



**APA Group**  
APA Group Limited  
ACN 091 344 704  
Level 25, 580 George Street, Sydney NSW 2000  
PO Box R41, Royal Exchange NSW 1225

P: +61 2 9693 0000  
F: +61 2 9693 0093  
[apa.com.au](http://apa.com.au)

24 March 2026

Economic Regulation Authority  
Assistant Director  
Monitoring and Licence Compliance  
Attn: Alex Kroon  
Level 4, 469 Wellington Street  
Perth WA 6000

Dear Alex,

**Re: EIRL6 - 2025 Performance Audit and Asset Management System Review – Post Audit Implementation Plan**

In accordance with clause 5.3 of the ERA's Audit and Review Guidelines, please find enclosed the Post Audit Implementation Plan for (EIRL6) APA Transmission (Roy Hill) Pty Ltd (the licensee).

Should you have any queries or require any further information please contact me.

Yours sincerely,

**Anna Priya**  
Regulatory Compliance Manager (West)  
Power & Electricity Transmission  
**M** +61 474 300 530  
**E** [Anna.Priya@apa.com.au](mailto:Anna.Priya@apa.com.au)

**EIRL6 – Post Audit Implementation Plan**

Recommendation reference (no./year)	Non-compliance / Control deficiency (Rating / Licence obligation reference number & licence obligation / Details of non-compliance or inadequacy of controls)	Auditor's recommendation	Action proposed to be taken by the licensee	Responsible person(s)	Target completion date
1/2025	<p><b>B2 (319, 320, 327, 448A &amp; 448C) Electricity Industry Metering Code – Clauses 3.1, 3.2(1), 3.5(3), 3.21(1), 3.21(4), 6.2 and 6.19A(1)</b></p> <p>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.</p> <p>These breaches relate to the following:</p> <ul style="list-style-type: none"> <li>conformance to a metrology procedure that does not currently exist</li> <li>adherence to validation, verification, and substitution of data in accordance with the metering code.</li> </ul> <p>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.</p>	<p>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:</p> <ul style="list-style-type: none"> <li>The licensee's position on which obligations where the licensee will continue to be non-compliant on the basis of practicality.</li> <li>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.</li> </ul> <p>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.</p>	<p>The Pilbara Energy System Metering Management Plan, developed in December 2025, will be reviewed and updated as necessary to ensure alignment with the intent and requirements of the Electricity Industry Metering Code, having regard to the practicalities of the licensee's operating environment in relation to the management of meters and metering data. Notice of intent of non-compliance will be added as an appendix to the Plan.</p>	Regulatory Compliance Manager (West)	30/09/2026



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2/2025	<p><b>B2 (366) Electricity Industry Metering Code – Clause 4.1(1)</b></p> <p>The licensee's CT and VT meters installed at the Licensee's/ ATC connection point had not been included in its metering base.</p>	<p>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.</p>	<p>The CTs and VTs installed at the licensee's/ ATC connection point do not constitute metering installations for the purposes of the Metering Code. These devices do not perform tariff metering functions and do not record energy data for settlement or billing purposes. Instead, the CTs and VTs provide inputs to a protection cell relay at a non-metering point, and no revenue or operational meter is installed at this location.</p> <p>On this basis, the CTs and VTs are not required to be included in the licensee's metering database, which is limited to metering points where meters are installed and energy data is collected and maintained in accordance with the Metering Code.</p> <p>The Pilbara Energy System Metering Management Plan will be reviewed to confirm that it clearly describes the distinction between metering points and non-metering points, including the role of CTs and VTs used solely for protection and monitoring purposes.</p> <p>Where required, the Plan will be amended to strengthen the rationale for the exclusion of such equipment from the metering database, consistent with the practical operation of the network and the requirements of the Metering Code.</p>	Regulatory Compliance Manager (West)	30/09/2026
03/2025	<p><b>B2 (369 &amp; 370) Electricity Industry Metering Code – Clause 4.3(1)</b></p> <p>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</p>	<p>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.</p>	<p>Populate the following required standing data in the Metering Database to ensure completeness and adherence to Electricity Industry Metering Code, clauses 4.3(1):</p> <ul style="list-style-type: none"> <li>• Voltage at metering point</li> <li>• Distribution loss factor</li> </ul>	Measurement Specialist Power	30/06/2026



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	<p>licensee's metering database contained the prerequisite standing data item headings but had not provided data or commentary on items:</p> <ul style="list-style-type: none"> <li>• (4) Voltage at metering point</li> <li>• (5) Distribution loss factor</li> <li>• (14) NMI meter</li> <li>• (20) Summation scheme values and multipliers</li> <li>• (21) Data register coding details</li> <li>• (27) Algorithms</li> </ul> <p>Obligation 369 is non-compliant because of the metering registry not complying with the Code, per Obligation 370.</p>		<ul style="list-style-type: none"> <li>• NMI meter</li> <li>• Summation scheme values and multipliers</li> <li>• Data register coding details</li> <li>• Algorithms</li> </ul>		
04/2025	<p><b>B2 (425) Electricity Industry Metering Code – Clause 5.22(4)</b></p> <p>For 2024-2025, APA was not able to demonstrate compliance to the Energy data - validation, substitution and estimation elements of the metering code.</p>	No further action required. Notice of intent of non-compliance was issued to the ERA.	<p>A notice of intent of non-compliance has been issued to the Economic Regulation Authority (ERA) in respect of the obligation requiring a network operator to notify each affected Code participant within 24 hours of detecting a loss of energy data or incorrect energy data.</p> <p>The notice was issued on the basis that the licensee's processes for detecting energy data loss or errors, and for notifying affected parties, are operationally managed through established contractual and operational arrangements with customers. These arrangements include agreed notification pathways, communication protocols and escalation mechanisms that are fit for purpose and consistent with the Metering Code objectives of promoting accurate metering and maintaining confidence in energy data used for commercial electricity transactions.</p>	Regulatory Compliance Manager (West)	30/09/2026



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			<p>The Pilbara Energy System Metering Management Plan will be reviewed to ensure that it adequately addresses the intent of the Metering Code requirement within the practicalities of the licensee's operating circumstances. Where necessary, the Plan will be revised to clarify the processes, responsibilities and governance arrangements that support timely identification of data issues and notification to affected Code participants.</p>		
05/2025	<p><b>B2 (451) Electricity Industry Metering Code – Clause 7.2(1)</b></p> <p>During 2024-2025, APA was unable to send or receive notice by facsimile.</p>	<p>No further action required. Notice of intent of non-compliance was issued to the ERA.</p>	<p>The licensee does not currently maintain devices capable of transmitting or receiving facsimile communications as required under clause 7.2(1)(b). The licensee does, however, maintain postal, electronic and telephone contact arrangements.</p> <p>A notice of intent of non-compliance has been issued to the Economic Regulation Authority (ERA) in respect of this obligation, on the basis that facsimile is an outdated method of communication and is not currently utilised in relation to any of APA Group's assets.</p> <p>The Pilbara Energy System Metering Management Plan will be reviewed and, where necessary, revised to accurately reflect and document the licensee's current communication arrangements.</p>	<p>Regulatory Compliance Manager (West)</p>	<p>30/09/2026</p>