ERA License Audit and Asset Management System Review

Report

APA Transmission (Roy Hill) Pty Ltd

March 12, 2026

→ The Power of Commitment

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Executive Summary

APA Transmission (Roy Hill) Pty Ltd (referred to hereafter as the Licensee) engaged GHD Pty Ltd (referred to hereafter as GHD) to conduct a scheduled review of its Asset Management System (AMS) and audit of its Electricity Integrated Regional Licence . This review and audit has been performed 3 years after the last audit was conducted in 2022 and covers the period 1 October 2022 to 30 September 2025.

The Economic Regulation Authority (ERA) had granted the Licensee an extension to the minimum required two-yearly audit/ review period.

After approval by the ERA of the Audit Plan, GHD carried out the review and audit during November and December 2025 as per the ERA 2019 Audit and Review Guidelines. GHD carried out a reasonable assurance engagement audit of 166 regulatory obligations with which and electricity generation licensee must comply. The specific obligations are listed in the report. This report provides the findings from the review and audit which assesses the Licensee's compliance with the conditions of its licence and the effectiveness of its AMS. It should be noted during this audit period a change of ownership took place on the 1 November 2023, which included the transfer of asset management tasks from Alinta's asset management software to APA's.

Licence Audit

The audit interviews were conducted via Microsoft Teams, with part of the GHD team present in person at APA's office. Evidence and supporting documents were supplied to the GHD team via a SharePoint site which required 2FA for users with granted access.

It was found that recommendations made in the previous audit have not been resolved in this audit period. Delivery of these recommendations was initially 31 March 2025, but due to resourcing constraints the Licensee proposed a new completion date of 31 December 2025.

Of the 166 obligations applicable to an electricity integrated regional licensee:

The Licensee was deemed to comply with 49 obligations which achieved a control/compliance rating of A/1

- 8 obligations were given a control/compliance rating of B/1
- 1 obligation was given a control/compliance rating of A/2
- 11 obligations were given a control/compliance rating of B/2
- While 97 obligations were not rated, either because they did not apply to the Licensee or no event occurred over the 3-year assessment period for the Licensee to be assessed against.

For the 58 obligations the Licensee were deemed to comply with, the licensee provided sufficient and timely evidence for GHD to conclude performance against those obligations were materially met for this review period.

For the 97 obligations not rated, GHD confirm that either these are not applicable to the licensee or could not find evidence an event occurred that justified assessment.

For the remaining obligations which were deemed non-compliant and were applicable to the licensee, recommendations have been made for the upcoming audit period. With the exception of obligation 326, as the audit found that the licensee adhered to the functional intent of the clause and it would be impractical and not cost effective to implement a compliant solution.

The Licensee's overall control environment operates well and shows compliance with majority of the licensee's obligations to the Electricity Integrated Regional Licence. Recommendations made in this report should help the Licensee achieve overall compliance in line with the ERA's guidelines.

AMS Review

The review interviews were conducted via in person meetings at the Licensee's main office. The Licensee was found to perform effectively against the criteria in the Guidelines. No recommendations were made as the Licensee did not perform under the threshold for any criterion during the audit period.

In the previous audit report, an opportunity for improvement was identified which related to employee emergency evacuation training. Based on the review of this audit period the training of employees has improved and therefore no recommendations have been made. Overall, due to no recommendations being needed it is GHD's opinion that the Licensee's AMS performs within the requirements of the ERA's guidelines.

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

Contents

Table index

Appendices

1. Introduction

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

The Licensee holds an electricity integrated regional licence (EIRL6). This licence was issued by ERA under section 19 of the Electricity Industry Act 2004 and enables the licensee to generate electricity.

1.1 Overview of The Licensee

The Licensee is part of APA Group, based in Australia. The Licensee operates the Newman Power Station, a 248MW facility that generates electricity to supply Roy Hill Iron Ore Pty Ltd and Fortescue Metals Group Ltd.

1.2 Purpose of this Report

This report provides the outcome of GHD's reasonable assurance audit assessment of the Licensee's 3-year electricity integrated reginal license audit, covering the period 1 October 2022 to 30 September 2025. ERA regulatory license requirements need to be assessed every two years, or longer if approved by the ERA. This audit assesses the effectiveness of measures taken by the license holder to meet the conditions of its license under its license obligations. It assessed:

- ***Process compliance:*** Effectiveness of systems and procedures
- ***Outcome compliance:*** Effectiveness of actual performance against license 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 the review includes performing a reasonable assurance assessment of the adequacy and effectiveness of performance against the requirements of the licensee. This is conducted by considering:

- a description of the review objectives and the methodology used to conduct the review;
- the period over which the review has been performed;
- details of the licensee's representatives participating in the review;
- details of key documents and other information sources examined by the auditor during the audit; and
- any other information the auditor considers relevant to the audit or review scope of work.

1.3 Scope and Limitations

This report has been prepared by GHD for APA Transmission (Roy Hill) Pty Ltd and may only be used and relied upon by APA Transmission (Roy Hill) Pty Ltd for the purpose agreed between GHD and APA Transmission (Roy Hill) Pty Ltd as set out in section 1.2 of this report.

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

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

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

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

Accessibility of documents

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

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

2. Methodology

2.1 Objectives

The objective of this reasonable assurance engagement review is to provide to the ERA an independent assessment of the effectiveness of the Licensee's Asset Management System (AMS) and adherence to applicable licence obligations for EIRL6 and provide recommendations to address identified non-compliances.

2.2 Methodology and Approach

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

– An initial discussion via teleconference with the Licensee to:
  - Identify the key processes and roles to be discussed
  - Discuss the audit plan
– Preparation of the draft Audit Plan for comment by the licensee.
– Submission of the draft Audit Plan to the ERA for approval
– 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:
  - Demonstration of key systems
  - Identifying documents to be sampled to confirm procedures and assess compliance with AMS criteria and license obligations
  - Review of procedures
– Preparation of a draft licence audit and AMS review report for the Licensee's review and comment
– Preparation of a final report for submission to the ERA

2.2.1 Audit & Review priorities and assessment criteria

As described in the Audit Plan submitted to the ERA, techniques such as observation, interviews and document review were used to gather evidence to support GHD's findings and recommendations.

Where high volume and low risk documentation is available, representative samples will be reviewed. These samples will be increased should breaches or inconsistencies be apparent, to allow GHD to make a more robust assessment.

Where identified higher risk areas are concerned, a larger sample will be taken and should any breach or inconsistency be identified, the sample will be extended to include all relevant documentation. Table 1 reflects the audit procedures for each audit priority outlined in section 3.2.4.3 of ERA's Audit and Review Guidelines.

In all cases, GHD will use professional judgement and scepticism in the collection of sufficient and appropriate evidence corresponding to the audit and review priority, with that evidence being persuasive rather than conclusive in nature.

Table 1 *Review Priority Procedures*

Audit or Review Priority	1	2	3	4	5
	High Priority		Moderate Priority		Low Priority
Audit Procedures	Interview supervisory and operational personnel Inspect relevant documents Obtain evidence policies, procedures and controls are in place and working effectively Examine compliance reports and breach register Obtain confirmations from third parties if applicable Examine reports and correspondence with other regulators (e.g. Building and Energy) Closely inspect applicable asset infrastructure Examine asset management system effectiveness criteria Sample, at a high level, output and timeliness procedures Recalculate a sample of relevant performance indicators		Interview supervisory and operational personnel Inspect relevant documents Obtain evidence policies, procedures and controls are in place and controls are working effectively Examine compliance reports and breach register Physically examine applicable asset infrastructure Examine asset management system effectiveness criteria Sample output and timeliness procedures Walkthrough the process to calculate relevant performance indicators		Interview supervisory or operational personnel Undertake a desktop review of relevant documents Undertake a desktop review of policies, procedures and controls in place View compliance reports and breach register Visit applicable asset infrastructure Undertake a desktop review of asset management system effectiveness criteria Sample, at a low level, output and timeliness procedures

2.2.2 Deviations from the Audit Plan

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

3. Audit/Review Details

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

3.1 Previous Audit/Review

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

The previous (2022) report identified well managed compliance and integrity of reporting by the previous owner Alinta, against the standards and obligations prescribed in the licence throughout the 1 October 2019 to 30 September 2022 period. It was found that 10 licence obligations were non-compliant these were:

- 1/2022 – Obligations 319, 320, 326, 327, 357, 448A, 448C
- 2/2022 – Obligation 366 Metering Code Clause 4.1(1)
- 3/2022 – Obligation 369 Metering Code Clause 4.2(1), 370 Metering Code Clause 4.3(1)

The recommendations included:

- 1/2022 – To establish a plan and procedure for demonstrating how the Metering Code and relevant clauses of its Interconnection Agreements. Take a clear position on those Metering Code obligations and accept non-compliance on the basis that it is not practical or useful to establish formal metrology procedures etc.
- 2/2022 – Update the metering database with standing data for its CT/VT meters installed at the Roy Hill and Cloudbreak connection point.
- 3/2022 – Complete or provide commentary on the standing data omitted from its metering database.

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

- Operational environment 4.2 – performance required corrective action (A3 rating).
- Asset operations 5.6 – performance required corrective action (B3 rating).

The recommendations included:

a) Schedule staff training to clear all overdue requirements with special emphasis given to site specific emergency response drills.

b) Ensure sufficient resources are allocated to maintaining key training requirements and emergency response drills.

3.2 Time Period Covered by the Audit/Review

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

3.3 Time Period of the Audit/Review Process

The audit/review commenced in November 2025 after ERA approved the Audit Plan on the 13 November 2025.

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

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

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

Site visit to NPS occurred on the 20 November.

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

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

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

Details of representatives from the Licensee are tabulated below.

Table 2 Details of Licensee Attendees

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

3.5 Details of Key Documents and Other Information Sources

A list of documents made available for the audit up to the end of the audit period is provided in Appendix B in Table 16.

3.6 Details of Auditors Participating in the Audit

The audit and review teams comprised of two (2) staff members from GHD. Details of their roles in the audit/review process are summarised in Table 3.

Table 3 Details of GHD Audit Team Members

Name	Role	Summary of Task	Hours Utilised (hrs)
Henry Le	Project Manager	Project management Review of Audit Plan and report	16
Raphael Ozsvath	Lead License Auditor	Audit plan preparation Licence performance audit Preparation of report	10
Mackensie D'Alton	AMS Review Support	Audit plan preparation AMS performance review Preparation of report	42
Emily Singleton	AMS Review Support	AMS performance review Preparation of report	26
Faye Yang	Audit Review Support	Audit plan preparation Licence performance audit Preparation of report	74
Liam Landman	Audit Review Support	Audit plan preparation Licence performance audit Preparation of report	20

4. Audit Performance Summary

Findings of the licence performance audit are summarised in table 4 with an adequacy of control and a compliance rating below.

Obligations which have a control/compliance rating of NR/NP have not been included in the table. For more detailed analysis of each obligation, refer to Appendix A.

Table 4 Audit Performance Summary table

Compliance Manual No	Obligation under Licence conditions	Type (1, 2 or NR)	Audit Priority (1=highest, 5=lowest)	Compliance rating					Control rating				
				1	2	3	4	N/R	A	B	C	D	N/P
Electricity Industry Act – Licence conditions and obligations													
101	Electricity Industry Act, section 13(1)	2	4	✓					✓				
102	Electricity Industry Act, section 14(1)(a)	2	4	✓					✓				
103	Electricity Industry Act, section 14(1)(b)	2	4	✓					✓				
104	Electricity Industry Act, section 14(1)(c)	2	4	✓					✓				
105	Economic Regulation Authority (Licensing Funding) Regulations 2014	2	4	✓					✓				
106	Electricity Industry Act, section 31(3)	NR	5	✓					✓				
Electricity licences – Licence conditions and obligations													
119	Distribution Licence, condition 4.3.1Generation Licence, condition 4.3.1Integrated Regional Licence, condition 4.3.1Retail Licence, condition 4.3.1 Transmission Licence, condition 4.3.1	2	4	✓					✓				
121	Distribution Licence, condition 5.3.2Generation Licence, condition 5.3.2Integrated Regional Licence, condition 5.3.2Retail Licence, condition 5.3.2Transmission Licence, condition 5.3.2	2	4	✓					✓				

Compliance Manual No	Obligation under Licence conditions	Type (1, 2 or NR)	Audit Priority (1=highest, 5=lowest)	Compliance rating					Control rating				
				1	2	3	4	N/R	A	B	C	D	N/P
122	Distribution Licence, condition 5.1.5Generation Licence, condition 5.1.5Integrated Regional Licence, condition 5.1.5Transmission Licence, condition 5.1.5	2	4	✓					✓				
126	Distribution Licence, condition 3.7.1Generation Licence, condition 3.7.1Integrated Regional Licence, condition 3.7.1Retail Licence, condition 3.7.1Transmission Licence, condition 3.7.1	2	4	✓					✓				
Electricity licences – Licence conditions and obligations													
317	Electricity Industry Metering Code, clause 2.2(1)(a)	2	4	✓					✓				
318	Electricity Industry Metering Code, clause 2.2(1)(b)	2	4	✓					✓				
319	Electricity Industry Metering Code, clause 3.1	2	4		✓					✓			
320	Electricity Industry Metering Code, clause 3.2(1)	2	4		✓					✓			
322	Electricity Industry Metering Code, clause 3.3(3)	2	4	✓					✓				
325	Electricity Industry Metering Code, clause 3.3C	2	4	✓					✓				
326	Electricity Industry Metering Code, clause 3.5(1) and(2)	2	4		✓					✓			
327	Electricity Industry Metering Code, clause 3.5(3)	2	4		✓					✓			
328	Electricity Industry Metering Code, clause 3.5(4)	2	4	✓					✓				
329	Electricity Industry Metering Code, clause 3.5(6)	2	4	✓					✓				
332	Electricity Industry Metering Code, clause 3.8	2	4	✓					✓				
333	Electricity Industry Metering Code, clause 3.9(3)	2	4	✓					✓				

Compliance Manual No	Obligation under Licence conditions	Type (1, 2 or NR)	Audit Priority (1=highest, 5=lowest)	Compliance rating					Control rating				
				1	2	3	4	N/R	A	B	C	D	N/P
336	Electricity Industry Metering Code, clause 3.10	2	4	✓						✓			
337	Electricity Industry Metering Code, clause 3.11(1)	2	4	✓						✓			
340	Electricity Industry Metering Code, clause 3.11A(1)	2	4	✓					✓				
342	Electricity Industry Metering Code, clause 3.12(1)	2	4	✓						✓			
343	Electricity Industry Metering Code, clause 3.12(2)	2	4	✓						✓			
344	Electricity Industry Metering Code, clause 3.12(3)	2	4	✓					✓				
345	Electricity Industry Metering Code, clause 3.12(4)	2	4	✓					✓				
356	Electricity Industry Metering Code, clause 3.20(3)	2	4	✓					✓				
358	Electricity Industry Metering Code, clause 3.21(2)	2	4	✓					✓				
359	Electricity Industry Metering Code, clause 3.22	2	4	✓					✓				
366	Electricity Industry Metering Code, clause 4.1(1)	2	4		✓					✓			
367	Electricity Industry Metering Code, clause 4.1(2)	2	4	✓					✓				
368	Electricity Industry Metering Code, clause 4.1(3)	2	4	✓					✓				
369	Electricity Industry Metering Code, clause 4.2(1)	2	4		✓					✓			
370	Electricity Industry Metering Code, clause 4.3(1)	2	4		✓					✓			
379	Electricity Industry Metering Code, clause 4.8(4)(a)	2	4	✓					✓				
380	Electricity Industry Metering Code, clause 4.8(4)(b)	2	4	✓					✓				
381	Electricity Industry Metering Code, clause 4.8(5)	2	4	✓					✓				
382	Electricity Industry Metering Code, clause 4.9	2	4	✓					✓				

Compliance Manual No	Obligation under Licence conditions	Type (1, 2 or NR)	Audit Priority (1=highest, 5=lowest)	Compliance rating					Control rating				
				1	2	3	4	N/R	A	B	C	D	N/P
385	Electricity Industry Metering Code, clause 5.3(1)	2	4	✓					✓				
385A.	Electricity Industry Metering Code, clause 5.3(2)	2	4	✓					✓				
386	Electricity Industry Metering Code, clause 5.4(1)	2	4	✓					✓				
391B.	Electricity Industry Metering Code, clause 5.6(5)	2	4	✓					✓				
401	Electricity Industry Metering Code, clause 5.16	2	4	✓					✓				
402	Electricity Industry Metering Code, clause 5.17(1)	NR	5	✓					✓				
411	Electricity Industry Metering Code, clause 5.20(1)	2	4		✓				✓				
412	Electricity Industry Metering Code, clause 5.20(2)	2	4	✓					✓				
422	Electricity Industry Metering Code, clause 5.22(1)	2	4	✓						✓			
423	Electricity Industry Metering Code, clause 5.22(2)	2	4	✓						✓			
424	Electricity Industry Metering Code, clause 5.22(3)	2	4	✓						✓			
425	Electricity Industry Metering Code, clause 5.22(4)	2	4		✓					✓			
426	Electricity Industry Metering Code, clause 5.22(5)	2	4	✓					✓				
427	Electricity Industry Metering Code, clause 5.22(6)	2	4	✓						✓			
428	Electricity Industry Metering Code, clause 5.23(1)	2	4	✓					✓				
447	Electricity Industry Metering Code, clause 6.1(1)	2	2	✓					✓				
448A.	Electricity Industry Metering Code, clause 6.2	2	4		✓					✓			
448C	Electricity Industry Metering Code, clause 6.19A(1)	2	4		✓					✓			
451	Electricity Industry Metering Code, clause 7.2(1)	NR	5		✓					✓			

Compliance Manual No	Obligation under Licence conditions	Type (1, 2 or NR)	Audit Priority (1=highest, 5=lowest)	Compliance rating					Control rating				
				1	2	3	4	N/R	A	B	C	D	N/P
452	Electricity Industry Metering Code, clause 7.2(2)	2	4	✓					✓				
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)	2	4	✓					✓				
463	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 8	2	4	✓					✓				
464	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 9	2	4	✓					✓				
465	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 10(1)	2	4	✓					✓				
468	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 13(2)	2	4	✓					✓				
469	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 13(3)	2	4	✓					✓				
477	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 23(1)	2	4	✓					✓				
478	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 23(2)	2	4	✓					✓				

4.1 Assessment Rating Scales

In accordance with the Audit Guidelines, an assessment of the Licensee's performance was completed using a rating of adequacy of control and compliance, as summarised in Table 5.

Table 5 Audit Compliance and Control Rating Scale

Adequacy of Controls Rating		Compliance Rating	
Rating	Description	Rating	Description
A	Adequate controls - no improvement needed	1	Compliant
B	Generally adequate controls - improvement needed	2	Non-compliant – minor impact on customers or third parties
C	Inadequate controls – significant improvement required	3	Non-compliant – moderate impact on customers or third parties

Adequacy of Controls Rating		Compliance Rating	
D	No controls evident	4	Non-compliant – major impact on customers or third parties
NP	Not Performed – A control rating was not required	NR	Not rated – No activity took place during the audit period

4.2 Licence Conditions Compliance and Control Audit Ratings Summary

In accordance with the Audit Guidelines, an assessment of the licensee's controls and compliance performance against its 166 EIRL6 licence obligations, that existed during this audit period was undertaken. Table 6 lists the number of licence obligations that were given each combination of control and compliance ratings. This table allows the licensee and the ERA to confirm that GHD have rated all relevant licence obligations and provides a simple summary of the Licensee's performance during the audit period.

Table 6 Licence Conditions Compliance and Control Ratings Summary Table

		Compliance rating					
Rating	Description	1	2	3	4	N/R	Total
Controls rating	A	49	1	0	0	0	50
	B	8	11	0	0	0	19
	C	0	0	0	0	0	0
	D	0	0	0	0	0	0
	N/P	0	0	0	0	97	97
	Total	58	11	0	0	97	166

Of the 166 obligations applicable to an electricity integrated regional licensee:

The Licensee was deemed to comply with 49 obligations which achieved a control/compliance rating of A/1

– 8 obligations was given a control/compliance rating of B/1
– 1 obligation was given a control/compliance rating of A/2
– 11 obligations were given a control/compliance rating of B/2
– While 97 obligations were not rated, either because they did not apply to the Licensee or no event occurred over the 3-year assessment period for the Licensee to be assessed against.

For the 58 obligations the Licensee were deemed to comply with, the licensee provided sufficient and timely evidence for GHD to conclude performance against those obligations were materially met for this review period.

For the 97 obligations not rated, GHD confirm that either these are not applicable to the licensee or could not find evidence an event occurred that justified assessment.

For the remaining obligations which were deemed non-compliant and were applicable to the licensee, recommendations have been made for the upcoming audit period. With the exception of obligation 326, as the audit found that the licensee adhered to the functional intent of the clause and it would be impractical and not cost effective to implement a compliant solution.

5. Audit Observations and Recommendations

Licence audit recommendations from the previous and current audit period are described below. The status of whether these recommendations have been resolved are commented on.

5.1 Recommendations from previous audit

Table 7 Status of recommendations addressing non-compliances from the previous audit – resolved

A: Resolved during previous audit Period
No recommendations were resolved from the previous audit period

Table 8 Status of recommendations addressing non-compliances from the previous audit – Unresolved

B: Unresolved during previous audit Period			
Recommendation reference (no./year): 1/2022	**License obligation number:** 319, 320, 326, 327, 357, 448A, 448C **Controls and Compliance Rating:** B2 **Obligation description:** Metering Code clauses 3.1, 3.2(1), 3.5(1) and (2), 3.5(3), 3.21(1), 6.2 and 6.19A(1) **Details of inadequate controls or non-compliance:** The previous audit rated obligations 319, 320, 326, 327, 357, 448A and 448C as being non-compliant. The controls/compliance rating of these obligations have been deemed a B/2 as the assessed impact on the licensee's customers and other users has been deemed as minor. The previous audit recommended the licensee to: a) Establish a plan and procedure for demonstrating how it will meet the Metering Code and the relevant	**Date Resolved:** Unresolved.	**Further action required (Yes/No/Not applicable):** Yes **Details of Further Action Required (Including Current Recommendation Reference, if Applicable):** In ERA's 2025 Annual Compliance Report and through audit interviews, APA will be completing a metering management plan to incorporate the technical requirements of the metering code relevant to its metering operations.

