STRICTLY PRIVATE AND CONFIDENTIAL

RSM

Ord Hydro Pty Ltd

Electricity Integrated Regional Licence – EIRL4

Performance Audit – 1 July 2022 to 30 June 2026

26 October 2026

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1. Executive Summary

1.1 Background

North Western Energy Pty Ltd, Pacific Hydro Group Two Pty Ltd & Energis Australia Pty Ltd's (trading as **Ord Hydro**) holds an Electricity Integrated Regional Licence ("**EIRL4**") issued by the Economic Regulation Authority ("**ERA**") under the *Electricity Industry Act 2004*. The EIRL4 authorises Ord Hydro to operate generating works, a transmission system and supply electricity to large use customers (i.e. a customer who consumes more than 160 MWh of electricity per year) in the Kimberley region. Ord Hydro's power station, which has a reported capacity of 30 megawatts, supplies electricity through its transmission system to Horizon Power, who on-sells the electricity to the towns of Kununurra and Wyndham.

A condition of the EIRL 4 is the requirement to engage an independent auditor, approved by the ERA, to undertake a Performance Audit every 24 months (unless otherwise in writing by the ERA). The last Ord Hydro Performance Audit conducted in 2022 found that it had achieved a satisfactory level of compliance with its licence. The ERA decided to maintain the audit period at 48 months, with this audit covering the period of 1 July 2022 to 30 June 2026. The audit conducted in 2022 of the 142 licence obligations applicable to Ord Hydro, found nine non-compliances and no controls deficiencies. Seven of the non-compliances were with the *Electricity Industry (Metering) Code 2012*, as Ord Hydro did not:

- Have a code-compliant and ERA-approved metrology procedure, model service level agreement or mandatory link criteria during the audit period (six non-compliances); and
- Correctly calibrate its check meters (one non-compliance).

The remaining two non-compliances were due to paying its standing charges late and not providing annual compliance reports and standing charge data to the ERA when required.

The auditor made six recommendations to address the non-compliances. The post-audit implementation plan stated that Ord Hydro will address all the recommendations by 1 September 2023.

It was also noted that Ord Hydro continued to be non-compliant with the Metering Code, as the non-compliances were also identified in its 2018 audit. It uses Power Purchase Agreements ("PPAs") with its two customers, which include similar obligations and controls as those in the Metering Code, in addition to the contractual obligation between the parties.

The Metering Code is designed for large networks with many users, like the South West Interconnected System. Some parts of the Metering Code are challenging for small network operators to comply with and not always necessary for the nature and size of their operations. Ord Hydro only has 11 meters for its two customers.

The auditor found that Ord Hydro's two customers were satisfied with Ord Hydro's performance and were not affected by the non-compliances. Ord Hydro has shown that it has appropriate metering installations in place and contractual arrangements with its two customers that are meeting the intent of the Metering Code.

One of the customers, Argyle Diamond Mine ceased operations in November 2020, and the supply of power was limited to the demand requirements for maintenance and decommissioning activities.

1.2 Objective Scope

The Performance Audit is defined as an examination of measures taken by Ord Hydro to meet the performance criteria specified in the EIRL4.

As required by the ERA Audit and Review Guidelines, the scope of the Performance Audit focussed on:

- **Process compliance** – the effectiveness of systems and procedures in place throughout the audit period, including the adequacy of internal controls.
- **Outcome compliance** – the actual performance against standards prescribed in the licence throughout the audit period.
- **Output compliance** – the existence of the output from systems and procedures throughout the audit period (specifically, proper records which provide assurance that procedures are consistently followed, and controls are maintained).
- **Integrity of reporting** – the completeness and accuracy of the compliance and performance reports provided to the ERA.
- **Compliance with any individual licence conditions** – the actual performance against the requirements imposed on the specific licensee by the ERA or specific matters raised by the ERA.

1.3 Ord Hydro's Responsibility

Ord Hydro is responsible for:

- Implementing policies, procedure and controls, which are designed to ensure compliance with the conditions of the EIRL4;
- Ensuring monitoring processes are in place to assess its compliance requirements and reporting on its level of compliance to ERA; and
- Implementing corrective actions for instances of non-compliance.

Assumptions made in considering the scope of our work included:

- The information received from Ord Hydro is assumed by RSM to be complete, accurate and valid; and
- Information relevant to the audit of compliance with the EIRL4 is communicated to RSM in a timely manner.

1.4 RSM's Responsibility

The audit has been conducted as described in the ERA Approved Audit Plan on 24 July 2026. RSM's responsibility was to express a conclusion on Ord Hydro's compliance, in all material aspects, with the conditions of the EIRL4 for the period of 1 July 2022 to 30 June 2026.

The assurance engagement has been conducted in accordance with the Audit and Review Guidelines and the Australian Standard on Assurance *Engagement ASAE3100 – Compliance Engagements* and *ASAE 3500 – Performance Engagements*. The assurance procedures include such tests and procedures as RSM consider necessary to obtain sufficient and appropriate evidence over Ord Hydro's compliance activities and controls implemented to meet the conditions within the EIRL4. These procedures have been undertaken to form a reasonable assurance conclusion as to whether, in all material aspects, the licence obligations are complied with, and control procedures were adequately designed and operated effectively based on the specified criteria for the period of 1 July 2022 to 30 June 2026.

ASAE3100 and *ASAE3500* also requires RSM to comply with the relevant ethical requirements of the Australian Professional Accounting Bodies.

1.5 General Observations

In considering Ord Hydro's internal control procedures, structure and environment, its compliance culture and its information systems specifically relevant to those licence obligations subject to audit, RSM noted that Ord Hydro has:

- Established an asset management framework supported by the Asset Management Policy, Strategic Asset Management Plan, annual Asset Management Plans and a Computerised Maintenance Management System ("CMMS");
- Maintenance activities are systematically scheduled, monitored, and reported, with performance oversight reinforced through monthly operational reporting, risk monitoring, and maintenance completion KPIs;
- Implemented a robust emergency management framework comprising an Emergency Response Plan, Business Continuity Plan, and multiple asset-specific contingency plans;
- Oversight of its metering infrastructure through documented metrology procedures, monthly meter testing, structured maintenance activities, and ongoing monitoring of meter accuracy;
- Physical and security controls have been implemented to protect critical infrastructure and metering data. These include restricted site access, surveillance monitoring, alarm systems, password-protected systems, controlled user access and documented information security requirements; and
- Maintained high levels of network reliability, with electricity availability consistently exceeding 99.9% across the audit period.

1.6 Summary of Actions to Address Previous Audit Recommendations

Outlined below is a summary of the actions taken by Ord Hydro in response to the recommendations in the previous audit report.

A. Resolved during current audit period				
Remediation Reference	**Non-Compliance / Controls Improvement**	**Proposed Management Action**	**Date Resolved**	**Further Action Required / Details of further action required**
03/2022	**Obligation 319:** The Licensee had not established a Metrology Procedure as required by the Metering Code. A non-compliance was noted in relation to the frequency of calibration of ADM-T1.	**Metrology Procedure** – Ord Hydro considers that the metrology obligations under its existing Power Purchase Agreements ("PPAs") apply to Ord Hydro's obligations under its EIRL4 as a generator rather than as a transmission network service provider. While the PPAs indirectly impose a requirement to comply with the Metering Code these apply to Ord Hydro in its capacity as a generator. Subsequently, Ord Hydro's view is that the requirements to establish a Metrology Procedure, Model Service Level Agreement and Mandatory Link Criteria do not apply.	31 August 2023	None required. Ord Hydro has since developed a Metrology Procedure (dated 31 August 2023) in compliance with Obligation 319.
04/2022	**Obligation 348:** The check metering installations on the Ord Hydro network were not calibrated although the main revenue meters were subject to calibration.	Ord Hydro will undertake a review of the calibration requirements of the check meters and take any action necessary.	1 September 2023	None required.

A. Resolved during current audit period				
Remediation Reference	**Non-Compliance / Controls Improvement**	**Proposed Management Action**	**Date Resolved**	**Further Action Required / Details of further action required**
05/2022	**Obligation(s) 369:** The Licensee Electrical Meters Summary (i.e. registry) was not compliant with all requirements of the Metering Code. Standing Data items 5, 12, 18 and 19 were omitted from the Metering Database (i.e. refer Standing Data Clause 4.3(1)).	Ord Hydro notes the audit report comments that the comprehensive requirements of the Meter Database may not apply to Ord Hydro as it is not a participant of the WEM. Ord Hydro will undertake a review of the Electrical Meters Summary spreadsheet to confirm that relevant requirements of the metering code are included.	1 July 2023	None required.
06/2022	**Obligation(s) 370:** Standing Data Items were not contained in the meter registry 5, 7, 12, 18, 19, 21, 22, 23, 24, 25, 26.	Refer to proposed Management action for **Obligation 369**.	1 July 2023	None required.
08/2022	**Obligation(s) 448A:** The Licensee had not established the following in accordance with 6.2 of the Metering Code. (a) a proposed model service level agreement; (b) [not used] (c) a proposed metrology procedure; and (d) proposed mandatory link criteria under clause 3.6.	Refer to proposed Management action for **Obligation 319**.	1 September 2023	None required.
09/2022	**Obligation(s) 448C:** The Licensee had not developed or published communication rules within 6 months of the Code applying to its operations.	Refer to proposed Management action for **Obligation 319**.	1 September 2023	None required.

B. Unresolved at end of current audit period				
Remediation Reference	**Non-Compliance / Controls Improvement**	**Proposed Management Action**	**Date Resolved**	**Further Action Required / Details of further action required**
02/2022	**Obligation 124:** The 2018 and 2019 Annual Compliance Reports and the 2020 and 2021 Standing Charges data were submitted outside the required timeframes. The Licensee updated the Breach Register in October 2022, however, for the duration of the audit period there were inconsistencies between the licensee's breach register and the annual compliance reports. Additionally, it was determined during the audit that the compliance reports were consistent with the details in the AMPs and LCM compliance data. It was noted that the Licensee had established a process for review of its non-compliances (i.e. Obligations Register, however, it was not specific enough to facilitate compliance and as such was not effective).	A comprehensive review of Ord Hydro's obligations is currently being undertaken. During this review, Ord Hydro will: a) Review its obligations relating to the Ord Hydro asset for completeness and accuracy, including the matters mentioned in the auditors' recommendation. b) Update the obligations accordingly in CRIS/Obligations Register. Establish a risk-based internal audit/review schedule for its annual compliance reporting process.	**Open**	*Annual Compliance Reports* prepared by Ord Hydro for the ERA must be submitted by 31 August each year. To support timely submission, we recommend: ▪ Updating the Internal Audit Schedule to define reporting requirements and schedule report review timeframes to ensure adequate review prior to due date (31 August). ▪ Implement calendar reminders and / or report status meetings to ensure ongoing awareness of completion timeframes leading up to the due date. Additionally, review of the *Obligations Register* (renamed the *Compliance Register*) noted that Licence Obligation 104B, which came into effect in January 2026, had not been incorporated into the register. While Ord Hydro advised the register is reviewed on an annual basis, we recommend implementing a requirement for ad-hoc reviews to capture any instances where the Licence Obligations may change during the year.
07/2022	**Obligation(s) 447:** The Licensee has not developed documentation as required by the Metering Code. Appreciation as the nature of the operations was made by the Audit Team, however, an exemption was not provided, and the documentation still remained outstanding. Given non-compliances related to calibration and meter registry standing data, the absence of internal operational and maintenance metrology procedures and the failure to comply following the renewal of the HP PPA.	Refer to proposed Management action for **Obligation 319**.	**Open**	We acknowledge that a finding was raised in the 2022 Performance Audit and Asset Management System Review Report in relation to the absence of the following documents required under Clause 6 of the Electricity Industry Metering Code: ▪ Model Service Level Agreement; and ▪ Mandatory Link Criteria. However, we note that the ERA have not specifically provided Ord Hydro with an exemption with this obligation requirement.

1.7 Summary of Findings and Recommendations

The table below summarises the findings and recommendations in relation to the Licence compliance obligations during the period 1 July 2022 to 30 June 2026, identifying where Ord Hydro had instances of non-compliance with the Licence conditions and where control deficiencies were identified.

Summary of Findings and Recommendations			
Obligation No.	**Licence Obligation**	**Finding**	**Recommendation**
Non-Compliance			
369	A network operator must ensure that its registry complies with the Code and the prescribed clause of the market rules.	The *Ord Electrical Meters Summary Standing Data* did not meet all requirements of the Electricity System and Market Rules (1 July 2026).	We acknowledge that the Senior Production Manager updated the *Ord Electrical Meters Summary Standing Data* on 10 September 2026, prior to the completion of this audit, to include the following requirements in compliance with the Electricity System and Market Rules (1 July 2026): ▪ Record the Market Participant(s) whose generation or consumption is measured by the meter; and ▪ Facilitate changes to the identity of the Market Participant(s) whose generation or consumption is measured by a meter as of a specified time.

1.8 Basis for Conclusion

RSM have completed the Performance Audit as required by the ERA Audit and Review Guidelines and present a summary of the findings below. In conducting the audit, we identified:

- **Three (3) obligations** which were assessed as non-compliant with control deficiencies rated level **B 2** (Refer to the two (2) open findings in **Section 1.6** and one (1) new finding in **Section 1.7** above).

The findings above are not considered to be material and indicate that Ord Hydro has generally complied with the conditions of the EIRL4. Refer to the **Independent Assurance Report** for a summary of the findings.

1.9 Summary of Assurance Conclusion

Based on the procedures performed and evidence obtained, in our opinion, Ord Hydro have implemented processes and controls to comply, in all material respects, with the EIRL4 for the period 1 July 2022 to 30 June 2026.

The **Independent Assurance Report** is on **page 20** of this report.

Section 3.1 contains a summary of Ord Hydro's EIRL4 obligations and our conclusions regarding the control and compliance ratings for each obligation, based on our assessment of Ord Hydro's controls.

Section 4 provides further detail of each finding and our assessment of Ord Hydro's EIRL4 obligations.

2. Audit Objective, Scope and Approach

2. Audit Objective, Scope and Approach

2.1 Objective

RSM was appointed by Ord Hydro, and approved by the ERA, to fulfil the role of the Approved Independent Auditor, to provide a reasonable assurance audit of compliance with the EIRL4.

