by APA maintenance philosophy has changed and incidents are approached with more scrutiny, no further improvements are required. Overall, ADEWAP has shown it has an effective asset management system.

This report is subject to, and must be read in conjunction with, the limitations set out in section 1.3 and the assumptions and qualifications contained throughout the Report.

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1. Introduction

1.1 Context

APA DEWAP Pty Ltd

APA DEWAP Pty Ltd (ADEWAP) is an energy infrastructure company controlled by APA Infrastructure Trust, of which APA Group Limited (APA) is the responsible entity.

For the licence area shown in Figure 2, ADEWAP holds an Electricity Integrated Regional Licence (EIRL7) and is licenced to:

- Construct and operate generating works or operate existing generating works
- Construct and operate a new transmission system or operate an existing transmission system
- Sell electricity to customers other than small use customers

ADEWAP's operations consist of:

- The Port Hedland Power Station, with three turbines at Port Hedland and two turbines at Boodarie configured to operate as a single power station
 - The ADEWAP network with three high voltage 66 kV transmission lines:
 - Port Hedland Power Station – Boodarie Power Station Line
 - Port Hedland Power Station – Murdoch Drive Substation Line (connecting to the Horizon Power network)
 - Port Hedland Power Station – Wedgefield Substation Line (connecting to the Horizon Power network)
- The network is part of the North-West Interconnected System (NWIS) in Western Australia (WA).
- Two meters, located at Boodarie Power Station

Figure 1 provides an indicative map of ADEWAP's operations¹.

Based on the site visit and the evidence provided during the audit, in general, ADEWAP operates under APA policies and procedures (e.g. Accounting Policy, Business Continuity Procedure).

ADEWAP has two customers on long term Power Purchase Agreements (PPAs):

- BHP Iron Ore Pty Ltd (BHP)
- The Pilbara Infrastructure Pty Ltd, a wholly owned subsidiary of Fortescue Metals Group (FMG)

Audit

Under the requirements of the *Electricity Industry Act 2004* [1], each licensee must provide the Economic Regulation Authority (ERA) with a performance audit completed by an independent auditor every 24 months (or a longer period if the Authority allows) and a report by an independent expert on the effectiveness of its asset management system every 24 months (or a longer period if the Authority allows).

The previous performance audit and asset management system review for licence EIRL7 were conducted in 2022. The key changes to the business since the previous audit are:

- On 1 November 2023, APA acquired ALINTA DEWAP Pty Ltd and as a result, the licence entity was updated from ALINTA DEWAP Pty Ltd to APA DEWAP Pty Ltd
- Changes arising from the change in ownership, including transfer of asset management tasks to the software in use within APA (MAXIMO, Workday).

APA engaged GHD, as an independent auditor, to undertake a performance audit for EIRL7 electricity licence owned by ADEWAP for the audit period of **1 July 2022 to 30 June 2025**. The appointment of GHD to conduct the audit was approved by ERA [2].

¹ Additional meters that ADEWAP interface with are managed by others: Horizon Power manage the meters at Wedgefield and South Hedland, and FMG manage the meters at Tiger Substation

This report presents the findings of the performance audit conducted on ADEWAP's electricity licence and the review completed on ADEWAP's asset management system. The report has been completed in accordance with the Audit Plan [4], approved by ERA on 28 July 2025 [3], and ERA's *2019 Audit and Review Guidelines: Electricity and Gas Licences* [5].

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 by:
 - Describing the Reviewer's observations and findings
 - Giving recommendations as required
 - Reviewing and providing commentary on the status of recommendations from the previous review

Figure 1 ADEWAP operations [6]

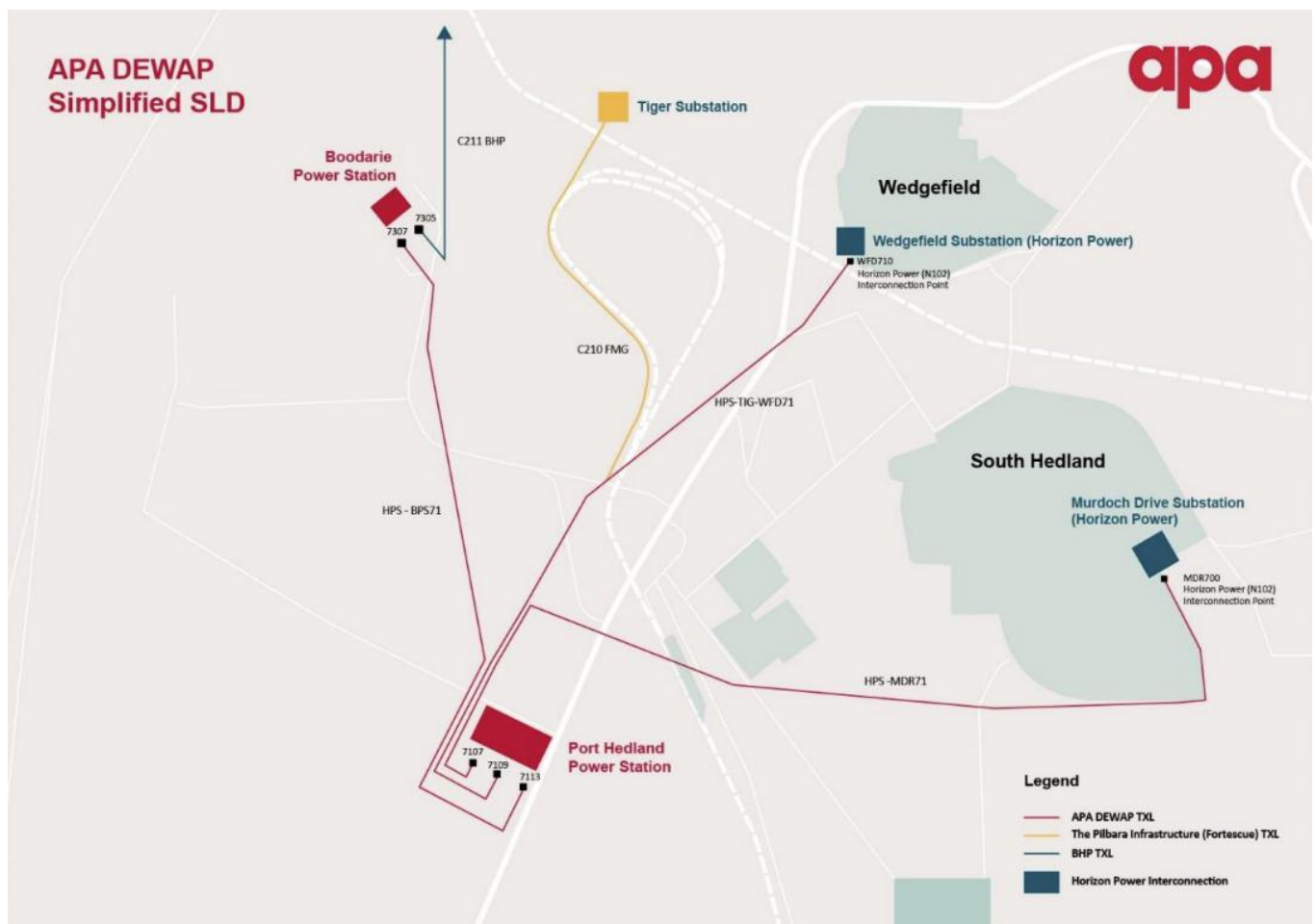


Figure 2 EIRL7 licence area [7]



1.3 Limitations

This report: has been prepared by GHD for APA DEWAP Pty Ltd and may only be used and relied on by APA DEWAP Pty Ltd for the purpose agreed between GHD and APA DEWAP Pty Ltd as set out in section 1.2 of this report.

GHD otherwise disclaims responsibility to any person other than APA DEWAP 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 (including those listed in section 1.4 of this report). GHD disclaims liability arising from any of the assumptions being incorrect.

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Audits by nature create a picture by collecting evidence based on a sample of the available information. It is therefore possible that non-compliance with one or more obligations may occur and go undetected.

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.

1.4 Assumptions


The audit has been completed based on the following assumptions:

- ADEWAP representatives interviewed during the audit provided, to the best of their ability, an accurate picture of their knowledge and understanding of ADEWAP's operations and activities for the audit period
- The documents provided by ADEWAP are currently in use (e.g. References [15], [27], [49]) and/or are authentic data/samples (e.g. References [22], [42])

2. Audit

2.1 Auditor's Statement

This audit report is an accurate presentation of my findings and opinions.

Signature	
Date	9 October 2025
Lead Auditor	Henry Le
Contact details	999 Hay St, Level 10 Perth, WA, 6000 +61 08 6222 8220

2.2 Scope and methodology

2.2.1 Objective

The objective of the audit is to assess the effectiveness of measures taken by the licensee, ADEWAP, to meet the conditions of their licence (EIRL7).

2.2.2 Scope of Work

The scope of the audit is to perform a reasonable assurance engagement on ADEWAP's compliance with the requirements of their electricity retail licence EIRL7 for the period **1 July 2022 to 30 June 2025**, in line with the ERA's 2019 Audit and Review Guidelines: Electricity and Gas Licences [5].

ADEWAP's previous compliance audit, completed in 2022, covered the period 1 July 2019 to 30 June 2022.

2.2.3 Approach

The audit was conducted using on the approach defined in the audit plan and in line with ERA's 2019 Audit and Review Guidelines: Electricity and Gas Licences (ERA Guidelines), as summarised in Figure 3 and Table 2.

Conduct audit

- Interviews
- Evaluate documentation
- Site visit
- Review previous recommendations

Audit reporting

- Prepare draft report, including findings and recommendations
- Prepare final report addressing ERA feedback

Table 2 Audit procedure for each audit priority

Audit or Review Priority		Examples of possible audit procedures
1	High Priority	Not applicable for this audit
2		
3	Moderate Priority	Interview ADEWAP representatives Desktop review of relevant documents Obtain evidence that policies, procedures and controls are in place and controls are working effectively (optional for audit priority 4) Examine compliance reports and, if applicable, breach register
4		
5	Low Priority	Interview ADEWAP representatives High level desktop review of relevant documents Desktop review of policies, procedures and controls in place View compliance reports and, if applicable, breach register

2.2.4 Site visit

A site visit to Port Hedland Power Station and Boodarie Power Station was conducted on 31 July 2025.

2.2.5 Licensee personnel

The ADEWAP representatives who participated in the audit are listed in Table 3.

Table 3 Licensee personnel

Title	Role	Interview date
Regulatory Compliance Manager	Primary contact, interviewee	25 July 2025
Head of Operations - Pilbara Energy	Interviewee	25 July 2025
Operations Manager - Pilbara Energy	Interviewee	25 July 2025
Asset Performance & Lifecycle Specialist	Interviewee	25 July 2025
Operations Risk, Compliance & Assurance Analyst	Interview support (supply evidence requested)	25 July 2025

2.2.6 Documentation

The documentation and information sources examined during the audit are listed in Section 5, and include the annual compliance reports, Power Purchase Agreements (PPAs) with BHP and The Pilbara Infrastructure Pty Ltd (FMG) and the Access Contract with Regional Power Corporation (trading as Horizon Power).

2.2.7 Work Schedule

The audit was undertaken over the period 21 July 2025 to 28 August 2025. The audit team members, the activities performed, and the hours used by each team member are shown in Table 4.

Table 4 *Work schedule and hours*

Name	Role	Hours per activity	
		Conduct audit	Reporting
Katrina Cook	Lead Auditor	40	40
Henry Le	Secondary Lead Auditor	16	30
Michelle Chavez	Auditor	8	16
Samaita Azmi	Audit Support	0	8
Marcel Oosthuizen	Report Approver	0	3

2.2.8 Deviations from the audit plan

The licensee engaged with the ERA to explore a revised draft report submission date. On 3 September 2025, the ERA granted an extension for EIRL7 to allow for the finalisation of the audit on 24 October 2025.

2.3 Audit findings

2.3.1 Performance summary

ADEWAP's performance in meeting each applicable licence obligation, as assessed during the audit, is summarised in Table 7 which shows:

- The licence obligation reference number and obligation, as defined by the Electricity Compliance Reporting Manual applicable during the auditing period [8]
- The audit priority, as defined in the Audit Plan [4] using a scale of 1 (highest priority) to 5 (lowest priority)
- The controls and compliance ratings, which use the rating scales defined by the ERA Guidelines and shown in Table 5 and Table 6 below:
 - Compliance is not rated for obligations where ADEWAP did not perform the activity during the audit period
 - A control rating is required for licence obligations with an audit priority of 1 to 3 or if the obligation has been assessed as non-compliant
- The obligations that have not been assessed, as per Section 2.2.8, are shown in the not assessed (N/A) column

Licence obligations that were assessed as 'not applicable' in the Audit Plan have not been rated nor included in the performance summary.

Further detail on the basis for the ratings, auditor's observations and recommendations is provided in Appendix A.

A further summary of ADEWAP's performance is provided in the form of a compliance and controls rating summary table in Table 8 on Page 16, following the performance summary table.

Table 5 Control ratings scale

Level	Description
A	Adequate controls – no improvement needed
B	Generally adequate controls – improvement needed
C	Inadequate controls – significant improvement required
D	No controls evident
N/P	Not performed – A controls rating was not required

Table 6 Compliance ratings scale

Level	Description
1	Compliant
2	Non-compliant – minor effect on customers or third parties
3	Non-compliant – moderate effect on customers or third parties
4	Non-compliant – major effect on customers or third parties
N/R	Not rated – No activity took place during the audit period

Table 7 Performance summary table

Licence obligation reference no.	Licence Obligation	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
Electricity Industry Act – Licence conditions and obligations												
101	Electricity Industry Act, section 13(1)	4					✓	✓				
102	Electricity Industry Act, section 14(1)(a)	4					✓	✓				
103	Electricity Industry Act, section 14(1)(b)	4					✓	✓				
104	Electricity Industry Act, section 14(1)(c)	4					✓	✓				
105	Economic Regulation Authority (Licensing Funding) Regulations 2014	4	✓					✓				
106	Electricity Industry Act, section 31(3)	5					✓	✓				
107	Electricity Industry Act, section 41(6)	4					✓	✓				
110	Electricity Industry Act, section 76	4					✓					✓
Electricity licences – Licence conditions and obligations												
119	Electricity Industry Act, section 11	4	✓					✓				
120	Electricity Industry Act, section 11	4					✓					✓
121	Electricity Industry Act, section 11	4					✓	✓				
122	Electricity Industry Act, section 11	4					✓	✓				
123	Electricity Industry Act, section 11	4					✓					✓
124	Electricity Industry Act, section 11	4	✓					✓				
125	Electricity Industry Act, section 11	4					✓					✓
126	Electricity Industry Act, section 11	4					✓	✓				
127	Electricity Industry Act, section 11	2	✓									✓
128	Electricity Industry Act, section 11	2	✓									✓
Electricity Industry Metering Code – Licence conditions and obligations												
317	Electricity Industry Metering Code, clause 2.2(1)(a)	5					✓	✓				
318	Electricity Industry Metering Code, clause 2.2(1)(b)	4					✓	✓				
319	Electricity Industry Metering Code, clause 3.1	3		✓					✓			

Licence obligation reference no.	Licence Obligation	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
320	Electricity Industry Metering Code, clause 3.2(1)	3		✓					✓			
321	Electricity Industry Metering Code, clause 3.3(1)	4					✓					✓
322	Electricity Industry Metering Code, clause 3.3(3)	4					✓					✓
323	Electricity Industry Metering Code, clause 3.3A(1)	4					✓	✓				
324	Electricity Industry Metering Code, clause 3.3B	4					✓					✓
325	Electricity Industry Metering Code, clause 3.3C	4					✓					✓
326	Electricity Industry Metering Code, clause 3.5(1) and (2)	4					✓	✓				
327	Electricity Industry Metering Code, clause 3.5(3)	4	✓					✓				
328	Electricity Industry Metering Code, clause 3.5(4)	4					✓	✓				
329	Electricity Industry Metering Code, clause 3.5(6)	4					✓	✓				
330	Electricity Industry Metering Code, clause 3.5(9)	4					✓					✓
331	Electricity Industry Metering Code, clause 3.7	4					✓					✓
332	Electricity Industry Metering Code, clause 3.8	4					✓	✓				
333	Electricity Industry Metering Code, clause 3.9(3)	4					✓	✓				
334	Electricity Industry Metering Code, clause 3.9(7)	4					✓					✓
335	Electricity Industry Metering Code, clause 3.9(9)	4					✓					✓
336	Electricity Industry Metering Code, clause 3.10	3		✓					✓			
337	Electricity Industry Metering Code, clause 3.11(1)	4	✓					✓				
338	Electricity Industry Metering Code, clause 3.11(2)	4					✓					✓
339	Electricity Industry Metering Code, clause 3.11(3)	4					✓	✓				
340	Electricity Industry Metering Code, clause 3.11A(1)	4	✓					✓				
341	Electricity Industry Metering Code, clause 3.11A(2)	4					✓					✓
342	Electricity Industry Metering Code, clause 3.12(1)	4	✓					✓				
343	Electricity Industry Metering Code, clause 3.12(2)	3		✓					✓			

Licence obligation reference no.	Licence Obligation	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
344	Electricity Industry Metering Code, clause 3.12(3)	4	✓					✓				
345	Electricity Industry Metering Code, clause 3.12(4)	4	✓					✓				
346	Electricity Industry Metering Code, clause 3.13(1)	4					✓					✓
347	Electricity Industry Metering Code, clause 3.13(3)(c)	4					✓					✓
348	Electricity Industry Metering Code, clause 3.13(4)	4					✓	✓				
349	Electricity Industry Metering Code, clause 3.14(3)	4					✓					✓
355	Electricity Industry Metering Code, clause 3.20(1)	4					✓					✓
356	Electricity Industry Metering Code, clause 3.20(3)	4					✓					✓
357	Electricity Industry Metering Code, clause 3.21(1)	4					✓					✓
358	Electricity Industry Metering Code, clause 3.21(2)	4					✓					✓
359	Electricity Industry Metering Code, clause 3.22	4					✓					✓
360	Electricity Industry Metering Code, clause 3.23(a)	4					✓					✓
361	Electricity Industry Metering Code, clause 3.23(b)	4					✓					✓
362	Electricity Industry Metering Code, clause 3.24A(1)	4					✓					✓
363	Electricity Industry Metering Code, clause 3.24B(1)	4					✓					✓
364	Electricity Industry Metering Code, clause 3.27	4					✓					✓
365	Electricity Industry Metering Code, clause 3.29	4		✓					✓			
366	Electricity Industry Metering Code, clause 4.1(1)	4	✓						✓			
367	Electricity Industry Metering Code, clause 4.1(2)	4					✓	✓				
368	Electricity Industry Metering Code, clause 4.1(3)	4	✓					✓				
369	Electricity Industry Metering Code, clause 4.2(1)	4	✓						✓			
370	Electricity Industry Metering Code, clause 4.3(1)	4	✓						✓			
371	Electricity Industry Metering Code, clause 4.4(1)	5					✓					✓
372	Electricity Industry Metering Code, clause 4.5(1)	5					✓					✓