B: Unresolved during previous audit Period			
	clauses of its PPA and Interconnection Agreement. Consideration should be given to: Establishing a Metering Management Plan (which has the benefit of capturing all relevant obligations in one place); and/or; Building on the PPA and Interconnection Agreement mechanism to be clearer on the agreed approach for managing meters and metering data to adequately meet the intent of the Metering Code, within the practicalities of AETRH's operating circumstances. b) Take a clear position on those Metering Code obligations where AETRH accepts that it will continue to be non-compliant on the basis that it is not practical or useful to establish formal metrology procedures.		
Recommendation reference (no./year): 2/2022	**License obligation number:** 366 **Controls and Compliance Rating:** B2 **Obligation description:** Metering Code Clause 4.1(1) **Details of inadequate controls or non-compliance:** The licensee's CT and VT meters installed at the AETRH/AETC connection point had not been included in its metering base.	**Date Resolved:** Unresolved.	**Further action required (Yes/No/Not applicable):** Yes **Details of Further Action Required (Including Current Recommendation Reference, if Applicable):** ERA's 2025 Annual Compliance Report and through audit interviews, APA will be completing a metering management plan to incorporate the technical requirements of the metering code relevant to its metering operations. This document will be produced by APA by 31 December 2025. which is to be provided to the ERA as part of APAs close out actions. The interviewees confirmed that information surrounding this obligation will be added into the metering management plan.
Recommendation reference (no./year): 3/2022	**License obligation number:** 369, 370 **Controls and Compliance Rating:** B3 **Details of inadequate controls or non-compliance:**	**Date Resolved:** Unresolved.	**Further action required (Yes/No/Not applicable):** Yes. **Details of Further Action Required (Including Current Recommendation Reference, if Applicable):**

B: Unresolved during previous audit Period			
	Obligation 370 - clause 4.3(1) of the Metering Code requires the licensee's metering database to contain the 30 specified standing data items. The licensee's metering database contained the prerequisite standing data item headings but had not provided data or commentary on items: (4) Voltage at metering point, (5) Distribution loss factor, (14) NMI meter, (20) Summation scheme values and multipliers, (21) Data register coding details, (27) Algorithms. Obligation 369 is non-compliant because of the metering registry not complying with the Code, per Obligation 370.		ERA's 2025 Annual Compliance Report and through audit interviews, APA will be completing a metering management plan to incorporate the technical requirements of the metering code relevant to its metering operations. This document will be produced by APA by 31 December 2025 which is to be provided to the ERA as part of APAs close out actions. The interviewees confirmed that information surrounding this obligation will be added into the metering management plan.

5.2 Recommendations of current audit

Table 9 Status of recommendations addressing non-compliances from current audit – resolved

B: Resolved during current audit Period			
Recommendation reference (no./year): N/A	**License obligation number:** 411 **Controls and Compliance Rating:** A2 **Obligation description:** Metering Code, clause 5.20(1) **Details of inadequate controls or non-compliance:** A previous non-compliance for this obligation was identified in the ERA 2024 and 2025 annual compliance reports. Hence the obligation has been given a rating of 2 as it is as the consequences to customers for this breach has been assessed as minor.	**Date Resolved:** Resolved 2025. An energy data verification request form was provided as evidence during the audit. This form included a request of the NMI and checksum, site address, selected meter, investigation code, description, investigation details as well as additional consumption and registration information. This obligation is assessed as sufficiently controlled.	**Further action required (Yes/No/Not applicable):** No **Details of Further Action Required (Including Current Recommendation Reference, if Applicable):** N/A

Table 10 Status of recommendations addressing non-compliances from the current audit – Unresolved

B: Unresolved during current audit Period			
Recommendation reference (no./year): 1/2025	**License obligation number:** 319, 320, 327, 448A, 448C **Controls and Compliance Rating:** B2 **Obligation description:** Metering Code clauses 3.1, 3.2(1), 3.5(3), 3.21(1), 3.21(4), 6.2 and 6.19A(1) **Details of inadequate controls or non-compliance:** The 2023 – 2025 ERA Annual Compliance reports have identified the following obligations to be non-compliant during the audit period. These breaches show that APA could not demonstrate compliance with the metrology requirements under the Electricity Industry Metering Code. These breaches relate to the following: - conformance to a metrology procedure that does not currently exist - adherence to validation, verification, and substitution of data in accordance with the metering code Recommendations to develop a metering procedure to consolidate the licensee's position on all obligations relating to the code have been made. It should be noted that for 447, 448A, 448C, a notice of intent of non-compliance was issued to the ERA during the audit period.	**Date Resolved:** Unresolved.	**Further action required (Yes/No/Not applicable):** Yes **Details of Further Action Required (Including Current Recommendation Reference, if Applicable):** It is recommended that a metering procedure be developed and submitted to the ERA under clause 6.2 of the Metering Code. This metering plan should consolidate the licensee's controls and methodology for all obligations applicable to the Metering Code and establish: - The licensee's position on which obligations where the licensee will continue to be non-compliant on the basis of practicality. - Confirm that the licensee's processes and procedures holistically provide sufficient detail to meet the requirements of the Code. Notices of non-compliances are recommended to be referenced in this plan. It is understood that, based on the 2025 Annual Compliance Report and audit interviews, APA will be completing a metering management plan to incorporate the technical requirements of the metering code relevant to its metering operations.
Recommendation reference (no./year): 2/2025	**License obligation number:** 366 **Controls and Compliance Rating:** B2	**Date Resolved:** Unresolved.	**Further action required (Yes/No/Not applicable):** Yes

B: Unresolved during current audit Period			
	Obligation description: Metering Code Clause 4.1(1) **Details of inadequate controls or non-compliance:** The licensee's CT and VT meters installed at the Licensee's/ATC connection point had not been included in its metering base.		**Details of Further Action Required (Including Current Recommendation Reference, if Applicable):** ERA's 2025 Annual Compliance Report and through audit interviews, APA will be completing a metering management plan to incorporate the technical requirements of the metering code relevant to its metering operations. The interviewees confirmed that information surrounding this obligation will be added into the metering management plan.
Recommendation reference (no./year): 3/2025	**License obligation number:** 369, 370 **Controls and Compliance Rating:** B2 **Details of inadequate controls or non-compliance:** Obligation 370 - clause 4.3(1) of the Metering Code requires the licensee's metering database to contain the 30 specified standing data items. The licensee's metering database contained the prerequisite standing data item headings but had not provided data or commentary on items: (4) Voltage at metering point, (5) Distribution loss factor, (14) NMI meter, (20) Summation scheme values and multipliers, (21) Data register coding details, (27) Algorithms. Obligation 369 is non-compliant because of the metering registry not complying with the Code, per Obligation 370.	**Date Resolved:** Unresolved.	**Further action required (Yes/No/Not applicable):** Yes. **Details of Further Action Required (Including Current Recommendation Reference, if Applicable):** ERA's 2025 Annual Compliance Report and through audit interviews, APA will be completing a metering management plan to incorporate the technical requirements of the metering code relevant to its metering operations. The interviewees confirmed that information surrounding this obligation will be added into the metering management plan.
Recommendation reference (no./year): 4/2025	**License obligation number:** 425 **Controls and Compliance Rating:** B2 **Obligation description:** Metering Code Clause 5.22(4) **Details of inadequate controls or non-compliance:**	**Date Resolved:** Notice of intent of non-compliance was issued to the ERA.	**Further action required (Yes/No/Not applicable):** No **Details of Further Action Required (Including Current Recommendation Reference, if Applicable):** N/A

B: Unresolved during current audit Period			
	For 2024-2025, APA was not able to demonstrate compliance to the Energy data - validation, substitution and estimation elements of the metering code.		
Recommendation reference (no./year): 5/2025	**License obligation number:** 451 **Controls and Compliance Rating:** B2 **Obligation description:** Metering Code Clause 7.2(1) **Details of inadequate controls or non-compliance:** During 2024-2025, APA was unable to send or receive notice by facsimile.	**Date Resolved:** Notice of intent of non-compliance was issued to the ERA.	**Further action required (Yes/No/Not applicable):** No **Details of Further Action Required (Including Current Recommendation Reference, if Applicable):** N/A

6. AMS Review Performance Summary

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

6.1 Assessment Rating Scales

In accordance with the 2025 Audit and Review Guidelines, the review of the asset management effectiveness was completed using the rating scales outlined in Table 11 and Table 12.

Table 11 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 significant 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 12 Performance Rating Scale (Reviews)

Rating	Description	Criteria
1	Performing effectively	• 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	• 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	• 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	• Process is not performed, or the performance is so poor the process is considered to be ineffective.

6.2 AMS Review Effectiveness Summary

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

The review was conducted using the asset management adequacy and performance ratings and the outcome is summarised in Table 13.

Table 13 AMS Review Results Summary

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

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

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

7. Review Observations and Recommendations

7.1 Asset Management System Review

The AMS review conducted is in Table 14. 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 14 Asset Management Review Observations and Recommendations

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

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Adequacy Rating	AMS Performance Rating
1.3	Service levels are defined in the asset management plan	4	1Section 3 (Performance Monitoring and Management) of the Licensee's Operational Excellence Standard outlines the performance requirements required for business processes. The AMP section 4.3 records the actual and forecast historical asset performance of generation sent out, capacity factor, net heat rate, forced outage factor, availability factor, start reliability and planned outage factor metrics. Section 3.1.1 of the AMP also outlines the contract maximum demand of the PPA (Power Purchase Agreement) with BHP and Fortescue (FMG). The power performance dashboard was also witnessed, demonstrating that the performance of the different assets is monitored. The dashboard takes data from Maximo, and was witnessed to include asset availability, outage factor, commercial start reliability, capacity factor, generation, delivered gas, heat rate, and energy delivered to customer.	A	1
1.4	Non-asset options (e.g. demand management) are considered	N/A	This finding is unchanged from previous audit. There is no requirement to consider non-asset options since the asset's primary purpose is to provide power to customers per the PPA.	N/A	N/A
1.5	Lifecycle costs of owning and operating assets are assessed	2	Section 6 of the AMP provides a 5-year capital expenditures forecast for the asset, as well as the capital expenditure of projects related to the asset in FY24. A Lifecycle Interface Tool was also witnessed, showing all the projects and budgeting associated with the asset for each financial year. Maximo third party software provides ten-year forecasts and feeds into an in-house program for lifecycle plans. More detailed budget planning is conducted annually, covering OPEX, CAPEX, asset refurbishment and renewals for a rolling 3-year period. The Asset Lifecycle Planning Procedure was also evidenced, which shows the key management practices used in asset lifecycle planning, as well as a 3-year ESPP Divisional Strategic Plan incorporating lifecycle costs from across the Licensee's Operations division. Dashboards providing a financial breakdown of each asset were also witnessed.	A	1
1.6	Funding options are evaluated	2	Refer to criteria 1.5 The Licensee's Asset Lifecycle Planning Procedure describes the requirement for individual financial models for each asset, including carrying value (CV) models, and long-term (20 year) CAPEX forecast. A CV Summary Updates SOP (Standard Operating Procedure) was also provided as evidence. Risk assessments in Maximo were witnessed. These allocate risk rankings to each project which helps assess the available budget. The Licensee's Project Management Framework (PMF) also includes requirements around consideration of funding options.	A	1

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

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Adequacy Rating	AMS Performance Rating
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	The Licensee's PMF is evidenced, which describes the key components for project management over the lifetime of the project starting at feasibility and finishing at decommissioning. The Project Proposal Tool (PPT) was also witnessed showing details for the project proposal such as required approvers, financial details and risk assessment. The Licensee's prioritisation of project and proposals is also witnessed, showing the priority assigned to each. No projects relating to this asset were undertaken during the review period. Evidence has been provided of Gateway 1 and 2 reviews per Licensee's PMF for a potential future turbine control system upgrade for the asset. These demonstrate consideration of multiple scenarios against the new asset option.	A	1
2.2	Evaluations include all life-cycle costs	2	See criteria 1.5 and 2.1 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. The Gateway 1 and 2 reviews provided by the Licensee for the potential future turbine control system upgrade demonstrate life-cycle cost estimates.	A	1
2.3	Projects reflect sound engineering and business decisions	2	See criteria 2.1 The PMF provides an adequate basis for making sure projects follow good engineering practices and investigating the effects for the Licensee's business. The Licensee also provided their Asset Integration Business Process Definition, which ensures projects are integrating into the business as seamlessly as possible, as well as the ESPP Divisional Strategic Plan, which incorporates costs, priorities, risks and activities across the Operations division. The Licensee's Project Completion Register Template is also evidenced, which demonstrates a checklist with the requirements for projects, acceptance criteria, required reference documents and who is responsible for the item.	A	1
2.4	Commissioning tests are documented and completed	2	There were no projects completed during the review period that would require commissioning tests. The Licensee evidenced documentation, including their PMF, and Asset Management Commissioning and Handover Business Process Definition, that detail the requirements for testing in the case of such projects.	A	1
2.5	Ongoing legal / environmental / safety obligations of the asset owner are assigned and understood	2	See criteria 1.2 regarding Section 7.2 of the AMP. See criteria 2.3 with reference to the Project Completion Register Template. Obligations are also stored and monitored in the Vigilant system, including assigning an owner and linking controls. Screenshots of this system have been provided by the Licensee.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Adequacy Rating	AMS Performance Rating
3	**Asset disposal** Asset disposal is the consideration of alternatives for the disposal of surplus, obsolete, under-performing or unserviceable assets.			**A**	**1**
3.1	Under-utilised and under-performing assets are identified as part of a regular systematic review process	4	The Licensee's OPD was witnessed to provide an overview of the asset's actual performance against the target performance. This is reviewed in monthly Asset Performance Meetings to monitor asset performance. Also evidenced was the Licensee's Power Performance Dashboard (PPD), which provides several metrics for assessing an asset's performance. Lifecycle Workshops are also held annually for each asset, and the Licensee provided evidence of an example agenda for one of these workshops, which listed Asset Performance as an agenda item.	A	1
3.2	The reasons for under-utilisation or poor performance are critically examined and corrective action or disposal undertaken	4	The Licensee's Asset Management Procedure for Suspension of Operating Assets was evidenced. The procedure has been developed to be flexible so that it can be applied to a range of project cases, and provides a guide to the decision making behind the suspension of an asset as well as the process to suspend an asset. Any failures are flagged in operational incident reports and are also highlighted in the OPD, where they are discussed in weekly meetings. Reports are generated through scheduled maintenance and inspections, ensuring that any issues are promptly identified and addressed. Additionally, suspended equipment is tracked in Maximo, providing a comprehensive overview of the status and condition of all assets.	A	1
3.3	Disposal alternatives are evaluated	2	No assets were disposed of during the audit period. The Licensee provided evidence of their Asset Decommissioning Business Process Definition, which ensures decommissioned assets follow a set of procedures, including deactivation operations, archiving asset records, planning and execution of asset removal, re-purposing or recycling, regulatory notification, land rehabilitation and monitoring, and sale or divestiture.	A	1
3.4	There is a replacement strategy for assets	4	Refer to criteria 3.2 and 3.3 The AMP lists spares as part of the AMS for multiple core equipment items. A spares register is kept in the Maximo system, which includes descriptions, quantities, and storage locations. Replacements are predicted and overlaid with the spares register. The Licensee projects lifecycle costs of the asset as mentioned in criteria 1.5.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Adequacy Rating	AMS 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	The Licensee evidences their Operational Excellence Framework section 1.1 Operations Risk & Opportunities. The purpose of this document is to ensure strategic objectives of Operations are met. The framework outlines that the external and internal environment should be analysed in a structured process to identify emerging risks and opportunities. Identified risks are managed with appropriate controls and treatments in place. Recurring maintenance and maintenance strategies are managed in Maximo in conjunction with the PM (Preventative Maintenance) schedules, if a defect is discovered a CM (Corrective Maintenance) is flagged in Maximo for the faulty equipment to be fixed. Maintenance levels are tracked in operational performance dashboards which were witnessed and screen shots provided. Maintenance completion is also tracked in Pilbara Energy Systems O&M Weekly Meetings and monthly operational performance meetings assess changes to external and internal environment, the Licensee has provided minutes for weekly meeting for 2024 and 2025 as evidence. The Licensee's weekly meetings provide week on week assessment of maintenance, operations, resourcing and health & safety. Monthly look ahead is also discussed including upcoming leave, tasks and outages.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Adequacy Rating	AMS Performance Rating
4.2	Performance standards (availability of service, capacity, continuity, emergency response, etc.) are measured and achieved	1	The Licensee's Power Performance Report dashboard allows them to track performance of the asset. The dashboard breaks down performance of assets into trackable metrics including availability, Heat Rate as well as Generation and Gas Consumption. Availability tracks outages due to forced trips, planned outages, maintenance and forced outages. The Licensee's dashboard also shows an optimisation metric measured in the Operations Performance Dashboard. This metric can be seen underperforming during the audit period. Discussions with the Licensee that this metric is gas-centric and was originally made for existing the Licensee's assets. The Licensee acknowledged that separate Power Performance Dashboard provides a more accurate reflection of the asset performance which was witnessed during interviews and the metric is reported during monthly meetings. During the interviews It was witnessed through the dashboard that on an asset level availability was slightly lower during the audit period, this was mostly attributed to a major inspection on one of the frames which was significantly delayed. Commercially the Licensee has achieved the required availability through the audit period. The dashboard also provides a historical list of outages. List item provides details including the plant name, outage type, out of service time, return to service time along with any comments on outage and corrective actions taken. Trips are uploaded to Safeguard part the Licensee's Maximo environment. The Licensee has an Emergency Management Plan for Newman Power station (dated 13 February 2024) which provides a detailed description of emergency response procedures and how to classify emergencies as level 1 through 4. There were no reportable incidents for the duration of the audit period. Evidence of an evacuation drill was also provided, which was conducted on the 20/05/2025.	B	1
4.3	Compliance with statutory and regulatory requirements	2	The Licensee's Compliance Management Policy (dated 27 August 2024) outlines objectives and responsibilities for compliance management. Business Process Definition section 5.3 Regulatory Compliance (dated 29 July 2025) is also provided which describes the deliverables to ensure assets are operated in accordance with legislative obligations. The document also provides the KPIs for measuring compliance and criteria for each KPI to assess its performance. Vigilant software is a web-based platform that allows an organisation to manage and track compliance, regulatory and risk items. The Licensee provided samples of their Regulations, Obligations & Controls dashboard (managed in Vigilant) which shows the number of obligations per asset. Detailed views of each obligation and control provide details including description, status, obligation owner, last certified date and priority. Along with obligations and controls tracking it can be seen, Newman Power Station Annual Compliance reports have been provided to ERA as required.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Adequacy Rating	AMS Performance Rating
4.4	Service standard (customer service levels etc) are measured and achieved.	4	The PPA (Power Purchase Agreement) for FMG and Roy Hill are outlined in section 3.1 Basis of Operation and Maintenance Program in the AMP, in which the Contract Maximum Demand (CMD) for supply to Roy Hill and FMG as well as the asset end of life is provided. The completion of the PPAs is used as a basis to determine the required Long-Term Service Agreement (LTSA) for each asset to ensure they remain in operation for the extent of the PPAs. Service agreements are summarised in section 3.4 of the AMP. A Contractual Service Agreement exists between the Licensee and GE (General Electric), for conducting maintenance and inspections for Frame 6B turbines. LTSA exists with Rolls-Royce for the Trent Turbine. An LTSA between the Licensee and Clarke Energy includes cover for maintenance of Jenbacher units. Customer service levels are tracked in Power Performance dashboards (see item 4.2) and reported during monthly leadership meetings, service levels have been satisfactory throughout the audit period. Commercial and Operations Performance meetings are held with the customers (FMG and Roy Hill) which discuss safety, asset performance, outages, summary of good and bad news. Samples of weekly operation & maintenance meetings minutes have also been provided (see item 4.1), which include discussions on the current state of operations. It should be noted metrics such as Integrity, Financial Performance, Optimisation and Maintenance Execution are shown as underperforming in the asset health dashboard, this is due to misalignment in balance sheets and sequencing issues resulting from the transition from Ellipse to Maximo. These metrics are in fact performing well and accurately reported during monthly meetings. The licensee is in the process of addressing the misalignment and some metrics such as Financial Performance were back on target during the audit period.	B	1
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	See Item 4.4 with reference to PPAs for FMG and Roy Hill being outlined in section 3 of the AMP. All operational procedures are linked in Maximo, auditors witnessed a workorder where the procedures to conduct maintenance had been detailed within the work order. Internal reporting of outages planned and unplanned are document in the POD (Plant Outage Database), maintenance plans can then be linked to these outages. The NPS AMP section 3 outlines the Operation and Maintenance Regime. Which provides a general overview of operations and a high-level look at maintenance procedures conducted for assets. The AMP also references APA Maintenance Standards along with APA Asset Management Policy.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Adequacy Rating	AMS Performance Rating
5.2	Risk management is applied to prioritise operations tasks	2	Discussions with the Licensee's personnel during interviews found that risk in inherently linked to the prioritisation of tasks through Maximo. The Licensee has detailed policy and procedures describing how risk management is performed. The Licensee's Risk Management System – Procedures is evidenced which provides generalised risk management approach for all operations to assess risks and risk management activities. Management of emerging risks is also considered in which depending on the predicted impact and timeframe of the risk they can be assigned as: • Act (3-5 years, Level 4 and 5) • Monitor (3–5 years, Level 3 / >5 years, Level 4 and 5) • Do Nothing (>5 years, Level 3) Work orders also have priority ratings assigned when they are created. Priority ratings determine who is notified when the work order is created as well as influence how work orders are prioritised. The priority rating ranges from 1 to 5 with 1 being the highest priority. The Priority designation was witnessed in a workorder being created, samples from within Maximo were also provided showing the allocated priority for different work orders.	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	Maximo is used as a live asset register; it tracks spare quantities and can create purchase orders to ensure adequate spares are maintained. Spares are assigned to work orders and then tagged out by maintenance staff which is then reflected in the inventory. Auditors witnessed the NPS inventory register while onsite. The inventory showed detailed list of items sored at NPS including description, balance of items and location. Auditors also witnessed the storerooms showing the that spares are well organised and have individual barcodes and item numbers. Asset locations are tracked in Maximo, samples show asset description, operational status, location and links to additional asset details tracked within Maximo. Asset condition isn't directly kept within the asset register, but historical and planned inspections are kept under job plans which are linked to individual assets. Job plans also provide location and status details of the asset. The Licensee conducts regular inspections on assets to ensure operability this can be seen in weekly O&M meeting minutes, and the job plans for assets.	A	1