2.2 Scope of Work

The ERA provides guidance on aspects of the Licence and Ord Hydro's performance criteria, which is expected to be reported upon and included in the scope of the Performance Audit in the respective ERA *Electricity Compliance Reporting Manual* (January 2022, January 2023, February 2023 and January 2026) ("**ERA Reporting Manual**"). A new obligation, 104B, was added during the audit period, to clarify that section 14(2) of the *Electricity Industry Act 2004* requires a licensee's asset management system to set out the measures to be taken by the licensee for the proper maintenance of the assets used in the supply of electricity and in the operation of, and, where relevant, the construction of, any generating works, transmission system or distribution system.

The Performance Audit applies the singular audit priority assessment approach to identify all applicable licence obligations. The scope of Ord Hydro's particular licence will be limited to those required for a trading licence.

Each of the compliance requirements identified in the relevant ERA Reporting Manual has been evaluated for applicability to Ord Hydro during the respective audit period and used as the basis for determining the performance criteria to be considered for the Performance Audit. The scope of the reasonable assurance engagement is defined by the requirements of the ERA Reporting Manual. It excludes assessments of systems and procedures that are not involved with ensuring compliance with the requirements of the EIRL4 and any other disclosure obligations under the ERA Reporting Manual.

The audit period is 1 July 2022 to 30 June 2026, being the sixth Performance Audit conducted to assess Ord Hydro's compliance against the conditions of the EIRL4. The previous audit was conducted for the period of 1 July 2018 to 30 June 2022. For details of the RSM team and time allocated to the audit, refer to **Appendix B – Work Schedule**.

The Audit Plan approved by the ERA for this Performance Audit sets out the compliance requirements that applied to Ord Hydro's operations during the audit period. In addition, the Audit Plan also listed Ord Hydro's EIRL4 obligations included in the scope of the audit, along with the risk assessment and audit priority assigned to each obligation.

2.3 Overview of Approach

RSM's approach for the Performance Audit involved the following activities which were undertaken during the period of 24 July to 30 September 2026:

- Utilised the ERA Audit and Review Guidelines and the applicable ERA Reporting Manuals as a guide, developed a risk assessment based on detailed system analysis and walkthrough including assessment of controls adequacy and effectiveness;
- Developed an Audit Plan for approval by the ERA and an associated work schedule (see **Appendix B – Work Schedule**);
- Interviewed relevant Ord Hydro key personnel to gain an understanding of internal controls and processes (see **Appendix A – References**);
- Reviewed relevant documentation, performed sample transaction testing and conducted walkthroughs of processes and controls to assess overall adequacy, compliance and effectiveness in accordance with the EIRL4 (see **Appendix A – References**);
- Conducted site visits at 3001b Lake Argyle Road, Lake Argyle, WA and 14 Papuana Street, Kununurra, WA. These were the primary locations where processes and controls were performed. and
- Reported findings to Ord Hydro for review and response.

2.4 Deviations from the Audit Plan

While performing an assessment on relevant supporting documentation as well as discussion with Ord Hydro key personnel to evaluate compliance and understanding the activities undertaken to achieve compliance, we completed a re-assessment of the inherent risk and control adequacy on each relevant performance obligation.

The completion of this task determined that there was no need to revise any inherent risk and control adequacy rating that could represent a deviation from the Audit Plan approved by the ERA on any audit priority.

2.5 Review of Prior Recommendations

This engagement is the sixth Performance Audit conducted to assess the effectiveness of measures taken by Ord Hydro to meet the relevant licence compliance requirements as specified in the ERA Electricity Compliance Reporting Manual and performance criteria specified in the EIRL4. The findings reported in the prior Performance Audit and actions taken by Ord Hydro to address issues raised have been considered as part of our audit priority assessment. Refer to **Section 1.6** for a summary of the actions taken by Ord Hydro in response to the recommendations in the previous audit report.

3. Performance Summary

3. Performance Summary

When assessing Ord Hydro's audit performance, RSM used the rating scale below which is defined in the ERA Audit and Review Guidelines. The rating scale considers a rating for Ord Hydro's control procedures and control environment (controls rating) and Ord Hydro's compliance with the conditions of its Licence (compliance rating).

Controls Adequacy 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 effect on customers or third parties
C	Inadequate controls – significant improvement required	3	Non-compliant – moderate effect on customers or third parties
D	No controls evident	4	Non-compliant – major effect on customers or third parties
N/P	Not performed – A controls rating was not required	N/R	Not rated – No activity took place during the audit period

The table below summarises the assessments made during the Performance Audit on Ord Hydro's compliance and the adequacy of controls in place to manage Ord Hydro's compliance with all the relevant EIRL4 obligations. It is noted that EIRL4 obligations that were assessed as 'Not Applicable' for the audit period have not been included in the table below.

Controls Rating	Compliance Rating					
	1	2	3	4	N/R	Total
A	7	0	0	0	0	7
B	0	3	0	0	0	3
C	0	0	0	0	0	0
D	0	0	0	0	0	0
N/P	45	0	0	0	88	133
Total	52	3	0	0	88	143

The table is consistent with the ratings in **Section 3.1** and **Section 4** of this report.

3.1 Performance Summary Table

In accordance with the ERA Audit and Review Guidelines, when assessing Ord Hydro's audit performance, for each Licence obligation, we rated Ord Hydro's compliance with the conditions of its licence (compliance rating). If Ord Hydro did not perform the activity during the audit period, the obligation was assessed as 'Not Rated' (N/R) with an explanation provided.

We also provided a rating for Ord Hydro's control procedures and control environment (controls ratings) for obligations with an Audit Priority of 1, 2 or 3, or those that was assessed to be non-compliant during the audit period. For most Audit Priorities 4 and 5, these were assessed as 'Not Performed' (N/P). However, for Audit Priorities 4 and 5 where detailed testing and walkthrough testing was performed, a control procedure and control environment (controls ratings) was provided.

The table below summarises the compliance rating and controls rating for each obligation. It is noted that Licence obligations that were assessed as 'Not Applicable' for the audit period have not been included in the Performance Summary Table below in accordance with the ERA Audit and Review Guidelines.

No.	Obligations Reference	Control Adequacy					Audit Priority	Compliance Rating				
		A	B	C	D	NP		1	2	3	4	NR
Section 12 : Electricity Industry Act – Licence Conditions and Obligations												
101	Electricity Industry Act, section 13(1) and EIRL, condition 5.3.1					✓	Priority 5	✓				
102	Electricity Industry Act, section 14(1)(a) and EIRL, condition 5.1.1					✓	Priority 5	✓				
103	Electricity Industry Act, section 14(1)(b) and EIRL, condition 5.1.2 and 5.1.3					✓	Priority 4	✓				
104	Electricity Industry Act, section 14(1)(c) and EIRL, condition 5.1.2 and 5.1.4					✓	Priority 4	✓				
104B (January 2026 onwards)	Electricity Industry Act, section 14(2) and EIRL, condition 5.1.2 and 5.1.1					✓	Priority 4	✓				
105	Economic Regulation Authority (Licensing Funding) Regulations 2014 and EIRL, condition 4.2.1	✓					Priority 4	✓				
106	Electricity Industry Act, section 31(3) and EIRL, condition 4.1.1					✓	Priority 5	✓				
107	Electricity Industry Act, section 41(6) and EIRL, condition 4.1.1					✓	Priority 4					✓
Section 13 : Electricity Licences – Licence Conditions and Obligations												
119	Electricity Industry Act, section 11 and EIRL, condition 4.3.1					✓	Priority 4	✓				
121	Electricity Industry Act, section 11 and EIRL, condition 5.3.2					✓	Priority 4	✓				
122	Electricity Industry Act, section 11 and EIRL, condition 5.1.5					✓	Priority 4	✓				
123	Electricity Industry Act, section 11 and EIRL, condition 4.4.1					✓	Priority 4					✓
124	Electricity Industry Act, section 11 and EIRL, condition 4.5.1		✓				Priority 3		✓			
125	Electricity Industry Act, section 11 and EIRL, condition 3.81. and 3.8.2					✓	Priority 4					✓
126	Electricity Industry Act, section 11 and EIRL, condition 3.8.1 and 3.7.1					✓	Priority 4	✓				
Section 15 : Electricity Industry Metering Code – Licence Conditions and Obligations												
317	Electricity Industry Metering Code, clause 2.2(1)(a) and EIRL, condition 4.1.1					✓	Priority 5	✓				✓
318	Electricity Industry Metering Code, clause 2.2(1)(b) and EIRL, condition 4.1.1					✓	Priority 4					✓

No.	Obligations Reference	Control Adequacy					Audit Priority	Compliance Rating				
		A	B	C	D	NP		1	2	3	4	NR
Part 3 – Meters and Metering Installations												
319	Electricity Industry Metering Code, clause 3.1 and EIRL, condition 4.1.1					✓	Priority 4	✓				
320	Electricity Industry Metering Code, clause 3.1 and EIRL, condition 4.1.1					✓	Priority 4	✓				
323	Electricity Industry Metering Code, clause 3.3A(1) and EIRL, condition 4.1.1					✓	Priority 4	✓				
324	Electricity Industry Metering Code, clause 3.3B and EIRL, condition 4.1.1					✓	Priority 4					✓
325	Electricity Industry Metering Code, clause 3.3C and EIRL, condition 4.1.1					✓	Priority 4	✓				
326	Electricity Industry Metering Code, clause 3.5(1) and (2) and EIRL, condition 4.1.1					✓	Priority 4	✓				
327	Electricity Industry Metering Code, clause 3.5(3) and EIRL, condition 4.1.1					✓	Priority 4	✓				
328	Electricity Industry Metering Code, clause 3.5(4) and EIRL, condition 4.1.1					✓	Priority 4	✓				
329	Electricity Industry Metering Code, clause 3.5(6) and EIRL, condition 4.1.1					✓	Priority 4					✓
330	Electricity Industry Metering Code, clause 3.5(9) and EIRL, condition 4.1.1					✓	Priority 4					✓
331	Electricity Industry Metering Code, clause 3.7 and EIRL, condition 4.1.1					✓	Priority 4					✓
332	Electricity Industry Metering Code, clause 3.8 and EIRL, condition 4.1.1					✓	Priority 4	✓				
333	Electricity Industry Metering Code, clause 3.9(3) and EIRL, condition 4.1.1					✓	Priority 4	✓				
335	Electricity Industry Metering Code, clause 3.9(9) and EIRL, condition 4.1.1					✓	Priority 4					✓
336	Electricity Industry Metering Code, clause 3.10 and EIRL, condition 4.1.1					✓	Priority 4	✓				
337	Electricity Industry Metering Code, clause 3.11(1) and EIRL, condition 4.1.1					✓	Priority 4	✓				
338	Electricity Industry Metering Code, clause 3.11(2) and EIRL, condition 4.1.1					✓	Priority 4					✓
339	Electricity Industry Metering Code, clause 3.11(3) and EIRL, condition 4.1.1					✓	Priority 4					✓
340	Electricity Industry Metering Code, clause 3.11A(1) and EIRL, condition 4.1.1					✓	Priority 4	✓				
341	Electricity Industry Metering Code, clause 3.11A(2) and EIRL, condition 4.1.1					✓	Priority 4					✓
342	Electricity Industry Metering Code, clause 3.12(1) and EIRL, condition 4.1.1					✓	Priority 4	✓				
343	Electricity Industry Metering Code, clause 3.12(2) and EIRL, condition 4.1.1					✓	Priority 4	✓				
344	Electricity Industry Metering Code, clause 3.12(3) and EIRL, condition 4.1.1					✓	Priority 4	✓				
345	Electricity Industry Metering Code, clause 3.12(4) and EIRL, condition 4.1.1					✓	Priority 4	✓				
346	Electricity Industry Metering Code, clause 3.13(1) and EIRL, condition 4.1.1					✓	Priority 4	✓				
347	Electricity Industry Metering Code, clause 3.13(3)(c) and EIRL, condition 4.1.1					✓	Priority 4	✓				
348	Electricity Industry Metering Code, clause 3.13(4) and EIRL, condition 4.1.1	✓					Priority 3	✓				
349	Electricity Industry Metering Code, clause 3.14(3) and EIRL, condition 4.1.1					✓	Priority 4					✓
355	Electricity Industry Metering Code, clause 3.20(1) and EIRL, condition 4.1.1					✓	Priority 4					✓
356	Electricity Industry Metering Code, clause 3.20(3) and EIRL, condition 4.1.1					✓	Priority 4					✓
357	Electricity Industry Metering Code, clause 3.21(1) and EIRL, condition 4.1.1					✓	Priority 4					✓
358	Electricity Industry Metering Code, clause 3.21(2) and EIRL, condition 4.1.1					✓	Priority 4					✓