Licence obligation reference no.	Licence Obligation	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
373	Electricity Industry Metering Code, clause 4.5(2)	4					✓					✓
374	Electricity Industry Metering Code, clause 4.6(1)	4					✓					✓
375	Electricity Industry Metering Code, clause 4.6(2)	4					✓					✓
376	Electricity Industry Metering Code, clause 4.7(1)	4					✓					✓
377	Electricity Industry Metering Code, clause 4.8(3)	4					✓					✓
378	Electricity Industry Metering Code, clause 4.8(3A)	4					✓					✓
379	Electricity Industry Metering Code, clause 4.8(4)(a)	4	✓					✓				
380	Electricity Industry Metering Code, clause 4.8(4)(b)	4	✓					✓				
381	Electricity Industry Metering Code, clause 4.8(5)	4	✓					✓				
382	Electricity Industry Metering Code, clause 4.9	4		✓				✓				
383	Electricity Industry Metering Code, clause 5.1 (1)	5					✓					✓
384	Electricity Industry Metering Code, clause 5.1(2)	5					✓					✓
385	Electricity Industry Metering Code, clause 5.3(1)	4					✓	✓				
386	Electricity Industry Metering Code, clause 5.4(1)	4					✓	✓				
387	Electricity Industry Metering Code, clause 5.4(1A)	4					✓	✓				
388	Electricity Industry Metering Code, clause 5.4(2)	4					✓					✓
389	Electricity Industry Metering Code, clause 5.5(2)	4					✓					✓
390	Electricity Industry Metering Code, clause 5.5(2A)	4					✓					✓
391	Electricity Industry Metering Code, clause 5.6(1)	4					✓					✓
391A	Electricity Industry Metering Code, clause 5.6(3)	4					✓					✓
391B	Electricity Industry Metering Code, clause 5.6(5)	4					✓					✓
392	Electricity Industry Metering Code, clause 5.7	4					✓					✓
393	Electricity Industry Metering Code, clause 5.8	4					✓					✓
394	Electricity Industry Metering Code, clause 5.9	4					✓					✓

Licence obligation reference no.	Licence Obligation	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
395	Electricity Industry Metering Code, clause 5.10	4					✓					✓
396	Electricity Industry Metering Code, clause 5.11	4					✓					✓
397	Electricity Industry Metering Code, clause 5.12(1)	4	✓									✓
398	Electricity Industry Metering Code, clause 5.13	4					✓					✓
399	Electricity Industry Metering Code, clause 5.14(3)	4					✓					✓
400	Electricity Industry Metering Code, clause 5.15	4					✓					✓
401	Electricity Industry Metering Code, clause 5.16	4					✓					✓
402	Electricity Industry Metering Code, clause 5.17(1)	4					✓	✓				
403	Electricity Industry Metering Code, clause 5.17A(1)	4					✓					✓
404	Electricity Industry Metering Code, clause 5.17A(3)	4					✓					✓
405	Electricity Industry Metering Code, clause 5.18	4					✓					✓
406	Electricity Industry Metering Code, clause 5.19(1)	5					✓					✓
407	Electricity Industry Metering Code, clause 5.19(2)	5					✓					✓
408	Electricity Industry Metering Code, clause 5.19(3)	4					✓					✓
409	Electricity Industry Metering Code, clause 5.19(5)	4					✓					✓
410	Electricity Industry Metering Code, clause 5.19(6)	5					✓					✓
411	Electricity Industry Metering Code, clause 5.20(1)	4					✓	✓				
412	Electricity Industry Metering Code, clause 5.20(2)	4		✓								✓
413	Electricity Industry Metering Code, clause 5.20(4)	4		✓								✓
414	Electricity Industry Metering Code, clause 5.21(2)	4	✓									✓
415	Electricity Industry Metering Code, clause 5.21(4)	4					✓					✓
416	Electricity Industry Metering Code, clause 5.21(5)	4					✓					✓
417	Electricity Industry Metering Code, clause 5.21(6)	4					✓					✓
418	Electricity Industry Metering Code, clause 5.21(8)	4					✓					✓

Licence obligation reference no.	Licence Obligation	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
419	Electricity Industry Metering Code, clause 5.21(9)	4					✓					✓
420	Electricity Industry Metering Code, clause 5.21(11)	4					✓					✓
421	Electricity Industry Metering Code, clause 5.21(12)	4					✓					✓
422	Electricity Industry Metering Code, clause 5.22(1)	3		✓					✓			
423	Electricity Industry Metering Code, clause 5.22(2)	4					✓					✓
424	Electricity Industry Metering Code, clause 5.22(3)	4					✓					✓
425	Electricity Industry Metering Code, clause 5.22(4)	4					✓					✓
426	Electricity Industry Metering Code, clause 5.22(5)	4					✓					✓
427	Electricity Industry Metering Code, clause 5.22(6)	4					✓					✓
428	Electricity Industry Metering Code, clause 5.23(1)	4					✓					✓
429	Electricity Industry Metering Code, clause 5.23(3)	4					✓					✓
430	Electricity Industry Metering Code, clause 5.24(1)	4					✓					✓
431	Electricity Industry Metering Code, clause 5.24(2)	4					✓					✓
432	Electricity Industry Metering Code, clause 5.24(3)	4					✓					✓
433	Electricity Industry Metering Code, clause 5.24(4)	4					✓					✓
434	Electricity Industry Metering Code, clause 5.25	4					✓					✓
435	Electricity Industry Metering Code, clause 5.27	4					✓					✓
439	Electricity Industry Metering Code, clause 5.31(2)	4					✓					✓
440	Electricity Industry Metering Code, clause 5.34(2)	4					✓	✓				
447	Electricity Industry Metering Code, clause 6.1(1)	3		✓					✓			
448	Electricity Industry Metering Code, clause 6.1(2)	4	✓					✓				
448A	Electricity Industry Metering Code, clause 6.2	5					✓		✓			
448B	Electricity Industry Metering Code, clause 6.18	5					✓					✓
448C	Electricity Industry Metering Code, clause 6.19A(1)	5					✓		✓			

Licence obligation reference no.	Licence Obligation	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
448D	Electricity Industry Metering Code, clause 6.19B(1)	5					✓					✓
449	Electricity Industry Metering Code, clause 6.20(4)	5					✓					✓
450	Electricity Industry Metering Code, clause 6.20(5)	4					✓					✓
450A	Electricity Industry Metering Code, clause 6.22	4					✓					✓
451	Electricity Industry Metering Code, clause 7.2(1)	5	✓						✓			
452	Electricity Industry Metering Code, clause 7.2(2)	4		✓					✓			
453	Electricity Industry Metering Code, clause 7.2(4)	4					✓					✓
454	Electricity Industry Metering Code, clause 7.2(5)	4					✓					✓
455	Electricity Industry Metering Code, clause 7.5	4					✓	✓				
456	Electricity Industry Metering Code, clause 7.6(1)	4					✓	✓				
457	Electricity Industry Metering Code, clause 8.1(1)	5					✓					✓
458	Electricity Industry Metering Code, clause 8.1(2)	5					✓					✓
459	Electricity Industry Metering Code, clause 8.1(3)	5					✓					✓
460	Electricity Industry Metering Code, clause 8.1(4)	4					✓					✓
461	Electricity Industry Metering Code, clause 8.3(2)	5					✓					✓
Electricity Industry (Network Quality and Reliability of Supply) Code – Licence conditions and obligations												
462	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 5(1)	5					✓	✓				
463	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 8	5					✓					✓
464	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 9	5	✓					✓				
465	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 10(1)	5	✓					✓				
466	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 10(2)	5					✓					✓
468	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 13(2)	5	✓					✓				

Licence obligation reference no.	Licence Obligation	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
469	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 13(3)	4					✓					✓
470	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 14(8)	4					✓					✓
471	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 15(2)	4					✓					✓
472	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 18	4					✓					✓
473	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 19	4					✓					✓
474	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 21(1)	4					✓					✓
475	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 21(2)	4					✓					✓
476	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 21(3)	4					✓					✓
477	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 23(1)	5					✓	✓				
478	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 23(2)	4					✓	✓				
479	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 24(3)	4					✓					✓
480	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 24(4)	4					✓					✓

Table 8 Compliance and controls rating summary table

		Compliance rating					
		1	2	3	4	N/R	Total
Controls rating	A	17	4	0	0	4	25
	B	1	8	0	0	2	11
	C	0	0	0	0	0	0
	D	0	0	0	0	0	0
	N/P	31	2	0	0	105	138
	Total	49	14	0	0	111	174

2.3.2 Recommendations from the previous audit

The status of recommendations from the previous audit is provided in Table 9. The text from both the audit report and the post implementation plan is provided for completeness.

Table 9 Status of recommendations addressing non-compliances from the previous audit

Recommendation reference no./year	Non-compliance / Controls improvement Rating / Licence obligation reference number and licence obligation / Details of non-compliance or inadequacy of controls	Auditor's recommendation	Date resolved	Further action required (Yes/No/Not Applicable)
				Details of further action required (including current recommendation reference, if applicable)
A. Resolved before end of previous audit				
Nil.				
B. Resolved before end of current audit				
1/2022	From the Previous Audit [10] Metering installation design requirements B2 <i>Obligations 319, 343 and 447</i> <i>Metering Code</i> <i>Clause 3.1 - A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and comply with any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act.</i> <i>Clause 3.12(2) - A network operator must ensure that instrument transformers in its metering installations comply with the relevant requirements of any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act and any requirements specified in the applicable metrology procedure.</i> <i>Clause 6.1(1) - A network operator must, in relation to its network, comply with the agreements, rules, procedures, criteria and processes prescribed.</i> Although Alinta has demonstrated that it has maintained its meters to the satisfaction of its customers throughout the audit period, it has not completed recommendation 2/2019 of the previous audit, regarding the creation of a metrology procedure to demonstrate its compliance with the specifications of the National Measurement Institute under the National Measurements Act.	Alinta should complete a metrology procedure to incorporate the technical requirements of the Metering Code relevant to Alinta's metering operations, subject to any exemption granted by the Pilbara ISOC Co Limited (ISO) under the Pilbara Network Rules for parts of the Metering Code.	22 March 2024 Pilbara ISOC Co granted ADEWAP an exception to selected clauses of the metering code [16]. It is noted that this exemption is to be reviewed 22 March 2027.	No.

Recommendation reference no./year	Non-compliance / Controls improvement Rating / Licence obligation reference number and licence obligation / Details of non-compliance or inadequacy of controls	Auditor's recommendation	Date resolved	Further action required (Yes/No/Not Applicable)
				Details of further action required (including current recommendation reference, if applicable)
	In August 2021, applied for exemption from Pilbara ISOC Co Limited (ISO) for parts of the Metering Code and is awaiting advice from ISO at the date of audit. This had no impact on customers and was rated as a minor noncompliance.			
	From the Post-Audit Implementation Plan [11]			
	B2 Obligations 319, 343, 447: Electricity Industry (Metering) Code 2012 Clauses 3.1, 3.12(2) & 6.1(1) <ul style="list-style-type: none"> Alinta DEWAP has not completed recommendation 2/2019 of the previous audit regarding creation of a metrology procedure to demonstrate its compliance with the specification of the National Measurement Institute under the National measurements Act 	Alinta DEWAP should complete a metrology procedure to incorporate the technical requirements of the Metering Code relevant to Alinta DEWAP's metering operations, subject to any exemption granted by the Pilbara ISOC Co Limited (ISO) under the Pilbara Network Rules (PNR) for parts of the Metering Code.		
2/2022	From the Previous Audit [10]		22 March 2024	No.
	Metering reporting B2 Obligations 448A and 448C <i>Clause 6.19A(1) - A network operator must, as soon as practicable and in any event no later than 6 months after the date this Code applies to it, submit to the ERA for its approval the prescribed documents in subclauses 6.2(a)-(d).</i> <i>Clause 6.2 - A network operator must publish its communication rules as soon as practicable, and in any event within 6 months after the date this Code applies to it.</i> In its role of a network operator, Alinta has not complied with clause 6.2(a)-(d) of the Metering Code, which required the following documents to be submitted by June 2013 to the ERA for approval:	a) Alinta should complete and submit the following documents to the ERA for approval: <ul style="list-style-type: none"> Proposed model service level agreement Proposed metrology procedure Proposed mandatory link criteria. b) Alinta should publish its communication rules unless otherwise exempted.	Pilbara ISOC Co granted ADEWAP an exception to selected clauses of the metering code [16]. It is noted that this exemption is to be reviewed 22 March 2027.	

Recommendation reference no./year	Non-compliance / Controls improvement Rating / Licence obligation reference number and licence obligation / Details of non-compliance or inadequacy of controls	Auditor's recommendation	Date resolved	Further action required (Yes/No/Not Applicable)
				Details of further action required (including current recommendation reference, if applicable)
	<ul style="list-style-type: none"> – Proposed model service level agreement – Proposed metrology procedure – Proposed mandatory link criteria. <p>Therefore, the communication rules have not been approved by the ERA or published by Alinta.</p> <p>This had no impact on customers and was rated as a minor noncompliance.</p>			
From the Post-Audit Implementation Plan [11]				
	<p>B2</p> <p>Obligations 448A, 448C: <i>Electricity Industry (Metering) Code 2012</i> Clauses 6.19A(1) & 6.2</p> <p>In its role of a network operator, Alinta DEWAP has not complied with clause 6.2(a)-(d) of the Metering Code, which required the following documents to be submitted to the ERA for approval:</p> <ul style="list-style-type: none"> – Proposed model service level agreement – Proposed metrology procedure – Proposed mandatory link criteria. <p>Therefore, the communication rules have not been approved by the ERA or published by Alinta DEWAP.</p>	<p>a) Alinta DEWAP should complete and submit the following documents to the ERA for approval:</p> <ul style="list-style-type: none"> – Proposed model service level agreement – Proposed metrology procedure – Proposed mandatory link criteria. <p>b) Alinta should publish its communication rules unless otherwise exempted.</p>		
C. Unresolved during current audit period				
Nil.				

2.3.3 Recommendations

The recommendations arising from the audit are provided in Table 10, for those resolved during current audit period (none), and Table 11 for those unresolved during current audit period.

Table 10 Recommendations to address current non-compliances and control deficiencies – resolved during current audit period

Licence Obligation No. Recommendation No.	Non-compliance / Controls Improvement	Date resolved & action taken by the licensee	Auditor's comments
319 320 336 343 422 447 448A 448C	<p>B2 Electricity Industry Metering Code, clause 3.1</p> <p>B2 Electricity Industry Metering Code, clause 3.2(1)</p> <p>B2 Electricity Industry Metering Code, clause 3.10</p> <p>B2 Electricity Industry Metering Code, clause 3.29</p> <p>B2 Electricity Industry Metering Code, clause 5.22(1)</p> <p>B2 Electricity Industry Metering Code, clause 6.1(1)</p> <p>N/P2 Electricity Industry Metering Code, clause 6.2</p> <p>N/P2 Electricity Industry Metering Code, clause 6.19A(1)</p> <p>No interim metrology procedure was in effect prior to exemption being granted during the audit period.</p>	<p>22 March 2024</p> <p>ADEWAP applied for exemption to various licence obligations and clauses under the Metering Code in October 2023. Exemptions were granted by Pilbara ISOC Co on 22 March 2024.</p>	No further action required.

Licence Obligation No. Recommendation No.	Non-compliance / Controls Improvement	Date resolved & action taken by the licensee	Auditor's comments
365	<p>B2 Electricity Industry Metering Code, clause 3.29</p> <p>A list of registered metering providers was not published in the interim prior to the exemption being granted</p>	<p>22 March 2024</p> <p>ADEWAP applied for exemption to various licence obligations and clauses under the Metering Code in October 2023. Exemptions were granted by Pilbara ISOC Co on 22 March 2024.</p>	No further action required.
451	<p>A2 Electricity Industry Metering Code, clause 7.2(1)</p> <p>There was not a means of communication via facsimile during the audit period.</p>	<p>22 March 2024</p> <p>ADEWAP applied for exemption to various licence obligations and clauses under the Metering Code in October 2023. Exemptions were granted by Pilbara ISOC Co on 22 March 2024.</p>	No further action required.

Table 11 Recommendations to address current non-compliances and control deficiencies – unresolved during current audit period

Reference Recommendation No.	Process and policy deficiency / performance deficiency (Rating / Licence obligation reference number & licence obligation / Details of non-compliance or inadequacy of controls)	Auditor's recommendation	Action taken by the end of licensee by end of audit period
1/2025	<p>A2 (366) Electricity Industry Metering Code, clause 4.1(1) Licensee record of standing data did not contain all required data.</p> <p>(369) Electricity Industry Metering Code, clause 4.2(1) A network operator must ensure that its registry complies with the Code and the prescribed clause of the market rules.</p> <p>(370) Electricity Industry Metering Code, clause 4.3(1) The standing data for a metering point must comprise at least the items specified.</p>	It is recommended that ADEWAP make arrangements for this register to be updated to include the required standing data as per the Code.	While the register has columns for the required standing data, it has yet to be populated by the end of the audit period. It is understood that this will be completed by 31 Dec 2025
2/2025	<p>B2 (452) Electricity Industry Metering Code, clause 7.2(2) Notification of contact details occurred after change took affect instead of 3 business days before as required by the Code.</p>	<p>It is recommended that ADEWAP implement controls in Vigilant or otherwise to ensure that all relevant Code Participants are notified of contact details changes at least 3 business days before the change takes effect. This would include a control to reliably prompt the responsible person, with sufficient notice to enable the task to be completed on time.</p> <p>A requirement that the notification be documented and records stored by ADEWAP for assurance purposes in those cases where the notification is undertaken by other parties/teams (e.g. APA internal working groups).</p>	<p>It is understood that all statutory, regulatory and environmental requirements are documented as tasks in Vigilant since acquisition of the asset in November 2024.</p> <p>Currently there is no activation of tasks for ad hoc or as required scenarios based on the audit findings. This action or another mitigation strategy is outstanding.</p>

3. Review

3.1 Confirmation of the Review

I confirm that the review carried out for EIRL7 and recorded in this report is an accurate presentation of our findings and opinions.

Signature	
Date	22 September 2025
Lead Reviewer	Henry Le
Contact details	999 Hay St, Level 10 Perth, WA, 6000 +61 08 6222 8220

3.2 Scope and Methodology

3.2.1 Objectives

The objective of this limited assurance engagement review is to provide to the ERA an independent assessment of the effectiveness of ADEWAP's Asset Management System (AMS) in relation to EIRL7 and provide recommendations to address identified non-compliances.