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

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

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Adequacy Rating	AMS Performance Rating
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	The Licensee evidences their Major Maintenance Management Standard, the standard is in place to provide a comprehensive way to manage maintenance on critical assets to mitigate unplanned outages. The process for managing major maintenance starts with long range plan then the core processes of Concept, Development, Planning, Delivery and Closeout. The process shows that risk, high level budgeting and resource planning are considered at an early stage which helps the Licensee conduct major maintenance events efficiently. The Licensee also provides the Asset Lifecycle Planning document which is part of the long-range planning stage outlined in the Major Maintenance Management Standard. The plan helps develop a 20-year look ahead of asset activities, which link back to the Licensee's Operational Excellence Standard to ensure accountable teams plan activities appropriately. See item 4.4 where the AMP summarises the service agreements made with OEMs for the gas turbines and Jenbacher units, the AMP also documents major maintenance history for each of the assets at NPS. The Licensee's Life Cycle Plan Interface Tool shows planned maintenance events and states which core process stage the maintenance is at, as described in the Major Maintenance Management Standard. The tool also provides the predicted budget for each financial year. An example workorder within Maximo was also witnessed showing the procedure required to conduct works. Interview discussions also stated that work orders will either have a standard procedure attached (for common maintenance items) or will have the required procedure described within the work order itself.	A	1
6.2	Regular inspections are undertaken of asset performance and condition	2	The O&M Weekly Meeting minutes show the planning and execution of multiple inspections throughout the audit period some mentioned include pressure vessel inspections and generator inspections. Multiple equipment tests can be tracked in O&M meetings including emissions testing, fire system testing and CO2 dump testing. Planned outages are tracked within the Licensee's Planned Outage Database (POD). Recurring planned outages for inspections could be seen in the calendar view with the POD, we witnessed the previously completed inspections as well as the upcoming inspects on various assets. The POD also provides the details around the outages including outage date and time, the return to service time, incident number and the workorder number. Work Order Completion dashboard was also witnessed showing the historical list of completed work orders for the Newman assets. The list showed that multiple inspections have taken place not only on major assets but safety equipment and site security infrastructure.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Adequacy Rating	AMS Performance Rating
6.3	Maintenance plans (emergency, corrective, and preventative) are documented and completed on schedule	2	Some improvements discussed during interviews suggested the transition from Ellipse (management system used by Alinta) to Maximo require improvements on sequencing. The issue arose due to Ellipse working based on scheduled dates whereas Maximo works on target dates, meaning all planned work orders would need to be rescheduled to re-align with planned outages. This issue resulted in unfavourable performance for maintenance execution and integrity metrics showing on the Licensee's Operations Performance Dashboard. Based on the O&M meetings, compliance with scheduled work orders was shown to be much lower according to the dashboard. A planner's report mentioned in the O&M meeting dated 29th June 2025 stated that actual compliance was sitting above 90%. Based on the interview discussions maintenance is performing well at the shortfall of man hours being attributed to re-sequencing planned maintenance. See item 6.2 with reference to the POD, which is used for planned and forced outages in which inspections and maintenance could be performed. POD also provides tracking of how long assets were out of service during the inspections and maintenance. The order completion register also shows completion of maintenance on Newman assets.	B	1
6.4	Failures are analysed and operational / maintenance plans adjusted where necessary	2	No major incidents or failures have occurred at NPS during the audit period. The Licensee utilizes their Operational Incidents dashboard to track incidents. The dashboard provides high level details on each incident including the date the incident occurred, risk, asset affected and the status. The Licensee evidences their Incident Management Standard. The standard describes how to classify an incident emergency response; 1 being minimal through to 5 being catastrophic. The standard also describes a means of classifying the incidents effect on HSEH (Health Safety Environment & Heritage), technology and enterprise security. Activities related to incident management are also allocated to job roles, depending on the activity the job role would be responsible, accountable, support, consulted or informed about the activity. An activity can come under Crisis Management, Incident Management or Emergency management and can consist of creating a management plan or performance reporting for example. The standard also describes that part of continuous improvement identifying root causes of the incident are investigated and if improvements can be made, actions are made and tracked in the Licensee's enterprise technology system. O&M meeting minutes show investigations occurring on for various parts of the asset throughout the audit period. During the O&M meeting on the 6th April 2025 an investigation into Start Diesel Governor issues can be seen for example.	A	1
6.5	Risk management is applied to prioritise maintenance tasks	4	See item 5.2 with reference to the Licensee's priority designation to work orders and risk management.	A	1
6.6	Maintenance costs are measured and monitored	4	See item 5.4, with reference to costs originating in Maximo then being processed by Workday.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Adequacy Rating	AMS 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	See criteria 5.6 Training provided by the Licensee helps users navigate and operate various systems associated with the business – for example, Maximo and Workday, which are key pieces of software that form a large part the AMS. The Licensee provides standards, user guides and SharePoint support hubs to help users comply with business operations. Evidence was provided of guides and the support hub for the Workday system, as well as a manual for the Redeye EDMS. The Licensee's Enterprise Security Policy, Information Security Classification and Handling Standard, and Physical Access Management Standard are examples of standards that were provided as evidence. These standards clearly state their purpose, scope, relevant key contacts, and a detailed description of how to apply the standard.	A	1
7.2	Input controls include suitable verification and validation of data entered into the system	2	Part of the Licensee's Operational Excellence Framework is the Asset Data and Records Business Process Definition; the purpose of this document is to ensure all information and data is complete, correct, current, and available to help maintain assets. It covers the requirements to ensure data is accurate and current. It is also stated that fit-for-purpose systems will be used for accurate generation, collection, storage and preservation of all required data. The Maximo system is used for generating and storing asset data, and the Licensee has a robust process for validating data, with an approval flow tied to adding or changing data, and a dedicated team for ensuring data is accurate. Different data access levels are granted to staff depending on their role (see criteria 7.3), with associated mandatory trainings as described in criteria 7.1. Work order requests are raised by operational staff, and go through an approvals process involving operations management.	A	1
7.3	Security access controls appear adequate, such as passwords	2	The Maximo Role Security Groups spreadsheet was evidenced, demonstrating the different data access types assigned to each job role within the Maximo system. Two-factor authentication is required to access different systems. The Information Security Classification and Handling Standard was evidenced, detailing how different types of data are classified and managed. The standard describes requirements for handling the organisation's information, confidentiality and IT practises. Also provided was the Licensee's Acceptable Use of Technology Standard, which defines the use principles all staff must adhere to when interacting with the Licensee's devices and network. This includes rules regarding reporting responsibilities, the transfer of data to and from third parties, remote working, monitoring and surveillance, and the acceptable use of information, technology, and storage media belonging to the Licensee.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Adequacy Rating	AMS Performance Rating
7.4	Physical security access controls appear adequate	2	The Licensee's Physical Access Management Standard was evidenced, which discusses the physical controls put in place to restrict physical access to the Licensee's assets. Security controls were also witnessed onsite. Physical access to the Newman Power Station (NPS) site requires passing through secure perimeter fencing, cameras and lockable gates. The switchrooms can only be accessed with an operator key, and the power station is manned 24/7. Furthermore, this asset site is located within the externally owned Mt Whaleback Minesite, which has its own security including access-card checkpoints. The towers for the transmission line between NPS and Roy Hill Mine are fitted with anti-climb protections.	A	1
7.5	Data backup procedures appear adequate, and backups are tested	4	See criteria 7.2 The Licensee's Service Continuity Management Standard was evidenced, which covers how they will protect their IT and OT environments from incidents, failures and disruptions. It details requirements for Service Continuity Plans, including procedures for creating, storing, maintaining and testing data backups. Per the standard, Service Continuity Plans must be tested, including the testing of data backups, every one or two years depending on the system category, and a review for compliance with recovery targets must also take place following any backup restoration. The IT Owner is responsible for ensuring accurate retention and disposal of backups.	A	1
7.6	Computations for licensee performance reporting are accurate	4	Dashboards receive data directly from the software (such as Maximo) that processes the data to ensure system monitoring is accurate. The Licensee's Power Performance Report Calculation Document was evidenced, which provides a breakdown of the calculations for calculating availability, generation and gas consumption, and heat rate statistics. Technicians can query data in Maximo if they believe it may be incorrect.	A	1
7.7	Management reports appear adequate for the licensee to monitor licence obligations	4	See criteria 4.2 and 6.1 Annual compliance reports for FY23, FY24, and FY25 were also evidenced.	A	1
7.8	Adequate measures to protect asset management data from unauthorised access	4	See criteria 7.2, 7.3 and 7.4	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Adequacy Rating	AMS 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 criteria 1.8 and 5.2 The Licensee has provided documentation of their Risk Management Framework (RMF), including a Risk Management Policy, Risk Management Procedure and Risk Management Standard.	A	1
8.2	Risks are documented in a risk register and treatment plans are implemented and monitored	2	See criteria 1.8, 5.2 and 8.1 Risks are recorded in the Vigilant system; screenshots of the Vigilant risk register have been provided by the Licensee. These show that risks can be sorted on a per asset basis, and that details shown include the assigned risk ID, approval status, risk title and residual risk rating. Additionally, trends in the risks are monitored and can be indicated as increasing, decreasing or steady. Actions and controls for each risk are also recorded in Vigilant, and each risk, action and control is assigned an owner. Any risks needing review or action can be seen in Vigilant, and the system will automatically raise notifications to relevant personnel. Risks can also be seen in the OPD, which gives a clear overview of total, reviewed, overdue and upcoming risks for the asset, and is reviewed in monthly meetings. Per the Licensee's risk management process, owners of a risk must ensure that it is adequately managed by the nominated controls or that control gaps are identified and escalated, and must maintain a plan of actions and mitigation treatments if the risk sits outside the targets defined in the RMF. If the target risk cannot be achieved, the owner must provide information on why this is, and – depending on the level of the risk – different levels of personnel are assigned to manage and approve whether to accept this residual risk. This is done through the Vigilant system as described above.	A	1
8.3	Probability and consequences of asset failure are regularly assessed	4	See criteria 1.7 and 1.8	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Adequacy Rating	AMS Performance Rating
9	**Contingency Planning**			**A**	**2**
9.1	Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks	2	The Licensee has well-established systems for responding to incidents; these are categorised into emergency response, business continuity management, or crisis management, based on the level of severity and type of the incident. The Enterprise Resilience Policy defines the principles, objectives and high-level roles and responsibilities for each of these categories. The Licensee's structured approach for business continuity is documented in their Business Continuity Management Business Process Definition and their Business Continuity Handbook. The handbook defines the procedures involved in preparing, maintaining, activating, and executing business continuity plans, including detailed requirements for creating, reviewing, and testing these plans. The Licensee provided an extract of the Business Continuity Plan for NPS. This details the continuity strategies for identified risks, including impact rating, maximum allowable outage, and response and communication strategies. It also states the requirement for major components of the plan to be tested on an annual basis through one or more of several specified test regimes. An enterprise Emergency Response Management Plan was evidenced, which provides a general procedure to be followed in response to emergency incidents that threaten to disrupt energy supply or to harm people, environment or property, and that call for immediate action. It includes documentation of incident level classification, emergency threats and scenarios, and the emergency response process and phases. It does not include detailed response procedures for specific incidents; this is covered by the Licensee's Operations Emergency Response Manual, which provides specific information for field-based operations personnel, including a summary of consolidated threats and associated comprehensive emergency management and action plans. A site Emergency Management Plan was also evidenced, which documents response procedures for specific emergency scenarios, as well as site-specific details and emergency contacts. An evacuation drill for NPS was conducted on 20th May 2025, and emergency response training was delivered on 18th March and 1st April 2025. The Licensee provided attendance records for these events, as well as an excerpt from their training matrix, which records the training required and completed by site personnel. They have also described a new emergency management team Exercise Walkthrough template that is being introduced to provide structure and prompts for short, informal discussions to test team understanding, and have confirmed that an emergency response exercise is scheduled for November 2026 for NPS.	A	2

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

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

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

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Adequacy Rating	AMS Performance Rating
12	**Review of AMS** The Asset Management System is regularly reviewed and updated.			**B**	**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 criteria 1.1 and 1.9 The AMP is reviewed annually, and – as described in criteria 1.9 – the review history evidenced in the AMP demonstrates a satisfactory frequency of reviews. Minor improvement is required to ensure that these reviews are effective as – per criteria 1.1 observations – the current AMP references the Ellipse system which is no longer in use. The Licensee's policy, procedure and standard documents all have revision history recorded. Per criteria 1.9, the AMS and Asset Management Planning Business Process Definitions are reviewed every three years, and the revision history evidenced in these documents is satisfactory.	B	1
12.2	Independent reviews (e.g. internal audit) are performed of the Asset Management System	2	The Licensee's AMS Business Process Definition references the requirement of regular reviews as per the Operational Excellence Framework, and the Business Process Review Procedure details the triggers and procedures for both internal and external reviews of the licensee's Business Processes. Annual compliance reports are provided to the Economic Regulation Authority (ERA); these reports provide an overview of the Licensee's adherence to regulatory requirements. The Licensee also provided their Integrated Assurance Asset Management Framework Process Definition, which requires internal audits for independent assurance. The Licensee conducts internal audits of their AMS in accordance with ERA requirements.	A	1

8. Confirmation of the Audit and Review

I confirm that the audit and review carried for the Licensee on 13 November 2025 – 23 January 2026 and recorded in this report is an accurate presentation of our findings and opinions.

Marcel Oosthuizen

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Appendix A

License Performance Audit

Table 15 License Performance Audit

Compliance Manual No	Obligation under Licence conditions	Description	Type (1, 2 or NR)	Audit Priority (1=highest, 5=lowest)	Compliance rating						Control rating					
					1	2	3	4	N/R	Compliance observation	A	B	C	D	N/P	Control observation
Electricity Industry Act – Licence conditions and obligations																
101	Electricity Industry Act, section 13(1)	A licensee must provide the ERA with a performance audit conducted by an independent expert acceptable to the ERA, not less than once every 24 months (or any longer period that the ERA allows).	2	4	✓					Assurance Advisory Group (AAG) prepared the 2022 Performance Audit report in April 2023. With the ERA's approval, a 36-month audit period was agreed, and GHD was appointed to undertake APA's performance audit for the period 1 October 2022 to 30 September 2025. Therefore, it is concluded that APA complied with this obligation.	✓					Assurance Advisory Group (AAG) prepared the 2022 Performance Audit report in April 2023. With the ERA's approval, a 36-month audit period was agreed, and GHD was appointed to undertake APA's performance audit for the period 1 October 2022 to 30 September 2025. Therefore, it is concluded that adequate controls were in place.
102	Electricity Industry Act, section 14(1)(a)	A licensee must provide for an asset management system.	2	4	✓					Through discussions with APA's Regulatory Compliance Manager, Head of Power Operations, and observation of their asset management plans and review of the AMS, we determined that during the audit period APA had provided for a functioning asset management system. Therefore, it is concluded that APA complied with this obligation.	✓					Through discussions with APA's Regulatory Compliance Manager, Head of Power Operations, and observation of their asset management plans and review of the AMS, we determined that during the audit period APA had provided for a functioning asset management system. Therefore, it is concluded that adequate controls were in place.
103	Electricity Industry Act, section 14(1)(b)	A licensee must notify details of the asset management system and any substantial changes to it to the ERA.	2	4	✓					The previous owner Alinta's Asset Management Plan was effective during the audit period and is currently being updated and brought across to the Licensee's documentation standard. APA notified the ERA of the organisational restructure from Alinta to APA. Therefore, it is concluded that the Licensee complied with this obligation.	✓					The previous owner Alinta's Asset Management Plan was effective during the audit period and is currently being updated and brought across to the Licensee's documentation standard. APA notified the ERA of the organisational restructure from Alinta to APA.
104	Electricity Industry Act, section 14(1)(c)	A licensee must provide the ERA with a report by an independent expert about the effectiveness of its asset management system every 24 months, or such longer period as determined by the ERA.	2	4	✓					Assurance Advisory Group (AAG) prepared the 2022 asset management system review report in April 2023. With the ERA's approval, a 36-month audit period was agreed, and GHD was appointed to undertake APA's performance audit for the period 1 October 2022 to 30 September 2025. Therefore, it is concluded that APA complied with this obligation.	✓					Assurance Advisory Group (AAG) prepared the 2022 asset management system review report in April 2023. With the ERA's approval, a 36-month audit period was agreed, and GHD was appointed to undertake APA's performance audit for the period 1 October 2022 to 30 September 2025. Therefore, it is concluded that adequate controls were in place.
105	Economic Regulation Authority (Licensing Funding) Regulations 2014	A licensee must pay the prescribed licence fees to the ERA according to clauses 6, 7 and 8 of the Economic Regulation Authority (Licensing Funding) Regulations 2014.	2	4	✓					APA has provided copies of invoices that demonstrate they have paid the prescribed licence fees by their due date during the audit period. Evidence supplied for EIRL6 include tax invoices for payments made to the ERA as well as customer statements. Therefore, it is concluded that APA complied with this obligation.	✓					APA has provided copies of invoices that demonstrate they have paid the prescribed licence fees by their due date during the audit period. Evidence supplied for EIRL6 include tax invoices for payments made to the ERA as well as customer statements. Therefore, it is concluded that adequate controls were in place.
106	Electricity Industry Act, section 31(3)	A licensee must take reasonable steps to minimise the extent, or duration, of any interruption, suspension or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause.	NR	5	✓					Through discussions with APA's Regulatory Compliance Manager, Head of Power Operations, it was determined that APA has controls in place to minimise the extent, or duration, of any interruptions, suspension, or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause. These include the APA Emergency Response Management Plan and Business Continuity Management Standard. Therefore, it is concluded that APA complied with this obligation.	✓					• Through discussions with APA's Regulatory Compliance Manager, Head of Power Operations, it was determined that APA has controls in place to minimise the extent, or duration, of any interruptions, suspension, or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause. These include the APA Emergency Response Management Plan, Business Continuity Management Standard and Business Continuity Plans (BCPs) The BCP for operations and maintenance was examined and included steps such as: Monitoring when/how/where incidents happened and who they happened to • Immediate actions that need to occur following an incident including confirmation of the employee's welfare, identification of affected areas and use of risk matrix

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																• The lifecycle of incident management including response, continuity, recovery and review Therefore, it is concluded that adequate controls were in place.
107	Electricity Industry Act, section 41(6)	A licensee must pay the costs of taking an interest in land or an easement over land.	2	4					✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that APA had not acquired an interest in land or an easement over land during the audit period.					✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that APA had not acquired an interest in land or an easement over land during the audit period.
Electricity licences – Licence conditions and obligations																
119	Distribution Licence, condition 4.3.1Generation Licence, condition 4.3.1Integrated Regional Licence, condition 4.3.1Retail Licence, condition 4.3.1 Transmission Licence, condition 4.3.1	A licensee and any related body corporate must maintain accounting records that comply with the Australian Accounting Standards Board Standards or equivalent International Accounting Standards.	2	4	✓					APA has provided annual reports and methodology that shows compliance to the Australian Accounting Standards Board Standards. Compliance reports were provided for each year within the audit period. The reports state that they have prepared in accordance with Australian Accounting Standards Board Standards. Therefore, it is concluded that APA complied with this obligation.	✓					APA has provided annual reports and methodology that shows compliance to the Australian Accounting Standards Board Standards. Compliance reports were provided for each year within the audit period. The reports state that they have prepared in accordance with Australian Accounting Standards Board Standards. Therefore, it is concluded that adequate controls were in place.
120	Distribution Licence, condition 5.2.4Generation Licence, condition 5.2.4Integrated Regional Licence, condition 5.2.4Retail Licence, condition 5.2.4Transmission Licence, condition 5.2.4	A licensee must comply with any individual performance standards prescribed by the ERA.	2	4					✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there were no individual performance standards prescribed by the ERA during the audit period.					✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there were no individual performance standards prescribed by the ERA during the audit period.
121	Distribution Licence, condition 5.3.2Generation Licence, condition 5.3.2Integrated Regional Licence, condition 5.3.2Retail Licence, condition 5.3.2Transmission Licence, condition 5.3.2	A licensee must comply, and require its auditor to comply, with the ERA's standard audit guidelines for a performance audit.	2	4	✓					GHDs performance audit plan for the period 1 October 2022 to 30 September 2025 have been approved by the ERA. The audits have been conducted as per the audit plan. Therefore, it is concluded that APA complied with this obligation.	✓					GHDs performance audit plan for the period 1 October 2022 to 30 September 2025 have been approved by the ERA. The audits have been conducted as per the audit plan. Therefore, it is concluded that adequate controls were in place.
122	Distribution Licence, condition 5.1.5Generation Licence, condition 5.1.5Integrated Regional Licence, condition 5.1.5Transmission Licence, condition 5.1.5	A licensee must comply, and must require the licensee's expert to comply, with the relevant aspects of the ERA's standard audit guidelines for an asset management system review.	2	4	✓					GHDs asset management system review plan for the period 1 October 2022 to 30 September 2025 have been approved by the ERA. The review has been conducted as per the audit plan. Therefore, it is concluded that APA complied with this obligation.	✓					GHDs asset management system review plan for the period 1 October 2022 to 30 September 2025 have been approved by the ERA. The review has been conducted as per the audit plan. Therefore, it is concluded that adequate controls were in place.
123	Distribution Licence, condition 4.4.1Generation Licence, condition 4.4.1Integrated Regional Licence, condition 4.4.1Retail Licence, condition 4.4.1Transmission	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	2	4					✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there had been no significant change in circumstances which would affect APA's ability to meet their obligations.					✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there had been no significant change in circumstances which would affect APA's ability to meet their obligations.