No.	Obligations Reference	Control Adequacy					Audit Priority	Compliance Rating				
		A	B	C	D	NP		1	2	3	4	NR
359	Electricity Industry Metering Code, clause 3.22 and EIRL, condition 4.1.1					✓	Priority 4					✓
364	Electricity Industry Metering Code, clause 3.27 and EIRL, condition 4.1.1					✓	Priority 4					✓
365	Electricity Industry Metering Code, clause 3.29 and EIRL, condition 4.1.1					✓	Priority 4					✓
Part 4 – The Metering Database												
366	Electricity Industry Metering Code, clause 3.29 and EIRL, condition 4.1.1					✓	Priority 4	✓				
367	Electricity Industry Metering Code, clause 4.1(2) and EIRL, condition 4.1.1					✓	Priority 4	✓				
368	Electricity Industry Metering Code, clause 4.1(3) and EIRL, condition 4.1.1					✓	Priority 4	✓				
369	Electricity Industry Metering Code, clause 4.2(1) and EIRL, condition 4.1.1		✓				Priority 4		✓			
370	Electricity Industry Metering Code, clause 4.3(1) and EIRL, condition 4.1.1	✓					Priority 2	✓				
371	Electricity Industry Metering Code, clause 4.4(1) and EIRL, condition 4.1.1					✓	Priority 5	✓				✓
372	Electricity Industry Metering Code, clause 4.5(1) and EIRL, condition 4.1.1					✓	Priority 5	✓				
373	Electricity Industry Metering Code, clause 4.5(2) and EIRL, condition 4.1.1					✓	Priority 4	✓				✓
374	Electricity Industry Metering Code, clause 4.6(1) and EIRL, condition 4.1.1					✓	Priority 4	✓				✓
375	Electricity Industry Metering Code, clause 4.6(2) and EIRL, condition 4.1.1					✓	Priority 4	✓				✓
376	Electricity Industry Metering Code, clause 4.7(1) and EIRL, condition 4.1.1					✓	Priority 4	✓				✓
377	Electricity Industry Metering Code, clause 4.8(3) and EIRL, condition 4.1.1					✓	Priority 4	✓				✓
378	Electricity Industry Metering Code, clause 4.8(3A) and EIRL, condition 4.1.1					✓	Priority 4	✓				✓
379	Electricity Industry Metering Code, clause 4.8(4)(a) and EIRL, condition 4.1.1					✓	Priority 4	✓				
380	Electricity Industry Metering Code, clause 4.8(4)(b) and EIRL, condition 4.1.1					✓	Priority 4	✓				
381	Electricity Industry Metering Code, clause 4.8(5) and EIRL, condition 4.1.1					✓	Priority 4	✓				
382	Electricity Industry Metering Code, clause 4.9 and EIRL, condition 4.1.1					✓	Priority 4	✓				
Part 5 – Metering Services												
383	Electricity Industry Metering Code, clause 5.1(1) and EIRL, condition 4.1.1					✓	Priority 5					✓
384	Electricity Industry Metering Code, clause 5.1(2) and EIRL, condition 4.1.1					✓	Priority 5					✓
385	Electricity Industry Metering Code, clause 5.3(1) and EIRL, condition 4.1.1					✓	Priority 4	✓				
386	Electricity Industry Metering Code, clause 5.4(1) and EIRL, condition 4.1.1	✓					Priority 4	✓				
387	Electricity Industry Metering Code, clause 5.4(1A) and EIRL, condition 4.1.1	✓					Priority 4	✓				
388	Electricity Industry Metering Code, clause 5.4(2) and EIRL, condition 4.1.1					✓	Priority 4					✓
389	Electricity Industry Metering Code, clause 5.5(2) and EIRL, condition 4.1.1					✓	Priority 4					✓
390	Electricity Industry Metering Code, clause 5.5(2A) and EIRL, condition 4.1.1					✓	Priority 4					✓
391	Electricity Industry Metering Code, clause 5.6(1) and EIRL, condition 4.1.1	✓					Priority 4	✓				
392	Electricity Industry Metering Code, clause 5.7 and EIRL, condition 4.1.1					✓	Priority 4					✓
393	Electricity Industry Metering Code, clause 5.8 and EIRL, condition 4.1.1					✓	Priority 4					✓

No.	Obligations Reference	Control Adequacy					Audit Priority	Compliance Rating				
		A	B	C	D	NP		1	2	3	4	NR
394	Electricity Industry Metering Code, clause 5.9 and EIRL, condition 4.1.1					✓	Priority 4					✓
397	Electricity Industry Metering Code, clause 5.12(1) and EIRL, condition 4.1.1					✓	Priority 4					✓
398	Electricity Industry Metering Code, clause 5.13 and EIRL, condition 4.1.1					✓	Priority 4					✓
399	Electricity Industry Metering Code, clause 5.14(3) and EIRL, condition 4.1.1					✓	Priority 4					✓
400	Electricity Industry Metering Code, clause 5.15 and EIRL, condition 4.1.1					✓	Priority 4					✓
403	Electricity Industry Metering Code, clause 5.17A(1) and EIRL, condition 4.1.1					✓	Priority 4					✓
404	Electricity Industry Metering Code, clause 5.17A(3) and EIRL, condition 4.1.1					✓	Priority 4					✓
405	Electricity Industry Metering Code, clause 5.18 and EIRL, condition 4.1.1					✓	Priority 4					✓
406	Electricity Industry Metering Code, clause 5.19(1) and EIRL, condition 4.1.1					✓	Priority 5					✓
407	Electricity Industry Metering Code, clause 5.19(2) and EIRL, condition 4.1.1					✓	Priority 5					✓
408	Electricity Industry Metering Code, clause 5.19(3) and EIRL, condition 4.1.1					✓	Priority 4					✓
411	Electricity Industry Metering Code, clause 5.20(1) and EIRL, condition 4.1.1					✓	Priority 4					✓
412	Electricity Industry Metering Code, clause 5.20(2) and EIRL, condition 4.1.1					✓	Priority 4					✓
413	Electricity Industry Metering Code, clause 5.20(4) and EIRL, condition 4.1.1					✓	Priority 4					✓
414	Electricity Industry Metering Code, clause 5.21(2) and EIRL, condition 4.1.1					✓	Priority 4					✓
415	Electricity Industry Metering Code, clause 5.21(4) and EIRL, condition 4.1.1					✓	Priority 4					✓
416	Electricity Industry Metering Code, clause 5.21(5) and EIRL, condition 4.1.1					✓	Priority 4					✓
417	Electricity Industry Metering Code, clause 5.21(6) and EIRL, condition 4.1.1					✓	Priority 4					✓
418	Electricity Industry Metering Code, clause 5.21(8) and EIRL, condition 4.1.1					✓	Priority 4					✓
419	Electricity Industry Metering Code, clause 5.21(9) and EIRL, condition 4.1.1					✓	Priority 4					✓
420	Electricity Industry Metering Code, clause 5.21(11) and EIRL, condition 4.1.1					✓	Priority 4					✓
421	Electricity Industry Metering Code, clause 5.21(12) and EIRL, condition 4.1.1					✓	Priority 4	✓				
422	Electricity Industry Metering Code, clause 5.22(1) and EIRL, condition 4.1.1	✓					Priority 4	✓				
423	Electricity Industry Metering Code, clause 5.22(2) and EIRL, condition 4.1.1					✓	Priority 4					✓
424	Electricity Industry Metering Code, clause 5.22(3) and EIRL, condition 4.1.1					✓	Priority 4					✓
425	Electricity Industry Metering Code, clause 5.22(4) and EIRL, condition 4.1.1					✓	Priority 4					✓
426	Electricity Industry Metering Code, clause 5.22(5) and EIRL, condition 4.1.1					✓	Priority 4					✓
427	Electricity Industry Metering Code, clause 5.22(6) and EIRL, condition 4.1.1					✓	Priority 4					✓
428	Electricity Industry Metering Code, clause 5.23(1) and EIRL, condition 4.1.1					✓	Priority 4					✓
429	Electricity Industry Metering Code, clause 5.23(3) and EIRL, condition 4.1.1					✓	Priority 4					✓
430	Electricity Industry Metering Code, clause 5.24(1) and EIRL, condition 4.1.1					✓	Priority 4					✓
431	Electricity Industry Metering Code, clause 5.24(2) and EIRL, condition 4.1.1					✓	Priority 4					✓
432	Electricity Industry Metering Code, clause 5.24(3) and EIRL, condition 4.1.1					✓	Priority 4					✓

No.	Obligations Reference	Control Adequacy					Audit Priority	Compliance Rating				
		A	B	C	D	NP		1	2	3	4	NR
433	Electricity Industry Metering Code, clause 5.24(4) and EIRL, condition 4.1.1					✓	Priority 4					✓
434	Electricity Industry Metering Code, clause 5.25 and EIRL, condition 4.1.1					✓	Priority 4					✓
Part 6 – Documentation												
447	Electricity Industry Metering Code, clause 6.1(1) and EIRL, condition 4.1.1		✓				Priority 2		✓			
448A	Electricity Industry Metering Code, clause 6.2 and EIRL, condition 4.1.1					✓	Priority 5					✓
448B	Electricity Industry Metering Code, clause 6.18 and EIRL, condition 4.1.1					✓	Priority 5					✓
448C	Electricity Industry Metering Code, clause 6.19A(1) and EIRL, condition 4.1.1					✓	Priority 5					✓
448D	Electricity Industry Metering Code, clause 6.19B(1) and EIRL, condition 4.1.1					✓	Priority 5					✓
449	Electricity Industry Metering Code, clause 6.20(4) and EIRL, condition 4.1.1					✓	Priority 5					✓
450	Electricity Industry Metering Code, clause 6.20(5) and EIRL, condition 4.1.1					✓	Priority 4					✓
Part 7 – Notices and Confidential Information												
451	Electricity Industry Metering Code, clause 7.2(1) and EIRL, condition 4.1.1					✓	Priority 5	✓				
452	Electricity Industry Metering Code, clause 7.2(2) and EIRL, condition 4.1.1					✓	Priority 4					✓
453	Electricity Industry Metering Code, clause 7.2(4) and EIRL, condition 4.1.1					✓	Priority 4					✓
454	Electricity Industry Metering Code, clause 7.2(5) and EIRL, condition 4.1.1					✓	Priority 4					✓
455	Electricity Industry Metering Code, clause 7.5 and EIRL, condition 4.1.1					✓	Priority 4					✓
456	Electricity Industry Metering Code, clause 7.6(1) and EIRL, condition 4.1.1					✓	Priority 4					✓
Part 8 – Dispute Resolution												
457	Electricity Industry Metering Code, clause 8.1(1) and EIRL, condition 4.1.1					✓	Priority 5					✓
458	Electricity Industry Metering Code, clause 8.1(2) and EIRL, condition 4.1.1					✓	Priority 5					✓
459	Electricity Industry Metering Code, clause 8.1(3) and EIRL, condition 4.1.1					✓	Priority 5					✓
460	Electricity Industry Metering Code, clause 8.1(4) and EIRL, condition 4.1.1					✓	Priority 4					✓
461	Electricity Industry Metering Code, clause 8.3(2) and EIRL, condition 4.1.1					✓	Priority 5					✓
16. 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) and EIRL, condition 4.1.1					✓	Priority 5	✓				
463	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 8 and EIRL, condition 4.1.1					✓	Priority 5	✓				✓
464	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 9 and EIRL, condition 4.1.1					✓	Priority 5	✓				
465	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 10(1) and EIRL, condition 4.1.1					✓	Priority 5	✓				

No.	Obligations Reference	Control Adequacy					Audit Priority	Compliance Rating				
		A	B	C	D	NP		1	2	3	4	NR
466	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 10(2) and EIRL, condition 4.1.1					✓	Priority 5	✓				
470	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 14(8) and EIRL, condition 4.1.1					✓	Priority 4					✓
471	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 15(2) and EIRL, condition 4.1.1					✓	Priority 4					✓
477	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 23(1) and EIRL, condition 4.1.1					✓	Priority 5	✓				
479	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 24(3) and EIRL, condition 4.1.1					✓	Priority 4					✓
480	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 24(4) and EIRL, condition 4.1.1					✓	Priority 4					✓

Independent Assurance Report – EIRL4 Performance Audit

Independent Assurance Report – EIRL4 Performance Audit

To: Economic Regulation Authority ("ERA") and Management of Ord Hydro Pty Ltd ("Ord Hydro"),

Independent Assurance Report on compliance with Ord Hydro's Electricity Integrated Regional Licence ("EIRL4")

RSM have conducted an audit on the systems, procedures and processes used by Ord Hydro to evaluate the operating effectiveness of the of the controls identified to maintain compliance with the EIRL4 obligations for the period 1 July 2022 to 30 June 2026. Our audit has been conducted to form a reasonable assurance conclusion, and this report has been prepared in accordance with the ERA Audit and Review Guidelines.

Ord Hydro Responsibilities

Management of Ord Hydro are responsible for designing, implementing and maintaining internal controls relevant to compliance with the EIRL4 and ensure operating processes meet the requirements as per the ERA Audit and Review Guidelines.

Independence

RSM have complied with the relevant ethical requirements relating to assurance engagements, which include independence and other requirements founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

In accordance with Australian Standard on Quality Control 1, RSM maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Our Responsibilities

Our responsibility is to express a conclusion on compliance with the EIRL4, in all material respects. The audit has been conducted in accordance with *ASAE 3100 – Compliance Engagement* and *ASAE 3500 Performance Engagements* to provide reasonable assurance that Ord Hydro has complied with all relevant obligations of the EIRL4 in accordance with the ERA Audit and Review Guidelines. We accordingly include such tests and procedures considered necessary in the circumstances.

RSM believe that the audit evidence obtained is sufficient and appropriate to provide a basis for our qualified audit opinion.

Inherent Limitations

Because of the inherent limitations of any internal control structure, it is possible that fraud or errors may occur and not be detected. RSM have not audited the overall internal control structure, and no opinion is expressed as to its effectiveness. An audit is not designed to detect all weaknesses in control procedures or all instances of non-compliance as it is not performed continuously throughout the period, and the tests performed are on a sample basis having regard to the nature and size of the entity.

Any projection of the evaluation of internal control procedures to future periods is subject to the risk that the procedures may become inadequate because of changes in conditions, or that the degree of compliance with them may deteriorate.

RSM believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Use of Report

This reasonable assurance report has been prepared for Ord Hydro and the ERA. RSM disclaim any assumption of responsibility for any reliance on this report to any other persons or users, or for any purpose other than that for which it was prepared.

Independent Assurance Report – EIRL4 Performance Audit

RSM disclaim all liability to any party other than Ord Hydro in respect of, or in consequence of, anything done, or omitted to be done, by any party in reliance, whether whole or partial, upon any information contained in this report. Any party, other than Ord Hydro, who chooses to rely in any way on the contents of this report, does so at their own risk.

Unqualified Opinion

Based on the procedures performed and evidence obtained, in our opinion, Ord Hydro have implemented processes and controls to comply, in all material respects, with the EIRL4 for the period of 1 July 2022 to 30 June 2026.

Basis for Opinion

Our review of Ord Hydro's internal control procedures, structure and environment, its compliance culture and its information systems specifically relevant to those licence obligations subject to audit noted the following:

- Ord Hydro has established an asset management framework supported by the Asset Management Policy, Strategic Asset Management Plan, annual Asset Management Plans and a Computerised Maintenance Management System ("CMMS");
- Maintenance activities are systematically scheduled, monitored, and reported, with performance oversight reinforced through monthly operational reporting, risk monitoring, and maintenance completion KPIs;
- Ord Hydro has implemented a robust emergency management framework comprising an Emergency Response Plan, Business Continuity Plan, and multiple asset-specific contingency plans;
- Oversight of its metering infrastructure is supported by documented metrology procedures, monthly meter testing, structured maintenance activities, and ongoing monitoring of meter accuracy;
- Physical and security controls have been implemented to protect critical infrastructure and metering data. These include restricted site access, surveillance monitoring, alarm systems, password-protected systems, controlled user access and documented information security requirements; and
- Ord Hydro has maintained high levels of network reliability, with electricity availability consistently exceeding 99.9% across the audit period.