3.2.2 Scope of Works

This review involves an assessment of the following key areas using a risk-based approach (similar to ISO31000:2018):

- **Process compliance:** Effectiveness of systems and procedures
- **Outcome compliance:** Effectiveness of actual performance against licence standards
- **Output compliance:** Effectiveness of records to indicate procedures are maintained
- **Integrity of reporting:** Assessment of the completeness and accuracy of compliance and performance documentation

The scope of this review involves an assessment of against each AMS effectiveness criteria. The review of ADEWAP's AMS covers the following asset management components:

1. Asset planning
2. Asset creation and acquisition
3. Asset disposal
4. Environmental analysis
5. Asset operations
6. Asset maintenance
7. Asset management information system
8. Risk management
9. Contingency planning
10. Financial planning

11. Capital expenditure planning
12. Review of AMS

3.2.3 Methodology and Approach

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

- a. An initial discussion via teleconference with APA to:
 - i. Identify the key processes and roles to be discussed
 - ii. Discuss the review plan
- b. Preparation of the draft audit plan for comment by the licensee.
- c. Submission of the draft Audit Plan to the ERA for approval
- d. A start-up meeting and follow meetings via in person and teleconference with business staff responsible for the audit area and assets. The call involved:
 - i. Demonstration of key systems
 - ii. Identifying documents to be sampled to confirm procedures and assess compliance with AMS criteria and licence obligations
 - iii. Review of procedures
- e. Preparation of a draft audit report for ADEWAP's review and comment
- f. Preparation of a final report for submission to the ERA

3.2.4 Work Schedule

The audit was undertaken over the period 21 July 2025 to 28 August 2025. The audit team members, the activities performed, and the hours used by each team member are shown in Table 4.

Table 12 Work schedule and hours

Name	Role	Hours per activity	
		Conduct audit	Reporting
Henry Le	Lead Reviewer Conduct Site Visit Report Reviewer	16	24
Mackensie D'Alton	Review Support	16	50
Marcel Oosthuizen	Report Approver	0	3

3.2.5 Deviations from the Audit Plan

There were no deviations from the AMS review described in the Audit Plan submitted to the ERA.

3.3 Review Performance Summary

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

3.3.1 Assessment Rating Scales

In accordance with the 2019 Audit and Review Guidelines, the review of the asset management effectiveness was completed using the rating scales outlined in Table 13 and Table 14.

Table 13 *Asset Management Process and Policy Definition Rating*

Rating	Description	Criteria
A	Adequately defined	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	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 substantial improvement	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	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 14 *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.

3.3.2 AMS Review Effectiveness Summary

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

The review was conducted using the asset management adequacy and performance ratings as described in Table 13 and Table 14. A summary of outcomes of the review is provided in Table 15.

Table 15 AMS Review Results Summary

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

AMS Component	Process and Policy Rating	Performance Rating
5. Asset operations	A	1
5.1. Operational policies and procedures are documented and linked to service levels required	A	1
5.2. Risk management is applied to prioritise operations tasks	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	A	1
5.4. Accounting data is documented for assets	A	1
5.5. Operational costs are measured and monitored	A	1
5.6. Staff resources are adequate and staff receive training commensurate with their responsibilities	A	1
6. Asset maintenance	A	1
6.1. Maintenance policies and procedures are documented and linked to service levels required	A	1
6.2. Regular inspections are undertaken of asset performance and condition	A	1
6.3. Maintenance plans (emergency, corrective, and preventative) are documented and completed on schedule	A	1
6.4. Failures are analysed and operational/maintenance plans adjusted where necessary	A	1
6.5. Risk management is applied to prioritise maintenance tasks	A	1
6.6. Maintenance costs are measured and monitored	A	1
7. Asset management information system	A	1
7.1. Adequate system documentation for users and IT operators	A	1
7.2. Input controls include suitable verification and validation of data entered into the system	A	1
7.3. Security access controls appear adequate, such as passwords	A	1
7.4. Physical security access controls appear adequate	A	1
7.5. Data backup procedures appear adequate, and backups are tested	A	1
7.6. Computations for licensee performance reporting are accurate	A	1
7.7. Management reports appear adequate for the licensee to monitor licence obligations	A	1
7.8. Adequate measures to protect asset management data from unauthorised access	A	1
8. Risk management	A	1
8.1. Risk management policies and procedures exist and are applied to minimise internal and external risks	A	1
8.2. Risks are documented in a risk register and treatment plans are implemented and monitored	A	1
8.3. Probability and consequences of asset failure are regularly assessed	A	1

AMS Component	Process and Policy Rating	Performance Rating
9. Contingency planning	A	1
9.1. Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks	A	1
10. Financial planning	A	1
10.1. The financial plan states the financial objectives and identifies strategies and actions to achieve those	A	1
10.2. The financial plan identifies the source of funds for capital expenditure and recurrent costs	A	1
10.3. The financial plan provides projections of operating statements (profit and loss) and statement of financial position (balance sheets)	A	1
10.4. The financial plan provides firm predictions on income for the next five years and reasonable predictions beyond this period	A	1
10.5. The financial plan provides for the operations and maintenance, administration and capital expenditure requirements of the services	A	1
10.6. Large variances in actual/budget income and expenses are identified and corrective action taken where necessary	A	1
11. Capital expenditure planning	A	1
11.1. There is a capital expenditure plan covering works to be undertaken, actions proposed, responsibilities and dates	A	1
11.2. The capital expenditure plan provides reasons for capital expenditure and timing of expenditure	A	1
11.3. The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan	A	1
11.4. There is an adequate process to ensure the capital expenditure plan is regularly updated and implemented	A	1
12. Review of AMS	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	A	1
12.2. Independent reviews (e.g. internal audit) are performed of the Asset Management System	A	1

3.3.3 Recommendations from previous review

The status of recommendations from the previous audit is provided in the following tables below.

Table 16 *Status of recommendations addressing AMS deficiencies from the previous review*

Reference / Recommendation reference	Process and policy deficiency / Performance deficiency Rating / Asset management process & effectiveness criterion / Details of deficiency)	Date resolved & action taken by the licensee	Auditor's comments
6.4 (1/2022)	<p>C3 Asset Maintenance</p> <p>Previous review found a high number of trips and a decline in asset performance for year 2022 compared to 2021. Deficiencies were found in existing procedures around consistent use of root cause analysis to plan and direct corrective actions.</p>	<p>30/11/2024 Following the acquisition of the Asset by APA, the review found that while operations proceeded as per usual initially, maintenance philosophy was changed to APA's Work Management System, which mandates regular use of root cause analysis during operational and maintenance incidents with scrutiny being aligned with the criticality of the asset and severity of the incident.</p>	<p>No further action required</p>

3.4 Review Observations and Recommendations

3.4.1 Asset Management System Review

The AMS review conducted is in Table 17. 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 17 *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	ADEWAP evidence each of the applicable processes with respect the asset planning. See individual effectiveness criteria observations. The Asset Management Plan (AMP) is currently being updated and brought across to ADEWAP's documentation standard. The previous Alinta AMP that was effective during the audit period and the draft 2026 version were also provided as evidence. The 2026 draft shows the previous iterations of the document including the rebranding that occurred on the 9 December 2024.	A	1
1.2	Planning processes and objectives reflect the needs of all stakeholders and are integrated with business planning	4	The consultation section of the AMP mentions that the AMP has been developed in consultation with key ADEWAP stakeholders and personnel. Section 7.4 provides a summary of all the regulatory compliances, as well as who is responsible for managing and upkeeping the compliances. ADEWAP also evidences their Operational Excellence Standard, which ensures ADEWAP will run their business effectively, efficiently and consistently 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. A Contract Management Meeting Report (Dec 2024) with BHP is also evidenced, providing a summary of operations for BHP and that all compliances are being adhered too.	A	1
1.3	Service levels are defined in the asset management plan	4	The section 3 Performance Monitoring and Management from the Operational Excellence Standard, outline the performance requirements required for business processes. Section 3.1.2 of the AMP also outlines the PPAs (Power Purchase Agreement) with BHP and Fortescue (FMG) and the average and maximum peak demand of each customer. The power performance dashboard is also witnessed showing the performance of the different assets is monitored. The dashboard was witnessed to include asset health, process safety, finance, maintenance, integrity, regulatory compliance, Reliability and maintenance strategy, risk and opportunity and optimisation.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
1.4	Non-asset options (e.g. demand management) are considered	4	<p>All non-asset operations are driven by client (BHP and FMG) contractual arrangements and ISOC Co, which ADEWAP adheres to.</p> <p>BHP and FMG provide load forecasts to ADEWAP. The PPAs also cover the Contract Maximum Demand (CMD) covering the requirements of ADEWAP in satisfying the demand of BHP and FMG.</p> <p>The plant is load following and maintains a minimum 20 MW spinning reserve along with priority dispatch with BHP and FMG also controls demand.</p> <p>ISOC Co (independent system operator for the North-West Interconnected System) directs droop operations.</p> <p>During the site visit the SCADA and control system was witnessed.</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 2026.</p> <p>Life Cycle Plan Interface Tool is also witnessed which shows 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 life cycle plans.</p> <p>The Asset Lifecycle Planning procedure is also evidenced, which shows the key management practices used in asset life cycle planning.</p> <p>Long term life cycle costs are reviewed annually. Dashboards also provide a financial breakdown of each asset was witnessed.</p>	A	1
1.6	Funding options are evaluated	2	<p>Refer to item 1.5, where life cycle planning tool is used.</p> <p>Risk assessments in Maximo witnessed which allocates risk rankings to each project for the asset which helps assess the available budget.</p> <p>Work order for an inspection of the high voltage switchyard was witnessed, inspections act as a way of determining where to allocate funds depending on equipment health. Asset health is also tracked in a dashboard.</p>	A	1
1.7	Costs are justified and cost drivers identified	2	<p>Contractual obligations defined in the PPAs, 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, compliance and assurance.</p> <p>The project risk rankings are used internally to assess and prioritise projects.</p>	A	1
1.8	Likelihood and consequences of asset failure are predicted	4	<p>Refer to item 1.6 risk ranking of each project.</p> <p>Inspections are conducted to assess the condition of assets and contribute to predicting potential failure. As described in item 1.3, asset health is regularly monitored via dashboards using input data from Maximo.</p> <p>The risk register which is maintained for Port Hedland Power Station was witnessed and a sample was provided for evidence.</p> <p>Risk Management Standard evidenced which outlines the minimum requirements for risk management to standardise across APA assets.</p>	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
1.9	Asset management plan is regularly reviewed and updated	2	The AMP has a history of regular reviews documented within, the AMP is reviewed annually, and updates occur when major changes happen in the AMS. The AMP revision history shows that the last review within the audit period completed on 9 Dec 2024. The AMP is stored and reviews managed within Red Eye, a cloud-based engineering document management system.	A	1
2	Asset creation and acquisition Asset creation/acquisition is the provision or improvement of assets			A	1
2.1	Full project evaluations are undertaken for new assets, including comparative assessment of non-asset options	2	ADEWAPs Project Management Framework (PMF) is evidenced, the document describes the key components for project management over the lifetime of the project starting at feasibility and finishing at decommissioning. ADEWAPs prioritisation of project and proposals is also witnessed, showing the priority assigned to each. The Project Proposal Tool was also witnessed showing details for the project proposal such as required approvers, financial details and risk assessment.	A	1
2.2	Evaluations include all life-cycle costs	2	Part of the Project Proposal Tool provides a look ahead of inflows along with CAPEX and OPEX outflows. The PMF also says a financial model will be developed for the business case as part of the feasibility study.	A	1
2.3	Projects reflect sound engineering and business decisions	2	The PMF provides an adequate basis for making sure projects follow good engineering practices and investigating the effects to the business. ADEWAP also provides as part of their Business Process Definition the Asset Integration, which ensures projects are integrating into the business as seamlessly as possible. ADEWAPs Project Completion Register Template is evidenced, which shows a checklist for the requirements for projects, acceptance criteria, required reference documents and who is responsible for the item.	A	1
2.4	Commissioning tests are documented and completed	2	ADEWAP has evidenced compliance, commissioning and hold point testing documents for the Port Headland solar farm which demonstrate good engineering practice.	A	1
2.5	Ongoing legal / environmental / safety obligations of the asset owner are assigned and understood	2	See Item 1.2 Section 7.4 of AMP. See Item 2.3 with reference to the Project Completion Register Template.	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