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	Licence, condition 4.4.1	may affect the licensee's ability to meet its obligations.														
124	Distribution Licence, condition 4.5.1Generation Licence, condition 4.5.1Integrated Regional Licence, condition 4.5.1Retail Licence, condition 4.4.1Transmission Licence, condition 4.5.1	A licensee must provide the ERA, in the manner prescribed, with any information that the ERA requires in connection with its functions under the Electricity Industry Act.	2	4					✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there was no request from the ERA to provide additional information outside of annual reporting and standard fees in connection with its functions under the Electricity Industry Act.					✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there was no request from the ERA to provide additional information outside of annual reporting and standard fees in connection with its functions under the Electricity Industry Act.
125	Distribution Licence, condition 3.8.1 and 3.8.2Generation Licence, condition 3.8.1 and 3.8.2Integrated Regional Licence, condition 3.8.1 and 3.8.2Retail Licence, condition 3.8.1 and 3.8.2Transmission Licence, condition 3.8.1 and 3.8.2	A licensee must publish any information as directed by the ERA to publish, within the timeframes specified.	2	4					✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that APA were not required to publish any information as directed by the ERA during the audit period.					✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that APA were not required to publish any information as directed by the ERA during the audit period.
126	Distribution Licence, condition 3.7.1Generation Licence, condition 3.7.1Integrated Regional Licence, condition 3.7.1Retail Licence, condition 3.7.1Transmission Licence, condition 3.7.1	All notices must be in writing, unless otherwise specified.	2	4	✓					Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was stated that all verbal communication between the ERA and APA was followed up via email. All communication between the ERA and APA has been saved for record keeping.. Therefore, it is concluded that APA complied with this obligation. Note, conversations between the ERA and APA not captured in writing cannot be validated.	✓					Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was stated that all verbal communication between the ERA and APA was followed up via email. All communication between the ERA and APA has been saved for record keeping. Therefore, it is concluded that adequate controls were in place. Note, conversations between the ERA and APA not captured in writing cannot be validated.
Electricity licences – Licence conditions and obligations																
317	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.	2	4	✓					The licensee has been compliant to this obligation during the audit period as there are no other code participants within the network due to the network being privately owned. Formal arrangements with customers are managed through PPAs.	✓					There are no other code participants within the network due to the network being privately owned. Formal arrangements with customers are managed through PPAs. The APA ringfencing procedure has further been provided which shows the group's separation of entities, personnel, accounts and information, contracts and pricing, as well as confidentiality. Hence this obligation has been assessed as sufficiently controlled.
318	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.	2	4	✓					As per obligation 317, the licensee has been compliant to this obligation during the audit period as there are no other code participants within the network due to the network being privately owned. Formal arrangements with customers are managed through PPAs.	✓					As per obligation 317, there are no other code participants within the network due to the network being privately owned. Formal arrangements with customers are managed through PPAs. The APA ringfencing procedure has further been provided which shows the group's separation of entities, personnel, accounts and information, contracts and pricing, as well as confidentiality. Hence this obligation has been assessed as sufficiently controlled.
319	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	2	4		✓				This obligation has been raised as a breach in the previous 2022 audit as well as in ERA's annual compliance reports. A recommendation from the previous audit (ref: 1/2022) has been made for the licensee to establish a plan and procedure for		✓				This obligation has been raised as a breach in the previous 2022 audit as well as in ERA's annual compliance reports. A recommendation from the previous audit (ref: 1/2022) has been made for the licensee to establish a plan and procedure for demonstrating how it will meet the metering

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		any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act.								demonstrating how it will meet the metering code and the relevant clauses of the PPA. These recommendations included: • Establishing a metering management plan (which better captures all the licensee's metering obligations in one place); and/or • Building on the PPA and interconnection agreement procedure (to better establish the required obligations of the licensee under the code) In ERA's 2025 Annual Compliance Report and through audit interviews, APA will be completing a metering management plan to incorporate the technical requirements of the metering code relevant to its metering operations. As he metering management plan was not in effect during the audit period, the compliance rating for this obligation is currently rated a 2.						code and the relevant clauses of the PPA. These recommendations included: • Establishing a metering management plan (which better captures all the licensee's metering obligations in one place); and/or • Building on the PPA and interconnection agreement procedure (to better establish the required obligations of the licensee under the code) In ERA's 2025 Annual Compliance Report and through audit interviews, APA will be completing a metering management plan to incorporate the technical requirements of the metering code relevant to its metering operations. As he metering management plan was not in effect during the audit period, the control rating for this obligation is currently rated a B.. Recommendation 1/2025 applies.
320	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.	2	4		✓				This obligation has been raised as a breach in the previous 2022 audit as well as in ERA's annual compliance reports. A recommendation from the previous audit (ref: 1/2022) has been made for the licensee to establish a plan and procedure for demonstrating how it will meet the metering code and the relevant clauses of the PPA. These recommendations included: • Establishing a metering management plan (which better captures all the licensee's metering obligations in one place); and/or • Building on the PPA and interconnection agreement procedure (to better establish the required obligations of the licensee under the code) In ERA's 2025 Annual Compliance Report and through audit interviews, APA will be completing a metering management plan to incorporate the technical requirements of the metering code relevant to its metering operations. As he metering management plan was not in effect during the audit period, the compliance rating for this obligation is currently rated a 2.		✓				This obligation has been raised as a breach in the previous 2022 audit as well as in ERA's annual compliance reports. A recommendation from the previous audit (ref: 1/2022) has been made for the licensee to establish a plan and procedure for demonstrating how it will meet the metering code and the relevant clauses of the PPA. These recommendations included: • Establishing a metering management plan (which better captures all the licensee's metering obligations in one place); and/or • Building on the PPA and interconnection agreement procedure (to better establish the required obligations of the licensee under the code) In ERA's 2025 Annual Compliance Report and through audit interviews, APA will be completing a metering management plan to incorporate the technical requirements of the metering code relevant to its metering operations. As he metering management plan was not in effect during the audit period, the control rating for this obligation is currently rated a B. Recommendation 1/2025 applies.
321	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.	2	4					✓	Based on interviews, confirmed via site visits, it is understood that all meters related to this license are accumulation meters. As such this obligation is not applicable to the licensee's operations during the audit period. It should be noted that a non-compliance was reported to the ERA in the 2024 and 2025 annual compliance report for this obligation. While APA have developed an action plan in response to this non-compliance, the finding still stands that this obligation is not applicable to the licensee's operation the site only has accumulation meters.					✓	Based on interviews, confirmed via site visits, it is understood that all meters related to this license are accumulation meters. As such this obligation is not applicable to the licensee's operations during the audit period.

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322	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.	2	4	✓					Audit interviews were conducted with the Head of Power Operations and Regulatory Compliance Manager. These discussions revealed that metering data can be downloaded in half-hourly intervals. A sample of this metering data downloaded via Pi, as well as corresponding invoicing calculations was provided. This obligation has been assessed as compliant.	✓					Audit interviews were conducted with the Head of Power Operations and Regulatory Compliance Manager. These discussions revealed that metering data can be downloaded in half-hourly intervals. A sample of this metering data downloaded via Pi, as well as corresponding invoicing calculations was provided. This obligation has been assessed as sufficiently controlled.
323	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.	2	4					✓	Audit interviews conducted with the Head of Power Operations and Regulatory Compliance Manager revealed that no bi-directional electricity flows occurred in the network where the metering point could not record such flows. Hence this obligation has been rated as non-applicable.					✓	Audit interviews conducted with the Head of Power Operations and Regulatory Compliance Manager revealed that no bi-directional electricity flows occurred in the network where the metering point could not record such flows. Hence this obligation has been rated as non-applicable.
324	Electricity Industry Metering Code, clause 3.3B	If a user is aware of bi-directional electricity flows at a metering point that was not previously subject to a bi-directional flows or any changes in a customer's or user's circumstances in a metering point that will result in bi- directional flows, the user must notify the network operator within 2 business days.	2	4					✓	Audit interviews conducted with the Head of Power Operations and Regulatory Compliance Manager revealed that there was no awareness of any bi-directional electricity flows that was previously not subject to bi-directional flows. Hence this obligation has been rated as non-applicable.					✓	Audit interviews conducted with the Head of Power Operations and Regulatory Compliance Manager revealed that there was no awareness of any bi-directional electricity flows that was previously not subject to bi-directional flows. Hence this obligation has been rated as non-applicable.
325	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: the net electricity production transferred into the network; and the net electricity consumption transferred out of the network.	2	4	✓					Audit interviews conducted with the Head of Power Operations and Regulatory Compliance Manager revealed that every meter was an accumulation meter. However bi-directional electricity flow did not occur during the audit period. This obligation has been assessed as compliant.	✓					Audit interviews conducted with the Head of Power Operations and Regulatory Compliance Manager revealed that every meter was an accumulation meter. However bi-directional electricity flow did not occur during the audit period. This obligation has been assessed as sufficiently controlled.

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326	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.	2	4		✓				This obligation has been raised as a breach in the previous 2022 audit as well as in ERA's annual compliance reports. Based on the following: - Audit interviews conducted with the Head of Power Operations and Regulatory Compliance Manager - Metering inspections during a site visit It is understood that all connection points are metered in accordance with relevant PPAs, and there are no Type 7 metering installations. While the meters are operated to the satisfaction of their customers, the newest meters installed still do not have a physical display as required under Clause 3.5(2)(b) of the Code. As such a compliance rating of 2 is given as the this is minor effect to customers and other parties. Seeing as the metering installations are: - Operated to the satisfaction of the licensee's customers - Able to be read remotely via a remote connection for a user with the appropriate credentials and the licensee's operating centre (verified on site) In addition, it would be impractical and not cost effective. As such, no recommendation will be presented for this obligation. It is also understood that the licensee intend to not comply with this obligation on the basis of practicality and cost.		✓				This obligation has been raised as a breach in the previous 2022 audit as well as in ERA's annual compliance reports. A recommendation from the previous audit (ref: 1/2022) has been made for the licensee to establish a plan and procedure for demonstrating how it will meet the metering code and the relevant clauses of the PPA. These recommendations included: • Establishing a metering management plan (which better captures all the licensee's metering obligations in one place); and/or • Building on the PPA and interconnection agreement procedure (to better establish the required obligations of the licensee under the code) In ERA's 2025 Annual Compliance Report and through audit interviews, APA will be completing a metering management plan to incorporate the technical requirements of the metering code relevant to its metering operations. As the metering management plan was not in effect during the audit period, the control rating for this obligation is currently rated a B. In the event that APA intend to continue to not comply with this obligation on the basis of practicality, this should be reflected in a consolidated metrology procedure.
327	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.	2	4		✓				This obligation has been raised as a breach in the previous 2022 audit as well as in ERA's annual compliance reports. A recommendation from the previous audit (ref: 1/2022) has been made for the licensee to establish a plan and procedure for demonstrating how it will meet the metering code and the relevant clauses of the PPA. These recommendations included: • Establishing a metering management plan (which better captures all the licensee's metering obligations in one place); and/or • Building on the PPA and interconnection agreement procedure (to better establish the required obligations of the licensee under the code) In ERA's 2025 Annual Compliance Report and through audit interviews, APA will be completing a metering management plan to incorporate the technical requirements of the metering code relevant to its metering operations. As he metering management plan was not in effect during the audit period, the compliance rating for this obligation is currently rated a 2.		✓				This obligation has been raised as a breach in the previous 2022 audit as well as in ERA's annual compliance reports. A recommendation from the previous audit (ref: 1/2022) has been made for the licensee to establish a plan and procedure for demonstrating how it will meet the metering code and the relevant clauses of the PPA. These recommendations included: • Establishing a metering management plan (which better captures all the licensee's metering obligations in one place); and/or • Building on the PPA and interconnection agreement procedure (to better establish the required obligations of the licensee under the code) In ERA's 2025 Annual Compliance Report and through audit interviews, APA will be completing a metering management plan to incorporate the technical requirements of the metering code relevant to its metering operations. . As he metering management plan was not in effect during the audit period, the control rating for this obligation is currently rated a B. Recommendation 1/2025 applies.

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328	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.	2	4	✓					Audit interviews conducted with the Head of Power Operations and Regulatory Compliance Manager confirmed that metering points are connected 'right on top of' connection points. This obligation has been assessed as compliant.	✓					Audit interviews conducted with the Head of Power Operations and Regulatory Compliance Manager confirmed that metering points are connected 'right on top of' connection points. This obligation has been assessed as sufficiently controlled.
329	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.	2	4	✓					Audit interviews conducted with the Head of Power Operations and Regulatory Compliance Manager revealed that this obligation was covered under PPAs. These PPAs were provided as evidence during the audit period. This obligation has been assessed as compliant.	✓					Audit interviews conducted with the Head of Power Operations and Regulatory Compliance Manager revealed that this obligation was covered under PPAs. These PPAs were provided as evidence during the audit period. This obligation has been assessed as sufficiently controlled.
330	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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager revealed that they were not aware of any metering installations that were non-compliant with the code. Hence this obligation has been rated as non-applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager revealed that they were not aware of any metering installations that were non-compliant with the code. Hence this obligation has been rated as non-applicable.
331	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.	2	4					✓	Discussion with the Head of Power Operations and Regulatory Compliance Manager revealed that all communications systems were internal. Hence this obligation has been rated as non-applicable.					✓	Discussion with the Head of Power Operations and Regulatory Compliance Manager revealed that all communications systems were internal. Hence this obligation has been rated as non-applicable.
332	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.	2	4	✓					Discussion with the Head of Power Operations and Regulatory Compliance Manager revealed that meters were secured in HV rooms, with access requiring operator locks. This obligation has been assessed as compliant.	✓					Discussion with the Head of Power Operations and Regulatory Compliance Manager revealed that meters were secured in HV rooms, with access requiring operator locks. This obligation has been assessed as sufficiently controlled.
333	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.	2	4	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that metering installations meet the requirements associated with the metering type. This obligation has been assessed as compliant.	✓					Regular tests reports and calibration tests are conducted on meters. These tests reports include testing of meter wiring, accuracy, etc. Multiple meter test reports were provided and witnessed as evidence during the audit period. This obligation has been assessed as sufficiently controlled.
334	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	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that there were no customers with an					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that there were no customers with an annual consumption of below

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					1	2	3	4	N/R	Compliance observation	A	B	C	D	N/P	Control observation
		whose annual consumption is below 750MWh must meet the relevant accuracy requirements of a Type 3 metering installation for active energy only.								annual consumption of below 750MWh. Hence this obligation has been rated as non-applicable.						750MWh. Hence this obligation has been rated as non-applicable.
335	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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no compensation was carried out during the audit period. Hence this obligation has been rated as non-applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no consumption was carried out during the audit period. Hence this obligation has been rated as non-applicable.
336	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.	2	4	✓					The licensee does not currently have a metering management plan. Audit interviews conducted with the Head of Power Operations and Regulatory Compliance Manager, discussions with operators on site and inspection of calibration reports and the PPAs, the audit finds that the tariff meters operate and are maintained in accordance with all relevant PPA's, the National Measurement Act and good industry practice. It is understood that all tariff metering data passes through multiple systems of verification as the data is relied upon for billing. While there is not a metering plan or metrology procedure, this is considered a controls deficiency rather than a compliance deficiency. The licensee have demonstrated that the system of operations around the resolution of tariff metering data is adequate. This obligation is therefore given a compliance rating of 1.		✓				The licensee does not currently have a metering management plan. In ERA's 2025 Annual Compliance Report and through audit interviews, APA will be completing a metering management plan to incorporate the technical requirements of the metering code relevant to its metering operations. This document will be produced by APA by 31 December 2025, which is to be provided to the ERA as part of APAs close out actions As he metering management plan was not in effect during the audit period, the control rating for this obligation is currently rated a B. Opportunity for improvement: GHD suggests that this obligation is included in the licensee's consolidated planning for a metering management plan. This allows for an auditable system of controls.
337	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.	2	4	✓					Although the licensee does not have a metering management plan, this obligation has been assessed as compliant as the invoicing model and input data were provided as evidence of data collection during the audit period.		✓				The licensee does not currently have a metering management plan. In ERA's 2025 Annual Compliance Report and through audit interviews, APA will be completing a metering management plan to incorporate the technical requirements of the metering code relevant to its metering operations. This document will be produced by APA by 31 December 2025, which is to be provided to the ERA as part of APAs close out actions As he metering management plan was not in effect during the audit period, the control rating for this obligation is currently rated a B.
338	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.	2	4					✓	No incidents of outages or malfunctions to a meeting installation occurred during the audit period. Hence this obligation is not appliable.					✓	No incidents of outages or malfunctions to a meeting installation occurred during the audit period. Hence this obligation is not appliable.
339	Electricity Industry Metering Code, clause 3.11(3)	A Code participant who becomes aware of an outage or malfunction of a metering installation must advise the	2	4					✓	No incidents of outages or malfunctions to a meeting installation occurred during the audit period. Hence this obligation is not appliable.					✓	No incidents of outages or malfunctions to a meeting installation occurred during the audit period. Hence this obligation is not appliable.

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		network operator as soon as practicable.														
340	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.	2	4	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that metering installations meet the requirements associated with the metering type. Regular tests reports and calibration tests are conducted on meters. These tests reports include testing of meter wiring, accuracy, etc. Multiple meter test reports were provided as evidence during the audit period. This obligation has been assessed as compliant.	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that metering installations meet the requirements associated with the metering type. Regular tests reports and calibration tests are conducted on meters. These tests reports include testing of meter wiring, accuracy, etc. Multiple meter test reports were provided as evidence during the audit period. These reports are conducted in line with AS 1284.13. This obligation has been assessed as sufficiently controlled.
341	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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager did not reveal any meters which have failed during the audit period. Hence this obligation is not appliable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager did not reveal any meters which have failed during the audit period. Hence this obligation is not appliable.
342	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.	2	4	✓					The licensee does not currently have a metering management plan. Based on - interviews conducted with the Head of Power Operations and Regulatory Compliance Manager - Meter inspections and drawing examinations by the AMS Review team during a site visit The audit finds that the meters are installed in accordance with as-built drawings and are operated to the satisfaction of the licensee's customers and in accordance with PPAs and what is expected of a skilled and competent professional practising in the relevant discipline. The compliance rating for this obligation is therefore rated 1.		✓				The licensee does not currently have a metering management plan. While the licensee were able to demonstrate compliance to this obligation through drawings and internal knowledge through staff, the audit finds the controls around this obligation were fragmented. Controls for this obligation were deemed generally adequate as the licensee was considered compliant following review of the evidence provided. The controls rating is therefore a B. Opportunity for Improvement: It is recommended that the design specification for all metering installations for this licence is recorded and referenced in either Vigilant (APA's compliance tracking platform) or referenced in a consolidated metering management plan for the licensee's compliance management of all Metering Code obligations.
343	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.	2	4	✓					Based on discussions with the Head of Power Operations and Regulatory Compliance Manager. It is understood that there have been no new metering installations during the audit period and the current metering installations (and instrument transformers) were undertaken through a standard engineering project protocol expected of a skilled and competent professional practising in the relevant discipline. Review of calibration reports demonstrates that the meters are operating and are maintained in accordance with applicable standards. Engineering drawings provided were reconciled with the installations on site.		✓				The licensee did not have a metering management plan during the audit period. In ERA's 2025 Annual Compliance Report and through audit interviews, APA will be completing a metering management plan to incorporate the technical requirements of the metering code relevant to its metering operations. As the metering management plan was not in effect during the audit period, the control rating for this obligation is currently rated a B, an opportunity for improvement exists for demonstrate controls specific to this and other licence obligations.
344	Electricity Industry Metering Code, clause 3.12(3)	A network operator must provide isolation facilities of a standard consistent with good electricity industry	2	4	✓					During the audit, single line diagrams (SLDs) were provided by the licensee showing the layout of the metering point along with its protection schemes and relays.	✓					During the audit, single line diagrams (SLDs) were provided by the licensee showing the layout of the metering point along with its protection schemes and relays. Site visits

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		practice, to facilitate testing and calibration of the metering installation.								This obligation has been assessed as compliant.						reveal that drawings and the site are in line with good electricity industry practice. This obligation has been assessed as sufficiently controlled.
345	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.	2	4	✓					During the audit, single line diagrams (SLDs) were provided by the licensee showing the layout of the metering point along with its protection schemes and relays. This obligation has been assessed as compliant.	✓					During the audit, single line diagrams (SLDs) were provided by the licensee showing the layout of the metering point along with its protection schemes and relays. Site visits reveal that drawings and the site are in line with good electricity industry practice. This obligation has been assessed as sufficiently controlled.
346	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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that the licensee only procured parallel check meters. They do not use partial check meters, meaning this obligation is not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that the licensee only procured parallel check meters. These meters are type 1 metering installations; certificates were provided showing conformance with type 1 metering requirements. They do not use partial check meters, meaning this obligation is not applicable.
347	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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that the licensee only procured parallel check meters. They do not use partial check meters, meaning this obligation is not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that the licensee only procured parallel check meters. These meters are type 1 metering installations; certificates were provided showing conformance with type 1 metering requirements. They do not use partial check meters, meaning this obligation is not applicable.
348	Electricity Industry Metering Code, clause 3.13(4)	A check metering installation for a metering point must comply with the prescribed requirements.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that the licensee only procured parallel check meters. They do not use partial check meters, meaning this obligation is not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that the licensee only procured parallel check meters. These meters are type 1 metering installations; certificates were provided showing conformance with type 1 metering requirements. They do not use partial check meters, meaning this obligation is not applicable.
349	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).	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that there are no metering installations that use the metering class CTs and VTs. Hence this obligation is not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal there are no metering installations that use the metering class CTs and VTs. Hence this obligation is not applicable.
355	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.	2	4					✓	This item has not been requested by a network operator during the audit period. Hence this obligation is not applicable.					✓	This item has not been requested by a network operator during the audit period. Hence this obligation is not applicable.
356	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.	2	4	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that no charges were levied customers that are not specifically defined in their SLAs. This obligation has been assessed as compliant.	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that no charges were levied customers that are not specifically defined in their SLAs. This obligation has been assessed as sufficiently controlled.