There were three (3) non-compliant licence obligations for the period of 1 July 2022 to 30 June 2026 associated with administrative issues, timeliness of annual compliance reports submissions and obligations associated with the 2012 Metering Code. Ord Hydro addressed and effectively closed out one (1) out of three (3) of the obligations during the audit period (Refer Obligation 369).

The table below summarises the three (3) findings in relation to the EIRL4 compliance obligations during the period 1 July 2022 to 30 June 2026, identifying where Ord Hydro had instances of non-compliance with the Licence conditions and where control deficiencies were identified. These findings are not considered to be material and indicate that Ord Hydro has generally complied with the conditions of the EIRL4. We have also identified three (3) improvement opportunities during the current audit, which have no impact on Ord Hydro's compliance with current Licence conditions.

Summary of Findings		
Obligation No.	**Licence Obligation**	**Findings**
Non-Compliance		
124	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.	We sighted Annual Compliance Reports submitted by Ord Hydro to the ERA for 2023, 2024, 2025 and 2026, and verified that each report had been signed-off by the General Manager Generation. However, the 2023 and 2025 reports were dated 22 September and 4 September respectively post the required due date of 31 August. Review of the *Obligations Register* (renamed as the *Compliance Register*) which is reviewed on an annual basis noted that Licence Obligation 104B which came into effect in January 2026 was not documented. This finding was also raised in the FY 2022 Performance Audit and remain unresolved at the time of the current audit.
369	A network operator must ensure that its registry complies with the Code and the prescribed clause of the market rules.	The Ord Electrical Meters Summary Standing Data did not meet all requirements of the Electricity System and Market Rules (1 July 2026). However, missing information was captured in the customer PPAs.
447	A network operator must, in relation to its network, comply with the agreements, rules, procedures, criteria and processes prescribed.	Our review confirmed that a Model Service Level Agreement and Mandatory Link Criteria have not been implemented. We acknowledge that a finding was raised in the 2022 Performance Audit and Asset Management System Review Report in relation to the absence of the above documentation. However, we note that, as at the time of the current audit, the ERA had not granted Ord Hydro an exemption from this requirement.

We approve the audit report and confirm the audit report is an accurate presentation of our findings and unqualified opinion.

Signed:

[redacted]

Partner, Risk Advisory

RSM Australia Pty Ltd
Level 27, 120 Collins Street
Melbourne, VIC 3000

26 October 2026

4. Detailed Findings

4. Detailed Findings

Each Licence obligation was assessed based on their Audit Priority which determined the audit objectives, the nature and extent of the audit procedures required (as outlined in the Audit Plan). In accordance with the Audit Plan, testing ranged from confirmation of existing controls via observation and walkthrough testing with key staff, walkthrough of each control to source documentation controls to confirmation of existing controls via observation, review of compliance reports and breach register and discussions with key personnel.

The table below details how Ord Hydro addressed their Licence obligations where the following observations and recommendations are presented in sub-sections for each of the relevant Codes and Regulations as detailed below:

- **Section 4.1** – Electricity Industry Act 2004: Licence Conditions and Obligations
- **Section 4.2** – Distribution Licence, Generation Licence, Integrated Regional Licence, Retail Licence and Transmission Licence Conditions and Obligations
- **Section 4.3** – Electricity Industry (Metering) Code 2012
- **Section 4.4** – Electricity Industry (Network Quality and Reliability of Supply) Code 2005

It is noted that Licence obligations that were assessed as 'Not Applicable' for the audit period have not been included in the detailed findings below in accordance with the ERA Audit and Review Guidelines.

Each section contains:

- **Assessment of compliance and control adequacy** – the conclusions from our audit procedures and our assessment of Ord Hydro's compliance with the applicable obligations;
- **Findings** – our understanding of the process and any issues that have been identified during the audit; and
- **Recommendations** – recommendations for improvement or enhancement of the process or control.

4.1 Electricity Industry Act 2004: Licence Conditions and Obligations

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
Section 12 : Electricity Industry Act – Licence Conditions and Obligations						
101	Electricity Industry Act, section 13(1) EIRL, condition 5.3.1	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).	5	N/P	1	The last Ord Hydro Asset Management System and Performance Audit was conducted in 2022 by Geographe Environmental Services Pty Ltd and published on the ERA website on 6 June 2023. The next Performance Audit, covering the period from 1 July 2022 to 30 June 2026, is currently being undertaken by RSM.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
102	Electricity Industry Act, section 14(1)(a) EIRL, condition 5.1.1	A licensee must provide for an asset management system.	5	N/P	1	Ord Hydro has established an *Asset Management Policy* (last reviewed on 25 February 2025) that provides guidance for the effective management of physical assets throughout their lifecycle. Ord Hydro also maintains an *Asset Management Plan Update Procedure* (last reviewed on 10 July 2024) to support the ongoing review and update of asset management plans. Ord Hydro utilises Maintainly as its Asset Management and Computerised Maintenance Management System ("CMMS"), to manage maintenance activities.
103	Electricity Industry Act, section 14(1)(b) EIRL, condition 5.1.2 and 5.1.3	A licensee must notify details of the asset management system and any substantial changes to it to the ERA.	4	N/P	1	The Senior Production Manager confirmed that there have been no substantial changes to Maintainly during the audit period.
104	Electricity Industry Act, section 14(1)(c) EIRL, condition 5.1.2 and 5.1.4	A licensee must provide the ERA with a report by an independent expert about the effectiveness of its asset management system every 24 months, or such longer period as determined by the ERA.	4	N/P	1	The most recent Asset Management System Review was completed in 2025, with the next review scheduled to cover the period 1 July 2025 to 30 June 2029, with the final report due by 31 October 2029. While the review concluded that Ord Hydro's asset management system was effective, four deficiencies were identified. These related to the testing of contingency plans, staff training on the Emergency Response Plan, and the need to update the Asset Management Plan to reflect an increased turbine inspection schedule.
104B (January 2026 onwards)	Electricity Industry Act, section 14(2) EIRL, condition 5.1.2 and 5.1.1	The licensee's asset management system must include the measures to be taken by the licensee for the proper maintenance of the assets used in the supply of electricity and in the operation of, and, where relevant, the construction of, any generating works, transmission system or distribution system.	4	N/P	1	Ord Hydro has in place the following documentation relating to its asset management to address this requirement: ▪ Asset Management Policy; ▪ Strategic Asset Management Plan; ▪ Asset Management Plan Update Procedure; and ▪ Asset Management Plan 2022 to 2026. The annual Asset Management Plan (i.e. Asset Management Plan 2026) set out the strategy for managing, maintaining, and investing in the Ord Hydro Power Plant to ensure its ongoing reliability, safety, regulatory compliance, and commercial viability. It also supports budgeting and capital planning decisions by identifying asset risks, condition issues, major works, and forecast expenditure.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
						CMMS has an in-built asset tree created which links all assets relating to Ord Hydro (i.e. Kununurra office, switchboard station, etc) specifically. Each asset has specific scheduled maintenance tasks to be completed throughout the year. Each tasks have an assigned due date, assigned team (i.e. Ord Hydro Team). Unscheduled are also recorded in CMMS. Task progress and completion is monitored as part of daily, informal pre-start safety meetings and monthly Operations reports / meetings. The timely completion of tasks is a KPI for all front-line staff. Review of Monthly Operations Reports for July and December 2022, 2023, 2024 and 2025 and February 2026 noted the inclusion of the following: ▪ Complaints relating to assets (incl. complaint date, status and resolution date where applicable); ▪ Production performance data; ▪ Maintenance activities (scheduled and unscheduled); ▪ Contractor performance relating to maintenance activities; ▪ Asset Management risks including controls and risk ratings (current and residual); and ▪ Asset Defect Management status updates. Monthly Operations Reports are shared during Monthly Operation Meetings attended by all site leads, the Senior Production Manager and the Executive Manager Operations. Reports with any notes from the monthly meetings are subsequently provided to the shareholders for noting.
105	Economic Regulation Authority (Licensing Funding) Regulations 2014 EIRL, condition 4.2.1	A licensee must pay the prescribed licence fees to the ERA according to clauses 6, 7 and 8 of the Economic Regulation Authority (Licensing Funding) Regulations 2014.	4	A	1	Sighted evidence confirming that Pacific Hydro's annual licence fees were paid to the Economic Regulation Authority (ERA) prior to 31 July each year for the 2022, 2023, 2024, 2025, and 2026 reporting periods.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
106	Electricity Industry Act, section 31(3) EIRL, condition 4.1.1	A licensee must take reasonable steps to minimise the extent, or duration, of any interruption, suspension or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause.	5	N/P	1	The *Emergency Response Plan* (last reviewed 2 December 2025) outlines procedures for a range of emergency scenarios, including floods, bushfires, electrical incidents, equipment failures and fires, with 24-hour operator availability, emergency contact protocols, annual training, emergency exercises, and remote shutdown capability via the SCADA system. The *Business Continuity Plan Procedure* provides guidance for incident classification, escalation, recovery planning and remediation to minimise the impact of disruptive events and enable the prompt restoration of business operations. Specific contingency plans have also been developed for powerline access, transformers, substations and switchyards. Emergency preparedness is reinforced through periodic on-site emergency exercises involving local emergency services, with drills conducted in August 2023, May 2025 and February 2026 covering scenarios such as downed powerlines, environmental incidents, fires and personnel injuries. Sighted exercise reports in person for the May 2025 and August 2023 drills. The IT Disaster Recovery Plan (last reviewed 21 August 2026) further supports operational resilience by defining IT recovery roles and responsibilities, disaster recovery activation processes, technical support arrangements, and recovery infrastructure across key service providers and communication platforms to ensure the restoration of critical technology services following a disruption (i.e. Viatek - IT Datacentre and Telstra Generation Data Communications, Azure - IT Cloud Infrastructure, Vocus - Starlink Generation Data Communications, Aussie Broadband - Office and Generation Data Communications).
107	Electricity Industry Act, section 41(6) EIRL, condition 4.1.1	A licensee must pay the costs of taking an interest in land or an easement over land.	4	N/P	N/R	The Senior Production Manager and Executive Manager Asset Management confirmed that there have been no new easements over land during audit period.

4.2 Distribution Licence, Generation Licence, Integrated Regional Licence, Retail Licence and Transmission Licence Conditions and Obligations

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
Section 13 : Electricity Licences – Licence Conditions and Obligations						
119	Electricity Industry Act, section 11 EIRL, 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.	4	N/P	1	Ord Hydro is a subsidiary of Pacific Hydro Pty Ltd (Trading as Pacific Blue Australia). Consolidated financial statements were prepared for the group for FY 2023, FY 2024 and FY 2025.
121	Electricity Industry Act, section 11 EIRL, 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.	4	N/P	1	RSM was engaged to conduct this engagement in compliance with the standard audit guidelines for a performance audit. This approach is detailed in Section 3, Our Approach, of the *Final ERA Performance Audit Plan*.
122	Electricity Industry Act, section 11 EIRL, 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.	4	N/P	1	This is outlined in Section 3 (Our Approach) of the *Final ERA Performance Audit Plan*.
123	Electricity Industry Act, section 11 EIRL, condition 4.4.1	In the manner prescribed, a licensee must notify the ERA, if it is under external administration or if there is a significant change in the circumstances that the licence was granted which may affect the licensee's ability to meet its obligations.	4	N/P	N/R	The Senior Production Manager and Executive Manager Asset Management confirmed that there has been no significant change in circumstances that may affect Ord Hydro's ability to meet its license obligation since the last performance audit conducted in 2022.
124	Electricity Industry Act, section 11 EIRL, 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.	3	B	2	We sighted Annual Compliance Reports submitted by Ord Hydro to the ERA for 2023, 2024 2025, and 2026, and verified that each report had been signed-off by the General Manager Generation. However, the 2023 and 2025 reports were dated 22 September and 4 September respectively post the required due date of 31 August. An Internal Audit Schedule was established in 2023 to organise and monitor the completion of annual site visits and completion of annual compliance checks. Review of the schedule noted that Ord Hydro checks of the *Compliance Register* occurred May – June annually.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
						Review of the *Obligations Register* (renamed as the *Compliance Register*) which is reviewed on an annual basis noted that Licence Obligation 104B which came into effect in January 2026 was not documented. The Senior Production Manager and Executive Manager Asset Management also confirmed that the ERA had not requested any information relating to Ord Hydro's functions under the Electricity Industry Act. **Recommendation 01/2026** We recommend that Ord Hydro: ▪ Update the Internal Audit Schedule to define reporting requirements and schedule report review timeframes to ensure adequate review prior to due date (31 August). ▪ Implement calendar reminders and / or report status meetings to ensure ongoing awareness of completion timeframes leading up to the due date. ▪ Implement a requirement for ad-hoc reviews to capture any instances where the Licence Obligations may change during the year.
125	Electricity Industry Act, section 11 EIRL, condition 3.81. and 3.8.2	A licensee must publish any information as directed by the ERA to publish, within the timeframes specified.	4	N/P	N/R	The Senior Production Manager and Executive Manager Asset Management confirmed that the ERA has not directed Ord Hydro to publish any information additional to the annual compliance report.
126	Electricity Industry Act, section 11 EIRL, condition 3.8.1 and 3.7.1	All notices must be in writing, unless otherwise specified.	4	N/P	1	The Senior Production Manager confirmed that the majority of notices are in writing with informal telephone conversations conducted where appropriate in addition to written notices.