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
3.1	Under-utilised and under-performing assets are identified as part of a regular systematic review process	4	ADEWAPs Optimisation dashboard was witnessed and provides an overview of the asset's actual performance against the target performance. ADEWAP rebuilt Alinta's Power Performance Report which provides several metrics for assessing an asset's performance.	A	1
3.2	The reasons for under-utilisation or poor performance are critically examined and corrective action or disposal undertaken	4	The Asset Management Procedure for Suspension of Operating Assets was evidenced; the procedure has been developed to be flexible so it can be applied to a range of project cases. The procedure provides a guide to the decision making behind the suspension of an asset as well as provides operations with a process to suspend an asset. Failures are flagged in operational incident reports and are also highlighted in the dashboard, 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. Part of the Asset Management Framework is Asset Decommissioning, which ensures decommissioned assets follow a set of procedures including: <ul style="list-style-type: none"> - Deactivation operations. - Archiving asset records. - Plan/execute asset removal, re-purposing or recycling. - Regulatory notification. - Land rehabilitation and monitoring. - Sale or divest. 	A	1
3.4	There is a replacement strategy for assets	4	The Maximo system includes a spares register, which was evidenced with the July 2025 spares register. This register includes descriptions, quantities, and storage locations. . Replacements are predicted and overlaid with the spares register. ADEWAP projects lifecycle costs of the asset as mentioned in item 1.5.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
4	Environmental analysis Environmental analysis examines the Asset Management System environment and assesses all external factors affecting the Asset Management System.			A	1
4.1	Opportunities and threats in the Asset Management System environment are assessed	2	Refer to item 3.2 asset performance tracked. Operational performance meetings are held monthly and Contract Management Meeting Report with BHP provided as evidence; environmental issues and licences are assessed. The compliance Management System Procedure Manual (CMS Handbook) is evidenced, this document is reviewed every two years. The document provides the procedure for maintaining the Regulatory Environment and ensures regulations, obligations, policy and procedures remain updated and reflect any change in the business. Part of the Asset Management Framework is the Operations Risk & Opportunities; document mentions the process to scan the external environment including market, regulatory and industry changes in addition to the internal environment.	A	1
4.2	Performance standards (availability of service, capacity, continuity, emergency response, etc.) are measured and achieved	2	Refer to item 3.2 asset performance tracked. Outages of each individual asset are presented in an Optimisation dashboard using data from Maximo. The optimisation dashboard also shows actual availability of assets against a target availability. A sample of the Power Performance Report dashboard was provided, which showed more information on the performance of assets including availability, generation and gas consumption, and heat rate.	A	1
4.3	Compliance with statutory and regulatory requirements	2	See item 1.2 and 1.7 with respect to BHP Contract Management Meeting Report, PPA obligations. Vigilant software is a web-based platform that allows an organisation to manage and track compliance, regulatory and risk items. ADEWAP provided a sample of a dashboard in their Regulatory & Compliance Management system (managed in Vigilant), the sample shows the obligations and the assets they are linked too. A sample of the Regulatory Dashboard is also provided, which provides summary of the obligation types, along with overdue and upcoming obligations. Along with obligation tracking in Vigilant, since APA took over DEWAP assets annual compliance reports have been provided to ERA as required.	A	1
4.4	Service standard (customer service levels etc) are measured and achieved.	2	See item 1.2 and 1.7, BHP Contract Management Meeting Report, PPA obligations. In addition, APA performs a customer experience survey to monitor and track customer relationships, including customers associated with the DEWAP. Quantitative surveys are done with APA's pipelines, power and electrical transmission customers. Results of the survey are used to update customer experience score and guide actions across the business. APA Client Experience Survey Research Report (May 2025) is provided as evidence which shows the sample breakdown of respondents.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
5	Asset operations Asset operations is the day-today running of assets (where the asset is used for its intended purpose).			A	1
5.1	Operational policies and procedures are documented and linked to service levels required	4	<p>AMP references the PPAs with BHP and FMG in section 3.1.2, PPAs describe the service levels required by ADEWAP to meet.</p> <p>ADEWAP utilises multiple Operation & Maintenance (O&M) dashboards to help track the general operation of DEWAP assets including operation incidents, work order completion and O&M Instructions. Sample of the Operational Incidents and Work Order Completion dashboards were provided.</p> <p>Multiple operational policy documents are evidenced including code of conduct policy; covers the expected behaviours of APA employees, Enterprise Resilience Policy; covers APA's approach to maintaining effective resilience to disruptions and minimise impacts to the business, Risk Management Policy; helps APA manage uncertainty and risk.</p> <p>ADEWAP evidenced their Standard Operating Procedure for Restart of Black Network to show procedures are documented. The document provides a detailed procedure for operators to perform a black restart of the 66kV line at Port Hedland Power Station.</p>	A	1
5.2	Risk management is applied to prioritise operations tasks	2	<p>See item 1.8, Risk ranking also contributes to the prioritisation of projects and tasks.</p> <p>ADEWAP's Risk Management Policy and Risk Management System – Procedures were evidenced. These documents outline how risk is managed throughout ADEWAP's operations, where emerging risks are identified their assigned rating i.e. catastrophic determines the priority of acting on the risk.</p> <p>Work order dashboard has also been witnessed showing different workorders assigned a priority.</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	2	<p>Maximo is used by ADEWAP to maintain the live asset register. ADEWAP utilises Maximo to provide asset information and track asset operation. A sample of the Location Extract from Maximo is evidenced, the sample provides details such as a description of the asset, if the asset is operating and asset location.</p> <p>See Item 6.2 with reference to Robotic Inspection Report, showing assets condition is monitored. Samples of ADEWAP's upcoming and completed work order dashboards also shows the planned and completed visual inspections of assets.</p> <p>ADEWAP provides a sample of Port Hedland's July 25 inventory. The sample provides a detailed list of components stored onsite including a basic description, storeroom number and current balance of the component.</p>	A	1
5.4	Accounting data is documented for assets	4	<p>Workday is utilised to store accounting data, and each asset is also allocated its own accountant. Workday – Getting Started Toolkit was provided as evidence. Workday is a third-party comprehensive financial management software used to automate People, Safety, Culture, Procurement and Finances processes at ADEWAP.</p>	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
5.5	Operational costs are measured and monitored	4	<p>The Financial Dashboard was observed, and it displays a comparison between the actual financial performance and the budgeted values. This dashboard is used for monitoring the financial health of the asset, as it allows ADEWAP to see how well the asset is performing financially compared to the planned budget. The dashboard includes various financial metrics and key performance indicators (KPIs) that provide insights into the asset's financial status.</p> <p>The financial data used in this dashboard originates from Workday. Workday is utilised to store and manage accounting data for each asset, ensuring that all financial information is accurate and up to date.</p>	A	1
5.6	Staff resources are adequate and staff receive training commensurate with their responsibilities	2	<p>Maximo and Workday E-learning page samples have been provided as evidence. Maximo and Workday are essential tools used by ADEWAP for asset management and financial management, respectively.</p> <p>The WA O&M Competency Matrix_2025 is also evidenced which provides a reference for the required trainings for each job role. The Port Headland Training Matrix also evidenced showing individual personnel trainings, completion dates and the frequency for refresher training.</p>	A	1
6	Asset maintenance Asset maintenance is the upkeep of assets.			A	1
6.1	Maintenance policies and procedures are documented and linked to service levels required	4	<p>Maintenance policies and procedures are stored in Red Eye, a cloud-based engineering document management system. These procedures are linked to the required service levels outlined in customer PPAs and are reported to customers through Contract Management Meeting Reports.</p> <p>KPIs are tracked in dashboards, showing monthly and daily metrics, ensuring that the maintenance activities align with the service levels required. The AMP also documents recent major maintenance history; this is supported by O&M dashboard providing a detailed history of completed maintenance. Between the AMP and O&M dashboard a clear record of maintenance activities has been documented.</p>	A	1
6.2	Regular inspections are undertaken of asset performance and condition	2	<p>Samples of dashboards showing upcoming workorders and workorder completion were provided. The previously completed and upcoming asset inspections can be seen in the dashboards.</p> <p>The TG102 Generator Robotic Inspection report was for an inspection that was conducted for the asset during the audit period was evidenced. In addition, a tracker for planned outages on AWEWAP's SharePoint system was witnessed and evidenced.</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	2	<p>ADEWAP monitor the efficiency and effectiveness of their maintenance operations over time by tracking the rolling average completion rate in their Work Order Completion dashboard. The dashboard provides a link to the assigned work order, date completed, priority and a basic description.</p> <p>Extracts from Maximo are also evidenced which show an investigation into a previous incident during the audit period. Incident details are provided including details of the incident, immediate actions taken and the team investigating the incident. Actions from the incident are captured in another sample showing, the investigation, communication of findings and the opportunity for improvement.</p>	A	1
6.4	Failures are analysed and operational / maintenance plans adjusted where necessary	1	<p>Incident, Near Miss & Hazard Management Guideline is evidenced which provides details on how incidents or near misses are investigated. The document also details how investigations should provide recommendations which will be agreed upon by relevant leaders/stakeholders.</p> <p>Since the acquisition by APA on 30/11/2024, the maintenance philosophy transitioned to APA's Work Management System, which requires regular root cause analysis for operational and maintenance incidents, with scrutiny based on asset criticality and incident severity. Incidents are maintained and tracked in Maximo; operational incident actions in Maximo were witnessed.</p> <p>An incident from early 2025 was evidenced, where there was a total loss of generation at Port Hedland Power Station. The example shows ADEWAP has an effective procedure for dealing with incidents, the incident has been tracked in Maximo providing details and a link to the investigation report. The investigation report (20250122 Loss of Total Generation Port Hedland (Inv291743)) provides a clear summary of the incident including the sequence of events, an in-depth investigation showing root cause analysis and findings. Recommendations are then provided with required completion date and personnel responsible.</p>	A	1
6.5	Risk management is applied to prioritise maintenance tasks	3	See item 5.2.	A	1
6.6	Maintenance costs are measured and monitored	4	See item 5.5.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
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	<p>See item 5.6.</p> <p>Training provided by ADEWAP helps users navigate and operate various systems associated with the business for example Maximo and Workday, which are key pieces of software which form a large part their AMS.</p> <p>ADEWAP provides standards, user guides and SharePoint support hubs to help users comply with business operations. ADEWAP's Information Security Classification and Handling Standard along with Physical Access Management Standard are examples of some standards provided as evidence.</p> <p>These standards clearly state the purpose, scope, key contacts and a detailed description of how to apply the standard. In addition, based on the discussions with the Regulatory Compliance Manager, and personnel on site, the review finds that APA have an IT support team in line with typical operations for a large business.</p>	A	1
7.2	Input controls include suitable verification and validation of data entered into the system	2	<p>Part of the Asset Management Framework is the Asset Data and Records; purpose of this document is to ensure all information and data is available to help maintain assets. It covers the requirements to ensure good decision-making supporting data is accurate and current. It is also stated that Fit-for-purpose systems will be used for accurate generation and collection.</p> <p>Work order requests are raised by operational staff which have an approval flow tied to operations management. Discussions with the Head of Operations, pointed to ADEWAP's commercial team who conducts data checks and flags occurrences of mismatching data.</p> <p>ADEWAP has a robust process for validating data, with a dedicated team to ensure data is accurate. The approval flow tied to adding or changing data entered also ensures it is accurate and was witnessed during the site visit. Data from Maximo is also tied to a Power Planning Report which is reviewed monthly by the Head of Operations and Operations Manager. A sample Power Planning Report dated within the audit period was evidenced.</p>	A	1
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.</p> <p>Two-factor authentication is required to access different systems, This requirement was witnessed during the interview process and site visit and when witnessing different components of the AMS.</p> <p>The Information Security Classification and Handling Standard was evidenced, detailing how different types of data are classified and managed. The standards reference requirements for handling the organisation's information, confidentiality and IT practises.</p>	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
7.4	Physical security access controls appear adequate	2	Physical access to the site requires passing through secure perimeter fencing, cameras and fob key access. Security protocols were witnessed onsite. Seeing as the asset is considered critical infrastructure, the security standard for the site is compliant to Security of Critical Infrastructure Act 2018 (SOCi). Visitor access is controlled with a visitor check in procedure; operator must be called, and escort provided. Physical Access Management Standard also evidenced, which discusses the physical control put in place to restrict physical access to ADEWAP assets.	A	1
7.5	Data backup procedures appear adequate, and backups are tested	4	See item 7.2. Service Continuity Management Standard is evidenced; covers how APA will protect its IT and OT environments for all assets. It is also mentioned as part of the continuity plan that recovery plans for systems are tested as well as capacity arrangements are adequate for data backup. If any data is restored from backup review for compliance targets takes place. Based on discussions with the Regulatory Compliance Manager, it is understood that the metering data is backed up under a full high-availability redundancy provided by a third party (Commvault). The Experion SCADA backups are performed automatically and stored locally on site. The Service Continuity Standard was also evidenced, which classifies this asset as requiring annual continuity testing, demonstrating effective and processes and policies. It should also be noted that the annual testing period is an APA process and policy and the due date has not been due within the audit period when taking into account the ownership period of the asset under ADEWAP.	A	1
7.6	Computations for licensee performance reporting are accurate	4	Dashboards receive data directly from the software that processes the data to ensure system monitoring is accurate. Power Performance Report (PPR) is evidenced, which provides a breakdown of the calculations for calculating Availability Statistics, Generation and Gas Consumption Statistics, and Heat Rate Statistics.	A	1
7.7	Management reports appear adequate for the licensee to monitor licence obligations	4	See items 4.2 and 6.1.	A	1
7.8	Adequate measures to protect asset management data from unauthorised access	4	See items 7.3 and 7.4.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
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 item 5.2 with reference to APA Group Standard and Policy for Risk Management.	A	1
8.2	Risks are documented in a risk register and treatment plans are implemented and monitored	2	See item 5.2. Based on APA Groups Risk Management System Process, owners of the risk must provide information on why target risk cannot be achieved, dependant on the level of risk assigned different levels of personnel are assigned to manage and approve whether to accept the residual risk. A sample of the Risk Registers stored and tracked in Vigilant is provided. The sample shows risks can be sorted on a per asset basis, details shown include assigned risk ID, approval status, risk title, Residual risk rating and Target risk rating. Additionally, trends in the risks are monitored and can be indicated as increasing, decreasing or steady.	A	1
8.3	Probability and consequences of asset failure are regularly assessed	4	See item 1.8. Q4 FY24 Operations draft ERM (Executive Risk Management Committee) report witnessed, covers early warning metrics, risk appetite and tolerance measures, and assurance review findings and actions closure. Root cause analysis occurs for any level 2 and above failures.	A	1
9	Contingency planning Contingency plans document the steps to deal with the unexpected failure of an asset.			A	1
9.1	Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks	2	APA provided the following examples that show adequate contingency planning. The Cyclone Action Plan and Cyclone Preparation documents provide a detailed breakdown of the steps personnel must take to prepare themselves and the site for potential incidents, divided into four stages. The Port Hedland turbines have manual control capabilities in case the Experian system fails, and there are two Experian servers, one of which serves as a backup. The Port Hedland emergency contact list has been evidenced. Additionally, the Hold Point Testing Summary for the solar farm demonstrates that the asset was tested for system disturbances, specifically frequency droop. The Emergency Response Plan provides a breakdown of incident management procedures.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
10	Financial planning Financial brings together the financial elements of the service delivery to ensure its financial viability over the long term.			A	1
10.1	The financial plan states the financial objectives and identifies strategies and actions to achieve those	5	Asset Financial Performance part of the Asset Management Framework is evidenced; this provides a summary of how budgeting, forecasting, monitoring and management is managed. The document also provides a guide to understand the health of different KPI's. The AMP also provides a 5-year forecast of capital expenditure and the capital expenditure of projects to be performed in 2026.	A	1
10.2	The financial plan identifies the source of funds for capital expenditure and recurrent costs	4	Asset Financial Performance document is evidenced which provides a breakdown of how financial performance is managed and tracked. This document also states that annual budget is approved by management which is submitted to an annual board meeting in April. The template power point for ESPP (Enterprise Strategic Planning Process) Divisional Strategic Plan (dated 12 Feb 2025) shows the development of a detailed budget is one of the six steps in ESPP. APA's Working Capital team collaborates closely with the Financial Planning team to allocate financial resources. The AMP identifies projects for the upcoming financial years and provides projections of the expected capital expenditure for these projects. Additionally, the Life Cycle Plan Interface Tool provides a comprehensive overview of the status of various projects, indicating whether they are recurring, in the concept phase, or in the planning stage. This tool also displays the current budget and forecasted budget for each project.	A	1
10.3	The financial plan provides projections of operating statements (profit and loss) and statement of financial position (balance sheets)	4	The Adaptive finance application platform is used to document operating financial information for assets. The Adaptive platform, which integrates input data from Workday, was witnessed, providing a detailed breakdown of labour costs, direct costs, and revenue for the asset. The 2024 Annual Report, which was evidenced, documents a financial summary for the 2023/2024 fiscal year during the audit period, utilising data from Adaptive. Additionally, a sample of financial position and operating statements was witnessed, which included a specific section for the asset.	A	1
10.4	The financial plan provides firm predictions on income for the next five years and reasonable predictions beyond this period	4	See item 1.6 and 5.1 with respect to financial plan and lifecycle costs.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
10.5	The financial plan provides for the operations and maintenance, administration and capital expenditure requirements of the services	4	See 10.3 with respect to the Adaptive platform.	A	1
10.6	Large variances in actual/budget income and expenses are identified and corrective action taken where necessary	2	See item 10.1 - KPI performance is monitored and assigned health levels based on asset performance. Monthly reports are provided to senior management and teams working on the assets, highlighting the comparison between budgeted and actual financial performance. The Performance Report for June 2025 was witnessed. The ESPP Divisional Strategic Plan template was also evidenced, which discusses plans related to growth and improvements, providing an overview of major priorities and strategic initiatives. Additionally, dashboards are utilised to provide tracking of actual expenditure compared to budgeted amounts.	A	1
11	Capital expenditure planning 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.			A	1
11.1	There is a capital expenditure plan covering works to be undertaken, actions proposed, responsibilities and dates	2	See item 10.2 with respect to the Life Cycle Plan Interface Tool. Asset Lifecycle Management Plan was witnessed; it provides a 20 year look ahead of recurring costs for the asset. The Control System Replacement Development Report was also evidenced as an example. The break down for the entire project is shown, stakeholders involvement, project team, estimated cost breakdown and business case development for the replacement of the control system.	A	1
11.2	The capital expenditure plan provides reasons for capital expenditure and timing of expenditure	4	See item 11.1 with respect to the Control System Replacement Development Report. The Control System Replacement Development Report requires the business case to include clear reasoning for a capital expenditure.	A	1
11.3	The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan	4	See item 1.5 and 11.1.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
11.4	There is an adequate process to ensure the capital expenditure plan is regularly updated and implemented	2	See item 10.6. Asset Financial Performance document updated every 3-years. Monthly Operation Performance Meetings, Asset Performance Meetings and Operations Business Finance Meetings help contribute to make sure the plan is up to date.	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	2	See item 1.1 AMP is reviewed annually. Policy, procedure and standard documents all have revision history recorded, and the frequency document are reviewed.	A	1
12.2	Independent reviews (e.g. internal audit) are performed of the Asset Management System	2	The Business Process – Asset Management System document (evidenced) references the requirement of regular reviews as per the Operational Excellence Framework. Annual compliance reports are provided to the Economic Regulation Authority (ERA). These reports offer an overview of the organisation's adherence to regulatory requirements. The Assurance Standard (evidenced) requires internal audits for independent assurance. ADEWAP conducts internal audits of their licence obligations in accordance with ERA requirements.	A	1

4. Terms and abbreviations

ADEWAP	APA DEWAP Pty Ltd
(the) Authority	Economic Regulation Authority
BHP	BHP Iron Ore Pty Ltd
ERA	Economic Regulation Authority
EIRL7	ADEWAP's Electricity Integrated Regional Licence
ERA Guidelines	Reference [5]
FMG	The Pilbara Infrastructure Pty Ltd, a wholly owned subsidiary of Fortescue Metals Group
GHD	GHD Pty Ltd, ABN: 39 008 488 373
Horizon Power	Regional Power Corporation, trading as Horizon Power
MWh	Megawatt hour
N/A	Not assessed
N/P	(Controls rating) not performed, refer to Table 5 on Page 8
N/R	(Compliance) not rated, refer to Table 6 on Page 8
TXL	Transmission Line
WA	Western Australia

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Table 18 AMS Review – Documents Reviewed

Doc no.	Filename	File Extension
1	AMP - Port Hedland FY2024 (1)	.docx
2	APA Group Standard - Operational Excellence	.pdf
3	APA Group Standard - Risk Management	.pdf
4	APA Risk Matrix extract	.jpg
5	APA_WOT010_TransmissionWorkOrderPrint	.pdf
6	Asset Health extract 001	.jpg
7	Asset Life-cycle Planning Procedure V5.2	.pdf
8	Asset Lifecycle Interface extract 001	.jpg
9	Asset Management Planning v2.0 2025-04.docx	.pdf
10	Asset Management Plans sensitive information kept extract	.jpg
11	BHPReportDec2024	.pdf
12	HV Switch Yard Inspections - Work Order	.pdf
13	Internal Stakeholders	.png
14	Life Cycle Risk Rating extract	.jpg
15	Operations Risk & Opportunities	.pdf
16	Opex Variance extract (OPD)	.jpg
17	PH OPD Asset Performance Dashboards	.docx
18	Project Proposal tool extract 001	.jpg
19	Project Proposal tool extract 002	.jpg
20	Project Proposal tool extract 003	.jpg
21	Project Proposal tool extract 004	.jpg
22	Project Proposal tool extract 005	.jpg
23	Project Proposal	.jpg
24	Risk Assessment CAPEX extract	.jpg
25	Risk Register extract	.png
26	530-TP-A-0021 - Project Completion_Closeout Register Template	.xlsx
27	AEME-0000-000-FRM-002 Project Management Framework	.docx
28	APA Group Procedure - Compliance Management System Handbook (3)	.pdf
29	Asset Integration v2.1 2025-05.docx	.pdf
30	Asset Life-cycle Planning Procedure V5.2 (1)	.pdf
31	HP2 Compliance Test Report Rev 2_NSP - pre-commissioning check sheet	.pdf
32	HP2 Compliance Test Report Rev 2_NSP	.pdf
33	PHSF-MFG-CS-ITC-408.1_PCS01 - PRE - COMMISSIONING	.pdf
34	Prioritisation Process	.jpg
35	Project Delivery Framework	.jpg
36	Project Proposal tool extract 001	.jpg
37	Project Proposal tool extract 002	.jpg
38	Project Proposal tool extract 003	.jpg
39	Project Proposal tool extract 004	.jpg

Doc no.	Filename	File Extension
40	Project Proposal tool extract 005	.jpg
41	Project Proposal	.jpg
42	ATP-PR-AM-0003 - Suspension of Operating Assets	.pdf
43	Asset Decommissioning v1.0 2025-06	.pdf
44	Compliance Obligations	.jpg
45	Optimisation (OPD) extract	.jpg
46	Port Hedland Inventory July 25	.pdf
47	Power Performance Report extract	.jpg
48	Reliability and Maintenance Strategy extract	.jpg
49	APA Group Procedure - Compliance Management System Handbook	.pdf
50	BHPReportDec2024	.pdf
51	EIRL007-version-5-APA-DEWAP-Pty-Ltd Licence	.PDF
52	Environment v1.0 2025-04.docx	.pdf
53	Incident Management v1.0 2025-05.docx	.pdf
54	Optimisation (OPD) extract	.jpg
55	PHPS- Compliance plan	.xlsx
56	Power Performance Report extract	.jpg
57	Reliability and Maintenance Strategy extract	.jpg
58	Technical Regulatory Compliance v3.0 2025-05.docx	.pdf
59	Vigilant - Compliance Plan screengrab	.pdf
60	2024-25-Annual-Report-into-Essential-System-Services-30-May-2025	.pdf
61	320-PL-ER-0001 ER Managment Plan	.pdf
62	4.3 Integrated Operations v1.1 2025-06	.pdf
63	APA Group Procedure - Ring Fencing	.pdf
64	APA Group Procedures – Risk Management System Processes	.pdf
65	APA Group Standard - Customer and Commercial Contracting	.pdf
66	APA HSE GD 07.01 T1 Incident, Near Miss & Hazard Management Guideline	.pdf
67	APA Policy - Code of Conduct	.pdf
68	APA Policy - Enterprise Resilience	.pdf
69	APA Policy - Risk Management	.pdf
70	Maximo Asset Extract	.PNG
71	Operational Incidents Dashboard extract	.jpg
72	Operations Business Continuity Procedure	.pdf
73	PHPS Standard Operating Procedure - Black Network Restart	.pdf
74	Port Hedland Training Matrix	.xlsx
75	Training & Competency v1.0 2025-06	.pdf
76	WA O&M Competency Matrix_2025	.xlsx
77	Work Order Dashboard - Priority Levels	.jpg
78	APA HSE GD 07.01 T1 Incident, Near Miss & Hazard Management Guideline	.pdf
79	Maintenance Execution Dashboard extract	.jpg