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357	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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal there is no metering procedure or documentation specifically defining time synchronisation about metered data. From discussions, it is understood that the licensee operates and maintains the meters to the satisfaction of their customers and to comply with applicable energy balance requirements under their PPAs and the Code. The meters do not contain an internal clock, time stamps are recorded externally when synchronised remotely. As such, this obligation cannot be rated.					✓	Seeing as there are no meters with an internal clock (time stamping is performed externally when the data is collected remotely), the controls for this obligation are considered as not performed.
358	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.	2	4	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that Pi servers were owned and operated in-house but not on site. This obligation is not applicable,	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that Pi servers were owned and operated in-house but not on site. This obligation is not applicable.
359	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.	2	4	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that there are electricians, instrument control engineers and technicians trained to program these meters. In some cases, APA may outsource these tasks to a third party. This obligation has been assessed as compliant.	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that there are electricians, instrument control engineers and technicians trained to program these meters. In some cases, APA may outsource these tasks to a third party. These meters do not require special licensees and have no enhanced features. This obligation has been assessed as compliant.
360	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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that signals are not sent to customers via meters during the audit period. Hence this obligation is not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that signals are not sent to customers via meters during the audit period. Hence this obligation is not applicable.
361	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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that signals are not sent to customers via meters during the audit period. Hence this obligation is not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that signals are not sent to customers via meters during the audit period. Hence this obligation is not applicable.
364	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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no new metering installations occurred during the audit period. Hence this obligation is not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no new metering installations occurred during the audit period. Hence this obligation is not applicable.
365	Electricity Industry Metering Code, clause 3.29	A network operator must publish a list of registered metering installation	2	4					✓	As APA owns and operates the network, there is no requirement for the licensee to publish and					✓	As APA owns and operates the network, there is no requirement for the licensee to publish and maintain the list of metering installation providers for itself.

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					1	2	3	4	N/R	Compliance observation	A	B	C	D	N/P	Control observation
		providers, including the prescribed details, and update the list at least annually.								maintain the list of metering installation providers for itself. Hence this obligation is not applicable.						Hence this obligation is not applicable.
366	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.	2	4		✓				The previous audit noted a non-compliance of this obligation for its absence of updating standing data at its CT/VT metering points. In ERA's 2025 Annual Compliance Report and through audit interviews, APA will be completing a metering management plan to incorporate the technical requirements of the metering code relevant to its metering operations. The interviewees confirmed that information surrounding this obligation will be added into the metering management plan. As he metering management plan was not in effect during the audit period, the compliance rating for this obligation is currently rated a 2.		✓				The previous audit noted a non-compliance of this obligation for its absence of updating standing data at its CT/VT metering points. In ERA's 2025 Annual Compliance Report and through audit interviews, APA will be completing a metering management plan to incorporate the technical requirements of the metering code relevant to its metering operations. The interviewees confirmed that information surrounding this obligation will be added into the metering management plan. As he metering management plan was not in effect during the audit period, the control rating for this obligation is currently rated a B.. Recommendation 2/2025 applies.
367	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).	2	4	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that its metering database is appropriately secure and protected by IT protocols. The licensee further provided evidence of its service security classification and service continuity management standard. APA have internally set the service criticality of its database to gold, which sets the maximum allowable outage (MAO) to 24 hours, Recovery time objective (RTO) to 12 hours and Recovery Point Objective (RPO) to 15 minutes. Both systems are licenced from AVEVA and supported by GTS (who has a third-party support agreement with APA). PI system has full HA redundancy setup with Commvault backups. This obligation has been assessed as compliant.	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that its metering database is appropriately secure and protected by IT protocols. The licensee further provided evidence of its service security classification and service continuity management standard. APA have internally set the service criticality of its database to gold, which sets the maximum allowable outage (MAO) to 24 hours, Recovery time objective (RTO) to 12 hours and Recovery Point Objective (RPO) to 15 minutes. Both systems are licenced from AVEVA and supported by GTS (who has a third-party support agreement with APA). PI system has full HA redundancy setup with Commvault backups. This obligation has been assessed as sufficiently controlled.
368	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.	2	4	✓					APA Group has a Service Continuity Management Standard. In line with this standard, the Newman Network comprising of Chichester Solar Farm, Christmas Creek, Cloudbreak, and Roy Hillis are all stored on PI. APA have internally set the service criticality of its database to gold, which sets the maximum allowable outage (MAO) to 24 hours, Recovery time objective (RTO) to 12 hours and Recovery Point Objective (RPO) to 15 minutes. Both systems are licenced from AVEVA and supported by GTS (who has a third-party support agreement with APA). PI system has full HA redundancy setup with Commvault backups.. As such APA has appropriate capability to restore the energy database and provide energy data to a Code Participant within 2 business days following a disaster. This obligation has been assessed as compliant.	✓					APA Group has a Service Continuity Management Standard. In line with this standard, the Newman Network comprising of Chichester Solar Farm, Christmas Creek, Cloudbreak, and Roy Hillis are all stored on PI. APA have internally set the service criticality of its database to gold, which sets the maximum allowable outage (MAO) to 24 hours, Recovery time objective (RTO) to 12 hours and Recovery Point Objective (RPO) to 15 minutes. Both systems are licenced from AVEVA and supported by GTS (who has a third-party support agreement with APA). PI system has full HA redundancy setup with Commvault backups. . As such APA has appropriate capability to restore the energy database and provide energy data to a Code Participant within 2 business days following a disaster. Evidence of this standard as well as screenshots of this platform have been provided. This obligation has been assessed as sufficiently controlled.
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.	2	4		✓				Noncompliance for this obligation was reported for this obligation in the last audit period. Where the licensee did not provide data on the following items: (4) Voltage at metering point, (5) Distribution loss factor, (14) NMI meter, (20)		✓				Noncompliance for this obligation was reported for this obligation in the last audit period. Where the licensee did not provide data on the following items: (4) Voltage at metering point, (5) Distribution loss factor, (14) NMI meter, (20) Summation scheme values and multipliers, (21) Data register coding details, (27) Algorithms.

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					1	2	3	4	N/R	Compliance observation	A	B	C	D	N/P	Control observation
										Summation scheme values and multipliers, (21) Data register coding details, (27) Algorithms. In ERA's 2025 Annual Compliance Report and through audit interviews, APA will be completing a metering management plan to incorporate the technical requirements of the metering code relevant to its metering operations. This document will be produced by APA by 31 December 2025, which is to be provided to the ERA as part of APAs close out action.. The interviewees confirmed that information surrounding this obligation will be added into the metering management plan. As he metering management plan was not in effect during the audit period, the compliance rating for this obligation is currently rated a 2.						In ERA's 2025 Annual Compliance Report and through audit interviews, APA will be completing a metering management plan to incorporate the technical requirements of the metering code relevant to its metering operations. The interviewees confirmed that information surrounding this obligation will be added into the metering management plan. As he metering management plan was not in effect during the audit period, the control rating for this obligation is currently rated a B. Recommendation 3/2025 applies.
370	Electricity Industry Metering Code, clause 4.3(1)	The standing data for a metering point must comprise at least the items specified.	2	4		✓				Noncompliance for this obligation was reported for this obligation in the last audit period. Where the licensee did not provide data on the following items: (4) Voltage at metering point, (5) Distribution loss factor, (14) NMI meter, (20) Summation scheme values and multipliers, (21) Data register coding details, (27) Algorithms. In ERA's 2025 Annual Compliance Report and through audit interviews, APA will be completing a metering management plan to incorporate the technical requirements of the metering code relevant to its metering operations. The interviewees confirmed that information surrounding this obligation will be added into the metering management plan. As he metering management plan was not in effect during the audit period, the compliance rating for this obligation is currently rated a 2.		✓				Noncompliance for this obligation was reported for this obligation in the last audit period. Where the licensee did not provide data on the following items: (4) Voltage at metering point, (5) Distribution loss factor, (14) NMI meter, (20) Summation scheme values and multipliers, (21) Data register coding details, (27) Algorithms. In ERA's 2025 Annual Compliance Report and through audit interviews, APA will be completing a metering management plan to incorporate the technical requirements of the metering code relevant to its metering operations. The interviewees confirmed that information surrounding this obligation will be added into the metering management plan. As he metering management plan was not in effect during the audit period, the control rating for this obligation is currently rated a B. Recommendation 3/2025 applies.
371	Electricity Industry Metering Code, clause 4.4(1)	If there is a discrepancy between energy data held in a metering installation and in the metering database, the affected Code participants and the network operator must liaise to determine the most appropriate way to resolve the discrepancy.	NR	5					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no discrepancies between energy data held in metering installation and database occurred. Hence this obligation is not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no discrepancies between energy data held in metering installation and database occurred. Hence this obligation is not applicable.
372	Electricity Industry Metering Code, clause 4.5(1)	A Code participant must not knowingly permit the registry to be materially inaccurate.	NR	5					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that the licensee has not knowingly permitted the registry to be materially inaccurate. No non-compliances were logged in Vigilant. Hence this obligation is not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that the licensee has not knowingly permitted the registry to be materially inaccurate. No non-compliances were logged in Vigilant. Hence this obligation is not applicable.
373	Electricity Industry Metering Code, clause 4.5(2)	Subject to subclause 5.19(6), if a Code participant, other than a network operator, becomes aware of a change to, or inaccuracy in, an item of standing data in the registry, then it must notify the network operator and	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no incidences of a change to or inaccuracy in an item of standing data in the registry occurred during the audit period. No non-compliances were logged in Vigilant. Hence this obligation is not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no incidences of a change to or inaccuracy in an item of standing data in the registry occurred during the audit period. No non-compliances were logged in Vigilant. Hence this obligation is not applicable.

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		provide details of the change or inaccuracy within the timeframes prescribed.														
374	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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no incidences of a change to or inaccuracy in an item of standing data in the registry occurred during the audit period. No non-compliances were logged in Vigilant. Hence this obligation is not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no incidences of a change to or inaccuracy in an item of standing data in the registry occurred during the audit period. No non-compliances were logged in Vigilant. Hence this obligation is not applicable.
375	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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no incidences of a change to or inaccuracy in an item of standing data in the registry occurred during the audit period. Hence this obligation is not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no incidences of a change to or inaccuracy in an item of standing data in the registry occurred during the audit period. Hence this obligation is not applicable.
376	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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no incidences of a change to or inaccuracy in an item of standing data in the registry occurred during the audit period. No non-compliances were logged in Vigilant. Hence this obligation is not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no incidences of a change to or inaccuracy in an item of standing data in the registry occurred during the audit period. No non-compliances were logged in Vigilant. Hence this obligation is not applicable.
377	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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no a retailer or a generator users had access to the licensee's network during the audit period. Hence this obligation is not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no a retailer or a generator users had access to the licensee's network during the audit period. Hence this obligation is not applicable.
378	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	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no a retailer or a generator users had access to the licensee's network during the audit period. Hence this obligation is not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no a retailer or a generator users had access to the licensee's network during the audit period. Hence this obligation is not applicable.

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					1	2	3	4	N/R	Compliance observation	A	B	C	D	N/P	Control observation
		provided by the network operator which provides 'read only' access.														
379	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	2	4	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that metering energy data is protected through sufficient security protocols and IT firewalls. Access to Pi data is provided to authorised personnel through user names and passwords. Appropriate measures are in place to ensure the licensee's Honeywell system is secure. This obligation has been assessed as compliant.	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that metering energy data is protected through sufficient security protocols and IT firewalls. Access to Pi data is provided to authorised personnel through user names and passwords. Appropriate measures are in place to ensure the licensee's Honeywell system is secure. APA have further internally set the service criticality of its database to gold, which sets the maximum allowable outage (MAO) to 24 hours, Recovery time objective (RTO) to 12 hours and Recovery Point Objective (RPO) to 15 minutes. Both systems are licenced from AVEVA and supported by GTS (who has a third-party support agreement with APA). PI system has full HA redundancy setup with Commvault backups. This obligation has been assessed as sufficiently controlled.
380	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.	2	4	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that metering energy data is protected through sufficient security protocols and IT firewalls. Access to Pi data is provided to authorised personnel through user names and passwords. Appropriate measures are in place to ensure the licensee's Honeywell system is secure. This obligation has been assessed as compliant.	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that metering energy data is protected through sufficient security protocols and IT firewalls. Access to Pi data is provided to authorised personnel through user names and passwords. Appropriate measures are in place to ensure the licensee's Honeywell system is secure. APA have further internally set the service criticality of its database to gold, which sets the maximum allowable outage (MAO) to 24 hours, Recovery time objective (RTO) to 12 hours and Recovery Point Objective (RPO) to 15 minutes. Both systems are licenced from AVEVA and supported by GTS (who has a third-party support agreement with APA). PI system has full HA redundancy setup with Commvault backups. This obligation has been assessed as sufficiently controlled.
381	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.	2	4	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that metering energy data is protected through sufficient security protocols and IT firewalls. Access to Pi data is provided to authorised personnel through user names and passwords. This obligation has been assessed as compliant.	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that metering energy data is protected through sufficient security protocols and IT firewalls. Access to Pi data is provided to authorised personnel through user names and passwords. APA have further internally set the service criticality of its database to gold, which sets the maximum allowable outage (MAO) to 24 hours, Recovery time objective (RTO) to 12 hours and Recovery Point Objective (RPO) to 15 minutes. Both systems are licenced from AVEVA and supported by GTS (who has a third-party support agreement with APA). PI system has full HA redundancy setup with Commvault backups. This obligation has been assessed as sufficiently controlled.
382	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.	2	4	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that metering data has been retained as prescribed. A sample of metering data has been provided. This obligation has been assessed as compliant.	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that metering data has been retained as prescribed. A sample of metering data has been provided. This obligation has been assessed as sufficiently controlled.

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383	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.	1	2					✓	There are no other retailors or code participants within the licensee's network during the audit period. Hence this obligation is not applicable.					✓	There are no other retailors or code participants within the licensee's network during the audit period. Hence this obligation is not applicable.
384	Electricity Industry Metering Code, clause 5.1(2)	Without limiting subclause 5.1(1), a network operator must: 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.	2	4					✓	There are no other retailors or code participants within the licensee's network during the audit period. Hence this obligation is not applicable.					✓	There are no other retailors or code participants within the licensee's network during the audit period. Hence this obligation is not applicable.
385	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).	2	4	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that metering data is always done in real time, usually within 30-minute intervals. A sample of metering data has been provided. This obligation has been assessed as compliant.	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that metering data is always done in real time, usually within 30-minute intervals. A sample of metering data has been provided. This obligation has been assessed as sufficiently controlled.
385A.	Electricity Industry Metering Code, clause 5.3(2)	Energy data obtained and transferred under clause 5.3(1) 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.	2	4	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that metering data when bi-directional electricity flows occur, a separate measurement for electricity data is also included. The licensee's check meters form a part of this validation process. This was confirmed and witnessed during the site visit. This obligation has been assessed as compliant.	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that metering data when bi-directional electricity flows occur, a separate measurement for electricity data is also included. The licensee's check meters form a part of this validation process. This was confirmed and witnessed during the site visit. This obligation has been assessed as sufficiently controlled.
386	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.	2	4	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that metering data is always done in real time, usually within 30-minute intervals. The licensee's check meters form a part of this validation process. This was confirmed and witnessed during the site visit. This obligation has been assessed as compliant.	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that metering data is always done in real time, usually within 30-minute intervals. The licensee's check meters form a part of this validation process. This was confirmed and witnessed during the site visit. This obligation has been assessed as sufficiently controlled.

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387	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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that metering data is always done in real time, usually within 30-minute intervals. These measurements are not done manually and hence are not undertaken by customers. This obligation has been deemed as not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that metering data is always done in real time, usually within 30-minute intervals. These measurements are not done manually and hence are not undertaken by customers. This obligation has been deemed as not applicable.
388	Electricity Industry Metering Code, clause 5.4(2)	A user must, when reasonably requested by a network operator, assist the network operator to comply with the network operator's obligation under subclause 5.4(1).	2	4					✓	No notifications were received from the network operator during the audit period. Hence this obligation is rated as not applicable.					✓	No notifications were received from the network operator during the audit period. Hence this obligation is rated as not applicable.
389	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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that there has been no provision of charge during the audit period under this obligation. This obligation has been deemed as not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that there has been no provision of charge during the audit period under this obligation. This obligation has been deemed as not applicable.
390	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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that there has been no provision of charge during the audit period under this obligation. This obligation has been deemed as not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that there has been no provision of charge during the audit period under this obligation. This obligation has been deemed as not applicable.
391	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).	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that the licensee provides energy data and corresponding estimates to its customers as per its PPAs. This obligation has been deemed as not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that the licensee provides energy data and corresponding estimates to its customers as per its PPAs. This obligation has been deemed as not applicable.
391A.	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 AEMO 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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that the network is not a part of the electricity market and hence estimated energy data does not need to be provided to AEMO. This obligation has been deemed as not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that the network is not a part of the electricity market and hence estimated energy data does not need to be provided to AEMO. This obligation has been deemed as not applicable.

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391B.	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.	2	4	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that metering data when bi-directional electricity flows occur, a separate measurement for electricity data is also included. The licensee's check meters form a part of this validation process. This obligation has been assessed as compliant.	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that metering data when bi-directional electricity flows occur, a separate measurement for electricity data is also included. The licensee's check meters form a part of this validation process. This obligation has been assessed as sufficiently controlled.
392	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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that the network is not a part of the electricity market and hence energy data does not need to be provided to IMO. This obligation has been deemed as not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that the network is not a part of the electricity market and hence energy data does not need to be provided to IMO. This obligation has been deemed as not applicable.
393	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.	2	4					✓	No requests for information outside those specified in SLAs were made during the audit period. This obligation has been deemed as not applicable.					✓	No requests for information outside those specified in SLAs were made during the audit period. This obligation has been deemed as not applicable.
394	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.	2	4					✓	No requests for information outside those specified in SLAs were made during the audit period. This obligation has been deemed as not applicable.					✓	No requests for information outside those specified in SLAs were made during the audit period. This obligation has been deemed as not applicable.
397	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.	2	4					✓	No requests for information outside those specified in SLAs and PPAs were made during the audit period. This obligation has been deemed as not applicable.					✓	No requests for information outside those specified in SLAs and PPAs were made during the audit period. This obligation has been deemed as not applicable.
398	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	2	4					✓	No requests for information outside those specified in SLAs and PPAs were made during the audit period. This obligation has been deemed as not applicable.					✓	No requests for information outside those specified in SLAs and PPAs were made during the audit period. This obligation has been deemed as not applicable.

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		point; and advise whether there is a communications link for the metering point, within 2 business days after the receipt of the request.														
399	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.	2	4					✓	No requests for information outside those specified in SLAs and PPAs were made during the audit period. This obligation has been deemed as not applicable.					✓	No requests for information outside those specified in SLAs and PPAs were made during the audit period. This obligation has been deemed as not applicable.
400	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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that the network is not a part of the electricity market and hence energy data does not need to be provided to IMO. This obligation has been deemed as not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that the network is not a part of the electricity market and hence energy data does not need to be provided to IMO. This obligation has been deemed as not applicable.
401	Electricity Industry Metering Code, clause 5.16	If a user collects or receives energy data from a metering installation then the user must provide the network operator with the energy data (in accordance with the communication rules) within the timeframes prescribed.	2	4	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that collection of data are in accordance with relevant PPAs. Reconciliation of energy data is undertaken internally to the satisfaction of APA's stakeholders. The PPA's include a provision for meter testing in the event of a discrepancy. This obligation has been deemed as compliant.	✓					Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that collection of data are in accordance with relevant PPAs. Reconciliation of energy data is undertaken internally to the satisfaction of APA's stakeholders. The PPA's include a provision for meter testing in the event of a discrepancy. This obligation has been deemed as sufficiently controlled.
402	Electricity Industry Metering Code, clause 5.17(1)	A user must provide standing data and validated, and where necessary substituted or estimated, energy data to the user's customer to which that information relates where the user is required by an enactment or an agreement to do so for billing purposes or for the purpose of providing metering services to the customer.	NR	5	✓					An incident regarding mismatched Pi data occurred for approximately 4 hours on the 8th of March 2024. Email exchanges between APA and a PI systems engineer were shown, showing APA's resolution of the issue. The emails clearly show how metered data can be backfilled with either OT/site data via validation-substitution logic. It should be noted that this for APA's Port Hedland asset, which is un-related to this license, however updates to metering protocol were carried across all of APA's assets. Hence this obligation has been assessed as compliant.	✓					The licensee states that a model validation tool is used to provide simple assurance checks on the PI data. For example, a check is performed for any intervals with the words "bad data", and another check looks for intervals that are repeating the same non-zero value. The licensee's interconnection agreements and PPAs contain further information on billing and disputed invoices for the assets under consideration. APA's Market Services team download all Pi data via Pi Datalink and extracts hardcoded files prior to ingestion into the billing models. This method has been in place as of September 2024 when APA took over custody of the Pi network from the previous owner, Alinta. Prior to September 2024, a daily Pi file was received via email from Alinta to a shared mailbox. If there were data gaps or erroneous data identified, an email was sent from APA Market Services to Alinta for corrective data backfilling to take place by Optimate (Alinta's 3rd party data consultants). Currently, if a data gap is identified, Market Services will raise an Incident request to APA's Service Centre for corrective action. Site engineers investigate the cause of the gap and backfill the data prior to the Pi Datalink being rerun and saved down for invoicing. There are no data substitutions that take place once the Pi files have been run, hardcoded files produced and invoices created. This obligation has been deemed as sufficiently controlled.