4.3 Electricity Industry (Metering) Code 2012

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
Section 15 : Electricity Industry Metering Code – Licence Conditions and Obligations						
317	Electricity Industry Metering Code, clause 2.2(1)(a) EIRL, condition 4.1.1	A network operator must treat all Code participants that are its associates on an arms-length basis.	5	N/P	1	The Senior Production Manager confirmed that all Code participants are treated on an arms-length basis and that Ord Hydro does not have any participants which are also associates.
318	Electricity Industry Metering Code, clause 2.2(1)(b) EIRL, condition 4.1.1	A network operator must ensure that no Code participant that is its associate receives a benefit in respect of the Code, unless the benefit is attributable to an arm's length application of the Code or is also made available to all other Code participants on the same terms and conditions.	4	N/P	N/R	The Senior Production Manager confirmed that no code participant associated with Ord Hydro received a benefit in respect of the Metering Code during the audit period.
Part 3 – Meters and Metering Installations						
319	Electricity Industry Metering Code, clause 3.1 EIRL, condition 4.1.1	A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and comply with any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act.	4	N/P	1	Ord Hydro established the *Ord Hydro Metrology Procedure - East Kimberly Power System* on 31 August 2023 following completion of the 2018 – 2022 Performance Audit. The procedure aligns and references the National Measurement Act 1960 through the inclusion of testing and inspection requirements for all Ord Hydro meters in accordance with AS1284.13 as outlined in Section 21, to ensure all meters comply with the *Metrology Procedure* and any specifications outlines in established PPAs. Review of the *Ord Electrical Meters Summary Standing Data* (last reviewed 10 August 2026) notes that there are currently three operating sites with check and revenue meters: ▪ ORD KNX - T1; ▪ ORD KNX - T2; and ▪ ORD LATV / LATV OPS. The 2025 and 2026 *Ord Hydro Asset Management Plans* stated that the Argyle Diamond Mine ("ADM") ceased operations in November 2020 with a following 'ramp down' providing only maintenance power until power was disconnected from the ADM metering site in 2025.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
						The Senior Production Manager advised that spare meters remain on hand but required no maintenance during the audit period due to lack of use. Ord Hydro conducts monthly checks of all meters through which calibration requirements are identified and actioned (where required). A full check of each meter is conducted every 3 years to ensure all calibrations are correct. Review of the *Ord Hydro Meter Checks* and *Ord Hydro Energy Revenue Meter Database* system extract confirmed checks are conducted monthly for all meters (including the ADM meter) to confirm the accuracy of energy data. Error rates were within the required 1% range for the audit period except for: ▪ February and April 2023 (ORD LATV / LATV OPS); and ▪ January to April 2023, August 2023 and January 2024 (ADM). In these instances, the meters were calibrated and compared against check meters to return error rates to the required 1% range by the following month.
320	Electricity Industry Metering Code, clause 3.1 EIRL, condition 4.1.1	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.	4	N/P	1	Review of the *Ord Hydro Metrology Procedure - East Kimberly Power System* (last reviewed 31 August 2023) and discussion with the Senior Production Manager and Ord Hydro Site Manager confirmed that customers of the Ord Hydro station utilise accumulation meters.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
323	Electricity Industry Metering Code, clause 3.3A(1) EIRL, condition 4.1.1	A network operator must ensure that bi-directional electricity flows do not occur at a metering point unless the metering installation for the metering point is capable of separately measuring and recording electricity flows in each direction.	4	N/P	1	The Senior Production Manager advised that while all established meters have bi-directional capabilities, they are operated as unidirectional meters. The *Ord Hydro Metrology Procedure - East Kimberly Power System* (last reviewed 31/08/2023) states a total of four metering points and their associated meter make and model to support bi-directional electricity flows as follows: ▪ Argyle Diamond Mine transformer 1 (check) = ORD ADM – T1; ▪ Kununurra Substation transformer 1 (Check) = ORD KNX - T1; ▪ Kununurra Substation transformer 2 (Check) = ORD KNX - T2; and ▪ Lake Argyle Tourist Village (check) = ORD LATV
324	Electricity Industry Metering Code, clause 3.3B EIRL, condition 4.1.1	If a user is aware of bi-directional electricity flows at a metering point that was not previously subject to a bi-directional flows or any changes in a customer's or user's circumstances in a metering point that will result in bi-directional flows, the user must notify the network operator within 2 business days.	4	N/P	N/R	The Senior Production Manager confirmed that there have been no changes to metering points since the last audit period and that while all established meters have bi-directional capabilities, they are only utilised as unidirectional meters.
325	Electricity Industry Metering Code, clause 3.3C EIRL, condition 4.1.1	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.	4	N/P	1	Review of the *Ord Electrical Meters Summary Standing Data* (last reviewed 10 August 2026) notes that there are three operating sites: ▪ ORD KNX - T1; ▪ ORD KNX - T2; and ▪ ORD LATV. Energy data from the metering installations identifies the net electricity production / consumption transferred into / out of the network, however the Senior Production Manager advised that while all check meters in place have bi-directional capabilities, they are only utilised as unidirectional.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
326	Electricity Industry Metering Code, clause 3.5(1) and (2) EIRL, condition 4.1.1	A network operator must ensure that there is a metering installation at every connection point on its network that is not an unmetered connection point. Unless it is a Type 7 metering installation, the metering installation must meet the functionality requirements prescribed.	4	N/P	1	The Senior Production Manager advised that there is no unmetered connection points associated with Ord Hydro. Review of the *Ord Electrical Meters Summary Standing Data* (last reviewed 10 August 2026) notes that there are three operating sites: ▪ ORD KNX - T1; ▪ ORD KNX - T2; and ▪ ORD LATV. Each operating site has two meters installed: ▪ SEL-734 (used for Revenue); and ▪ CEWE Instrument, CEP21P Uni-directional (used for Check). The *Ord Hydro Metrology Procedure - East Kimberly Power System* defines a revenue meter as a "meter that is used for obtaining the primary source of energy data" and a check meter as a "meter that meets the requirements of clause 3.13 of the Code and is used as a secondary source of energy data."
327	Electricity Industry Metering Code, clause 3.5(3) EIRL, condition 4.1.1	For each metering installation on its network, a network operator must provide, install, operate and, subject to subclause 3.7(5), maintain the metering installation in the manner prescribed, unless otherwise agreed.	4	N/P	1	Section 5.1.1 of the *Ord Hydro Metrology Procedure - East Kimberly Power System* (last reviewed 31 August 2023) sets out the process to be followed by Ord Hydro personnel when installing meters, including requirements designed to ensure compliance with the Electricity Industry Metering Code. The *Horizon Power PPA* includes references for alignment with the Electricity Industry Metering Code, good electricity industry practice and the Metrology Procedure. Clause 13 of the *Horizon Power PPA* includes requirements that upon commencement date of the PPA, all meters already installed must comply with the relevant specifications and technical requirements.
328	Electricity Industry Metering Code, clause 3.5(4) EIRL, condition 4.1.1	Except for a Type 7 metering installation, a network operator must ensure that the metering point for a revenue metering installation is located as close as practicable to the connection point in accordance with good electricity industry practice.	4	N/P	1	Review of the *Ord Electrical Meters Summary Standing Data* (last reviewed 10 August 2026) notes that all installed meters (both current and out of service) were located at the relevant substation.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
329	Electricity Industry Metering Code, clause 3.5(6) EIRL, condition 4.1.1	A network operator may only impose a charge for providing, installing, operating or maintaining a metering installation in accordance with the applicable service level agreement that it has with the user.	4	N/P	N/R	Review of the *Argyle Diamond Mines PPA* and *Horizon Power PPA* confirmed that Ord Hydro does not impose any costs associated with providing, installing, operating or maintaining a metering installation.
330	Electricity Industry Metering Code, clause 3.5(9) EIRL, condition 4.1.1	If a network operator becomes aware that a metering installation does not comply with the Code, it must advise affected parties of the non-compliance and arrange for the non-compliance to be corrected as soon as practicable.	4	N/P	N/R	The Senior Production Manager confirmed that there have been no non-compliances with metering installations during the audit period. Section 8 of the *Ord Hydro Metrology Procedure - East Kimberly Power System* (last reviewed 31/08/2023) states that any non-compliance installation against the Electricity Industry Metering Code must be repaired or replaced as soon as practical, and any outages or malfunctions of metering installations must be advised to Ord Hydro as soon as possible. Section 17.6.1 of the procedure required notification to impacted customers of any errors detected during testing along with the duration of the error's existence.
331	Electricity Industry Metering Code, clause 3.7 EIRL, condition 4.1.1	All devices that may be connected to a telecommunications network must be compatible with the telecommunications network and comply with all applicable State and Commonwealth enactments.	4	N/P	N/R	The Senior Production Manager confirmed that there are no metering devices that are connected to a telecommunication network.
332	Electricity Industry Metering Code, clause 3.8 EIRL, condition 4.1.1	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 unauthorised access to be detected.	4	N/P	1	The Senior Production Manager advised that no unauthorised access to metering data have been identified since the last audit period. <u>System Access</u> Access to the Ord Hydro metering database is username and unique password protected. Ord Hydro's IT team access monitoring processes identify any instances where unauthorised access may occur, including instances of multiple password attempts. Where IT deems activity potentially suspicious, activity is escalated to the relevant stakeholders (i.e. IT Manager and Senior Production Manager), as required. The Senior Production Manager advised that metering installations cannot be remotely accessed and must be read manually on-site.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
						Section 16 of the *Ord Hydro Metrology Procedure - East Kimberly Power System* (last reviewed 31 August 2023) states that "access to a metering installation and the metering database is secured from unauthorised access in line with clauses 4.8(4)(a) and 4.8(4)(b) of the Code and in line with good electricity industry practice." The *Ord Electrical Meters Summary Standing Data* (last reviewed 10 August 2026) includes the users with access to each metering installation and respective access rights (i.e. Read or Read/Write) and the requirement to have passwords for each user to minimise the possibility of unauthorised access. <u>Physical Access</u> Access to physical metering installations is secured through measures observed during the Kununurra on-site visit such as: ▪ Barbed wire fencing around the perimeter of each sub-station (housing each meter) with locked gates and keys held by the two Ord Hydro Site Managers and Ord Hydro Maintenance Technician; ▪ Meters are housed in small out-buildings / sheds within each fenced sub-station with locked doors and keys held by the two Ord Hydro Site Managers and Ord Hydro Maintenance Technician; ▪ Where keys are not on hand with relevant personnel, keys are located in the Ord Hydro office (14 Papuana Street, Kununurra, WA) which has 24-hour surveillance cameras, locked doors and passcode access into the room where the keys are stored.
333	Electricity Industry Metering Code, clause 3.9(3) EIRL, condition 4.1.1	Subject to subclauses 3.9(4), 3.9(5) and 3.9(7), each metering installation must meet at least the requirements for that type of metering installation as specified in Table 3 in Appendix 1 of the Code for metering installations on the SWIN or in Table 3A in Appendix 1 for metering installations on a network other than the SWIN.	4	N/P	1	Review of the *Ord Electrical Meters Summary Standing Data* (last reviewed 10 August 2026) confirmed that no calibration tables were applied to achieve metering installation accuracy in accordance with the accuracy requirements in Appendix 1, Table 3 of the Electricity Industry Metering Code for any of Ord Hydro's metering installations. Furthermore, the Standing Data includes the specific requirements outlined in Table 3 in Appendix 1 of the Code.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
335	Electricity Industry Metering Code, clause 3.9(9) EIRL, condition 4.1.1	If compensation is carried out within the meter, then the resultant metering system error must be as close as practicable to zero.	4	N/P	N/R	The Senior Production Manager confirmed that there was no compensation carried out within Ord Hydro's meters during the audit period.
336	Electricity Industry Metering Code, clause 3.10 EIRL, condition 4.1.1	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.	4	N/P	1	The Senior Production Manager advised that Ord Hydro's meters meet the NMI specifications under the National Measurement Act. Any programmable settings in metering installations, data loggers or peripheral devices do not impact the resolution of displayed or stored data.
337	Electricity Industry Metering Code, clause 3.11(1) EIRL, condition 4.1.1	A network operator must ensure that a metering installation on its network is operating consistently with good electricity industry practice to measure and record data and permits the collection of data within the time specified in the applicable service level agreement, for at least the percentages of the year specified.	4	N/P	1	Section 19 of the *Ord Hydro Metrology Procedure - East Kimberly Power System* (last reviewed 31 August 2023) documents the checks of metering installation energy data required to align with good electricity industry practice. Ord Hydro meters are checked monthly alongside Accumulation Energy Data collections in accordance with the relevant customer PPA. Ord Hydro tracks all supply outages through the outage file from OSI Pi Historian (SCADA). Review of the incidents extract identified the following operation percentages between 2022 and 2026: ▪ 2022/23: KNX Supply (99.98%) and PATV Supply (99.99%); ▪ 2023/24: KNX Supply (99.95%) and PATV Supply (99.93%); ▪ 2024/25: KNX Supply (99.94%) and PATV Supply (99.94%); and ▪ 2025/26: KNX Supply (99.98%) and PATV Supply (99.93%).