Doc no.	Filename	File Extension
80	Maintenance completion history extract	.jpg
81	Monitoring and Data extract	.jpg
82	Operational incident Maximo extract	.jpg
83	Operational incident actions Maximo extract	.jpg
84	Operational incident investigation Maximo extract	.jpg
85	Planned outages Port Hedland 2025	.xlsx
86	TG102_March_2023_Generator_Robotic_Field_Service_Report - Planned Outage Report	.pdf
87	Upcoming work order extract	.jpg
88	WA O&M Competency Matrix_2025	.xlsx
89	Work Order Dashboard - Priority Levels	.jpg
90	Work Order completion tracking extract	.jpg
91	Work order completion history extract 001	.jpg
92	Work order details extract	.jpg
93	upcoming work order	.jpg
94	work order completing_tracking dashboard extract	.jpg
95	Acceptable Use of Technology Standard	.pdf
96	Asset Data and Records	.pdf
97	Asset Management Planning v2.0 2025-04.docx	.pdf
98	Creating Strong Passwords FAQs	.pdf
99	EKTIMO Report	.pdf
100	Information Security Classification and Handling Standard	.pdf
101	Maximo Role Security Groups (2)	.xlsx
102	Physical Access Management Standard	.pdf
103	Power Performance Report Detailed Requirements - As Built	.docx
104	Service Continuity Management Standard (2)	.pdf
105	320-PL-ER-0001 ER Managment Plan	.pdf
106	APA Group Procedure - Ring Fencing	.pdf
107	APA Group Procedures – Risk Management System Processes	.pdf
108	APA Group Standard - Customer and Commercial Contracting	.pdf
109	APA Group Standard - Risk Management	.pdf
110	APA HSE GD 07.01 T1 Incident, Near Miss & Hazard Management Guideline	.pdf
111	APA Policy - Code of Conduct	.pdf
112	APA Policy - Enterprise Resilience	.pdf
113	APA Policy - Risk Management	.pdf
114	Asset Risk Register Vigilant extract	.jpg
115	Asset Risks and Opportunities v1.2 2025-06	.pdf
116	BCP - O&M	.pdf
117	Executive Risk Management Committee extract	.jpg
118	Operational Incidents Dashboard extract	.jpg
119	Operations Business Continuity Procedure	.pdf

Doc no.	Filename	File Extension
120	Operations RCA Financial Management Procedure R0_signed	.dotx
121	Operations Risk & Opportunities	.pdf
122	Vigilant Risk Item extract	.jpg
123	0050AA54B3AA250213080701 Cyclone Prep Zelia	.pdf
124	320-PL-ER-0001 ER Managment Plan	.pdf
125	320-TP-ER-0004PortHedland EMT Event	.docx
126	APA Pilbara Energy_Port_Hedland_Power_Station_Version_No2.6 (1)	.pdf
127	APA Policy - Enterprise Resilience	.pdf
128	APA Procedure - Cyclone Action Plan	.pdf
129	APA_System Disturbance 0041_HedlandSFHoldPointTest	.pdf
130	BCP - O&M	.pdf
131	Business Continuity Management v2.0 2025-04.docx	.pdf
132	Business Continuity Plan 2024 extract Pilbara Sites	.docx
133	Operations Business Continuity Procedure	.pdf
134	Service Continuity Management Standard (2)	.pdf
135	2025 EARNINGS GROWTH	.pdf
136	27. PES June	.pptx
137	APA Annual Report FY2023	.pdf
138	APA Annual Report FY2024	.pdf
139	APA ESPP - Divisional Strategic Plan_v.1.1 - Operations	.pptx
140	Asset Model Schematic screengrab	.jpg
141	CAPEX Forecast in the ASM extract	.jpg
142	CAPEX Plan extract 001	.jpg
143	FY25 Budget_FY26-FY27 Forecast Timetable	.xlsx
144	Financial Performance OPD extract	.jpg
145	Financial Performance v1.1 2025-06	.pdf
146	Long term financial capital and expense plan	.xlsx
147	Operational incidents for the last 12 months extract	.jpg
148	Operations Strategy and Business Objectives (1)	.pdf
149	PH Budget Sample Adaptive system	.xlsx
150	RE_ AMS Review Documents - Your action required	.msg
151	Supplier_Invoices_RECON	.xlsx
152	24083-RP-A-0002_1_TG404 Develop Report	.pdf
153	Lifecycle Interface Tool Extract	.PNG
154	Lifecycle Plans 20 year extract	.jpg
155	1.3 Asset Management System v2.0 2025-04.docx (1)	.pdf
156	APA Group Standard - Assurance	.pdf
157	APA AMP - Port Hedland FY26_DRAFT	.pdf
158	Alinta Port Hedland Asset Management Plan 2024 1	.pdf
159	Maximo Maintenance System Training	.jpg

Doc no.	Filename	File Extension
160	Maximo O&M eLearn screenshot	.jpg
161	Maximo Work Order Task Entry	.pdf
162	Reliability and Maintenance Strategy extract 001	.jpg
163	Reliability and Maintenance Strategy extract	.jpg
164	Vigilant User guide - Reviewing Actions for Approval	.pdf
165	Word doc with each OPD Asset Performance tab	.jpg
166	Workday - Getting Started Toolkit	.pdf
167	Workday Support Hub sharepoint site	.jpg
168	Workday eLearning screenshot	.jpg
169	20250122 Loss of Total Generation Port Hedland (Inv291743)	.pdf

Appendices

Appendix A

Audit observations & recommendations

Table 19 Electricity Industry Act – Licence conditions and obligations

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
101	Integrated Regional Licence, condition 5.3.1	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 (or any longer period that the ERA allows).	4	<p>The previous performance audit for ADEWAP (then Alinta DEWAP Pty Ltd) was conducted by Quantum Management Consulting and Assurance in 2022 [10].</p> <p>Following the 2022 audit, the ERA notified Alinta DEWAP Pty Ltd that a good level of compliance with its licence had been achieved and set the next audit period as 36 months [9].</p> <p>GHD was appointed, with ERA approval [2], to conduct the current performance audit for the period defined by ERA (1 July 2022 to 30 June 2025).</p> <p>Therefore, it is concluded that ADEWAP complied with this obligation. The ERA audits themselves are listed as an action APA's compliance tracking platform: Vigilant.</p>	N/P	1	
102	Integrated Regional Licence, condition 5.1.1	Electricity Industry Act, section 14(1)(a)	A licensee must provide for an asset management system.	4	<p>Evidence viewed during the audit demonstrates that ADEWAP had an asset management system in place for the audit period:</p> <p>Asset management system documents in place for Alinta DEWAP Pty Ltd prior to 30 June 2023 (viewed, during the site visit, in the "vault" where legacy Alinta DEWAP Pty Ltd documents are stored)</p> <p>The Alinta DEWAP Pty Ltd Asset Management Plan from 30 June 2023 [13]</p> <p>The rebranded (APA) version of the Asset Management Plan dated 9 December 2024 (viewed during the site visit)</p> <p>Therefore, it is concluded that ADEWAP complied with this obligation</p>	N/P	1	
103	Integrated Regional Licence, condition 5.1.2 and 5.1.3	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.	4	<p>Evidence considered to identify changes to the asset management system during the audit period included:</p> <p>The interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager identified</p> <p>Inspection of the software platforms used for the asset management system (including MAXIMO and the SCADA system) during the site inspection</p> <p>Based on this information, the substantial changes made to the asset management system during the audit period related to the transition from Alinta DEWAP Pty Ltd to APA DEWAP Pty Ltd:</p> <p>Moving the works management system used for assets was from Ellipse to MAXIMO</p> <p>Change to the Workday platform software system for Procurement & Supply Chain processes and activities</p> <p>Based on document reviews [14] [31], the ERA was notified of these changes.</p>	N/P	1	
104	Integrated Regional Licence, condition 5.1.4	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.	4	<p>The previous asset management system review for ADEWAP (then Alinta DEWAP Pty Ltd) was conducted by Quantum Management Consulting and Assurance in 2022 [10].</p> <p>Following the 2022 review, the ERA provided notification that they considered Alinta DEWAP Pty to have an effective asset management system and set the next review period as 36 months [9].</p> <p>GHD was appointed, with ERA approval [2], to conduct the current asset management system review for the period defined by ERA (1 July 2022 to 30 June 2025).</p> <p>Therefore, it is concluded that ADEWAP complied with this obligation.</p>	N/P	1	

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
105	Integrated Regional Licence, condition 4.2.1	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.	4	<p>Based on document reviews ([18], [19], [22], [23],) the prescribed fees were paid to ERA on time for the periods:</p> <p>25/06/2024 to 24/06/2025</p> <p>25/06/2025 to 24/06/2026</p> <p>It is noted that the licence fee payments within the audit period were due (within one month of the 25 June anniversary date of the licence) prior to ADEWAP's ownership of the asset (from November 2023):</p> <p>25/06/2022 to 24/06/2023</p> <p>25/06/2023 to 24/06/2024</p> <p>Based on discussions with Head of Operations, Operations Manager and the Regulatory Compliance Manager, it is understood that there have been no outstanding licence fees during the audit period.</p> <p>As no supporting evidence of non-compliance was observed, in line with Section 5.1.6.1 of the audit and review guidelines [5], this obligation has been rated as compliant and the adequacy of the controls for the obligation has been rated.</p> <p>Based on information provided by the Regulatory Compliance Manager, ADEWAP have the following controls in place:</p> <p>This obligation is entered in ADEWAP's compliance management software, Vigilant, with accompanying controls, recurring actions and email reminders [47]</p> <p>Regulatory compliance KPIs are in place that include tracking the status of these actions every month at asset performance meetings</p> <p>The APA OpsRCA Financial Management Procedure [49], which defines the process for invoices, including those relating to licence fees</p>	A	1	
106	Integrated Regional Licence, condition 4.1.1	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.	5	<p>Based on:</p> <p>The interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager</p> <p>Document reviews [50] [21]</p> <p>ADEWAP have controls in place to minimise the extent, or duration, of any interruption, suspension or restriction of the supply of electricity:</p> <p>The APA Emergency Response Management Plan</p> <p>The Business Continuity Plan, which sets out the continuity strategies for various risks including disruption / reduction to grid supply connection, disruption / reduction to site service supplies and loss of key suppliers of O&M supplies and services.</p> <p>Therefore, it is concluded that ADEWAP complied with this obligation.</p>	N/P	1	
107	Integrated Regional Licence, condition 4.1.1	Electricity Industry Act, section 41(6)	A licensee must pay the costs of taking an interest in land or an easement over land.	4	<p>Based on document reviews, during the audit period, under the <i>Land Administration Act 1997</i> ADEWAP (then Alinta DEWAP Pty Ltd) took an interest in:</p> <p>An easement over land for the transmission or distribution of electricity [58]</p> <p>An interest in land for the establishment of a renewable energy precinct and related purposes [59]</p> <p>Based on:</p> <p>Confirmation from the Regulatory Compliance Manager [64]</p> <p>A requested sample of documents [60] [61] [62] [63]</p> <p>APA Infrastructure Limited has been paying the costs of these interests.</p>	N/P	1	

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
					Therefore, it is concluded that ADEWAP complied with this obligation.			
110	Integrated Regional Licence, 6.7.1	Electricity Industry Act, section 76	If a designation under section 71(1) of the Electricity Industry Act is in force, a licensee must perform the functions of a retailer of last resort and must carry out the supplier of last resort plan if it comes into operation under section 70 of the Electricity Industry Act.	4	Based on the interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager, ADEWAP is not designated as a retailer of last resort. Therefore, compliance with this obligation is not rated.	N/P	N/R	

Table 20 Electricity licences – Licence conditions and obligations

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
119	Integrated Regional Licence, condition 4.3.1	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.	4	<p>Consolidated financial statements for the APA Group and APA Infrastructure Trust, including ADEWAP and other subsidiaries, were published in the APA Group's Annual Reports:</p> <ul style="list-style-type: none"> Annual Report 2024 (the financial year ended 30 June 2024, noting APA acquired ADEWAP on 1 November 2023) [25] Annual Report 2025 (for financial year ended 30 June 2025) [26] <p>The reports state that they have prepared in accordance with Australian Accounting Standards Board Standards, and this is confirmed by an included independent auditor's report.</p> <p>As no supporting evidence of non-compliance was observed, in line with Section 5.1.6.1 of the audit and review guidelines [5], this obligation has been rated as compliant and the adequacy of the controls for the obligation has been rated.</p> <p>APA have a Group Policy for Accounting [48] in place, which applies to all entities which make up the APA Group. This document states that APA prepares its financial statements in accordance with Australian Accounting Standards.</p>	A	1	
120	Integrated Regional Licence, condition 5.2.4	Electricity Industry Act, section 11	A licensee must comply with any individual performance standards prescribed by the ERA.	4	Based on the interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager, ADEWAP did not prescribe any individual performance standards during the audit period. Therefore, compliance with this obligation is not rated.	N/P	N/R	
121	Integrated Regional Licence, condition 5.3.2	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.	4	<p>The previous audit report in 2022 [10], approved by ERA, states that it complied with ERA's 2019 Audit Review Guidelines – Electricity and Gas Licences.</p> <p>The audit plan [4] for this audit, approved by ERA [3], states that the audit will follow the process set out in the ERA guidelines [5].</p> <p>Therefore, it is concluded that ADEWAP complied with this obligation.</p>	N/P	1	

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
122	Integrated Regional Licence, condition 5.1.5	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.	4	<p>The previous asset management system review report in 2022 [10], approved by ERA, states that it complied with ERA's 2019 Audit Review Guidelines – Electricity and Gas Licences.</p> <p>The audit and review plan [4] for the current review, approved by ERA [3], states that the review will follow the process set out in the ERA guidelines [5].</p> <p>Therefore, it is concluded that ADEWAP complied with this obligation.</p>	N/P	1	
123	Integrated Regional Licence, condition 4.4.1	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.	4	<p>Based on the interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager:</p> <ul style="list-style-type: none"> – ADEWAP was not under external administration during the audit period – There was no significant change in circumstances that affected ADEWAP's ability to meet its obligations during the audit period <p>Therefore, compliance with this obligation is not rated.</p>	N/P	N/R	
124	Integrated Regional Licence, condition 4.5.1	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.	4	<p>Based on document reviews, the interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager and information provided by the Regulatory Compliance Manager:</p> <ul style="list-style-type: none"> – Annual Compliance Reports were submitted to ERA for 22/23 [29] and 23/24 [30], while the 24/25 Annual Compliance Report is currently being drafted and not yet due to ERA at the time of writing – Performance reports were not required as ADEWAP do not supply small use customers – Standing charge data was provided to the ERA 01/10/2022 to 30/09/2023 [32] 01/10/2023 to 30/09/2024 [35] <p>As no supporting evidence of non-compliance was observed, in line with Section 5.1.6.1 of the audit and review guidelines [5], this obligation has been rated as compliant and the adequacy of the controls for the obligation has been rated.</p> <p>Based on information provided by the Regulatory Compliance Manager, ADEWAP have the following controls in place:</p> <ul style="list-style-type: none"> – This obligation is entered in ADEWAP's compliance management software, Vigilant, with an accompanying control, recurring actions and email reminders [57] – Regulatory compliance KPIs are in place that include tracking the status of these actions every month at asset performance meetings – The APA OpsRCA Financial Management Procedure [49], which defines the process for invoices, including those relating to licence fees 	A	1	
125	Integrated Regional Licence, condition 3.8.1 and 3.8.2	Electricity Industry Act, section 11	A licensee must publish any information as directed by the ERA to publish, within the timeframes specified.	4	<p>Based on the interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager, the ERA did not direct ADEWAP to publish any information during the audit period.</p> <p>Therefore, compliance with this obligation is not rated as no relevant activity occurred during the audit period.</p>	N/P	N/R	

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
126	Integrated Regional Licence, condition 3.7.1	Electricity Industry Act, section 11	All notices must be in writing, unless otherwise specified.	4	Based on: – Document reviews of [34] [36] [37] [38] [39] [44] [45] – The interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager, ADEWAP communication in connection with the licence is conducted in writing (via email &/or letter). Therefore, it has been concluded that ADEWAP complied with this obligation.	N/P	1	
127	Integrated Regional Licence, condition 6.9.1	Electricity Industry Act, section 11	A distributor must create and maintain a Priority Restoration Register.	2	ADEWAP's licence does not include any conditions under 6.9 <i>Priority Restoration Register</i> . Therefore, this is not rated.	A	N/R	
128	Integrated Regional Licence, condition 6.9.3	Electricity Industry Act, section 11	The Priority Restoration Register must comply with any criteria determined by the Minister.	2	As per no. 127	A	N/R	

Table 21 Electricity Industry Metering Code – Licence conditions and obligations

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
317	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 2.2(1)(a)	A network operator must treat all Code participants that are its associates on an arms-length basis.	5	An APA Ring Fencing Procedure [56] is in place and defines the specific requirements for ADEWAP, including requirements for any associate arrangements to achieve meet the same standard as arm's-length arrangements with third parties. Therefore, it has been concluded that ADEWAP complied with this obligation.	N/P	1	
318	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 2.2(1)(b)	A network operator must ensure that no Code participant that is its associate receives a benefit in respect of the Code, unless the benefit is attributable to an arm's length application of the Code or is also made available to all other Code participants on the same terms and conditions.	4	As per no. 317	N/P	1	
319	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.1	A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and comply with any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act.	3	It is understood that the meters are maintained to the satisfaction of ADEWAP's customers. Under Alinta DEWAP, the exemption was not requested, and no metrology procedure was in place under APA DEWAP's ownership of the asset during audit period. Pilbara ISOC Co granted ADEWAP an exemption to this clause for existing meters and legacy customers which took effect on 22 March 2024 [16]. This exemption is effective throughout the audit period. It is noted that the exemption is to be reviewed on 22 March 2027. ADEWAP applied for exemption prior to their acquisition of the asset (10 October 2023), while no interim metrology procedure was established, this audit deems that there was generally adequate controls to manage this obligation were in place prior to ADEWAP's acquisition. Seeing as no metrology procedure was in effect during the audit period prior the exemption being granted on 22 March 2024, this audit finds that the licensee has been non-compliant for the period between 1 July 2022 and 22 March 2024. Seeing as the meters have been operated to the satisfaction of their customers (BHP and FMG), the impact of this non-compliance on customers is deemed to be minor.	B	2	Seeing as an exemption to this clause was granted by Pilbara ISOC Co, no recommendation has been made.