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403	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).	NR	5					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that outside of SLAs and PPAs, customers did not request any additional data. This obligation has been deemed as not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that outside of SLAs and PPAs, customers did not request any additional data. This obligation has been deemed as not applicable.
404	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.	NR	5					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that outside of SLAs and PPAs, customers did not request any additional data. This obligation has been deemed as not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that outside of SLAs and PPAs, customers did not request any additional data. This obligation has been deemed as not applicable.
405	Electricity Industry Metering Code, clause 5.18	If a user collects or receives information regarding a change in the energisation status of a metering point then the user must provide the network operator with the prescribed information, including the stated attributes, within the timeframes prescribed.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that as a user of the network for the sole purposes on an interconnection arrangement, the licensee had no obligations to fulfill relating to the energisation status of meters and provision of customer information. Hence this obligation and those assessed under clauses 5.18 and 5.19 of the metering code has been deemed as not applicable during the audit period.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that as a user of the network for the sole purposes on an interconnection arrangement, the licensee had no obligations to fulfill relating to the energisation status of meters and provision of customer information. Hence this obligation and those assessed under clauses 5.18 and 5.19 of the metering code has been deemed as not applicable during the audit period.
406	Electricity Industry Metering Code, clause 5.19(1)	A user must, when requested by the network operator acting in accordance with good electricity industry practice, use reasonable endeavours to collect information from customers, if any, that assists the network operator in meeting its obligations described in the Code and elsewhere, and provide that information to the network operator.	NR	5					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that as a user of the network for the sole purposes on an interconnection arrangement, the licensee had no obligations to fulfill relating to the energisation status of meters and provision of customer information. Hence this obligation and those assessed under clauses 5.18 and 5.19 of the metering code has been deemed as not applicable during the audit period.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that as a user of the network for the sole purposes on an interconnection arrangement, the licensee had no obligations to fulfill relating to the energisation status of meters and provision of customer information. Hence this obligation and those assessed under clauses 5.18 and 5.19 of the metering code has been deemed as not applicable during the audit period.
407	Electricity Industry Metering Code, clause 5.19(2)	A user must, to the extent that it is able, collect and maintain a record of the prescribed information in relation to the site of each connection point with which the user is associated.	NR	5					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that as a user of the network for the sole purposes on an interconnection arrangement, the licensee had no obligations to fulfill relating to the energisation status of meters and provision of customer information. Hence this obligation and those assessed under clauses 5.18 and 5.19 of the metering code has been deemed as not applicable during the audit period.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that as a user of the network for the sole purposes on an interconnection arrangement, the licensee had no obligations to fulfill relating to the energisation status of meters and provision of customer information. Hence this obligation and those assessed under clauses 5.18 and 5.19 of the metering code has been deemed as not applicable during the audit period.
408	Electricity Industry Metering Code, clause 5.19(3)	Subject to subclauses 5.19(3A) and 5.19(6), the user must, within 1 business day after becoming aware of any change in an attribute described in subclause 5.19(2), notify the network operator of the change.	NR	5					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that as a user of the network for the sole purposes on an interconnection arrangement, the licensee had no obligations to fulfill relating to the energisation status of meters and provision of customer information.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that as a user of the network for the sole purposes on an interconnection arrangement, the licensee had no obligations to fulfill relating to the energisation status of meters and provision of customer information.

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					1	2	3	4	N/R	Compliance observation	A	B	C	D	N/P	Control observation
										Hence this obligation and those assessed under clauses 5.18 and 5.19 of the metering code has been deemed as not applicable during the audit period.						Hence this obligation and those assessed under clauses 5.18 and 5.19 of the metering code has been deemed as not applicable during the audit period.
409	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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that as a user of the network for the sole purposes on an interconnection arrangement, the licensee had no obligations to fulfill relating to the energisation status of meters and provision of customer information. Hence this obligation and those assessed under clauses 5.18 and 5.19 of the metering code has been deemed as not applicable during the audit period.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that as a user of the network for the sole purposes on an interconnection arrangement, the licensee had no obligations to fulfill relating to the energisation status of meters and provision of customer information. Hence this obligation and those assessed under clauses 5.18 and 5.19 of the metering code has been deemed as not applicable during the audit period.
410	Electricity Industry Metering Code, clause 5.19(6)	The user must use reasonable endeavours to ensure that it does not notify the network operator of a change in an attribute described in subclause 5.19(2) that results from the provision of standing data by the network operator to the user.	NR	5					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that as a user of the network for the sole purposes on an interconnection arrangement, the licensee had no obligations to fulfill relating to the energisation status of meters and provision of customer information. Hence this obligation and those assessed under clauses 5.18 and 5.19 of the metering code has been deemed as not applicable during the audit period.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that as a user of the network for the sole purposes on an interconnection arrangement, the licensee had no obligations to fulfill relating to the energisation status of meters and provision of customer information. Hence this obligation and those assessed under clauses 5.18 and 5.19 of the metering code has been deemed as not applicable during the audit period.
411	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.	2	4		✓				A previous non-compliance for this obligation was identified in the ERA 2024 and 2025 annual compliance reports. Hence the obligation has been given a rating of 2 as it is as the consequences to customers for this breach has been assessed as minor.	✓					An energy data verification request form was provided as evidence during the audit. This form included a request of the NMI and checksum, site address, selected meter, investigation code, description, investigation details as well as additional consumption and registration information. This obligation is assessed as sufficiently controlled.
412	Electricity Industry Metering Code, clause 5.20(2)	An Energy Data Verification Request Form must require a Code participant to provide the information prescribed.	2	4	✓					An energy data verification request form was provided as evidence during the audit. This form included a request of the NMI and checksum, site address, selected meter, investigation code, description, investigation details as well as additional consumption and registration information. This obligation is assessed as compliant.	✓					An energy data verification request form was provided as evidence during the audit. This form included a request of the NMI and checksum, site address, selected meter, investigation code, description, investigation details as well as additional consumption and registration information. This obligation is assessed as sufficiently controlled.
413	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: 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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that no data verification requests were made during the applicable audit period. This obligation has been deemed as not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that no data verification requests were made during the applicable audit period. This obligation has been deemed as not applicable.

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414	Electricity Industry Metering Code, clause 5.21(2)	A network operator must comply with any reasonable request under subclause 5.21(1).	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that no requests regarding the accuracy of metering data were made during the applicable audit period. This obligation has been deemed as not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that no requests regarding the accuracy of metering data were made during the applicable audit period. This obligation has been deemed as not applicable.
415	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.	2	4					✓	It is understood based on interviews with the Head of Power Operations and Regulatory Compliance Manager that no request for a test or audit occurred during the audit period.					✓	Although APA reported a breach of this obligation to the ERA in 2024, this notification represented a blanket report relating specifically to the absence of a documented metrology procedure, rather than a failure to comply with the requirements of this obligation. A review of the PPAs with relevant customers for this asset indicates that provisions are in place outlining APA's obligations in the event that a meter test or audit is requested.
416	Electricity Industry Metering Code, clause 5.21(5)	A Code participant must not request a test or audit under subclause 5.21(1) unless the Code participant is a user and the test or audit relates to a time or times at which the user was the current user or the Code participant is the IMO.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that no requests of this nature were made during the applicable audit period. This obligation has been deemed as not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that no requests of this nature were made during the applicable audit period. This obligation has been deemed as not applicable.
417	Electricity Industry Metering Code, clause 5.21(6)	A Code participant must not make a request under subclause 5.21(1) that is inconsistent with any access arrangement or agreement.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that no requests of this nature were made during the applicable audit period. This obligation has been deemed as not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that no requests of this nature were made during the applicable audit period. This obligation has been deemed as not applicable.
418	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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that no charges were applied to users outside those listed in SLAs. This obligation has been deemed as not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that no charges were applied to users outside those listed in SLAs. This obligation has been deemed as not applicable.
419	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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that no charges were applied to users outside those listed in SLAs. This obligation has been deemed as not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that no charges were applied to users outside those listed in SLAs. This obligation has been deemed as not applicable.
420	Electricity Industry Metering Code, clause 5.21(11)	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: advise the affected parties as soon as	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that no inaccuracies of the metering installation or information from the metering installation occurred This obligation has been deemed as not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager indicate that no inaccuracies of the metering installation or information from the metering installation occurred. This obligation has been deemed as not applicable.

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		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.														
421	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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no corrections of meter data occurred during the audit period. This obligation has been deemed as not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no corrections of meter data occurred during the audit period. This obligation has been deemed as not applicable.
422	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.	2	4	✓					It is understood that substitutions have been conducted during the audit period. Upon review, substitutions as well as data verification were conducted in a manner expected of a skilled and competent professional practising in the relevant discipline. While breaches of this obligation were recorded by the ERA for APA in both 2024 and 2025, these findings relate broadly to the lack of a metrology procedure and reflect APA's view that the reporting requirements imposed were onerous and duplicative of existing procedures. In this context, the licensee has recently issued a notice of intent of non-compliance to the ERA. Notwithstanding the above, a review of APA's processes and operational practices indicates that, in aggregate, the validation and substitution of data are being undertaken in accordance with the requirements of Appendix 2 and Appendix 3 of the Code, respectively.		✓				The processes and procedures for the validation and substitution of data implemented during the audit period were assessed as being performed to a standard expected of a skilled and competent professional practising in the relevant discipline. While the underlying processes were considered sound, controls were observed to be largely iterative in nature in the absence of formally documented control mechanisms. Accordingly, opportunities for improvement were identified, resulting in an overall rating of B.
423	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.	2	4	✓					The nature of the breach has been reported by the Head of Power Operations as "APA was not able to demonstrate compliance to the Energy data - validation, substitution and estimation elements of the metering code." The audit has found that, for the purposes of billing, metering data is validated and reconciled through multiple systems internally. This includes the use of parallel check meters to ensure appropriate billing. While breaches of this obligation were self-reported by APA in both 2024 and 2025, these findings relate broadly to the lack of a metrology procedure. The licensee has recently issued a notice of intent of non-compliance to the ERA. Notwithstanding the above, it was found that APA have complied with this obligation, seeing as all tariff meters have a parallel check meter. Compliance with this obligation is therefore rated 1.		✓				While breaches of this obligation were recorded by the ERA for APA in both 2024 and 2025, these findings relate broadly to the lack of a metrology procedure. The licensee has recently issued a notice of intent of non-compliance to the ERA. Notwithstanding the above, it was found that APA adequately control this obligation through their operational activities which is expected of a skilled and competent professional practising in the relevant discipline. Notwithstanding the blanket reporting approach adopted by APA in relation to breaches across multiple licences, which incidentally captured this obligation, improvements are required to APA's control framework to ensure that each obligation is managed through controls that are appropriately designed and specifically aligned to the requirements of the individual obligation. This obligation is therefore rated B.

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424	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.	2	4	✓					A breach of this obligation was recorded in 2024 and 2025 by APA to the ERA. The nature of the breach has been reported by the Head of Power Operations as "APA was not able to demonstrate compliance to the Energy data - validation, substitution and estimation elements of the metering code." It is understood that substitutions have been conducted during the audit period. Upon review, substitutions as well as data verification were conducted in a manner expected of a skilled and competent professional practising in the relevant discipline. The substitution techniques were found to be compliant with the accepted substitution techniques as per method 11 in Appendix 3 of the Code. While breaches of this obligation were self-reported by APA in both 2024 and 2025, these findings relate broadly to the lack of a metrology procedure. The licensee has recently issued a notice of intent of non-compliance to the ERA. Notwithstanding the above, it was assessed that APA complied with the requirements of this obligation during the audit period, as data substitutions were undertaken in a manner consistent with one of the recognised methods prescribed under the Code.		✓				While breaches of this obligation were self-reported by APA in both 2024 and 2025, these findings relate broadly to the lack of a metrology procedure. The licensee has recently issued a notice of intent of non-compliance to the ERA. Notwithstanding the above, the controls demonstrated when substitutions were conducted for energy data during the audit period demonstrated sound engineering processes, approval flow and controls expected of a skilled and competent professional practising in the relevant discipline. However, opportunities for improvement were identified to reduce reliance on iterative processes observed in this instance.
425	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.	2	4		✓				It should be noted that APA have noted a breach of this obligation was recorded in 2024 and 2025 to the ERA. The nature of the breach has been reported by the Head of Power Operations as "APA was not able to demonstrate compliance to the Energy data - validation, substitution and estimation elements of the metering code." This was reported for a group of clauses in the Metering Code. It is understood that substitutions have been conducted during the audit period. In this instance, energy data was found to be incorrect from the meters, and a substitution of data was required. Upon review, substitutions as well as data verification were conducted in a manner expected of a skilled and competent professional practising in the relevant discipline. It is understood that affected Code Participants (customers under an access contract with the licensee) were not notified. Seeing as the data substitution was resolved prior to billing, the licensee demonstrating adherence to their PPAs, this breach is considered to have a minor effect on customers and third parties, the compliance given a 2.		✓				A breach of this obligation was recorded in 2024 and 2025 by APA to the ERA. The validation, substitution and estimation of energy data exist in contractual arrangements between APA and its customers, including agreed GEIP standards, safeguards, dispute mechanisms and communication protocols. These arrangements have been commercially negotiated to the satisfaction of all APA's contract counterparties, and are sufficiently detailed to meet the Metering Code Objectives of; a) promoting the provision of accurate metering of electricity production and consumption; and b) promoting access to and confidence in data of parties to commercial electricity transactions. The licensee has recently issued a notice of intent of non-compliance to the ERA. As a breach has been recorded, the control rating for this obligation is given a B. Recommendation 4/2025 applies.
426	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.	2	4	✓					A breach of this obligation was recorded in 2024 and 2025 by APA to the ERA. The nature of the breach has been reported by the Head of Power Operations as "APA was not able to demonstrate compliance to the Energy data - validation, substitution and estimation elements of the metering code."	✓					A breach of this obligation was recorded in 2024 and 2025 by APA to the ERA. The validation, substitution and estimation of energy data exist in contractual arrangements between APA and its customers, including agreed GEIP standards, safeguards, dispute mechanisms and communication protocols. These

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										The licensee has recently issued a notice of intent of non-compliance to the ERA. Notwithstanding the above, It is understood that substitutions have been conducted during the audit period, this was found to be in accordance with requirements set out in the Code. This took place when energy data was found to fail validation tests as per clause 5.22(5)(e). As a breach has been recorded, the compliance rating for this obligation is given a 2.						arrangements have been commercially negotiated to the satisfaction of all APA's contract counterparties, and are sufficiently detailed to meet the Metering Code Objectives of; a) promoting the provision of accurate metering of electricity production and consumption; and b) promoting access to and confidence in data of parties to commercial electricity transactions. Notwithstanding that ERA have noted a breach against this obligation in their reporting. The controls and processes in place demonstrates that this obligation is sufficiently control by the licensee to maintain their service agreements.
427	Electricity Industry Metering Code, clause 5.22(6)	A network operator must review all validation failures before undertaking any substitution.	2	4	✓					The nature of the breach has been reported by the Head of Power Operations as "APA was not able to demonstrate compliance to the Energy data - validation, substitution and estimation elements of the metering code." Data validation procedures by the licensee are consistent and expected of a skilled and competent professional practising in the relevant discipline. However, data validation procedures used by the licensee does not contemplate Appendix 2 of the Metering Code as required by clause 5.22(1)(a). As such, review of validation failures cannot be demonstrated by the licensee. It is understood that substitutions have been conducted during the audit period. Upon review, substitutions as well as data verification were conducted in a manner expected of a skilled and competent professional practising in the relevant discipline. While breaches of this obligation were self-reported by APA in both 2024 and 2025, these reports related broadly to the absence of a documented metrology procedure. The licensee has recently issued a notice of intent of non-compliance to the ERA. The licensee has recently issued a notice of intent of non-compliance to the ERA. Notwithstanding the above, this audit finds that the licensee has complied with the requirements set out in the Code.		✓				The validation, substitution and estimation of energy data exist in contractual arrangements between APA and its customers, including agreed GEIP standards, safeguards, dispute mechanisms and communication protocols. These arrangements have been commercially negotiated to the satisfaction of all APA's contract counterparties, and are sufficiently detailed to meet the Metering Code Objectives of; a) promoting the provision of accurate metering of electricity production and consumption; and b) promoting access to and confidence in data of parties to commercial electricity transactions. The controls were assessed as effective and, when considered collectively, were found to demonstrate compliance with the requirements of the Code. However, improvements are required to better map operational practices to compliance with this and other applicable obligation requirements related to the metering code. The control rating for this obligation is given a B.
428	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.	2	4	✓					An incident regarding mismatched Pi data occurred for approximately 4 hours on the 8th of March 2024. Email exchanges between APA and a PI systems engineer were shown, showing APA's resolution of the issue. The emails clearly show how metered data can be backfilled with either OT/site data via validation-substitution logic. Hence this obligation has been assessed as compliant.	✓					The licensee states that a model validation tool is used to provide simple assurance checks on the PI data. For example, a check is performed for any intervals with the words "bad data", and another check looks for intervals that are repeating the same non-zero value. The licensee's interconnection agreements and PPAs contain further information on billing and disputed invoices for the assets under consideration. As described in the compliance observation, when the licensee receives Pi files, if there are data gaps or erroneous data identified, an email will be sent from APA Market Services to Alinta for corrective data backfilling to take place by Optimate (Alinta's 3rd party data consultants). Currently, if a data gap is identified, Market Services will raise an Incident request to APA's Service Centre for corrective

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																action. Site engineers investigate the cause of the gap and backfill the data prior to the Pi Datalink being rerun and saved down for invoicing. There are no data substitutions that take place once the Pi files have been run, hardcoded files produced and invoices created. This obligation has been deemed as sufficiently controlled.
429	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: 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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no replacement of meters has occurred during the audit period. The incident recorded in obligation 402 is related to signal transmission issues and not a result of any metering inaccuracies, hence it is no noted here. No additional flags were raised in the test and calibration reviews. This obligation has been deemed as not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no replacement of metes has occurred during the audit period. This obligation has been deemed as not applicable.
430	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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no instances where meter data has had to be replaced with a more accurate second value during the audit period. This obligation has been deemed as not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no instances where meter data has had to be replaced with a more accurate second value during the audit period. This obligation has been deemed as not applicable.
431	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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no instances where meter data has had to be replaced with a more accurate second value during the audit period. This obligation has been deemed as not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no instances where meter data has had to be replaced with a more accurate second value during the audit period. This obligation has been deemed as not applicable.
432	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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no instances where meter data has had to be replaced with a more accurate second value during the audit period. This obligation has been deemed as not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no instances where meter data has had to be replaced with a more accurate second value during the audit period. This obligation has been deemed as not applicable.

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433	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.	2	4					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no instances where meter data was asked to be replaced with an estimated or substituted value during the audit period. This obligation has been deemed as not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no instances where meter data was asked to be replaced with an estimated or substituted value during the audit period. This obligation has been deemed as not applicable.
434	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.	2	4					✓	The licensee did not have a metrology procedure in effect that was approved by the ERA during the audit period. While management of the accuracy and quality of metering data is performed effectively as discussed in this report. There is no metrology procedure to audit this against. This obligation cannot be rated.					✓	Controls for adherence to a metrology procedure were not performed during the audit period.
435	Electricity Industry Metering Code, clause 5.27	Upon request from a network operator, the current user for a connection point must provide the network operator with customer attribute information that it reasonably believes are missing or incorrect within the timeframes prescribed.	NR	5					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no instances where customer attribute information was requested. This obligation has been deemed as not applicable.					✓	Interviews conducted with the Head of Power Operations and Regulatory Compliance Manager reveal that no instances where customer attribute information was requested. This obligation has been deemed as not applicable.
441	Electricity Industry Metering Code, clause 5.37(1)(a)	A network operator must for the year ending on each 30 June, prepare a report setting out the information listed in subclause 5.37(2) for each metering service it was requested during the year to provide or scheduled during the year to carry out.	2	4					✓	During the audit period of 1 October 2022 to 30 September 2025 APA did not have any small use customers connected to their network. Therefore, they were not contracted to provide metering services and this obligation was not relevant for this audit period.					✓	During the audit period of 1 October 2022 to 30 September 2025 APA did not have any small use customers connected to their network. Therefore, they were not contracted to provide metering services, and this obligation was not relevant for this audit period.
442	Electricity Industry Metering Code, clause 5.37(1)(b)	A network operator must provide a copy of the report described in subclause 5.37(1)(a) to the Minister and the ERA not less than 5 business days before it is published under subclause 5.37(3).	2	4					✓	During the audit period of 1 October 2022 to 30 September 2025 APA did not have any small use customers connected to their network. Therefore, they were not contracted to provide metering services and this obligation was not relevant for this audit period.					✓	During the audit period of 1 October 2022 to 30 September 2025 APA did not have any small use customers connected to their network. Therefore, they were not contracted to provide metering services and this obligation was not relevant for this audit period.
443	Electricity Industry Metering Code, clause 5.37(1)(b)	A network operator must publish the report described in subclause 5.37(1) within 3 months after the year ends.	2	4					✓	During the audit period of 1 October 2022 to 30 September 2025 APA did not have any small use customers connected to their network. Therefore, they were not contracted to provide metering services and this obligation was not relevant for this audit period.					✓	During the audit period of 1 October 2022 to 30 September 2025 APA did not have any small use customers connected to their network. Therefore, they were not contracted to provide metering services and this obligation was not relevant for this audit period.
444	Electricity Industry Metering Code, clause 5.37(2)	The report prepared by the network operator must include the information prescribed.	2	4					✓	During the audit period of 1 October 2022 to 30 September 2025 APA did not have any small use customers connected to their network. Therefore, they were not contracted to provide metering services and this obligation was not relevant for this audit period.					✓	During the audit period of 1 October 2022 to 30 September 2025 APA did not have any small use customers connected to their network. Therefore, they were not contracted to provide metering services and this obligation was not relevant for this audit period.
445	Electricity Industry Metering Code, clause 5.37(3)	For each relevant metering service, the information in subclause 5.37(2) must be reported separately for the specified classes of connection point.	2	4					✓	During the audit period of 1 October 2022 to 30 September 2025 APA did not have any small use customers connected to their network. Therefore, they were not contracted to provide metering services and this obligation was not relevant for this audit period.					✓	During the audit period of 1 October 2022 to 30 September 2025 APA did not have any small use customers connected to their network. Therefore, they were not contracted to provide metering services and this obligation was not relevant for this audit period.