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
338	Electricity Industry Metering Code, clause 3.11(2) EIRL, condition 4.1.1	If an outage or malfunction occurs to a metering installation, the network operator must repair the metering installation in accordance with the applicable service level agreement.	4	N/P	N/R	The Senior Production Manager confirmed that there have been no non-compliances with metering installations during the audit period. Section 8 of the *Ord Hydro Metrology Procedure - East Kimberly Power System* (last reviewed 31 August 2023) further states that any identified mis-performing metering component or non-compliance installation against the Electricity Industry Metering Code must be prepared or replaced as soon as practical and any outages or malfunctions of metering installations must be advised to Ord Hydro as soon as possible. Review of the incidents extract from the SCADA system noted a total of 19 outages during the audit period, 74% of which were attributed to lightning strikes with a total accumulation of 1,935 minutes (32.25 hours) of power outages across all meter / connections points between 2022 and 2026. The longest outage across any meter / connections point was an outage occurring on 31 December 2023 of the ADM point (post mine closure in 2020) for a total of 220 minutes (3.67 hours). As this outage did not impact customer operations, no issues were raised by the customer.
339	Electricity Industry Metering Code, clause 3.11(3) EIRL, condition 4.1.1	A Code participant who becomes aware of an outage or malfunction of a metering installation must advise the network operator as soon as practicable.	4	N/P	N/R	Section 8.3 of the *Ord Hydro Metrology Procedure - East Kimberly Power System* (last reviewed 31/08/2023) states that "any party who becomes aware of an outage or malfunction of a metering installation or any of its components must advise Ord Hydro as soon as practicable." Notification protocols of malfunctions and outages are outlined in the respective PPAs with the clients in the following clauses: ▪ *Horizon Power PPA*: Clauses 6.8, 7.4 and 8.12; and ▪ *Argyle Diamond Mines PPA*: Clause 14.9.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
340	Electricity Industry Metering Code, clause 3.11A(1) EIRL, condition 4.1.1	A network operator must ensure that the meters on its network are systematically sampled and tested for accuracy in accordance with AS 1284.13.	4	N/P	1	The Senior Production Manager confirmed that there have been no failures in the population under AS 1284.13 during the audit period. Ord Hydro established the *Ord Hydro Metrology Procedure - East Kimberly Power System* on 31 August 2023 following completion of the 2018 – 2022 Performance Audit. The procedure aligns and references to the National Measurement Act 1960 through the inclusion of testing and inspection requirements for all Ord Hydro meters in accordance with AS1284.13 as outlined in Section 21 to ensure all meters comply with the *Metrology Procedure* and any specifications outlines in established PPAs. Ord Hydro conducts monthly checks of all meters through which calibration requirements are identified and actioned (where required). In addition, a full check of each meter is conducted every 3 years to ensure all calibrations are correct. Review of the *Ord Hydro Meter Checks* and *Ord Hydro Energy Revenue Meter Database* system extract confirmed checks are conducted monthly for all meters (including the ADM meter) to confirm the accuracy of energy data. Error rates were within the required 1% range for the audit period except for: ▪ February and April 2023 (ORD LATV / LATV OPS); and ▪ January to April 2023, August 2023 and January 2024 (ADM). In these instances, the meters were calibrated and compared against check meters to return error rates to the required 1% range by the following month.
341	Electricity Industry Metering Code, clause 3.11A(2) EIRL, condition 4.1.1	Subject to clause 3.11A(3), if a "population" of meters is deemed to have failed under AS 1284.13, the network operator must ensure that all of the meters in that population are removed and replaced with new meters within 3 years of the testing of the population.	4	N/P	N/R	The Senior Production Manager confirmed that there were no failures of the "population" of meters and no removal or replacement of meters during the audit period.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
342	Electricity Industry Metering Code, clause 3.12(1) EIRL, condition 4.1.1	A network operator must ensure that each metering installation complies with at least the prescribed design requirements.	4	N/P	1	The Senior Production Manager confirmed that Ord Hydro's meters meet the NMI specifications under the National Measurement Act. Section 5.1.1 of the *Ord Hydro Metrology Procedure - East Kimberly Power System* (last reviewed 31 August 2023) includes requirements in which metering installations must comply with as follows: ▪ CT cores of revenue metering installations must not be used for any purpose other than revenue metering and check metering as per the Code; ▪ CT cores of Types 1 and 2 check metering installations must not be used for other purposes subject to clause 3.12 (1) (a) of the Code, unless with the written approval of Ord Hydro; and ▪ If only one set of VT secondary winding is provided for a revenue metering and check metering installation, then the voltage supplies to both metering installations must be separately fused subject to clause 3.12(1)(d) of the Code.
343	Electricity Industry Metering Code, clause 3.12(2) EIRL, condition 4.1.1	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.	4	N/P	1	The Senior Production Manager confirmed advised that Ord Hydro's meters meet the NMI specifications under the National Measurement Act. Review of the *Ord Hydro Metrology Procedure - East Kimberly Power System* (last reviewed 31/08/2023) and *Ord Electrical Meters Summary Standing Data* (last reviewed 10 August 2026) verified alignment with NMI specifications.
344	Electricity Industry Metering Code, clause 3.12(3) EIRL, condition 4.1.1	A network operator must provide isolation facilities of a standard consistent with good electricity industry practice, to facilitate testing and calibration of the metering installation.	4	N/P	1	The Senior Production Manager confirmed that isolation facilities were provided in a manner consistent with good electricity industry practice to facilitate testing and calibration of the metering installations. The Senior Production Manager also advised that spare meters were on hand but required no maintenance during the audit period due to the last of use.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
345	Electricity Industry Metering Code, clause 3.12(4) EIRL, condition 4.1.1	A network operator must maintain drawings and supporting information, of a standard consistent with good electricity industry practice, to detail the metering installation for maintenance and auditing purposes.	4	N/P	1	Ord Hydro maintains the *Ord Supply System Single Line Diagram* ('SLD') (last reviewed 30 January 2019) which depicts the Ord Hydro Power Station electrical distribution network. Specific supporting information such as metering installation maintenance is documented in the relevant PPAs.
346	Electricity Industry Metering Code, clause 3.13(1) EIRL, condition 4.1.1	A network operator must procure the user, or the user's customer, to install, or arrange for the installation of, a full check metering installation or partial check metering installation in accordance with the prescribed requirements.	4	N/P	1	The Senior Production Manager confirmed that all established check meters were full installations. No partial check metering installations were in place during the audit period.
347	Electricity Industry Metering Code, clause 3.13(3)(c) EIRL, condition 4.1.1	A partial check metering installation must be physically arranged in a manner determined by the network operator, acting in accordance with good electricity industry practice.	4	N/P	1	The Senior Production Manager confirmed that no partial check metering installations were in place during the audit period.
348	Electricity Industry Metering Code, clause 3.13(4) EIRL, condition 4.1.1	A check metering installation for a metering point must comply with the prescribed requirements.	3	A	1	Review of the *Ord Electrical Meters Summary Standing Data* (last reviewed 10 August 2026) confirmed inclusion the prescribed requirements for error level in the PPAs and as required by Table 3 of the Electricity Industry Metering Code. Section 19 of the *Ord Hydro Metrology Procedure - East Kimberly Power System* (last reviewed 31/08/2023) states that Ord Hydro conducts energy data checks on all metering installations including alignment of the check meter reading against energy data within the uncertainty limits of both meters. The procedure also includes alignment and reference to the National Measurement Act 1960 and testing and inspection requirements in accordance with AS1284.13. Review of the *Ord Hydro Meter Checks* and *Ord Hydro Energy Revenue Meter Database* system extracts confirmed checks were conducted monthly for all during the audit period to confirm the accuracy of energy data.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
						Error rates were within the 1% range documented in the *Ord Hydro Metrology Procedure - East Kimberly Power System* for the audit period except for: ▪ February and April 2023 (ORD LATV / LATV OPS); and ▪ January to April 2023, August 2023 and January 2024 (ADM). In these instances, the meters were calibrated and compared against check meters to return error rates to the required 1% range by the following month. The 2025 and 2026 *Ord Hydro Asset Management Plans* stated that the ADM ceased operations in November 2020 with a following 'ramp down' providing only maintenance power until power was disconnected from the ADM site in 2025. Following disconnection in 2025, ADM meters were still checked on a monthly basis as the power lines remain live, but do not currently provide power to any customers.
349	Electricity Industry Metering Code, clause 3.14(3) EIRL, condition 4.1.1	If, under clause 3.14(2), a metering installation uses metering class CTs and VTs that do not comply with the Table 3 or Table 3A in Appendix 1 (as applicable), then the network operator must take the actions specified in order to achieve the accuracy requirements in Table 3 or Table 3A in Appendix 1 (as applicable).	4	N/P	N/R	Review of the *Ord Electrical Meters Summary Standing Data* (last reviewed 10 August 2026) confirmed all meters installed and maintained by Ord Hydro are Type 3 and meet the requirements of Table 3 of the Electricity Industry Metering Code.
355	Electricity Industry Metering Code, clause 3.20(1) EIRL, condition 4.1.1	If reasonably requested by a Code participant, a network operator must provide enhanced technology features in a metering installation.	4	N/P	N/R	The Senior Production Manager confirmed that Ord Hydro's metering installation have not been enhanced by technology features during the audit period as a result of customer requests. Section 9 of the *Ord Hydro Metrology Procedure - East Kimberly Power System* (last reviewed 31 August 2023) states that Ord Hydro will provide enhanced technology features in a metering installation in accordance with requirements of the relevant Customer PPA where requested, for additional charges.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
356	Electricity Industry Metering Code, clause 3.20(3) EIRL, condition 4.1.1	A network operator may only impose a charge for the provision of metering installations with enhanced technology features in accordance with its applicable service level agreement with the user.	4	N/P	N/R	Refer to **Licence Obligation 355** for observations.
357	Electricity Industry Metering Code, clause 3.21(1) EIRL, condition 4.1.1	Meters containing an internal real time clock must maintain time accuracy as prescribed. Time drift must be measured over a period of 1 month.	4	N/P	N/R	The Senior Production Manager advised that Ord Hydro's meters contain internal real-time clocks in alignment with the requirements of Electricity Industry Metering Code, clause 3.21(1). However, we were further advised that while the meters have real time clock functionality, this is not utilised.
358	Electricity Industry Metering Code, clause 3.21(2) EIRL, condition 4.1.1	If a metering installation includes measurement elements and an internal data logger at the same site, it must include facilities on-site for storing the interval energy data for the periods prescribed.	4	N/P	N/R	The Senior Production Manager advised that Ord Hydro utilises internal data loggers at the same site where meters are installed, however data loggers are not associated with revenue metering arrangements such as temperature, pressure, flow, etc.
359	Electricity Industry Metering Code, clause 3.22 EIRL, condition 4.1.1	A network operator providing one or more metering installations with enhanced technology features must be licensed to use, and access, the metering software applicable to all devices being installed and be able to program the devices and set parameters.	4	N/P	N/R	The Senior Production Manager confirmed that Ord Hydro's metering installation have not been enhanced by technology features during the audit period as a result of customer requests.
364	Electricity Industry Metering Code, clause 3.27 EIRL, condition 4.1.1	A person must not install a metering installation on a network unless the person is the network operator or a registered metering installation provider for the network operator doing the type of work authorised by its registration.	4	N/P	N/R	Review of the Review of the *Ord Electrical Meters Summary Standing Data* (last reviewed 10 August 2026) and discussion with the Senior Production Manager and Ord Hydro Site Manager confirmed there have been no new metering installations to the network since the last audit.
365	Electricity Industry Metering Code, clause 3.29 EIRL, condition 4.1.1	A network operator must publish a list of registered metering installation providers, including the prescribed details, and update the list at least annually.	4	N/P	N/R	The Senior Production Manager advised that Ord Hydro does not engage any metering installation service providers. Hence, the requirement to maintain a list of registered metering installation providers is not applicable.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
Part 4 – The Metering Database						
366	Electricity Industry Metering Code, clause 3.29 EIRL, condition 4.1.1	A network operator must establish, maintain and administer a metering database containing standing data and energy data for each metering point on its network.	4	N/P	1	Ord Hydro maintains the *Ord Electrical Meters Summary Standing Data* (last reviewed 10 August 2026) and meter database to contain metering point standing and energy data.