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
320	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.2(1)	An accumulation meter must at least conform to the requirements specified in the applicable metrology procedure and display or permit access to a display of the measurements that are specified in subclauses 3.2(1)(a)(b) using dials, a cyclometer, an illuminated display panel or some other visual means.	3	Based on the screenshot provided [51], the display for ADEWAP's meters shows accumulated and hourly electricity consumption. However, as per no. 319, while ADEWAP has been granted an exemption for providing a metrology procedure there is a period of non-compliance during the audit period.	B	2	Seeing as an exemption to this clause was granted by Pilbara ISOCo, no recommendation has been made
321	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.3(1)	An interval meter must at least have an interface to allow the interval energy data to be downloaded in the manner prescribed using an interface compatible with the requirements specified in the applicable metrology procedure.	4	As per no. 319 It is understood based on discussions with the Operations Manager that, while meters are capable of providing interval data, which can be provided upon request. The meters are categorised as accumulation meters.	N/P	N/R	
322	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.3(3)	If a metering installation is required to include a communications link, the link must, where necessary, include a modem and isolation device approved under the relevant telecommunications regulations that allows the interval energy data to be downloaded in the manner prescribed.	4	Based on information provided by the Regulatory Compliance Manager, ADEWAP's meters are connected to an internal network only. Therefore, compliance with this obligation is not rated as no relevant activity occurred during the audit period.	N/P	N/R	
323	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.3A(1)	A network operator must ensure that bi-directional electricity flows do not occur at a metering point unless the metering installation for the metering point is capable of separately measuring and recording electricity flows in each direction.	4	Based on the site visit inspection of metering points and the Experion system software platform used for monitoring and control: <ul style="list-style-type: none">– All customer metering points are designed to be one-directional only– No customer connections had bi-directional flow during the audit period Therefore, it is concluded that ADEWAP complied with this obligation.	N/P	1	
324	Integrated Regional Licence, condition 4.1.1	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.	4	Based on: <ul style="list-style-type: none">– The interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager– The inspection of metering points and the Experion system software platform used for monitoring and control during the site visit All customer metering points are designed to be one-directional only and ADEWAP did not detect any changes in bi-directional flow at a metering point during the audit period. Therefore, compliance with this obligation is not rated as no relevant activity occurred during the audit period.	N/P	N/R	
325	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.3C	An accumulation meter or an interval meter that separately measures and records bi-directional electricity flows at the metering point must record: <ul style="list-style-type: none">– the net electricity production transferred into the network; and– the net electricity consumption transferred out of the network.	4	As per no. 324	N/P	N/R	
326	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.5(1) and (2)	A network operator must ensure that there is a metering installation at every connection point on its network that is not an unmetered connection point. Unless it is a Type 7 metering installation, the metering installation must meet the functionality requirements prescribed.	4	Based on site visit inspections, metering installations are in place at every connection point on ADEWAP network Therefore, it is concluded that ADEWAP complied with this obligation.	N/P	1	

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
327	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.5(3)	For each metering installation on its network, a network operator must provide, install, operate and, subject to subclause 3.7(5), maintain the metering installation in the manner prescribed, unless otherwise agreed.	4	Based on the interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager, no new metering installations were installed on ADEWAP's network during the audit period. The PPA [28] outlines requirements for effective maintenance and operation of the meters. Based on discussions and meters witnessed during the site visit, the audit finds that the metering installations at the asset are operated and maintained in the manner prescribed. Note that ADEWAP is exempt from having a metrology procedure as described in no. 319.	A	1	
328	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.5(4)	Except for a Type 7 metering installation, a network operator must ensure that the metering point for a revenue metering installation is located as close as practicable to the connection point in accordance with good electricity industry practice.	4	Based on information provided by the Regulatory Compliance Manager [52], ADEWAP's meters are located as close as practicable to the connection point as practicable. Therefore, it is concluded that ADEWAP complied with this obligation.	N/P	1	
329	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.5(6)	A network operator may only impose a charge for providing, installing, operating or maintaining a metering installation in accordance with the applicable service level agreement that it has with the user.	4	The responsibilities for metering installation maintenance costs and expenses are clearly defined in the relevant PPA [28]. Therefore, it is concluded that ADEWAP complied with this obligation.	N/P	1	
330	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.5(9)	If a network operator becomes aware that a metering installation does not comply with the Code, it must advise affected parties of the non-compliance and arrange for the non-compliance to be corrected as soon as practicable.	4	Based on: – The interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager – Records provided [53] [54] ADEWAP did not identify any meters that did not comply with the code the audit period. Therefore, compliance with this obligation is not rated as no relevant activity occurred during the audit period.	N/P	N/R	
331	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.7	All devices that may be connected to a telecommunications network must be compatible with the telecommunications network and comply with all applicable State and Commonwealth enactments.	4	Based on information provided by the Regulatory Compliance Manager, ADEWAP's meters are connected to an internal network only. Therefore, compliance with this obligation is not rated as no relevant activity occurred during the audit period.	N/P	N/R	
332	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.8	Subject to clause 3.27, a network operator must ensure that, consistent with the standards of good electricity industry practice, each metering installation on its network is secured by devices or methods that hinder unauthorized access and enable unauthorized access to be detected.	4	Based on site visit observations ADEWAP's meters are located in a location with access control and a range of additional security controls in place. Therefore, it is concluded that ADEWAP complied with this obligation.	N/P	1	
333	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.9(3)	Subject to subclauses 3.9(4), 3.9(5) and 3.9(7), each metering installation must meet at least the requirements for that type of metering installation as specified in Table 3 in Appendix 1 of the Code for metering installations on the SWIN or in Table 3A in Appendix 1 for metering installations on a network other than the SWIN.	4	As per no. 332	N/P	1	
334	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.9(7)	A metering installation used to supply a customer with requirements above 1000 volts that requires a VT and whose annual consumption is below 750MWh must meet the relevant accuracy requirements of a Type 3 metering installation for active energy only.	4	Meter data was witnessed during the site visit. No metering installation has a consumption below 750 MWh during the audit period.	N/P	N/R	

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
335	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.9(9)	If compensation is carried out within the meter, then the resultant metering system error must be as close as practicable to zero.	4	Based on the: <ul style="list-style-type: none"> – Metering database information provided [52] – Relevant PPA [28] there is no requirement for compensation to be carried out within the meters. Therefore, compliance with this obligation is not rated as no relevant activity occurred during the audit period.	N/P	N/R	
336	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.10	A network operator must ensure that any programmable settings in any of its metering installations, data loggers or peripheral devices, which may affect the resolution of displayed or stored data, satisfy the relevant requirements specified in the applicable metrology procedure and comply with any applicable instructions by the National Measurement Institute under the National Measurement Act.	3	ADEWAP have evidenced that their metering installation monitoring and history is maintained by a third party, Aveva Pi. An extract of the metering data history was evidenced [67] and demonstrates sufficiently time resolution to adequately service their customers in line with relevant PPAs. However, there was a period where no interim metrology procedure was in place prior to exemptions being granted by Pilbara ISOC Co as per no. 319.	B	2	Seeing as an exemption to this clause was granted by Pilbara ISOC Co, no recommendation has been made
337	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.11(1)	A network operator must ensure that a metering installation on its network is operating consistently with good electricity industry practice to measure and record data and permits the collection of data within the time specified in the applicable service level agreement, for at least the percentages of the year specified.	4	Through a discussion with Operations Manager for the asset, review of the metering arrangements during the site visit, the audit is of the view that the meters are maintained in line with good electricity industry practice. Metering data is remotely stored and managed by a third party operating and data management system Aveva Pi. APA's commercial team collates required data in order to meet service levels as defined in the PPAs [28].	A	1	
338	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.11(2)	If an outage or malfunction occurs to a metering installation, the network operator must repair the metering installation in accordance with the applicable service level agreement.	4	Based on: <ul style="list-style-type: none"> – The interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager – Discussions during the site visit – Records provided [53] [54] there were no outages or malfunctions for ADEWAP's two meters at Boodarie Power Station. Therefore, compliance with this obligation is not rated as no relevant activity occurred during the audit period.	N/P	N/R	
339	Integrated Regional Licence, condition 4.1.1	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.	4	As per the licence EIRL7, ADEWAP is both the network operator and Code participant (retailer, generator) [4]. Therefore, it is concluded that ADEWAP complied with this obligation.	N/P	1	
340	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.11A(1)	A network operator must ensure that the meters on its network are systematically sampled and tested for accuracy in accordance with AS 1284.13.	4	Through a discussion with Operations Manager for the asset, review of the metering arrangements during the site visit and review of the asset maintenance dashboards on site [65], the audit is of the view that the meters are systematically sampled for accuracy as prescribed.	A	1	
341	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.11A(2)	Subject to clause 3.11A(3), if a "population" of meters is deemed to have failed under AS 1284.13, the network operator must ensure that all of the meters in that population are removed and replaced with new meters within 3 years of the testing of the population.	4	Based on the interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager, there was no failure of a "population" of meters during the audit period. Therefore, compliance with this obligation is not rated as no relevant activity occurred during the audit period.	N/P	N/R	
342	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.12(1)	A network operator must ensure that each metering installation complies with at least the prescribed design requirements.	4	Upon review of the design drawings for the metering installations [66], the Horizon Power meter requirements in the network access contract [40] and discussions with the Operations Manager and review of the metering arrangement on site, this audit is of the view that all metering installations operate under the requirements prescribed in the code.	A	1	

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
343	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.12(2)	A network operator must ensure that instrument transformers in its metering installations comply with the relevant requirements of any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act and any requirements specified in the applicable metrology procedure.	3	ADEWAP has demonstrated that the meters have been maintained to the satisfaction of their customers during the audit period. As per no. 319, ADEWAP have been granted an exemption for provision of a metrology procedure, however, there was no interim procedure in place prior to the exemption being granted.	B	2	Seeing as an exemption to this clause was granted by Pilbara ISOCo, no recommendation has been made
344	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.12(3)	A network operator must provide isolation facilities of a standard consistent with good electricity industry practice, to facilitate testing and calibration of the metering installation.	4	Based on site visit observations and discussions, for maintenance, calibration or testing of the meters: <ul style="list-style-type: none"> – A line outage of the feeder is organised, including notification of the customer (BHP) – A line outage procedure is followed – A risk assessment is performed – Sign off by the Head of Operations is required Therefore, it is concluded that ADEWAP complied with this obligation.	A	1	
345	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.12(4)	A network operator must maintain drawings and supporting information, of a standard consistent with good electricity industry practice, to detail the metering installation for maintenance and auditing purposes.	4	Based on document reviews [33] and site visit observations, metering panel drawings are in place and maintenance plans (emergency, corrective, and preventative) are documented. Therefore, it is concluded that ADEWAP complied with this obligation.	A	1	
346	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.13(1)	A network operator must procure the user, or the user's customer, to install, or arrange for the installation of, a full check metering installation or partial check metering installation in accordance with the prescribed requirements.	4	No new metering installations were installed on ADEWAP's network during the audit period based on: <ul style="list-style-type: none"> – Observations during the site visit – The interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager Therefore, compliance with this obligation is not rated as no relevant activity occurred during the audit period.	N/P	N/R	
347	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.13(3)(c)	A partial check metering installation must be physically arranged in a manner determined by the network operator, acting in accordance with good electricity industry practice.	4	ADEWAP does not use partial check meters.	N/P	N/R	
348	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.13(4)	A check metering installation for a metering point must comply with the prescribed requirements.	4	Based on discussions with the Operations Manager, and review of the metering arrangement and monitoring systems on site. All metering installations are type 1 full check metering installations and complies with the prescribed requirements under the code.	N/P	1	
349	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.14(3)	If, under clause 3.14(2), a metering installation uses metering class CTs and VTs that do not comply with the Table 3 or Table 3A in Appendix 1 (as applicable), then the network operator must take the actions specified in order to achieve the accuracy requirements in Table 3 or Table 3A in Appendix 1 (as applicable).	4	Based on discussions with the Operations Manager and review of the metering points on site alongside design drawings for the switchroom facility. This audit concludes that the meters meet the requirements of clause 3.13(4)b of the Metering Code. No metering installation have been identified as requiring an upgrade under clause 3.14(2) of the Metering Code.	N/P	N/R	
355	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.20(1)	If reasonably requested by a Code participant, a network operator must provide enhanced technology features in a metering installation.	4	The relevant PPA [27] underwent accession, retirement, amendment and restatement during the audit period (but does not constitute or create a new power purchase agreement). The amendments to the PPA do not include any requests for enhanced technology features. Therefore, compliance with this obligation is not rated as no relevant activity occurred during the audit period	N/P	N/R	

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
356	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.20(3)	A network operator may only impose a charge for the provision of metering installations with enhanced technology features in accordance with its applicable service level agreement with the user.	4	As per no. 355	N/P	N/R	
357	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.21(1)	Meters containing an internal real time clock must maintain time accuracy as prescribed. Time drift must be measured over a period of 1 month.	4	Metering data is remotely stored and managed by a third party operating and data management system Aveva Pi. Time series information is stored separately as per data logs that were reviewed [67].	N/P	N/R	
358	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.21(2)	If a metering installation includes measurement elements and an internal data logger at the same site, it must include facilities on-site for storing the interval energy data for the periods prescribed.	4	Based on the site visit, no local (internal) data logger or historian is installed on site: all monitoring and data storage from meters is remote via Aveva PI. Therefore, compliance with this obligation is not rated.	N/P	N/R	
359	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.22	A network operator providing one or more metering installations with enhanced technology features must be licensed to use, and access, the metering software applicable to all devices being installed and be able to program the devices and set parameters.	4	As per no. 355	N/P	N/R	
360	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.23(a)	Where signals are provided from the meter for the user or the user's customer, a network operator must ensure that signals are isolated by relays or electronic buffers to prevent accidental or malicious damage to the meter.	4	No signals were provided from the meter to the user or customer during the audit period.	N/P	N/R	
361	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.23(b)	Where signals are provided from the meter for the user or the user's customer, a network operator must provide the user, or the user's customer, with sufficient details of the signal specification to enable compliance with clause 3.23(c) of the Code.	4	As per no. 360	N/P	N/R	
362	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.24A(1)	If a retailer requests a network operator to install a pre- payment meter at a connection point, then the pre- payment meter must be sufficient to enable the retailer to comply with the retailer's obligations under the Code of Conduct.	4	No new metering installations were installed on ADEWAP's network during the audit period based on: <ul style="list-style-type: none"> Observations during the site visit The interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager Therefore, compliance with this obligation is not rated as no relevant activity occurred during the audit period	N/P	N/R	
363	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.24B(1)	If a retailer requests a network operator to replace a pre- payment meter at a connection point with a meter that is not a pre-payment meter, then the network operator must do so in accordance with this Code and the Code of Conduct.	4	As per no. 362	N/P	N/R	
364	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.27	A person must not install a metering installation on a network unless the person is the network operator or a registered metering installation provider for the network operator doing the type of work authorised by its registration.	4	As per no. 362	N/P	N/R	

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
365	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.29	A network operator must publish a list of registered metering installation providers, including the prescribed details, and update the list at least annually.	4	ADEWAP have not published a list of registered metering installation providers. Pilbara ISOC Co granted ADEWAP an exemption to this clause for existing meters and legacy customers which took effect on 22 March 2024 [16]. It should be noted that the exemption to this clause was not granted for future installations or customers, meaning that ADEWAP would be required to publish a list of providers for future metering installations and customers. No new metering installations of customers have been established during the audit period.	B	2	Seeing as an exemption to this clause was granted by Pilbara ISOC Co, no recommendation has been made
366	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.1(1)	A network operator must establish, maintain and administer a metering database containing standing data and energy data for each metering point on its network.	4	Based on: – The interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager – Observations during the site visit – Metering database spreadsheet [52] ADEWAP have a metering database in place, while the database is mapped to the required information as per Table 2 in clause 4.3(1), the database information provided was missing some standing data for all metering points (such as National Metering Identifiers and algorithms).	A	2	1/2025 It is recommended that ADEWAP make arrangements for this register to be updated to include the required standing data as per the Code.
367	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.1(2)	A network operator must ensure that its metering database with its associated links, circuits, information storage and processing systems are secured by devices or methods consistent with a good industry practice (to hinder unauthorised access and enable unauthorised access to be detected).	4	Based on site visit observations, ADEWAP's metering database and associated systems are secured via user logins with defined user clearance and/or authentication. Therefore, it is concluded that ADEWAP complied with this obligation.	N/P	1	
368	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.1(3)	A network operator must prepare and, if applicable, implement a disaster recovery plan to ensure that it is able, to rebuild the metering database and provide energy data to Code participants within 2 business days after the day of any disaster.	4	Based on the information provided, there are a range of business continuity documents in place [20] [21] [24] for ADEWAP. In addition, advice was provided by APA IT reflecting their data operation and back up procedures [68]. The audit concludes that: – The metering database is sufficiently backed up regularly to be able to recover the database if required. – It is understood that the asset under this licence is classified internally as Gold, meaning that internal controls are in place such that maximum allowable outage time for the asset is 24 hours. – ADEWAP have appropriate capability to restore the energy database and provide energy data to a Code Participant within 2 business days following a disaster.	A	1	
369	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.2(1)	A network operator must ensure that its registry complies with the Code and the prescribed clause of the market rules.	4	See no. 366 It should also be noted that the market rules apply to the assets connected to the South West Interconnected System (SWIS), which is not applicable to EIRL7.	A	2	Recommendation 1/2025 applies
370	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.3(1)	The standing data for a metering point must comprise at least the items specified.	4	See no. 366	A	2	Recommendation 1/2025 applies

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
371	Integrated Regional Licence, condition 4.1.1	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.	5	Based on: <ul style="list-style-type: none"> The interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager Discussions during the site visit Records provided [53] [54] there were no discrepancies for ADEWAP's two meters at Boodarie Power Station. Therefore, compliance with this obligation is not rated as no relevant activity occurred during the audit period.	N/P	N/R	
372	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.5(1)	A Code participant must not knowingly permit the registry to be materially inaccurate.	5	The interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager, stated that ADEWAP did not detect or become aware of any inaccuracies in the registry or in standing data during the audit period. Therefore, compliance with this obligation is not rated as no relevant activity occurred during the audit period	N/P	N/R	
373	Integrated Regional Licence, condition 4.1.1	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.	4	As per no. 372	N/P	N/R	
374	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.6(1)	If the network operator is notified of a change to, or inaccuracy in, an item of standing data by a Code participant that is the designated source for the item of standing data under Table 2 in clause 4.3(1) then the network operator must update the registry to address the issue.	4	As per no. 372	N/P	N/R	
375	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.6(2)	If a network operator is notified of a change to, or inaccuracy in, an item of standing data by a Code participant which is not the designated source for the item of standing data, or otherwise becomes aware of a change to or inaccuracy in an item of standing data, then the network operator must determine whether the registry should be updated, and update the registry as required.	4	As per no. 372	N/P	N/R	
376	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.7(1)	If standing data for a metering point is updated in the registry, the network operator must, within 2 business days after the update (or such other time as is specified in the applicable service level agreement) notify the update to the current user and each previous user, if the updated standing data relates to a period or periods when the previous user was the current user.	4	As per no. 372	N/P	N/R	
377	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.8(3)	A network operator must allow a user who is a retailer or a generator to have local and, where a suitable communications link is installed, remote access to the energy data for metering points at its associated connection points, using a password provided by the network operator that provides 'read only' access.	4	Based on information provided by ADEWAP's Regulatory Compliance Manager [39], no other users had access to DEWAP's transmission network during the audit period. Therefore, compliance with this obligation is not rated as no relevant activity occurred during the audit period. It is noted that this obligation is one for which Pilbara ISOC0 granted ADEWAP an exemption for existing meters and legacy customers (so long as there is only one retailer selling electricity transported through the ADEWAP network) which took effect on 22 March 2024 [16].	N/P	N/R	