Compliance Manual No	Obligation under Licence conditions	Description	Type (1, 2 or NR)	Audit Priority (1=highest, 5=lowest)	Compliance rating						Control rating					
					1	2	3	4	N/R	Compliance observation	A	B	C	D	N/P	Control observation
446	Electricity Industry Metering Code, clause 5.38	network operator must keep such records of information as are required for the purposes of subclause 5.37, and must retain the information (in a format that is accessible within a reasonable period of time) for at least 7 years after the day on which a report containing the information is published under subclause 5.37(1)(c)	2	4					✓	During the audit period of 1 October 2022 to 30 September 2025 APA did not have any small use customers connected to their network. Therefore, they were not contracted to provide metering services and this obligation was not relevant for this audit period.					✓	During the audit period of 1 October 2022 to 30 September 2025 APA did not have any small use customers connected to their network. Therefore, they were not contracted to provide metering services and this obligation was not relevant for this audit period.
447	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.	2	2	✓					It should be noted that clause 6.1(1)(c) of the code requires compliance with a metrology procedure which has not been developed by the licensee. This is also the case for communication rules as per clause 6.1(1)(b). No such procedures were not in effect during the audit period and therefore this obligation cannot be rated with respect to these clauses. Service level agreements (PPAs with customers) are complied with to the satisfaction of customers and third parties, as required under the Code. This audit finds that the licensee has complied with 6.1(1)(a) as it was found that there were no compliance issues with service level agreements during the audit period.	✓					The Licensee provided evidence of effective controls with respect to adherence to their service level agreements with all users for this asset. PPA's reviewed also include sufficient provisions for users to request energy verification, internal audits and entitlements for liquidated damages in the event of issues with non-compliance by the licensee. Evidence of controls these activations have been evidenced (such as energy verification request forms). This obligation is considered to be effectively controlled.
448	Electricity Industry Metering Code, clause 6.1(2)	A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed.	2	4					✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that the network is a private network and therefore no such obligations were relevant during the audit period.					✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that the network is a private network and therefore no such obligations were relevant during the audit period.
448A.	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).	2	4		✓				Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that the metrology procedure prescribed in subclause 6.2 had not been submitted for ERA approval.		✓				Current controls in place relating to metering prioritise fulfilment of customer service agreements. There is sufficient detail to demonstrate general controls across obligations perform adequately. APA is developing a metering management plan, revision of the interconnection Agreement mechanism, and to take a clear position of those metering code obligations where APA accepts that it will continue to be non-compliant on the basis that it is not practical or useful to establish formal metrology procedures. In the absence of controls during the audit period, this obligation is considered adequately controlled but requires improvement, controls rating is B. Recommendation 1/2025 applies.
448B.	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.	2	4					✓	Based on the findings for obligation 448A, this obligation is not relevant for the current audit period.					✓	Based on the findings for obligation 448A, this obligation is not relevant for the current audit period.
448C	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.	2	4		✓				Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that APA has not complied with clause 6.19A(1) as communication rules had not been published.		✓				Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it is understood that APA plans to submit an intent of non-compliance. Current communications protocols used by the licensee demonstrate effective operations and compliance with communications requirements in the PPAs to the satisfaction of their customers.

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					1	2	3	4	N/R	Compliance observation	A	B	C	D	N/P	Control observation
																Recommendation 1/2025 applies.
448D	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.	2	4					✓	Based on the findings for obligation 448B this has not been assessed.					✓	Based on the findings for obligation 448B this has not been assessed.
449	Electricity Industry Metering Code, clause 6.20(4)	A network operator must amend any document in accordance with the ERA's final recommendation.	2	4					✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that no amendments had been made to any of the documentation submitted to the ERA during this audit period. Therefore, this obligation was not relevant for the assessed audit period.					✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that no amendments had been made to any of the documentation submitted to the ERA during this audit period. Therefore, this obligation was not relevant for the assessed audit period.
450	Electricity Industry Metering Code, clause 6.20(5)	The network operator must publish any document that has been amended under subclause 6.20(4).	2	4					✓	Based on the findings for obligation 449 this was not assessed.					✓	Based on the findings for obligation 449 this was not assessed.
451	Electricity Industry Metering Code, clause 7.2(1)	Code participants must use reasonable endeavours to ensure that they can send and receive a notice by post, facsimile and electronic communication and must notify the network operator of a telephone number for voice communication in connection with the Code.	NR	5		✓				Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there are multiple ongoing communication links between the ERA and APA. All forms of communication required in obligation 451 are accounted for with the exception of facsimile. The non-compliance has been documented in the provided compliance report.		✓				APA does not currently have devices capable of transmitting and receiving facsimiles and does not support facsimile as a means of communication on the basis that it is an outdated mode of communication and not currently in use in relation to any of APA's assets. APA issued a notice of intent of noncompliance to the ERA. Recommendation 5/2025 applies.
452	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.	2	4	✓					Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that two changes to contact details had occurred during the audit period. Change from Alinta to APA was communicated with ERA on 07/11/2023 & DEMIRS on 12/04/2024. Evidence of this communication was provided for review. Therefore, it is concluded that APA complied with this obligation.	✓					Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that two changes to contact details had occurred during the audit period. Change from Alinta to APA was communicated with ERA on 07/11/2023 & DEMIRS on 12/04/2024. Evidence of this communication was provided for review. Therefore, it is concluded that adequate controls were in place.
453	Electricity Industry Metering Code, clause 7.2(4)	If requested by a network operator with whom it has entered into an access contract, the Code participant must notify its contact details to a network operator within 3 business days after the request.	2	4					✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that no contact detail requests were made during the audit period					✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that no contact detail requests were made during the audit period
454	Electricity Industry Metering Code, clause 7.2(5)	A Code participant must notify any affected network operator of any change to the contact details it notified to the network operator under subclause 7.2(4) at least 3 business days before the change takes effect.	2	4					✓	As APA operate a private network this obligation was not relevant during the audit period.					✓	As APA operate a private network this obligation was not relevant during the audit period.
455	Electricity Industry Metering Code, clause 7.5	A Code participant must subject to subclauses 5.17A and7.6 not disclose, or	2	4					✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there were no					✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed

Compliance Manual No	Obligation under Licence conditions	Description	Type (1, 2 or NR)	Audit Priority (1=highest, 5=lowest)	Compliance rating						Control rating					
					1	2	3	4	N/R	Compliance observation	A	B	C	D	N/P	Control observation
		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.								instances where confidential information had been disclosed or reproduced.						that there were no instances where confidential information had been disclosed or reproduced.
456	Electricity Industry Metering Code, clause 7.6(1)	A Code participant must disclose or permit the disclosure of confidential information that is required to be disclosed by the Code.	2	4					✓	Based on the finding for obligation 455 this obligation was not relevant for the current audit period.					✓	Based on the finding for obligation 455 this obligation was not relevant for the current audit period.
457	Electricity Industry Metering Code, clause 8.1(1)	If any dispute arises between any Code participants, then (subject to subclause 8.2(3)) representatives of disputing parties must meet within 5 business days after a notice given by a disputing party to the other disputing parties and attempt to resolve the dispute by negotiations in good faith.	NR	5					✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there were no instances of a formal dispute being raised. APA confirmed that there is a protocol in place for disputes regarding PPAs and connection agreements.					✓	Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations, it was confirmed that there were no instances of a formal dispute being raised. APA confirmed that there is a protocol in place for disputes regarding PPAs and connection agreements.
458	Electricity Industry Metering Code, clause 8.1(2)	If a dispute is not resolved within 10 business days after the dispute is referred to representative negotiations, the disputing parties must refer the dispute to a senior management officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.	NR	5					✓	Based on the findings for obligation 457 this obligation was not relevant for the current audit period.					✓	Based on the findings for obligation 457 this obligation was not relevant for the current audit period.
459	Electricity Industry Metering Code, clause 8.1(3)	If the dispute is not resolved within 10 business days after the dispute is referred to senior management negotiations, the disputing parties must refer the dispute to the senior executive officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.	NR	5					✓	Based on the findings for obligation 457 this obligation was not relevant for the current audit period.					✓	Based on the findings for obligation 457 this obligation was not relevant for the current audit period.
460	Electricity Industry Metering Code, clause 8.1(4)	If the dispute is resolved by representative negotiations, senior management negotiations or CEO negotiations, the disputing parties must prepare a written and signed record of the resolution and adhere to the resolution.	2	4					✓	Based on the findings for obligation 457 this obligation was not relevant for the current audit period.					✓	Based on the findings for obligation 457 this obligation was not relevant for the current audit period.
461	Electricity Industry Metering Code, clause 8.3(2)	The disputing parties must at all times conduct themselves in a manner which is directed towards achieving the objective in subclause 8.3(1).	NR	5					✓	Based on the findings for obligation 457 this obligation was not relevant for the current audit period.					✓	Based on the findings for obligation 457 this obligation was not relevant for the current audit period.
Electricity Industry (Network Quality and Reliability of Supply) Code – Licence conditions and obligations																

Compliance Manual No	Obligation under Licence conditions	Description	Type (1, 2 or NR)	Audit Priority (1=highest, 5=lowest)	Compliance rating						Control rating					
					1	2	3	4	N/R	Compliance observation	A	B	C	D	N/P	Control observation
462	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.	2	4	✓					Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations it is understood that the electricity supplied to its customers electrical installations complied with the standards prescribed in the PPAs. It was confirmed that ongoing monitoring of power quality was performed in real time via Voltage, Frequency, and Reactive Power measurements. Therefore, it is concluded that APA complied with this obligation.	✓					Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations it is understood that the electricity supplied to its customers electrical installations complied with the standards prescribed in the PPAs. It was confirmed that ongoing monitoring of power quality was performed in real time via Voltage, Frequency, and Reactive Power measurements. Therefore, it is concluded that adequate controls were in place.
463	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.	2	4	✓					Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations it was confirmed that no disconnections were made outside of allowed circumstances within the audit period. APA has disconnected the supply of electricity due to weather events. Therefore, it is concluded that APA complied with this obligation.	✓					Through discussions with APA's Regulatory Compliance Manager and Head of Power Operations it was confirmed that no disconnections were made outside of allowed circumstances within the audit period. APA has disconnected the supply of electricity due to weather events. Therefore, it is concluded that adequate controls were in place.
464	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.	2	4	✓					It was confirmed through discussion with APA's Regulatory Compliance Manager and Head of Power Operations that the occurrence and duration of disruptions was kept to a minimum. Evidence in the form of a planned outage database and outage list was provided by APA. It was confirmed that 11 outages occurred during the audit period at the Newman plant and that a network recovery procedure has been created and applied during these circumstances. These 11 outage entries included the cause of the outage, outage type, out of service date, return to service date, and note explaining the event. Outage causes ranged from lightning strikes, over-current and over-frequency trips, to various faults. A copy of the network recovery procedure has been provided by APA. This report describes the full network energisation process following a line trip or complete blackout. Therefore, it is concluded that APA complied with this obligation.	✓					It was confirmed through discussion with APA's Regulatory Compliance Manager and Head of Power Operations that the occurrence and duration of disruptions was kept to a minimum. Evidence in the form of a planned outage database and outage list was provided by APA. It was confirmed that 11 outages occurred during the audit period at the Newman plant and that a network recovery procedure has been created and applied during these circumstances. These 11 outage entries included the cause of the outage, outage type, out of service date, return to service date, and note explaining the event. Outage causes ranged from lightning strikes, over-current and over-frequency trips, to various faults. A copy of the network recovery procedure has been provided by APA. This report describes the full network energisation process following a line trip or complete blackout. Therefore, it is concluded that adequate controls were in place.
465	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.	2	4	✓					A copy of the network recovery procedure has been provided by APA. This report describes the full network energisation process following a line trip or complete blackout. It includes an overview of scope, definitions, responsibilities, control measures, diagrams of circuit breaker statuses, and detailed steps on the energisation process. These steps show that the licensee aimed to reduce the effect of any interruptions as reasonably practical. Therefore, it is concluded that APA complied with this obligation.	✓					A copy of the network recovery procedure has been provided by APA. This report describes the full network energisation process following a line trip or complete blackout. It includes an overview of scope, definitions, responsibilities, control measures, diagrams of circuit breaker statuses, and detailed steps on the energisation process. These steps show that the licensee aimed to reduce the effect of any interruptions as reasonably practical. Therefore, it is concluded that adequate controls were in place.
466	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.	2	4					✓	It was confirmed through discussion with APA's Regulatory Compliance Manager and Head of Power Operations that there is no alternate supply.					✓	It was confirmed through discussion with APA's Regulatory Compliance Manager and Head of Power Operations that there is no alternate supply.
468	Electricity Industry (Network Quality and Reliability of	A distributor or transmitter must, so far as reasonably practicable, ensure that customers in specified areas do not have average total	2	4	✓					A copy of the network recovery procedure has been provided by APA. This report describes the full network energisation process following a line trip or complete blackout. It includes an overview of scope, definitions, responsibilities, control	✓					A copy of the network recovery procedure has been provided by APA. This report describes the full network energisation process following a line trip or complete blackout. It includes an overview of scope, definitions, responsibilities, control measures, diagrams of circuit

Compliance Manual No	Obligation under Licence conditions	Description	Type (1, 2 or NR)	Audit Priority (1=highest, 5=lowest)	Compliance rating						Control rating					
					1	2	3	4	N/R	Compliance observation	A	B	C	D	N/P	Control observation
	Supply) Code, clause 13(2)	lengths of interruptions of supply greater than specified durations.								measures, diagrams of circuit breaker statuses, and detailed steps on the energisation process. These steps show that the licensee aimed to reduce the length of any interruptions as reasonably practical. Therefore, it is concluded that APA complied with this obligation.						breaker statuses, and detailed steps on the energisation process. These steps show that the licensee aimed to reduce the length of any interruptions as reasonably practical. Therefore, it is concluded that adequate controls were in place.
469	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.	2	4	✓					The specified calculation method for average total length of supply interruptions is specified in each PPA. The outage register states beginning and end time, in minutes. Evidence of this was supplied by APA in the planned outage report. Therefore, it is concluded that APA complied with this obligation.	✓					The specified calculation method for average total length of supply interruptions is specified in each PPA. The outage register states beginning and end time, in minutes. Evidence of this was supplied by APA in the planned outage report. Therefore, it is concluded that adequate controls were in place.
470	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 Electricity Industry (Network Quality and Reliability of Supply) Code 2005.	2	4					✓	It was confirmed through discussion with APA's Regulatory Compliance Manager and Head of Power Operations that there were no instances of the minister issuing instruments under section 14 during the audit period.					✓	It was confirmed through discussion with APA's Regulatory Compliance Manager and Head of Power Operations that there were no instances of the minister issuing instruments under section 14 during the audit period.
471	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.	2	4					✓	It was confirmed through discussion with APA's Regulatory Compliance Manager and Head of Power Operations that there were no instances of modifications related to power quality or reliability during the audit period.					✓	It was confirmed through discussion with APA's Regulatory Compliance Manager and Head of Power Operations that there were no instances of modifications related to power quality or reliability during the audit period.
477	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.	2	4	✓					It was confirmed through discussion with APA's Regulatory Compliance Manager and Head of Power Operations that compliance is monitored via a software platform, data management system and planned outage database. Therefore, it is concluded that APA complied with this obligation.	✓					It was confirmed through discussion with APA's Regulatory Compliance Manager and Head of Power Operations that compliance is monitored via a software platform, data management system and planned outage database. Therefore, it is concluded that adequate controls were in place.
478	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.	2	4	✓					Records of information have been kept by APA via their data management system and planned outage database used for record keeping of compliance. Therefore, it is concluded that APA complied with this obligation.	✓					Records of information have been kept by APA via their data management system and planned outage database used for record keeping of compliance. Therefore, it is concluded that adequate controls were in place.
479	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.	2	4					✓	It was confirmed through discussion with APA's Regulatory Compliance Manager and Head of Power Operations that no requests for power quality investigations occurred during this audit period.					✓	It was confirmed through discussion with APA's Regulatory Compliance Manager and Head of Power Operations that no requests for power quality investigations occurred during this audit period.
480	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.	2	4					✓	Based on the findings for obligation 479 this obligation is not relevant for the current audit period.					✓	Based on the findings for obligation 479 this obligation is not relevant for the current audit period.

Appendix B

List Of Documents Provided

Filenames:

Table 16 File names table

Index	File Name
1	EIRL6_filelist.csv
2	AETRH EIRL6 Annual Compliance Report 2022-23 Final.pdf
3	Compliance Report - EIRL6 2024 - Updated.pdf
4	Compliance Report - EIRL 6 (Final) 29.08.2025 - Signed.pdf
5	EIRL10 - 2022 Performance Audit Report.pdf
6	EIRL11 - 2022 Performance Audit Report.pdf
7	EIRL6 - 2022 Performance Audit Report.pdf
8	Notice---2022-audit-and-review---EIRL006---Alinta-Energy-Transmission-Roy-Hill-Pty-Ltd - Audit Frequency.pdf
9	Notice---2022-Audit-and-Review---EIRL010---Alinta-Energy-Transmission-Chichester-Pty-Ltd - Audit Frequency.pdf
10	Notice---2022-Audit-and-Review---EIRL011---Alinta-Energy-Chichester-Pty-Ltd - Audit Frequency.pdf
11	1.3 Asset Management System v3.0.pdf
12	2.5 Asset Management Planning v3.0.pdf
13	Asset Life-cycle Planning Procedure V5.2.pdf
14	Maximo.png
15	Power Performance Report - NPS.jpg
16	1. 20190809 - Chichester PPA.pdf
17	Asset Life-cycle Planning Procedure V5.2 (2).pdf
18	7.3 Asset Management Planning (Asset Lifecycle Procedure).jpg
19	PES - TG404 Control System Upgrade - Gate 2.pdf
20	PES - TG404 Control System Upgrade - Gate 2.pdf
21	APA Group Standard - Risk Management (2).pdf
22	2.5 Asset Management Planning v3.0.pdf
23	2.1 project proposal .png
24	3.2 Projects and Shutdowns v3.0.pdf
25	AEME-0000-000-FRM-002 Project Management Framework.docx
26	APA Group Standard - Project Assurance.pdf
27	Prioritisation Process.jpg
28	Project Delivery Framework.jpg
29	Project Proposal tool extract 001.jpg
30	Project Proposal tool extract 002.jpg
31	Project Proposal tool extract 003.jpg
32	Project Proposal tool extract 004.jpg
33	Project Proposal tool extract 005.jpg
34	Project Proposal.jpg
35	2.2A - Prioritisation Process.png
36	2.2B - Stage Gate Documents and NPV Analysis.png
37	PES - TG404 Control System Upgrade - Gate 2 (1).pdf
38	3.1 Asset Integration v3.0.pdf
39	Asset Life-cycle Planning Procedure V5.2 (2).pdf

Index	File Name
40	2.4a - AEME-0000-000-FRM-002 Project Management Framework (1).docx
41	2.4b & 2.5 - Project Delivery Framework.png
42	3.3 Asset Commissioning and Handover v3.0.pdf
43	2.4b & 2.5 - Project Delivery Framework.png
44	530-TP-A-0021 - Project Completion_Closeout Register Template.xlsx
45	2.1 Asset Optimisation v3.4.pdf
46	2.2 Reliability and Maintenance Strategy v3.0.pdf
47	3.2 Power Performance Dashboard.png
48	ATP-PR-AM-0003 - Suspension of Operating Assets.pdf
49	3.6 Asset Decommissioning v2.0.pdf
50	1.1 Operations Risk & Opportunities v3.0.pdf
51	2.3 Asset Risks and Opportunities v1.3.pdf
52	4.2 &4 .2a Power Performance Dashboard.png
53	5.3 Regulatory Compliance v4.0.pdf
54	APA Group Procedure - Compliance Management System Handbook (4).pdf
55	APA Group Standard - Risk and Compliance.pdf
56	APA Policy - Compliance Management.pdf
57	Assets - compliance plan view - EIRL11.xlsx
58	Assets - compliance plan view - EIRL6.xlsx
59	Compliance Obligations in Vigilant.pdf
60	EIRL 10 Example - Obligation, Control & Action.pdf
61	Vigilant - Obligations, controls & actions .pdf
62	4.4a Power Performance Dashboard.png
63	4.4B - Customer Survey Example.pdf
64	4.3 Integrated Operations v2.0.pdf
65	4.5 Incident Management v1.0 2025-05.docx.pdf
66	4.6 Maintenance Execution v3.0.pdf
67	6.3 Safe Work System v3.0.pdf
68	6.4 Process Safety v4.1 2025-09-15.pdf
69	5.3 - Maximo Locations Extract.png
70	Asset list .xlsx
71	APA Policy - Accounting.pdf
72	5.6 Training Status Dashboard.png
73	6.6 Training and Competency v1.0.pdf
74	Maximo Maintenance System Training.jpg
75	Maximo O&M eLearn screenshot.jpg
76	WA O&M Competency Matrix_2025.xlsx
77	Workday - Getting Started Toolkit.pdf
78	Workday eLearning screenshot.jpg
79	Workday Support Hub sharepoint site.jpg
80	APA Group Standard - Major Maintenance Management.pdf