367	Electricity Industry Metering Code, clause 4.1(2) EIRL, condition 4.1.1	A network operator must ensure that its metering database with its associated links, circuits, information storage and processing systems are secured by devices or methods consistent with a good industry practice (to hinder unauthorised access and enable unauthorised access to be detected).	4	N/P	1	The Senior Production Manager advised that no unauthorised access to metering data have been identified during the audit period. Ord Hydro's *Information and Records Management Policy* outline the expectations for creation, management and usage of information and records. <u>System Access</u> Access to the Ord Hydro metering database is username and unique password protected. The IT team access monitoring processes identify any instances where unauthorised access may occur, including instances of multiple password attempts. Where IT deems activity potentially suspicious, activity is escalated to the relevant stakeholders (i.e. IT Manager and Senior Production Manager) where required. The Senior Production Manager advised that metering installations cannot be remotely accessed and must be read manually on-site. Section 16 of the *Ord Hydro Metrology Procedure - East Kimberly Power System* (last reviewed 31 August 2023) states that "access to a metering installation and the metering database is secured from unauthorised access in line with clauses 4.8(4)(a) and 4.8(4)(b) of the Code and in line with good electricity industry practice". The *Ord Electrical Meters Summary Standing Data* (last reviewed 10 August 2026) includes the users with access to each metering installation and respective access rights (i.e. Read or Read/Write) and the requirement to have passwords for each user to minimise the possibility of unauthorised access.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
368	Electricity Industry Metering Code, clause 4.1(3) EIRL, condition 4.1.1	A network operator must prepare and, if applicable, implement a disaster recovery plan to ensure that it is able, to rebuild the metering database and provide energy data to Code participants within 2 business days after the day of any disaster.	4	N/P	1	Preparation, implementation and resolution of emergencies, events, incidents and disasters is documented in the following: ▪ *IT Disaster Recovery Plan;* ▪ *Emergency Response Plan;* ▪ *Continuity Plan Procedure;* ▪ *Contingency Plans (for substations and switchyards, power transformer and powerline access); and* ▪ *PPAs.* The *IT Disaster Recovery Plan* (last reviewed 21 August 2026) outlines Ord Hydro's contracts with Viatek and Azure to provide primary server infrastructure, back up and replication of all systems and information relating to Ord Hydro (incl. the metering database) as well as the operation of two geographically disparate data centres to minimise the risk of data loss. The *Emergency Response Plan* (last reviewed 2 December2025) and *Business Continuity Plan Procedure* (last reviewed 2/09/2025) provide proactive approaches to maintaining electricity supply through identification of foreseeable emergency scenarios with specific response actions and escalation protocols to manage and contain the incident including escalations to key stakeholders where electricity supply is threatened. *Contingency Plans* have been established for specific events involving powerline access, power transformers, substations and switchyards. The PPAs documents the requirements to advise customers as soon as reasonably practicable of any supply interruptions in the following clauses: ▪ Horizon Power PPA: Clauses 6.8, 7.4 and 8.12; and ▪ Argyle Diamond Mine PPA: Clauses 14.5, 14.6 and 14.9.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
369	Electricity Industry Metering Code, clause 4.2(1) EIRL, condition 4.1.1	A network operator must ensure that its registry complies with the Code and the prescribed clause of the market rules.	4	B	2	Ord Hydro maintains the *Ord Electrical Meters Summary Standing Data* (reviewed 10 August 2026) which complies with the requirements of Clause 4.2(1) of the Electricity Industry Metering Code. Specific customer connection to metering installations for generation and consumption measurements are covered in the applicable PPAs, however, not included in the *Ord Electrical Meters Summary Standing Data* as required under the market rules. **Recommendation 02/2026** We recommend that Ord Hydro: ▪ Record the Market Participant(s) whose generation or consumption is measured by the meter; and ▪ Facilitate changes to the identity of the Market Participant(s) whose generation or consumption is measured by a meter as of a specified time. We acknowledge that the Senior Production Manager updated the *Ord Electrical Meters Summary Standing Data* on 10 September 2026 to include the above.
370	Electricity Industry Metering Code, clause 4.3(1) EIRL, condition 4.1.1	The standing data for a metering point must comprise at least the items specified.	2	A	1	Ord Hydro maintains the Ord Electrical Meters Summary Standing Data (reviewed 10 August 2026 and last updated 10 September 2026) which complies with the requirements of Clause 4.3(1) of the Electricity Industry Metering Code.
371	Electricity Industry Metering Code, clause 4.4(1) EIRL, condition 4.1.1	If there is a discrepancy between energy data held in a metering installation and in the metering database, the affected Code participants and the network operator must liaise to determine the most appropriate way to resolve the discrepancy.	5	N/P	N/R	The Senior Production Manager advised there were no discrepancies between energy data held in a metering installation and in the metering database during the audit period. Section 17 of the *Ord Hydro Metrology Procedure - East Kimberly Power System* requires where there is a discrepancy between the energy data stored in the meter and the metering database for parties to communicate with the impacted customers the errors detected, possible duration of error existence and proposed resolutions.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
372	Electricity Industry Metering Code, clause 4.5(1) EIRL, condition 4.1.1	A Code participant must not knowingly permit the registry to be materially inaccurate.	5	N/P	1	The Senior Production Manager advised that there were no instances of inaccuracy or changes identified in the standing data and registry since the last audit. The *Ord Electrical Meters Summary Standing Data* is reviewed annually (last reviewed 10 August 2026) to ensure the data remains accurate and meets all information requirements as stipulated in the Licence and Electricity Industry Metering Code.
373	Electricity Industry Metering Code, clause 4.5(2) EIRL, condition 4.1.1	Subject to subclause 5.19(6), if a Code participant, other than a network operator, becomes aware of a change to, or inaccuracy in, an item of standing data in the registry, then it must notify the network operator and provide details of the change or inaccuracy within the timeframes prescribed.	4	N/P	N/R	The Senior Production Manager advised that there were no instances of inaccuracy or changes identified in the standing data and registry since the last audit or any notifications from customers relating to the standing data during the audit period.
374	Electricity Industry Metering Code, clause 4.6(1) EIRL, condition 4.1.1	If the network operator is notified of a change to, or inaccuracy in, an item of standing data by a Code participant that is the designated source for the item of standing data under Table 2 in clause 4.3(1) then the network operator must update the registry to address the issue.	4	N/P	N/R	Refer to **Licence Obligation 373** for observations.
375	Electricity Industry Metering Code, clause 4.6(2) EIRL, condition 4.1.1	If a network operator is notified of a change to, or inaccuracy in, an item of standing data by a Code participant which is not the designated source for the item of standing data, or otherwise becomes aware of a change to or inaccuracy in an item of standing data, then the network operator must determine whether the registry should be updated, and update the registry as required.	4	N/P	N/R	Refer to **Licence Obligation 373** for observations.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
376	Electricity Industry Metering Code, clause 4.7(1) EIRL, condition 4.1.1	If standing data for a metering point is updated in the registry, the network operator must, within 2 business days after the update (or such other time as is specified in the applicable service level agreement) notify the update to the current user and each previous user, if the updated standing data relates to a period or periods when the previous user was the current user.	4	N/P	N/R	Refer to **Licence Obligation 373** for observations.
377	Electricity Industry Metering Code, clause 4.8(3) EIRL, condition 4.1.1	A network operator must allow a user who is a retailer or a generator to have local and, where a suitable communications link is installed, remote access to the energy data for metering points at its associated connection points, using a password provided by the network operator that provides 'read only' access.	4	N/P	N/R	The Senior Production Manager advised that there are no metering devices that are connected to a telecommunication network. Furthermore, all meters are read manually by Ord Hydro personnel with no remote access to metering points.
378	Electricity Industry Metering Code, clause 4.8(3A) EIRL, condition 4.1.1	A network operator must allow a user who is a retailer or a generator to have access to data held in its metering database for metering points at its associated connection points, by the prescribed methods, using a password provided by the network operator which provides 'read only' access.	4	N/P	N/R	The Senior Production Manager advised that all meters are read manually by Ord Hydro personnel with no remote access to metering points. Meter data is provided to customers via invoices issued monthly. The Senior Production Manager further noted that there were no requests raised by customers during the audit period for an additional energy data to be provided beyond what is provided in the monthly invoices.
379	Electricity Industry Metering Code, clause 4.8(4)(a) EIRL, condition 4.1.1	A network operator must have devices and methods in place to ensure that energy data held in its metering installation is secured from unauthorised local or remote access using the methods prescribed.	4	N/P	1	Refer to **Licence Obligation 332** for observations.
380	Electricity Industry Metering Code, clause 4.8(4)(b) EIRL, condition 4.1.1	A network operator must have devices and methods in place to ensure that the data held in its metering database is secured from unauthorised local, or remote, access using the methods prescribed.	4	N/P	1	Refer to **Licence Obligation 332** for observations.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
381	Electricity Industry Metering Code, clause 4.8(5) EIRL, condition 4.1.1	Without limiting subclause 4.8(4), a network operator must ensure that electronic passwords and other electronic security controls are only issued to the specified authorised personnel and otherwise keep its records of electronic passwords, and other electronic security controls, secure from unauthorised access.	4	N/P	1	Refer to **Licence Obligation 332** for observations.
382	Electricity Industry Metering Code, clause 4.9 EIRL, condition 4.1.1	A network operator must retain energy data in its metering database for each metering point on its network, including any energy data that has been replaced under subclause 5.24, for at least the periods, and with the level of accessibility, prescribed.	4	N/P	1	All energy data is retained in the metering database. Review of the *Ord Hydro Energy Revenue Meter Database* confirmed that energy data is retained for the time periods required in Clause 4.9 of the Electricity Industry Metering Code (i.e. 13 months and 5 years and 11 months).
Part 5 – Metering Services						
383	Electricity Industry Metering Code, clause 5.1(1) EIRL, condition 4.1.1	A network operator must use all reasonable endeavours to accommodate another Code participant's requirement to obtain a metering service and requirements in connection with the negotiation of a service level agreement.	5	N/P	N/R	Ord Hydro did not enter into any new PPAs or Service Level Agreements during the audit period. As such, this obligation is not applicable and cannot be assessed for compliance.
384	Electricity Industry Metering Code, clause 5.1(2) EIRL, condition 4.1.1	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.	5	N/P	N/R	Refer to **Licence Obligation 383** for observations.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
385	Electricity Industry Metering Code, clause 5.3(1) EIRL, condition 4.1.1	A network operator must, for each metering point on its network, obtain energy data from the metering installation and transfer the energy data into its metering database by no later than 2 business days after the date for the scheduled meter reading for the metering point (or such other time as is specified in the applicable service level agreement).	4	N/P	1	Section 6.4 of the *Ord Hydro Metrology Procedure - East Kimberly Power System* states that the metering database utilised by Ord Hydro must permit collection of data within the timeframes specified in the relevant customer PPA. Clause 11.1 of the Horizon Power PPA states that meters must be read on the last day of each billing period (i.e. monthly). All energy data is retained in the metering database. Review of the *Ord Hydro Energy Revenue Meter Database* spreadsheet confirmed that energy data is retained for the time periods required in Clause 4.9 of the Electricity Industry Metering Code (i.e. 13 months and 5 years and 11 months).
386	Electricity Industry Metering Code, clause 5.4(1) EIRL, condition 4.1.1	A network operator must, for each meter on its network, at least once in every 12-month period undertake a meter reading that provides an actual value that passes the validation processes in Appendix 2.	4	A	1	Section 6.4 of the *Ord Hydro Metrology Procedure - East Kimberly Power System* states that the metering database utilised by Ord Hydro must "permit collection of data within the timeframes specified in the relevant Customer Power Purchase Agreement". Clause 11.1 of the *Horizon Power PPA* states that meters must be read on the last day of each billing period (i.e. monthly). Review of the *Ord Hydro Energy Revenue Meter Database* confirmed that meter readings are conducted for all meters on a monthly basis. The Senior Production Manager advised that there were no substitution or estimations of energy data during the audit period, hence, the requirements of Appendix 3 of the Electricity Industry Metering Code were not applicable for the audit period.
387	Electricity Industry Metering Code, clause 5.4(1A) EIRL, condition 4.1.1	The meter reading referred to in clause 5.4(1) must not be undertaken by the customer associated with the meter, and must be undertaken by a person who is employed or appointed by the network operator and who is suitably skilled in accordance with good electricity industry practice to carry out meter readings.	4	A	1	The Senior Production Manager advised that meter readings are conducted manually on a monthly basis as meters do not have remote access. Ord Hydro personnel responsible (i.e. electrical working personnel) for conducting meter readings must undertake the following training relevant to their job title evidenced through review of Ord Hydro's *Operations Job Based Training Report* (dated 12 August 2026): ▪ High Voltage - Authorised Recipient (every 3 years) ▪ High Voltage - Electrical Authorisation Letter (annually) ▪ Permit to Work Training (once off)