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
378	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.8(3A)	A network operator must allow a user who is a retailer or a generator to have access to data held in its metering database for metering points at its associated connection points, by the prescribed methods, using a password provided by the network operator which provides 'read only' access.	4	As per no. 377	N/P	N/R	
379	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.8(4)(a)	A network operator must have devices and methods in place to ensure that energy data held in its metering installation is secured from unauthorised local or remote access using the methods prescribed	4	Based on information provided by the Regulatory Compliance Manager, ADEWAP's meters are connected to an internal network only. Based on site visit observations, ADEWAP metering installations and database are secured via user logins with defined user clearance and/or authentication. Therefore, it is concluded that ADEWAP complied with this obligation.	A	1	
380	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.8(4)(b)	A network operator must have devices and methods in place to ensure that the data held in its metering database is secured from unauthorised local, or remote, access using the methods prescribed.	4	As per no. 379	A	1	
381	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.8(5)	Without limiting subclause 4.8(4), a network operator must ensure that electronic passwords and other electronic security controls are only issued to the specified authorised personnel and otherwise keep its records of electronic passwords, and other electronic security controls, secure from unauthorised access.	4	APA's Information Security Classification and Handling Standard [17] defines the handling requirements, authorisation and controls for electronic information. Therefore, it is concluded that ADEWAP complied with this obligation.	A	1	
382	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.9	A network operator must retain energy data in its metering database for each metering point on its network, including any energy data that has been replaced under subclause 5.24, for at least the periods, and with the level of accessibility, prescribed.	4	While ADEWAP has in place a data management system (AVEVA PI) for the storage of metering data, based on: <ul style="list-style-type: none"> The interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager The metering database spreadsheet [52] and Experion interval data samples [67] The audit concludes that the Experion system retains relevant energy data that is accessible for at least 13 months. An opportunity exists for ADEWAP to update their standing data records (internally referred to as their "Metering Database") to include instructions or a procedure to access and view the energy metering data on their third-party provider's system. It is suggested that the standing data be recorded and stored as a "registry" and the metering database be aligned with Experion's records.	B	1	
383	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.1 (1)	A network operator must use all reasonable endeavours to accommodate another Code participant's requirement to obtain a metering service and requirements in connection with the negotiation of a service level agreement.	5	Based on information provided by ADEWAP's Regulatory Compliance Manager [39], no other users had access to DEWAP's transmission network during the audit period. Therefore, compliance with this obligation is not rated as no relevant activity occurred during the audit period.	N/P	N/R	

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
384	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.1(2)	Without limiting subclause 5.1(1), a network operator must: <ul style="list-style-type: none"> – expeditiously and diligently process all requests for a service level agreement; – negotiate in good faith with a Code participant regarding the terms for an agreement; and – to the extent reasonably practicable in accordance with good electricity industry practice, permit a Code participant to acquire a metering service containing only those elements of the metering service which the Code participant wishes to acquire. 	5	As per no. 383	N/P	N/R	
385	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.3(1)	A network operator must, for each metering point on its network, obtain energy data from the metering installation and transfer the energy data into its metering database by no later than 2 business days after the date for the scheduled meter reading for the metering point (or such other time as is specified in the applicable service level agreement).	4	Based on discussions with ADEWAP's Operations Manager and Head of Operations, review of the metering arrangements on site. The audit concludes that: <ul style="list-style-type: none"> – All energy data is immediately stored by a third party through the Experion platform. – Meter readings are undertaken in 30-minute intervals – Meter data validation is performed by APA Commercial only for the purposes of billing on a regular basis in line with their customer billing cycles – ADEWAP's use of check meters means that the energy data validation process outlined in Appendix 2 of the code can be accommodated. 	N/P	1	
386	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.4(1)	A network operator must, for each meter on its network, at least once in every 12-month period undertake a meter reading that provides an actual value that passes the validation processes in Appendix 2.	4	See no. 385	N/P	1	
387	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.4(1A)	The meter reading referred to in clause 5.4(1) must not be undertaken by the customer associated with the meter, and must be undertaken by a person who is employed or appointed by the network operator and who is suitably skilled in accordance with good electricity industry practice to carry out meter readings.	4	See no. 385	N/P	1	
388	Integrated Regional Licence, condition 4.1.1	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).	4	Based on discussions with Head of Operations, it has been advised that the network operator has not made any requests with respect to comply with subclause 5.4(1) during the audit period.	N/P	N/R	
389	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.5(2)	Subject to subclause 5.5(2A)(b), a network operator may impose a charge for the provision of data, but only if a user has requested the energy data to the extent permitted by, and in accordance with the applicable service level agreement between it and the user; and if a customer has given a direction under subclause 5.17A(1), in accordance with the prescribed conditions.	4	As per no. 388	N/P	N/R	

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
390	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.5(2A)	A network operator must not impose a charge for the provision of standing data and for the provision of energy data if another enactment prohibits it doing so.	4	Current Power Purchase Agreements with ADEWAP's customers [28] do not include a provision to impose a charge to provide standing or energy data upon request. No such charge has been imposed during the audit period.	N/P	N/R	
391	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.6(1)	Subject to subclause 5.6(2), a network operator must provide validated, and where necessary, substituted or estimated energy data for a metering point to the user for the metering point and the IMO within the timeframes prescribed in subclause 5.6(1)(2).	4	Based on discussions with ADEWAP's Head of Operations and review of the metering arrangements onsite. The audit concludes that: <ul style="list-style-type: none"> – Metering information is sufficiently recorded, validated and retained in line with customer PPAs [28] – Seeing as this asset is not part of the wholesale electricity market, data is not required to be provided to the IMO (AEMO). – During the audit period, no other users were given access to ADEWAP's transmission network. 	N/P	N/R	
391A	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.6(3)	A network operator must provide validated, and where necessary substituted or estimated, interval energy data for a metering point to the IMO before 5pm on the first business day after the network operator obtains energy data for the metering point under clause 5.3(1)(a), or such other time as agreed in writing.	4	As per no. 391	N/P	N/R	
391B	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.6(5)	Energy data provided under clauses 5.6(1) and 5.6(3) must include: for a metering point at which bi-directional electricity flows occur, a separate measurement of each of the electricity production and the electricity consumption at that metering point; and on and from five-minute settlement commencement, five-minute interval energy data in respect of 5MS meters.	4	As per no. 391	N/P	N/R	
392	Integrated Regional Licence, condition 4.1.11	Electricity Industry Metering Code, clause 5.7	If a replacement energy data value is inserted in a metering database for a metering point, the network operator must provide replacement energy data to the user for the metering point and the IMO within the timeframes prescribed.	4	As per no. 391	N/P	N/R	
393	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.8	A network operator must provide a user with whatever information the network operator has that is necessary to enable the user to comply with its obligations under the Code of Conduct, within the time necessary for the user to comply with the obligations.	4	Through interviews and a review of metering arrangements on site. The audit concludes that: <ul style="list-style-type: none"> – All relevant energy data information and supporting data, is provided to customers under their service agreements (PPAs) [28] – No other users were given access to ADEWAPs transmission network for this asset during the audit period – No requests have been made for energy or standing data during the audit period – Seeing as this asset is not on the wholesale electricity market, reporting of data to the IMO is not required. 	N/P	N/R	
394	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.9	A network operator must provide standing data, provided to or obtained by it under this Code, to users where required to do so under any enactment.	4	As per no. 393	N/P	N/R	
395	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.10	A network operator must provide a subset of the standing data to a retailer in accordance with the provisions of Annex 4 of the Customer Transfer Code.	4	As per no. 393	N/P	N/R	

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
396	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.11	If a transfer occurs at a connection point, then within 2 business days after the transfer date, as defined in the Customer Transfer Code, the network operator must provide the incoming retailer with a copy of the standing data for each metering point associated with the connection point.	4	Based on the interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager, no connection point transfers occurred during the audit period. Therefore, compliance with this obligation is not rated as no relevant activity occurred during the audit period. It is noted that Pilbara ISOC Co granted ADEWAP an exemption to this obligation for existing meters and legacy customers and for any future metering installations and new customers (subject to conditions defined in the final decision), which took effect on 22 March 2024 [16].	N/P	N/R	
397	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.12(1)	If a user gives a network operator an energy data request for a metering point in accordance with the communication rules, and the energy data request relates only to a time or times for which the user was the current user at the metering point, then the network operator must provide a user with a complete set of energy data for the metering point within the timeframes prescribed.	4	Based on discussions with the Head of Operations and Regulatory Compliance Officer, there have been no requests for energy data from a user during the audit period. ADEWAP have provided a data verification request form template [15] in the event such a request occurs. It is noted that Pilbara ISOC Co granted ADEWAP an exemption to this obligation for existing meters and legacy customers and for any future metering installations and new customers (subject to an alternative arrangement defined in the final decision), which took effect on 22 March 2024 [16].	A	N/R	
398	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.13	If the current user for a metering point gives the network operator a standing data request for the metering point in accordance with the communication rules then the network operator must: – provide the current user with a complete current set of standing data for a metering point; and – advise whether there is a communications link for the metering point, within 2 business days after the receipt of the request.	4	As per no. 393	N/P	N/R	
399	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.14(3)	If a user makes a bulk standing data request, the network operator must in accordance with the communication rules, acknowledge receipt of the request and provide the requested standing data within the timeframes prescribed.	4	As per no. 393	N/P	N/R	
400	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.15	If a network operator provides energy data to a user or the IMO it must also provide the date of the meter reading in accordance with the requirements specified.	4	As per no. 393	N/P	N/R	
401	Integrated Regional Licence, condition 4.1.1	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.	4	As per no. 393	N/P	N/R	
402	Integrated Regional Licence, condition 4.1.1	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.	4	Based on site visit observations and discussions, the procedures in place are sufficient to obtain metering data for cost allocation and billing. Therefore, it has been concluded that ADEWAP complied with this obligation.	N/P	1	

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
403	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.17A(1)	A network operator must provide data for a metering point from its metering database to a person if (and to the extent that) the customer associated with the metering point gives the network operator a direction to do so that complies with subclause 5.17A(2).	4	Based on site visit observations and discussion, no such requests were made during the audit period. Therefore, compliance with this obligation is not rated as no relevant activity occurred during the audit period.	N/P	N/R	
404	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.17A(3)	A network operator must comply with a direction under subclause 5.17A(1) within the timeframes prescribed.	4	As per no. 403	N/P	N/R	
405	Integrated Regional Licence, condition 4.1.1	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 attributes, within the timeframes prescribed.	4	An Access Contract is in place between ADEWAP and Horizon Power Based on: <ul style="list-style-type: none"> The interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager The Access Contract [40] Horizon Power manages the metering points and collects metering data relating to their network. Therefore, compliance with this obligation is not rated as no relevant activity occurred during the audit period.	N/P	N/R	
406	Integrated Regional Licence, condition 4.1.1	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.	5	As per no. 405	N/P	N/R	
407	Integrated Regional Licence, condition 4.1.1	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. Note: The prescribed information listed in clause 5.19(2) was changed by the Electricity Industry (Metering) Amendment Code 2018.	5	As per no. 405	N/P	N/R	
408	Integrated Regional Licence, condition 4.1.1	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.	4	As per no. 405	N/P	N/R	
409	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.19(5)	A network operator must give notice to a user, or (if there is a different current user) the current user, acknowledging receipt of any customer, site or address attributes from the user within the timeframes prescribed.	4	As per no. 405	N/P	N/R	
410	Integrated Regional Licence, condition 4.1.1	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.	5	As per no. 405	N/P	N/R	
411	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.20(1)	A network operator must, by not later than 6 months after the date this Code applies to the network operator, develop, in accordance with the communication rules, an Energy Data Verification Request Form.	4	Based on documentation provided [15], ADEWAP have an Energy Data Verification Request Form (with Alinta branding). Therefore, it is concluded that ADEWAP complied with this obligation. Pilbara ISOC Co granted ADEWAP an exemption to this clause for existing meters and legacy customers which took effect on 22 March 2024 [16].	N/P	1	

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
412	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.20(2)	An Energy Data Verification Request Form must require a Code participant to provide the information prescribed.	4	Based on documentation provided [15], ADEWAP Energy Data Verification Request Form requests most of the prescribed information. However the reason for the request as per 5.20(2)(b) is not explicitly stated verbatim. The form does require a participant to disclose “Investigation Details” and present details of a disputed reading and consumption. As such, the audit finds that the form sufficiently reflects the intent of the Code and meets the underlying requirements in substance. It is also noted that an exemption to clause 5.20(1) was granted by Pilbara ISOCO on 22 March 2024.	B	N/R	
413	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.20(4)	If a Code participant requests verification of energy data under subclause 5.20(3), the network operator must, in accordance with the metrology procedure: <ul style="list-style-type: none"> – subject to subclause 5.20(5), use reasonable endeavours to verify energy data; and – inform the requesting Code participant of the result of the verification and provide the verified energy data to that Code participant within the timeframes prescribed. 	4	As per no. 403, 411 and 412. Verification of energy data was not requested by a code participant during the audit period. As such there is no relevant activity to assess whether the licensee has complied with this obligation.	B	N/R	
414	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.21(2)	A network operator must comply with any reasonable request under subclause 5.21(1).	4	Based on discussions with Head of Operations, Regulatory Compliance Officer and Operations Manager, no such requests have been made with respect to energy or standing data during the audit period. Note that controls for inaccuracies in energy data by ADEWAP are in place as per the PPAs with customers [28].	A	N/R	
415	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.21(4)	A test or audit under subclause 5.21(1) is to be conducted in accordance with the metrology procedure and the applicable service level agreement.	4	Based on discussions with Head of Operations, Regulatory Compliance Officer and Operations Manager, no such requests have been made to test or audit the meters during the audit period. Pilbara ISOCO granted ADEWAP a partial exemption to this clause for existing meters and legacy customers which took effect on 22 March 2024 [16].	N/P	N/R	
416	Integrated Regional Licence, condition 4.1.1	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 IMO.	4	As per no. 415	N/P	N/R	
417	Integrated Regional Licence, condition 4.1.1	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.	4	As per no. 415	N/P	N/R	
418	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.21(8)	A network operator may only impose a charge for the testing of the metering installations, or auditing of information from the meters associated with the metering installations, or both, in accordance with the applicable service level agreement between it and the user.	4	PPA Clause 9.6 allows the customer, with prior notice of the Supplier the right to inspect the metering installations. The Clause does not include a provision for the supplier (ADEWAP) to impose a change of inspection or audit of the metering installation. No such requests under the PPA or otherwise have been made during the audit period.	N/P	N/R	
419	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.21(9)	Any written service level agreement entered into under subclause 5.21(7) must include a provision that no charge is to be imposed if the test or audit reveals a non- compliance with this Code.	4	As per no. 418	N/P	N/R	

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
420	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.21(11)	<p>If a test or audit shows that the accuracy of the metering installation or information from the meter associated with the metering installation does not comply with the requirements under this Code, the network operator must:</p> <ul style="list-style-type: none"> – advise the affected parties as soon as practicable of errors detected under a test or audit, the possible duration of the errors; and – must restore the accuracy of the metering installation in accordance with the applicable service level agreement. <p>NOTE: Clause 5.21(11)(c) gives the network operator an option to make corrections to the energy data for a period up to 12 months before the date of the test or audit.</p>	4	As per no. 418	N/P	N/R	
421	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.21(12)	The original stored error correction data in a meter must not be altered except during accuracy testing and calibration of a metering installation.	4	Based on site visit observations and discussions, no alterations occurred during the audit period. Therefore, compliance with this obligation is not rated as no relevant activity occurred during the audit period.	N/P	N/R	
422	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.22(1)	A network operator must validate energy data in accordance with this Code applying, as a minimum, the prescribed rules and procedures set out in Appendix 2 and must, where necessary, substitute and estimate energy data under this Code applying, as a minimum, the prescribed rules and procedures set out in Appendix 3.	3	<p>Based on discussions with the Regulatory Compliance Manager, the audit concludes that energy data is validated by APA Commercial for the purposes of accurate billing in accordance with service agreements with customers [28].</p> <p>Pilbara ISOC Co granted ADEWAP an exemption to this clause for existing meters and legacy customers which took effect on 22 March 2024 [16]. No interim metrology procedure was in place to define ADEWAP's controls around validation of energy data in accordance with the Code. As described in 319, ADEWAP requested exemption for this and other clauses under the Code prior to their acquisition of the asset.</p> <p>No new metering installations have been installed during the audit period.</p>	B	2	Seeing as an exemption to this clause was granted by Pilbara ISOC Co, no recommendation has been made.
423	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.22(2)	The network operator must use check metering data, where available, to validate energy data provided that the check metering data has been appropriately adjusted for differences in metering installation accuracy in accordance with subclause 3.13.	4	<p>Pilbara ISOC Co granted ADEWAP an exemption to this clause for existing meters and legacy customers which took effect on 22 March 2024 [16].</p> <p>No new metering installations have been installed during the audit period.</p>	N/P	N/R	
424	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.22(3)	If a check meter is not available or energy data cannot be recovered from the metering installation within the time required under this Code, or if clause 5.22(7) applies, then the network operator must prepare substitute values using a method contained in Appendix 3 (or in the case of a substitution under clause 5.22(7), a method contained in the metrology procedure) and agreed where necessary with the relevant Code participants.	4	<p>Pilbara ISOC Co granted ADEWAP an exemption to this clause for existing meters and legacy customers which took effect on 22 March 2024 [16].</p> <p>No new metering installations have been installed during the audit period.</p>	N/P	N/R	