Index	File Name
81	work order completing_tracking dashboard extract.jpg
82	Work order completion history extract 001.jpg
83	Work Order completion tracking extract.jpg
84	6.4A - Operational Incidents Dashboard.png
85	6.4b APA HSE GD 07.01 T1 Incident, Near Miss & Hazard Management Guideline.pdf
86	APA Group Standard - Incident Management.pdf
87	6.5a - Work Order Dashboard - Priority Levels.png
88	6.5b - Work Order Dashboard - Priority Levels.png
89	7.1 maximo training.png
90	APA Policy - Enterprise Security.pdf
91	EKTIMO Report.pdf
92	Physical Access Management Standard.pdf
93	Power Performance Report Detailed Requirements - As Built.docx
94	Power Performance Report Detailed Requirements - As Built.pdf
95	RedEye Operations and Service Manual - V0.1.pdf
96	Service Continuity Management Standard (2).pdf
97	Workday & Adaptive SOC 1 Type 2_ 10_1_24 - 3_31_25.pdf
98	Workday Enterprise SOC 2 Type 2_ 10_1_23 - 9_30_24.pdf
99	5.1 Asset Data and Records v3.0.pdf
100	Acceptable Use of Technology Standard.pdf
101	Creating Strong Passwords FAQs.pdf
102	Information Security Classification and Handling Standard.pdf
103	Maximo Role Security Groups (2).xlsx
104	APA Group Standard - Physical Security and Natural Hazards Risk Management.pdf
105	Service Continuity Management Standard (2).pdf
106	7.6 - EKTIMO Report.pdf
107	Reg Compliance - OPD.jpg
108	Service Continuity Management Standard (2) (1).pdf
109	APA Group Procedure - Risk Management (3).pdf
110	APA Group Standard - Risk Management (1).pdf
111	APA Policy - Risk Management (3).pdf
112	1.1 Operations Risk & Opportunities v3.0.pdf
113	2.3 Asset Risks and Opportunities v1.3.pdf
114	Risk Monitoring via OPD - Newman Power Station.jpg
115	Vigilant - Risk Registers.pdf
116	RSK1687 - Loss of turbine or generator.pdf
117	1.6 Business Continuity Management v3.0.pdf
118	APA Policy - Enterprise Resilience (1).pdf
119	Business Continuity Plan 2024 extract Pilbara Sites.docx
120	EMT ER Management Plan.pdf
121	ERT ER Field Manual.pdf

Index	File Name
122	Pilbara_Energy_Newman_Power_Station_WA_Version_No3.3 (1).pdf
123	1.2 Operations Strategy and Business Objectives.pdf
124	10.2 - 10.3A - APA ESPP - Divisional Strategic Plan_v.1.1 - Operations.pptx
125	10.2 - 10.3B - FY25 Budget_FY26-FY27 Forecast Timetable.xlsx
126	10.6B - Financial Performance (OPD).png
127	2.6 Financial Performance v2.0.pdf
128	2024_25-BSF - Annual Plan (Rev. 1).pdf
129	APA 1H25 Interim Results.pdf
130	APA Annual Report FY2023.pdf
131	APA Annual Report FY2024.pdf
132	APA Annual Report FY21.pdf
133	APA Annual Report FY22.pdf
134	APA Annual Report FY23.pdf
135	APA Annual Report FY24.pdf
136	202408_CF_SOP_CV Summary Update v1.0 (CLEAN).docx
137	24083-RP-A-0002_1_TG404 Develop Report.pdf
138	Asset Life-cycle Management Plan - Excerpt PES.jpg
139	Lifecycle Interface Tool Extract.PNG
140	Asset Life-cycle Planning Procedure V5.2 (1).pdf
141	1.3 Asset Management System v3.0.pdf
142	1.4 Integrated Assurance v3.0.pdf
143	APA-Procedure---Business-Process-Review (1).pdf
144	APA Group Standard - Operational Excellence (3).pdf
145	Business Processes under Operational Excellence.zip
146	Intro - Ops Ex.pptx
147	OPD Asset Performance Dashboards - NPS.docx
148	APA - Notification of Organisational Restructure.eml
149	ERA - Notification of Organisational Restructure 29.07.2025.pdf
150	EIRL10 - 2022 AMS Review Report.pdf
151	EIRL11 - 2022 AMS Review Report.pdf
152	EIRL6 - 2022 AMS Review Report.pdf
153	APA_PROC_-_Supplier_Invoice_and_Payments_Detail.xlsx
154	EIRL6, 10 & 11 - Annual & Qrtly Invoices Paid - Financial Tracking Tool (2024).jpg
155	EIRL6, 10 & 11 - Annual & Qrtly Invoices Paid - Financial Tracking Tool (2025).jpg
156	Vigilant - Obligations, controls & actions (payment of fees).pdf
157	ARTRX_1005780.pdf
158	ARTRX_1006058.pdf
159	ARTRX_1006414.pdf
160	ARTRX_1007089.pdf
161	ARTRX_1007692.pdf
162	ARTRX_1007869.pdf

Index	File Name
163	ARTRX_1005640.pdf
164	ARTRX_1006075.pdf
165	ARTRX_1006440.pdf
166	ARTRX_1007068.pdf
167	ARTRX_1007704.pdf
168	ARTRX_1007713.pdf
169	ARTRX_1005744.pdf
170	ARTRX_1006031.pdf
171	ARTRX_1006413.pdf
172	ARTRX_1007033.pdf
173	ARTRX_1007655.pdf
174	ARTRX_1007830.pdf
175	ERA_30-SEP-24_114182_274773.pdf
176	ERA_30-SEP-25_114182_274773.pdf
177	ERA_31-AUG-24_114182_274773.pdf
178	ERA_31-AUG-25_114182_274773.pdf
179	107 - 183-120020-ACCT 12000013__Remittance_2025-03-07.pdf
180	107 - 183-125467-LEASE_241910000133_Remittance_2024-07-10.pdf
181	107 - EIRL10 - L46-137 DMIRS Rent Notice 20.12.2024 - $12,487.20.pdf
182	107 - EIRL10 - L46-139 DMIRS Rent Notice 10.01.2025 - $13,120.80.pdf
183	107 - EIRL10 - L46-139 DMIRS Rent Notice 11.01.2024 - $11,928.00.pdf
184	107 - EIRL10 - L46-140 DEMIRS Rent Notice 10.01.2025 - $3,801.60.pdf
185	107 - EIRL10 - L46-140 DEMIRS Rent Notice 11.01.2024 - $3,456.00.pdf
186	107 - EIRL10 - L46-143 DEMIRS Annual Rent Notice 08.01.2024 - $96.00.pdf
187	107 - EIRL10 - L46-143 DEMIRS Rent Notice 07.01.2025 - $105.60.pdf
188	107 - EIRL11 - L46-138 DMIRS Annual Rent Notice 02.01.2024 - $6,336.00.pdf
189	107 - EIRL11 - L46-138 DMIRS Rental Notice 02.01.2025 - $6,969.60.pdf
190	107 - EIRL6 - DPLE Invoice_LD395952 - 01.07.2024 to 31.12.2024 - $105,000.00.pdf
191	107 - Land Rent Notice - Payment Recon.xlsx
192	2025-annual-report.pdf
193	231101_asx_apa_completes_alinta_energy_pilbara_acquisition.pdf
194	240522_asx_apa_presentation_pilbara_energy_system_investor_site_visit.pdf
195	APA Policy - Accounting.pdf
196	fy24-annual-report.pdf
197	Auditor (GHD) approval letter - Audits and Reviews 2025 - APA Group - EIRL006 EIRL010 EIRL011.PDF
198	Commencement letter - 2025 audits and reviews - EIRL006, EIRL10, EIRL11.pdf
199	Plan approval letter - 2025 Audits and Reviews - APA Group - EIRL006 EIRL010 EIRL011.PDF
200	APA - Notification of Organisational Restructure.eml
201	APA Group - Change to Asset Management System.eml
202	APA Group - CrowdStrike SCADA outage.eml
203	APA Group Annual Compliance Reports - EGL01, EGL26, EIRL6, EIRL7, EIRL10, EIRL11.eml

Index	File Name
204	ERA WA Invoice invoice 1005383..eml
205	FW Outstanding Tax Invoice 1005382 for APA Transmission (Chichester) Pty Ltd.eml
206	Invoices - Chichester and Roy Hill (1005549_1005581_1005603).eml
207	Notice of Intent - Non Compliance to Metering Code.pdf
208	Notice of Intent - Non-Compliance to Metering Code.eml
209	Notice-minor-licence-amendment-entity-name-change-EIRL006-EIRL007-EIRL010-EIRL011-Alinta-Energy-entities.pdf
210	RE 2024 Standing Charge Data reporting.eml
211	RE 2024-05-03 DGS014428 Query Change to Licence Details Notification.eml
212	RE Accident Report - Property Damage.eml
213	Re APA - Notification of Organisational Restructure.eml
214	RE APA Group Annual Compliance Reports - EGL01, EGL26, EIRL6, EIRL7, EIRL10, EIRL11.eml
215	RE Approval - minor amendment (entity name change) to licences EIRL6, EIRL7, EIRL10 and EIRL11.eml
216	RE Invoice 1005640.eml
217	Re Licensing - APA Group Change of Ownership Notification.eml
218	Re Notification to the ERA - APA main contact change.eml
219	RE Request for progress updates - Audits and reviews - EIRL6, EIRL10 and EIRL11.eml
220	RE Standing Charge Invoices relating to EIRL6, EIRL7, EIRL10, EIRL11.eml
221	RE TRIM APA Group Annual Compliance Reports - EGL01, EGL26, EIRL6, EIRL7, EIRL10, EIRL11.eml
222	RE TRIM RE Request for progress updates - Audits and reviews - EIRL6, EIRL10 and EIRL11.eml
223	RE TRIM RE Standing Charge Invoices relating to EIRL6, EIRL7, EIRL10, EIRL11.eml
224	RE Updated Contact Details for Pilbara Energy Assets.eml
225	REFURT~1.EML
226	Request to Amend Licence.eml
227	Updated Contact Details for Pilbara Energy Assets.eml
228	[EXT] 2023-24 Data reporting - Minor updates to handbook and datasheet for electricity distributors.eml
229	[EXT] 2023-24 Data reporting - Minor wording change for planned _ unplanned indicators in electricity distribution handbook.eml
230	[EXT] 2024 Standing Charge Data reporting.eml
231	[EXT] 2024-25 Performance report - Handbooks and datasheets now available.eml
232	[EXT] 2024_25 review of Audit and Review Guidelines - Public consultation.eml
233	[EXT] ACMA Renewal of Apparatus Licence(s) – Renewal Notice.eml
234	[EXT] Approval - minor amendment (entity name change) to licences EIRL6, EIRL7, EIRL10 and EIRL11.eml
235	[EXT] Clause references in electricity distributor handbook and reporting form.eml
236	[EXT] Economic Regulation Authority _ Tax Invoice 1005780 for APA Transmission (Chichester) Pty Ltd.eml
237	[EXT] Economic Regulation Authority _ Tax Invoice 1006031 for APA Transmission (Roy Hill) Pty Ltd.eml
238	[EXT] Economic Regulation Authority _ Tax Invoice 1006058 for APA Transmission (Chichester) Pty Ltd.eml
239	[EXT] Economic Regulation Authority _ Tax Invoice 1006413 for APA Transmission (Roy Hill) Pty Ltd.eml
240	[EXT] Economic Regulation Authority _ Tax Invoice 1006440 for APA (Chichester) Pty Ltd.eml
241	[EXT] Economic Regulation Authority _ Tax Invoice 1007655 for APA Transmission (Roy Hill) Pty Ltd.eml
242	[EXT] Economic Regulation Authority _ Tax Invoice 1007692 for APA Transmission (Chichester) Pty Ltd.eml
243	[EXT] Economic Regulation Authority _ Tax Invoice 1007704 for APA (Chichester) Pty Ltd.eml

Index	File Name
244	[EXT] Economic Regulation Authority _ Tax Invoice 1007830 for APA Transmission (Roy Hill) Pty Ltd.eml
245	[EXT] Economic Regulation Authority _ Tax Invoice 1007869 for APA Transmission (Chichester) Pty Ltd.eml
246	[EXT] ERA - Statement of Account as at 30-SEP-24.eml
247	[EXT] ERA - Statement of Account as at 30-SEP-25.eml
248	[EXT] ERA - Statement of Account as at 31-AUG-24.eml
249	[EXT] ERA - Statement of Account as at 31-AUG-25.eml
250	[EXT] ERA Webinar _ Q&A Overview of changes to 2024 utility performance reporting.eml
251	[EXT] FW APA Group Annual Compliance Reports - EGL01, EGL26, EIRL6, EIRL7, EIRL10, EIRL11.eml
252	[EXT] FW Licensing - APA Group Change of Ownership.eml
253	[EXT] FW Reminder 2024-25 Performance Datasheets (Energy retailers & distributors) due by 31 August 2025.eml
254	[EXT] FW Reminder from the ERA - Submission of 2024_25 annual compliance reports.eml
255	[EXT] FW Standing Charge Data for Retail.eml
256	[EXT] RE 2024-05-03 DGS014428 Query Change to Licence Details Notification.eml
257	[EXT] RE APA - Notification of Organisational Restructure.eml
258	[EXT] RE APA Group - Change to Asset Management System.eml
259	[EXT] RE Invoices - Chichester and Roy Hill (1005549_1005581_1005603).eml
260	[EXT] RE Notification to the ERA - APA main contact change.eml
261	[EXT] RE Outstanding Tax Invoice 1005382 for APA Transmission (Chichester) Pty Ltd.eml
262	[EXT] RE Request to Amend Licence.eml
263	[EXT] RE Standing Charge Invoices relating to EIRL6, EIRL7, EIRL10, EIRL11.eml
264	[EXT] RE TRIM APA Group Annual Compliance Reports - EGL01, EGL26, EIRL6, EIRL7, EIRL10, EIRL11.eml
265	[EXT] RE TRIM Notice of Intent - Non-Compliance to Metering Code.eml
266	[EXT] RE TRIM RE Request for progress updates - Audits and reviews - EIRL6, EIRL10 and EIRL11.eml
267	[EXT] RE Updated Contact Details for Pilbara Energy Assets.eml
268	[EXT] Reminder - Request - Data used to calculate 2024 Licence Standing Charges.eml
269	[EXT] Reminder 2024-25 Performance Datasheets (Energy retailers & distributors) due by 31 August 2025.eml
270	[EXT] Reminder from the ERA - Submission of 2023_24 annual compliance reports.eml
271	[EXT] Request - Data used to calculate 2024 Licence Standing Charges - Energy Licensees.eml
272	[EXT] Request for progress updates - Audits and reviews - EIRL6, EIRL10 and EIRL11.eml
273	[EXT] Request for shapefile of licensed operating area map EIRL10.eml
274	[EXT] [SEC=OFFICIAL] RE Update of Details for Licences 9827603_1 and 9827604_1 [Ref CSC2024-15508] CRM001635004908.eml
275	_E191F~1.EML
276	317 - APA Group Procedure - Ring Fencing.pdf
277	Solar Farm tariff meters Roy Hill.jpeg
278	Switch room 191 - Tariff Meter Roy HIll.jpeg
279	Switch room 291 - Tariff Meter Roy HIll.jpeg
280	27-11-2025 Audit.zip
281	321 & 402 – Commentary on interval meter data & substitution of data.pdf
282	INC0293402 July 2025 Roy Hill backfill.docx
283	[EXT] RE Mis-matched PI data.eml

Index	File Name
284	322 & 337 - FMG Chichester PPA Invoice Model - Accrual.xlsm
285	322 & 337 - Roy Hill PPA Invoice Model - Accrual.xlsm
286	Deed_of_Amendment_%26_Restatement_-_Newman_Power_Purchase_Agreement_-_002.pdf
287	1. 20190809 - Chichester PPA (1).pdf
288	201909~1.PDF
289	333, 340, 421 - Cloud Break Tarrif Meter test report.pdf
290	333, 340, 421 - RH SWR191_Main Meter Test reoprt 2025.pdf
291	333, 340, 421 - RH SWR1_CHECK Meter Test reoprt 2025.pdf
292	333, 340, 421 - Roy Hill Tarrif Meter test report.pdf
293	333, 340, 421- Christmas Creek Tarrif Meter Test Report.pdf
294	344 - 0416-E2-1558-11 Check Meter Feeder B.pdf
295	333, 340, 421 - Cloud Break Tarrif Meter test report.pdf
296	333, 340, 421 - RH SWR191_Main Meter Test reoprt 2025.pdf
297	333, 340, 421 - RH SWR1_CHECK Meter Test reoprt 2025.pdf
298	333, 340, 421 - Roy Hill Tarrif Meter test report.pdf
299	333, 340, 421- Christmas Creek Tarrif Meter Test Report.pdf
300	2024-06-01_PREVIOUS_PERIOD_CHICHESTER.xlsx
301	2024-06-01_PREVIOUS_PERIOD_ROY HILL.xlsx
302	APA_PI_CHICHESTER - 30 Min Data.xls
303	APA_PI_ROY HILL.xls
304	0416-E2-1505-01.E.AB.PDF
305	0416-E2-1531-04.D.AB.PDF
306	0416-E2-1531-05.D.AB.PDF
307	Metering Database.xlsx
308	367 - Service Continuity Classification.pdf
309	7.5 - Service Continuity Management Standard (2).pdf
310	Energy Data Verification Request Form.pdf
311	447 - Commentary on compliance with PPAs.pdf
312	Notice of Intent - Non Compliance to Metering Code.pdf
313	Notice of Intent - Non-Compliance to Metering Code.eml
314	APA - Primary Contact Change & Notification of new EIRL.eml
315	New regulatory compliance contact for WA power assets.msg
316	Updated Contact Details for Pilbara Energy Assets.eml
317	Vigilant Obligations & Controls - Contact Details.pdf
318	[EXT] RE APA - Primary Contact Change & Notification of new EIRL.eml
319	464 - Outages EIRL Newman.xlsx
320	465 - GTCO-HS-SOP-400-1000 Restoration 1 251122.pdf
321	Asset Life-cycle Planning Procedure V5.2 (3).pdf
322	APA Group Standard - Operational Excellence.pdf
323	APA Group Standard - Risk Management.pdf
324	Asset Management Planning v2.0 2025-04.docx.pdf

Index	File Name
325	Operations Risk & Opportunities.pdf
326	3.1 - Asset Integration v2.1 2025-05.docx.pdf
327	APA Group Procedure - Compliance Management System Handbook.pdf
328	Asset Life-cycle Planning Procedure V5.2.pdf
329	Project Delivery Framework.jpg
330	Asset Decommissioning v1.0 2025-06.pdf
331	APA 1H25 Interim Results.pdf
332	APA Annual Report FY21.pdf
333	APA Annual Report FY22.pdf
334	APA Annual Report FY23.pdf
335	APA Annual Report FY24.pdf
336	APA Group Procedure - Compliance Management System Handbook.pdf
337	Incident Management v1.0 2025-05.docx.pdf
338	320-PL-ER-0001 ER Managment Plan.pdf
339	APA Group Procedure - Ring Fencing.pdf
340	APA Group Procedures – Risk Management System Processes.pdf
341	APA Group Standard - Customer and Commercial Contracting.pdf
342	APA Policy - Code of Conduct.pdf
343	APA Policy - Enterprise Resilience.pdf
344	APA Policy - Risk Management.pdf
345	Operations Business Continuity Procedure.pdf
346	Training & Competency v1.0 2025-06.pdf
347	WA O&M Competency Matrix_2025.xlsx
348	Asset Life-cycle Planning Procedure V5.2 (3).pdf
349	WA O&M Competency Matrix_2025.xlsx
350	Acceptable Use of Technology Standard.pdf
351	Asset Data and Records.pdf
352	Asset Management Planning v2.0 2025-04.docx.pdf
353	Creating Strong Passwords FAQs.pdf
354	Information Security Classification and Handling Standard.pdf
355	Maximo Role Security Groups (2).xlsx
356	Physical Access Management Standard.pdf
357	2022 06 27 APA Risk Library and Target Risk Tool v1.4.pdf
358	320-PL-ER-0001 ER Managment Plan.pdf
359	APA Group Procedure - Ring Fencing.pdf
360	APA Group Procedures – Risk Management System Processes.pdf
361	APA Group Standard - Customer and Commercial Contracting.pdf
362	APA Group Standard - Risk Management.pdf
363	APA Policy - Code of Conduct.pdf
364	APA Policy - Enterprise Resilience.pdf
365	Asset Risks and Opportunities v1.2 2025-06.pdf

Index	File Name
366	Emergency Managment Plan Pilbara_Energy_Newman_Power_Station_WA_Version_No3.3.pdf
367	Operations Business Continuity Procedure.pdf
368	Operations RCA Financial Management Procedure R0_signed.dotx
369	Operations Risk & Opportunities.pdf
370	APA Policy - Enterprise Resilience.pdf
371	BCP - O&M.pdf
372	Business Continuity Management v2.0 2025-04.docx.pdf
373	Emergency Managment Plan Pilbara_Energy_Newman_Power_Station_WA_Version_No3.3.pdf
374	2024_25-BSF - Annual Plan (Rev. 1).pdf
375	APA 1H25 Interim Results.pdf
376	APA Annual Report FY2023.pdf
377	APA Annual Report FY2024.pdf
378	APA Annual Report FY21.pdf
379	APA Annual Report FY22.pdf
380	APA Annual Report FY23.pdf
381	APA Annual Report FY24.pdf
382	Asset Financial Performance v1.1 2025-06.pdf
383	1.3 Asset Management System v2.0 2025-04.docx (1).pdf
384	APA Group Standard - Assurance.pdf

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