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
425	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.22(4)	If a network operator detects a loss of energy data or incorrect energy data from a metering installation, it must notify each affected Code participant of the loss or error within 24 hours after detection.	4	Based on the site visit observations and the interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager, no such events were detected during the audit period. Therefore, compliance with this obligation is not rated as no relevant activity occurred during the audit period. It is noted that this obligation is one for which Pilbara ISOCO granted ADEWAP an exemption for existing meters and legacy customers which took effect on 22 March 2024 [16].	N/P	N/R	
426	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.22(5)	Substitution or estimation of energy data is required when energy data is missing, unavailable or corrupted, including in the circumstances described in this subclause.	4	As per no. 425	N/P	N/R	
427	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.22(6)	A network operator must review all validation failures before undertaking any substitution.	4	As per no. 425	N/P	N/R	
428	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.23(1)	If a network operator determines that there is no possibility of determining an actual value for a metering point, then the network operator must designate an estimated or substituted value for the metering point to be a deemed actual value for the metering point.	4	As per no. 425	N/P	N/R	
429	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.23(3)	If a network operator has designated a deemed actual value for a metering point then the network operator must: <ul style="list-style-type: none"> – repair or replace the meter or one or more of components of metering equipment (as appropriate) at the metering point; and – subclauses 5.24(3(c) and 5.24(4) apply in respect of the estimated or substituted value which was designated to be the deemed actual value. 	4	As per no. 425	N/P	N/R	
430	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.24(1)	If a network operator uses an actual value (first value) for energy data for a metering point, and a better quality actual or deemed actual value is available (second value), the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice.	4	Based on discussions with Head of Operations and the Regulatory Compliance Manager, the audit concludes that no instances of : <ul style="list-style-type: none"> – An identified second value was available – Substitution or estimation of energy data was required – An estimated or substituted value was requested by a Code participant 	N/P	N/R	
431	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.24(2)	If a network operator uses a deemed actual value (first value) for energy data for a metering point, and a better quality deemed actual value is available (second value), then the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice.	4	As per no. 430	N/P	N/R	
432	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.24(3)	If a network operator uses an estimated or substituted value (first value) for energy data for a metering point, and a better quality actual, deemed, estimated or substituted value is available (second value), then the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice or the user and its customer jointly request it to do so.	4	As per no. 430	N/P	N/R	

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
433	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.24(4)	A network operator (acting in accordance with good electricity industry practice) must consider any reasonable request from a Code participant for an estimated or substituted value to be replaced under subclause 5.24.	4	As per no. 430	N/P	N/R	
434	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.25	A network operator must ensure the accuracy of estimated energy data in accordance with the methods in its metrology procedure and ensure that any transformation or processing of data preserves its accuracy in accordance with the metrology procedure.	4	As per no. 430	N/P	N/R	
435	Integrated Regional Licence, condition 4.1.1	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.	4	Horizon Power is the network operator. No such requests have been made during the audit period.	N/P	N/R	
439	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.31(2)	For each non-compliant metering installation notified under subclause 5.31(1)(b), the electing network operator may, by notice to the electricity networks corporation, require the electricity networks corporation to upgrade a non-compliant metering installation, in which case the electricity networks corporation must undertake the upgrade in accordance with the metering data agency agreement and good electricity industry practice.	4	Based on site visit observations and discussions, no metering installation has been identified as non-compliant during the audit period. Therefore, compliance with this obligation is not rated.	N/P	N/R	
440	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.34(2)	Except to the extent that the metering data agency agreement provides otherwise, the costs which may be recovered by the electricity networks corporation under subclause 5.34(1) must not exceed the amounts prescribed.	4	Based on site visit observations and discussions, no non-compliant costs were incurred. Therefore, it has been concluded that ADEWAP complied with this obligation.	N/P	1	
447	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 6.1(1)	A network operator must, in relation to its network, comply with the agreements, rules, procedures, criteria and processes prescribed.	3	ADEWAP did not have a metrology procedure in place during the audit period. Pilbara ISOC Co granted ADEWAP an exemption to this obligation for existing meters and legacy customers which took effect on 22 March 2024 [16]. As described in no. 319, no interim procedure was in place. This audit finds that the licensee demonstrated adequate controls their management of this obligation with non-compliance having a minor impact on customers and third parties.	B	2	Seeing as an exemption to this clause was granted by Pilbara ISOC Co, no recommendation has been made.
448	Integrated Regional Licence, condition 4.1.1	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.	4	Based on document reviews [40] and the site visit, controls are in place (Vigilant system) to comply with the access contract.	A	1	
448A	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 6.2	A network operator must, as soon as practicable and in any event no later than 6 months after the date this Code applies to it, submit to the ERA for its approval the prescribed documents in subclauses 6.2(a)-(d).	5	Pilbara ISOC Co granted ADEWAP an exemption to this clause for existing meters and legacy customers which took effect on 22 March 2024 [16]. Seeing as no interim documents were in place prior to the exemption. This is deemed as a non-compliance	N/P	2	Seeing as an exemption to this clause was granted by Pilbara ISOC Co, no recommendation has been made.
448B	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 6.18	A network operator must publish the document within 10 business days after notification of the ERA's approval under subclauses 6.13(1)(a)(i), 6.16 or 6.17.	5	ADEWAP have not submitted the prescribed documents to ERA for approval as per no. 448A. Therefore, compliance with this obligation is not rated as no relevant activity occurred during the audit period.	N/P	N/R	

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
448C	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 6.19A(1)	A network operator must publish its communication rules as soon as practicable, and in any event within 6 months after the date this Code applies to it.	5	No communication rules have been published. Pilbara ISOC Co granted ADEWAP an exemption to this clause for existing meters and legacy customers which took effect on 22 March 2024 [16]. Seeing as no interim communication rules were in place prior to the exemption. This is deemed as a non-compliance	N/P	2	Seeing as an exemption to this clause was granted by Pilbara ISOC Co, no recommendation has been made.
448D	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 6.19B(1)	Once communication rules have been published for a network under clause 6.19A, or amended under clause 6.21(3), the communication rules may only be amended thereafter in accordance with the communication rules made under subclause 6.7(1)(k) or clause 6.19C.	5	As per no. 448C	N/P	N/R	
449	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 6.20(4)	A network operator must amend any document in accordance with the ERA's final recommendation.	5	Based on the correspondence between ERA and ADEWAP viewed during the audit, there was no relevant activity during the audit period. Therefore, compliance with this obligation is not rated.	N/P	N/R	
450	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 6.20(5)	The network operator must publish any document that has been amended under subclause 6.20(4).	4	As per no. 449	N/P	N/R	
450A	Western Power Distribution Licence, condition 4.1.1 Western Power Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 6.22	The electricity networks corporation must, by 1 October 2021, submit to the ERA for its approval a revised metrology procedure that: <ul style="list-style-type: none"> contains a method for estimating weekly energy data for manually read interval metering installations; and reflects any other changes made to this Code by the 2021 Metering Code amendments. 	4	Not assessed as this obligation is not applicable to Integrated Regional Licences.	N/P	N/R	
451	Integrated Regional Licence, condition 4.1.1	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.	5	Based on: <ul style="list-style-type: none"> The interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager identified Document reviews [45] [46] ADEWAP have demonstrated effective management and controls of typical forms of communication in line with a large organisation. ADEWAP have postal, electronic and telephone contact details, but not facsimile, as required under 7.2(1)(b). Therefore, it is concluded that ADEWAP were non-compliant during the audit period, with minor effect to customers or third parties. Pilbara ISOC Co granted ADEWAP an exemption to this clause which took effect on 22 March 2024 [16].	A	2	Seeing as an exemption to this clause was granted by Pilbara ISOC Co, no recommendation has been made.

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
452	Integrated Regional Licence, condition 4.1.1	Electricity Industry Metering Code, clause 7.2(2)	A network operator must notify each Code participant of its initial contact details and of any change to its contact details at least 3 business days before the change takes effect.	4	<p>Based on:</p> <ul style="list-style-type: none"> The interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager identified Document reviews [44] [45] [46] [47] <p>There were relevant two changes to contact details during the audit period:</p> <ul style="list-style-type: none"> Change of all contact details due to transfer from ALINTA DEWAP Pty Ltd to APA DEWAP Pty Ltd on 1 November 2023 Change of Regulatory Compliance Manager, with handover on 05/03/2025, leading to a change in telephone number for voice communication <p>Based on a review of the documents provided, it was found that:</p> <ul style="list-style-type: none"> Changes were communicated after they had taken place <p>The information provided on controls indicated that:</p> <ul style="list-style-type: none"> ADEWAP have compliance management software, Vigilant, in place, which is used to list regulatory obligations, including for ERA and AEMO ADEWAP relies on other teams within APA to manage Horizon Power (e.g. via monthly Asset Performance Meetings) <p>While it was found that ADEWAP effectively interface and communicate with all relevant code participants with respect to the operation of this asset, this audit concludes that the licence holder has been non-compliant with this obligation.</p>	B	2	<p>2/2025</p> <p>It is recommended that ADEWAP implement controls in Vigilant or otherwise to ensure that all relevant Code Participants are notified of contact details changes at least 3 business days before the change takes effect. This would include a control to reliably prompt the responsible person, with sufficient notice to enable the task to be completed on time</p> <p>A requirement that the notification be documented and records stored by ADEWAP for assurance purposes in those cases where the notification is undertaken by other parties/teams (e.g. APA internal working groups).</p>
453	Integrated Regional Licence, condition 4.1.1	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.	4	<p>Based on the interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager, there were no contact detail requests from Horizon Power during the audit period.</p> <p>Therefore, compliance with this obligation is not rated as no relevant activity occurred during the audit period.</p>	N/P	N/R	
454	Integrated Regional Licence, condition 4.1.1	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.	4	As per no. 453.	N/P	N/R	

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
455	Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1	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.	4	Based on document reviews, ADEWAP have controls in place to prevent inappropriate disclosure of confidential information under and in connection with the Code: <ul style="list-style-type: none"> – The Power Purchase Agreement between BHP Iron Ore Pty Ltd and ADEWAP (Alinta DEWAP Pty Ltd at the time of signing) [28] sets out confidentiality requirements – The Power Purchase Agreement between The Pilbara Infrastructure Pty Ltd and ADEWAP (Alinta DEWAP Pty Ltd at the time of signing) [27] sets out confidentiality requirements – The Access Contract between Regional Power Corporation (trading as Horizon Power) and ADEWAP includes a section on confidentiality requirements The interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager indicated that, during the audit period, no confidential information was disclosed other than as required to be disclosed by the Code.	N/P	1	
456	Integrated Regional Licence, condition 4.1.1	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.	4	As per no. 455.	N/P	1	
457	Integrated Regional Licence, condition 4.1.1	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.	5	Based on the interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager, there were no disputes under, or in connection with, the Electricity Industry Customer Transfer Code during the audit period. <ul style="list-style-type: none"> – The Power Purchase Agreement between BHP Iron Ore Pty Ltd and ADEWAP (Alinta DEWAP Pty Ltd at the time of signing) [28] sets out requirements for dispute resolution. Therefore, compliance with this obligation is not rated as no relevant activity occurred during the audit period.	N/P	N/R	
458	Integrated Regional Licence, condition 4.1.1	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.	5	As per no. 457.	N/P	N/R	
459	Integrated Regional Licence, condition 4.1.1	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.	5	As per no. 457.	N/P	N/R	
460	Integrated Regional Licence, condition 4.1.1	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.	4	As per no. 457.	N/P	N/R	
461	Integrated Regional Licence, condition 4.1.1	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).	5	As per no. 457.	N/P	N/R	

Table 22 Electricity Industry (Network Quality and Reliability of Supply) Code – Licence conditions and obligations

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
462	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 5(1)	A distributor or transmitter must, as far as reasonably practicable, ensure that electricity supply to a customer's electrical installations complies with prescribed standards.	5	<p>Based on:</p> <ul style="list-style-type: none"> – The interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager, – Document reviews [27] [28] – Observations and information gathered during the site visit [41] <p>it is noted that</p> <ul style="list-style-type: none"> – The prescribed standards (voltage fluctuations and harmonics) defined in ADEWAP's PPAs with customers are compatible (i.e. are aligned or more stringent) with the Code obligations (and the transmission and distribution system performance and planning criteria Pilbara Harmonised Technical Rules). – The software platform Experion is in place to monitor and control of the assets, including voltage and frequency setpoints for the plant operation. <p>Therefore, it has been concluded that ADEWAP complied with this obligation.</p>	N/P	1	
463	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 8	A distributor or transmitter must, so far as reasonably practicable, disconnect the supply of electricity to installations or property in specified circumstances, unless it is in the interest of the customer to maintain the supply.	5	<p>ADEWAP's PPAs with customers [27] [28] outline requirements for disconnection for various circumstances such as voluntary, involuntary, and emergency. The PPAs also outline the procedures for disconnection and obligation to reconnect.</p> <p>Based on the interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager there were no disconnections of supply during the audit period.</p> <p>Therefore, compliance with this obligation is not rated as no relevant activity occurred during the audit period.</p>	N/P	N/R	
464	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 9	A distributor or transmitter must, as far as reasonably practicable, ensure that the supply of electricity is maintained and the occurrence and duration of interruptions is kept to a minimum.	5	<p>Based on:</p> <ul style="list-style-type: none"> – The interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager – The system description published on APA's website [6] <p>ADEWAP operates the network on a 'n-1' basis which allows supply to customers to continue in the case of an outage at one generation site.</p> <p>In addition, ADEWAP have identified and assessed the risk of unplanned loss of power generation capacity and put in place preventative and mitigating controls to manage the risk [55].</p> <p>Therefore, it has been concluded that ADEWAP complied with this obligation.</p>	A	1	
465	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 10(1)	A distributor or transmitter must, so far as reasonably practicable, reduce the effect of any interruption on a customer.	5	As per no. 464	A	1	

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
466	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 10(2)	A distributor or transmitter must consider whether, in specified circumstances, it should supply electricity by alternative means to a customer who will be affected by a proposed interruption.	5	Based on the interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager there were no proposed interruptions of supply to customer premises expected to exceed the relevant period during the audit period. Therefore, compliance with this obligation is not rated as no relevant activity occurred during the audit period.	N/P	N/R	
468	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 13(2)	A distributor or transmitter must, so far as reasonably practicable, ensure that customers in specified areas do not have average total lengths of interruptions of supply greater than specified durations.	5	As per no. 464	A	1	
469	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 13(3)	The average total length of interruptions of supply is to be calculated using the specified method.	4	Based on the interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager, there were no interruptions of supply to customer premises during the audit period, as ADEWAP operates the network on a 'n-1' basis which allows supply to customers to continue in the case of an outage at one generation site. Therefore, compliance with this obligation is not rated as no relevant activity occurred during the audit period.	N/P	N/R	
470	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 14(8)	A distributor or transmitter must, on request, provide to an affected customer a free copy of an instrument issued by the Minister and of any notice given under section 14(7) of the <i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005</i> .	4	During the audit period, there were no such instruments issued by the Minister affecting customers. Therefore, compliance with this obligation is not rated.	N/P	N/R	
471	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 15(2)	A distributor or transmitter that agrees with a customer to exclude or modify certain provisions must set out the advantages and disadvantages to the customer of doing so in their agreement.	4	Based on: <ul style="list-style-type: none"> – The interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager – Review of the PPAs [27] [28] no applicable provisions have been excluded or modified by during the audit period. Therefore, compliance with this obligation is not rated.	N/P	N/R	
472	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 18	A distributor operating a relevant distribution system must, in specified circumstances, make a payment to a customer within a specific timeframe for a failure to give required notice of planned interruption.	4	ADEWAP supplies electricity to large use customers (more than 160 MWh of electricity per year) only, therefore this obligation was not applicable during the audit period as it applies for supply to eligible persons (who consume not more than 50 MWh of electricity per year) only. Therefore, compliance with this obligation is not rated.	N/P	N/R	
473	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 19	A distributor operating a relevant distribution system must, in specified circumstances, make a payment to a customer within a specific timeframe if a supply interruption exceeds 12 hours.	4	ADEWAP supplies electricity to large use customers (more than 160 MWh of electricity per year) only, therefore this obligation was not applicable during the audit period as it applies for supply to eligible persons (who consume not more than 50 MWh of electricity per year) only. Therefore, compliance with this obligation is not rated.	N/P	N/R	
474	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 21(1)	A distributor operating a relevant distribution system must provide eligible customers with information about applying for payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.	4	ADEWAP supplies electricity to large use customers (more than 160 MWh of electricity per year) only, therefore this obligation was not applicable during the audit period as it applies for supply to eligible persons (who consume not more than 50 MWh of electricity per year) only. Therefore, compliance with this obligation is not rated.	N/P	N/R	

No.	Obligations under licence condition	Licence obligation	Summary description	Audit priority	Observations	Controls rating	Compliance rating	Recommendations
475	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 21(2)	A distributor operating a relevant distribution system must provide written notice to customers about payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.	4	ADEWAP supplies electricity to large use customers (more than 160 MWh of electricity per year) only, therefore this obligation was not applicable during the audit period as it applies for supply to eligible persons (who consume not more than 50 MWh of electricity per year) only. Therefore, compliance with this obligation is not rated.	N/P	N/R	
476	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 21(3)	A distributor operating a relevant distribution system must provide written notice to eligible customers about payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005 not less than once in each financial year.	4	ADEWAP supplies electricity to large use customers (more than 160 MWh of electricity per year) only, therefore this obligation was not applicable during the audit period as it applies for supply to eligible persons (who consume not more than 50 MWh of electricity per year) only. Therefore, compliance with this obligation is not rated.	N/P	N/R	
477	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 23(1)	A distributor or transmitter must take all such steps as are reasonably necessary to monitor the operation of its network to ensure compliance with specified requirements.	5	Based on: <ul style="list-style-type: none"> The interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager Observations and information gathered during the site visit [41] [42] [43] ADEWAP has in place: <ul style="list-style-type: none"> A software platform, Experion, for monitoring the operation of its network, including voltage A data management system, AVEVA PI, for storage of the information A Planned Outage Database (POD) where planned and unplanned outages are recorded and retained Therefore, it is concluded that ADEWAP complied with this obligation	N/P	1	
478	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 23(2)	A distributor or transmitter must keep records of information regarding its compliance with specific requirements for the period specified.	4	As per no. 477	N/P	1	
479	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 24(3)	A distributor or transmitter must complete a quality investigation requested by a customer in accordance with specified requirements.	4	Based on the interview with the Head of Operations, Operations Manager, Asset Performance & Lifecycle Specialist, and Regulatory Compliance Manager, there were no customer requests to complete a quality investigation during the audit period. Therefore, compliance with this obligation is not rated.	N/P	N/R	
480	Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 24(4)	A distributor or transmitter must report the results of an investigation to the customer concerned.	4	As per no. 479	N/P	N/R	



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