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
						▪ High Voltage - High Voltage Operator Training - Refresher (every 3 years) ▪ High Voltage Operator Training (once off) Review of personnel training confirmed all personnel are up to date with the above training requirements.
388	Electricity Industry Metering Code, clause 5.4(2) EIRL, condition 4.1.1	A user must, when reasonably requested by a network operator, assist the network operator to comply with the network operator's obligation under subclause 5.4(1).	4	N/P	N/R	The Senior Production Manager confirmed there were no requests made to the customer during the audit period.
389	Electricity Industry Metering Code, clause 5.5(2) EIRL, condition 4.1.1	Subject to subclause 5.5(2A)(b), a network operator may impose a charge for the provision of data, but only if ▪ a user has requested the energy data to the extent permitted by, and in accordance with the applicable service level agreement between it and the user; and ▪ if a customer has given a direction under subclause 5.17A(1), in accordance with the prescribed conditions.	4	N/P	N/R	Review of the *Horizon Power PPA* noted no mention of charges associated with the provision of energy data or standing data were requested by the customer.
390	Electricity Industry Metering Code, clause 5.5(2A) EIRL, condition 4.1.1	A network operator must not impose a charge for the provision of standing data and for the provision of energy data if another enactment prohibits it doing so.	4	N/P	N/R	Refer to **Licence Obligation 389** for observations.
391	Electricity Industry Metering Code, clause 5.6(1) EIRL, condition 4.1.1	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 AEMO within the timeframes prescribed in subclause 5.6(1)(2).	4	A	1	The *Ord Hydro Metrology Procedure - East Kimberly Power System* states in Section 6.4 that the metering database utilised by Ord Hydro must "permit collection of data within the timeframes specified in the relevant Customer Power Purchase Agreement". Clause 11.1 of the *Horizon Power PPA* states that meters must be read on the last day of each billing period (i.e. monthly). Meter data is provided to customers via invoices issued monthly. There were no substitution or estimations of energy data during the audit period.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
392	Electricity Industry Metering Code, clause 5.7 EIRL, condition 4.1.1	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 AEMO within the timeframes prescribed.	4	N/P	N/R	No substitutions or estimations of energy data were undertaken during the audit period. Accordingly, the requirements of Clause 5.7 of the Electricity Industry Metering Code were not applicable during the period under review.
393	Electricity Industry Metering Code, clause 5.8 EIRL, condition 4.1.1	A network operator must provide a user with whatever information the network operator has that is necessary to enable the user to comply with its obligations under the Code of Conduct, within the time necessary for the user to comply with the obligations.	4	N/P	N/R	The Senior Production Manager confirmed that no customers requested additional information during the audit period beyond the energy data provided through monthly invoices. Ord Hydro's obligation to comply with this requirement is outlined in the following documentation: ▪ Section 6.4 of the *Ord Hydro Metrology Procedure - East Kimberly Power System* states that the metering database utilised by Ord Hydro must "permit collection of data within the timeframes specified in the relevant Customer Power Purchase Agreement"; ▪ Clause 11.1 of the Horizon Power PPA requires meter readings to be obtained on the last day of each billing period (i.e. monthly); and ▪ Section 11.4 of the *Ord Hydro Metrology Procedure - East Kimberly Power System* requires Ord Hydro to provide energy data or standing data, upon request, in accordance with the relevant Customer PPA.
394	Electricity Industry Metering Code, clause 5.9 EIRL, condition 4.1.1	A network operator must provide standing data, provided to or obtained by it under this Code, to users where required to do so under any enactment.	4	N/P	N/R	Refer to **Licence Obligation 393** for observations.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
397	Electricity Industry Metering Code, clause 5.12(1) EIRL, condition 4.1.1	If a user gives a network operator an energy data request for a metering point in accordance with the communication rules, and the energy data request relates only to a time or times for which the user was the current user at the metering point, then the network operator must provide a user with a complete set of energy data for the metering point within the timeframes prescribed.	4	N/P	N/R	The Senior Production Manager confirmed that no customers requested data for a metering point during the audit period beyond the energy data provided through monthly invoices. Refer also to commentary in **Licence Obligation 393**.
398	Electricity Industry Metering Code, clause 5.13 EIRL, condition 4.1.1	If the current user for a metering point gives the network operator a standing data request for the metering point in accordance with the communication rules then the network operator must: ▪ provide the current user with a complete current set of standing data for a metering point; and ▪ advise whether there is a communications link for the metering point, within 2 business days after the receipt of the request.	4	N/P	N/R	Refer to **Licence Obligation 397** for observations.
399	Electricity Industry Metering Code, clause 5.14(3) EIRL, condition 4.1.1	If a user makes a bulk standing data request, the network operator must in accordance with the communication rules, acknowledge receipt of the request and provide the requested standing data within the timeframes prescribed.	4	N/P	N/R	Refer to **Licence Obligation 397** for observations.
400	Electricity Industry Metering Code, clause 5.15 EIRL, condition 4.1.1	If a network operator provides energy data to a user or AEMO it must also provide the date of the meter reading in accordance with the requirements specified.	4	N/P	N/R	Refer to **Licence Obligation 397** for observations.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
403	Electricity Industry Metering Code, clause 5.17A(1) EIRL, condition 4.1.1	A network operator must provide data for a metering point from its metering database to a person if (and to the extent that) the customer associated with the metering point gives the network operator a direction to do so that complies with subclause 5.17A(2).	4	N/P	N/R	The Senior Production Manager confirmed that there has been no request for data for a metering point beyond the energy data provided through monthly invoices.
404	Electricity Industry Metering Code, clause 5.17A(3) EIRL, condition 4.1.1	A network operator must comply with a direction under subclause 5.17A(1) within the timeframes prescribed.	4	N/P	N/R	Refer to **Licence Obligation 403** for observations.
405	Electricity Industry Metering Code, clause 5.18 EIRL, condition 4.1.1	If a user collects or receives information regarding a change in the energisation status of a metering point then the user must provide the network operator with the prescribed information, including the stated attributes, within the timeframes prescribed.	4	N/P	N/R	The *Ord Hydro and Horizon Power Communications Protocol* provides a general process for communication between both parties including notifications relating to energisation and de-energisation of metering points. The Senior Production Manager advised that there were no notifications from any customers regarding a change of energisation status of a metering point during the audit period.
406	Electricity Industry Metering Code, clause 5.19(1) EIRL, condition 4.1.1	A user must, when requested by the network operator acting in accordance with good electricity industry practice, use reasonable endeavours to collect information from customers, if any, that assists the network operator in meeting its obligations described in the Code and elsewhere, and provide that information to the network operator.	5	N/P	N/R	The *Ord Hydro and Horizon Power Communications Protocol* includes general customer-data access and communication arrangements. Customer PPAs (i.e. Horizon Power PPA) document requests for customer information where applicable. The Senior Production Manager advised that information was not collected from any customers during the audit period to assist Ord Hydro in meeting its obligations.
407	Electricity Industry Metering Code, clause 5.19(2) EIRL, condition 4.1.1	A user must, to the extent that it is able, collect and maintain a record of the prescribed information in relation to the site of each connection point with which the user is associated. Note: The prescribed information listed in clause 5.19(2) was changed by the *Electricity Industry (Metering) Amendment Code 2018*.	5	N/P	N/R	Refer to **Licence Obligation 406** for observations.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
408	Electricity Industry Metering Code, clause 5.19(3) EIRL, condition 4.1.1	Subject to subclauses 5.19(3A) and 5.19(6), the user must, within 1 business day after becoming aware of any change in an attribute described in subclause 5.19(2), notify the network operator of the change.	4	N/P	N/R	Refer to **Licence Obligation 406** for observations.
411	Electricity Industry Metering Code, clause 5.20(1) EIRL, condition 4.1.1	A network operator must, by not later than 6 months after the date this Code applies to the network operator, develop, in accordance with the communication rules, an Energy Data Verification Request Form.	4	N/P	N/R	The Senior Production Manager confirmed that there were no energy data verification requests during the audit period.
412	Electricity Industry Metering Code, clause 5.20(2) EIRL, condition 4.1.1	An Energy Data Verification Request Form must require a Code participant to provide the information prescribed.	4	N/P	N/R	Refer to **Licence Obligation 411** for observations.
413	Electricity Industry Metering Code, clause 5.20(4) EIRL, condition 4.1.1	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.	4	N/P	N/R	Refer to **Licence Obligation 411** for observations.
414	Electricity Industry Metering Code, clause 5.21(2) EIRL, condition 4.1.1	A network operator must comply with any reasonable request under subclause 5.21(1).	4	N/P	N/R	There was no request to test and/or audit the accuracy of the metering installation, the energy data from the metering installation and the standing data for the metering installation during the audit period.
415	Electricity Industry Metering Code, clause 5.21(4) EIRL, condition 4.1.1	A test or audit under subclause 5.21(1) is to be conducted in accordance with the metrology procedure and the applicable service level agreement.	4	N/P	N/R	Refer to **Licence Obligation 414** for observations.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
416	Electricity Industry Metering Code, clause 5.21(5) EIRL, condition 4.1.1	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 AEMO.	4	N/P	N/R	Refer to **Licence Obligation 414** for observations.
417	Electricity Industry Metering Code, clause 5.21(6) EIRL, condition 4.1.1	A Code participant must not make a request under subclause 5.21(1) that is inconsistent with any access arrangement or agreement.	4	N/P	N/R	Refer to **Licence Obligation 414** for observations.
418	Electricity Industry Metering Code, clause 5.21(8) EIRL, condition 4.1.1	A network operator may only impose a charge for the testing of the metering installations, or auditing of information from the meters associated with the metering installations, or both, in accordance with the applicable service level agreement between it and the user.	4	N/P	N/R	There was no request to test and/or audit the accuracy of the metering installation, the energy data from the metering installation and the standing data for the metering installation during the audit period. Further, the PPA with Horizon Power does not permit charges for meter testing or auditing.
419	Electricity Industry Metering Code, clause 5.21(9) EIRL, condition 4.1.1	Any written service level agreement entered into under subclause 5.21(7) must include a provision that no charge is to be imposed if the test or audit reveals a non-compliance with this Code.	4	N/P	N/R	Refer to **Licence Obligation 418** for observations.
420	Electricity Industry Metering Code, clause 5.21(11) EIRL, condition 4.1.1	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 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[1]. **Note 1** Clause 5.21(11)(c) gives the network operator an option to make corrections to the energy data for a period up to 12 months before the date of the test or audit.	4	N/P	N/R	There was no request to test and/or audit the accuracy of the metering installation, the energy data from the metering installation and the standing data for the metering installation during the audit period.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
421	Electricity Industry Metering Code, clause 5.21(12) EIRL, condition 4.1.1	The original stored error correction data in a meter must not be altered except during accuracy testing and calibration of a metering installation.	4	N/P	1	Section 7 of the *Ord Hydro Metrology Procedure - East Kimberly Power System* requires meters to be tested in accordance with AS 1284.13, while Section 21 requires revenue-meter accuracy testing at least every 36 months by a NATA-accredited person or authority. The Senior Production Manager confirmed that original stored meter error-correction data is change restricted and further confirmed that no data alterations occurred during the audit period.
422	Electricity Industry Metering Code, clause 5.22(1) EIRL, condition 4.1.1	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.	4	A	1	The Senior Production Manager advised that metering installations cannot be remotely accessed and must be read manually on-site on a monthly basis. During the reading process the reader must verify the following in accordance with Appendix 2 of the Electricity Industry Metering Code: ▪ Verify that the energy data correctly pertains to the registered metering installation; ▪ Verify the magnitude and profile of the energy data is correct for the primary energy and respective date/time of the energy data; and ▪ Verify the initial meter installation functionality and readings. The Senior Production Manager advised that there were no substitutions or estimations of energy data during the audit period. Section 14.1 of the *Ord Hydro Metrology Procedure - East Kimberly Power System* states that energy data collected from all metering installations is validated under the relevant requirements. Section 14.2 requires failed data to be corrected where the correct reading can be determined or substituted under the applicable Customer PPA. Sections 15.1 and 20.1 address estimation and substitution under the relevant PPA. Review of the *Ord Electrical Meters Summary Standing Data* verified that all meters are Type 3 and there are no unmetered connection points in the Ord Hydro network. Hence Appendix 2 paras 2.3 - 2.4 of the Electricity Industry Metering Code were not applicable for the audit period.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
423	Electricity Industry Metering Code, clause 5.22(2) EIRL, condition 4.1.1	The network operator must use check metering data, where available, to validate energy data provided that the check metering data has been appropriately adjusted for differences in metering installation accuracy in accordance with subclause 3.13.	4	N/P	N/R	The Senior Production Manager confirmed that check meter data was available during the audit period, however, was not utilised as there was no substitution or estimations of energy data during the audit period or any instances where metering-installation accuracy differences were adjusted.
424	Electricity Industry Metering Code, clause 5.22(3) EIRL, condition 4.1.1	If a check meter is not available or energy data cannot be recovered from the metering installation within the time required under this Code, or if clause 5.22(7) applies, then the network operator must prepare substitute values using a method contained in Appendix 3 (or in the case of a substitution under clause 5.22(7), a method contained in the metrology procedure) and agreed where necessary with the relevant Code participants.	4	N/P	N/R	The Senior Production Manager confirmed that there were no instances during the audit period where a check meter was not available or energy data could not be recovered from the metering installation. Additionally, we note check meter data was available during the audit period, however, was not utilised as there was no substitution or estimations of energy data required during the audit period. Section 20.1 of the *Ord Hydro Metrology Procedure - East Kimberly Power System* states that substitution required because of a metering-installation failure or meter-data-handling problem is to be conducted in accordance with the relevant customer PPA.
425	Electricity Industry Metering Code, clause 5.22(4) EIRL, condition 4.1.1	If a network operator detects a loss of energy data or incorrect energy data from a metering installation, it must notify each affected Code participant of the loss or error within 24 hours after detection.	4	N/P	N/R	The Senior Production Manager confirmed that there were no instances where loss or incorrect energy data was detected during the audit period. This is checked through review of check meter data used to validate data accuracy. Section 14.3 of the *Ord Hydro Metrology Procedure - East Kimberly Power System* provides for Ord Hydro to investigate apparently lost or erroneous energy data and make corrections or adjustments where a measurement fault is identified. Section 17.6.1 requires Ord Hydro to advise the customer of errors detected through a test or audit and the possible duration of those errors. Clause 6.8(c)(ii) of the *Horizon Power PPA* outlines the requirement for Ord Hydro to notify Horizon Power in writing within 24 hours of interruption commencement.
426	Electricity Industry Metering Code, clause 5.22(5) EIRL, condition 4.1.1	Substitution or estimation of energy data is required when energy data is missing, unavailable or corrupted, including in the circumstances described in this subclause.	4	N/P	N/R	The Senior Production Manager confirmed that there were no instances where loss or incorrect energy data was detected during the audit period, this is checked through review of check meter data used to validate data accuracy.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
						Sections 14.2 and 15.1 of the *Ord Hydro Metrology Procedure - East Kimberly Power System* provide for correction, substitution, or estimation where energy data fails validation. Section 20.1 states that where substitution is required because of a metering-installation failure or a problem with meter-data handling, substitution is to be undertaken in accordance with the relevant customer PPA.
427	Electricity Industry Metering Code, clause 5.22(6) EIRL, condition 4.1.1	A network operator must review all validation failures before undertaking any substitution.	4	N/P	N/R	The Senior Production Manager advised that check meter data was available, however not utilised as there was no substitution or estimations of energy data during the audit period. The *Ord Hydro Metrology Procedure - East Kimberly Power System* addresses the review, correction, and substitution of energy data following a validation failure. However, Section 14.3 uses discretionary wording expressing that Ord Hydro "may review" validation failures, whereas Licence Obligation 427 requires all validation failures to be reviewed before any substitution is undertaken. **Improvement Opportunity** We recommend that Ord Hydro amend the wording in the metrology procedure to capture this action as mandatory instead of voluntary (i.e. “must” instead of “may”).
428	Electricity Industry Metering Code, clause 5.23(1) EIRL, condition 4.1.1	If a network operator determines that there is no possibility of determining an actual value for a metering point, then the network operator must designate an estimated or substituted value for the metering point to be a deemed actual value for the metering point.	4	N/P	N/R	There have been no instances where Ord Hydro was unable to determine an actual value for a metering point. Section 14.2 of the *Ord Hydro Metrology Procedure - East Kimberly Power System* states that where energy data fails validation, Ord Hydro will manually correct the reading if the correct reading can be determined or substitute the reading in accordance with the applicable customer PPA. Section 15.1 states that energy data is estimated or substituted in accordance with the applicable customer PPA.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
429	Electricity Industry Metering Code, clause 5.23(3) EIRL, condition 4.1.1	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.	4	N/P	N/R	The Senior Production Manager advised that there were no deemed actual values designated and no replacement or repairs to meters or meter components during the audit period. Section 14.2 and 14.3(b) of the *Ord Hydro Metrology Procedure - East Kimberly Power System* states that failed energy data will be corrected or substituted and that, where the validation failure is caused by a defective metering installation, the installation "may" be repaired or replaced in accordance with the Code or applicable customer PPA. However, Licence Obligation 429 requires that Ord Hydro must repair or replace the relevant component when a deemed actual value has been designated. **Improvement Opportunity** We recommend that Ord Hydro amend the wording in the metrology procedure to capture this action as mandatory instead of voluntary (i.e. "must" instead of "may").
430	Electricity Industry Metering Code, clause 5.24(1) EIRL, condition 4.1.1	If a network operator uses an actual value (first value) for energy data for a metering point, and a better quality actual or deemed actual value is available (second value), the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice.	4	N/P	N/R	The Senior Production Manager confirmed there were no instances during the audit period where energy data was replaced with better quality data (i.e. second value over first value). Section 14 of the Ord Hydro Metrology Procedure - East Kimberly Power System states that Ord Hydro validates energy data collected from all metering installations. Where data fails validation, Ord Hydro may manually correct the reading where the correct reading can be determined or substitute the reading under the applicable PPA. The procedure also permits corrections or adjustments where a fault associated with measurement is identified. Moreover, the Horizon Power PPA contains requirements concerning meter accuracy and specifies that contract charges are to be determined under the applicable specifications where a consumption meter fails to provide an accurate reading.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
431	Electricity Industry Metering Code, clause 5.24(2) EIRL, condition 4.1.1	If a network operator uses a deemed actual value (first value) for energy data for a metering point, and a better quality deemed actual value is available (second value), then the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice.	4	N/P	N/R	Refer to **Licence Obligation 430** for observations.
432	Electricity Industry Metering Code, clause 5.24(3) EIRL, condition 4.1.1	If a network operator uses an estimated or substituted value (first value) for energy data for a metering point, and a better quality actual, deemed, estimated or substituted value is available (second value), then the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice or the user and its customer jointly request it to do so.	4	N/P	N/R	Refer to **Licence Obligation 430** for observations.
433	Electricity Industry Metering Code, clause 5.24(4) EIRL, condition 4.1.1	A network operator (acting in accordance with good electricity industry practice) must consider any reasonable request from a Code participant for an estimated or substituted value to be replaced under subclause 5.24.	4	N/P	N/R	The Senior Production Manager confirmed there were no requests from Code participants during the audit period regarding estimated or substituted values. The *Ord Hydro Metrology Procedure - East Kimberly Power System* provides for customer requests concerning the accuracy of a metering installations, energy data or standing data. It states that Ord Hydro will use reasonable endeavours to conduct a requested test or audit and may repeat validation or confirm that substitution or estimation was performed in alignment with the procedure.
434	Electricity Industry Metering Code, clause 5.25 EIRL, condition 4.1.1	A network operator must ensure the accuracy of estimated energy data in accordance with the methods in its metrology procedure and ensure that any transformation or processing of data preserves its accuracy in accordance with the metrology procedure.	4	N/P	N/R	The Ord Hydro Metrology Procedure - East Kimberly Power System states that energy data collected from all metering installations is validated under Section 19. Where data fails validation, the reading may be manually corrected or substituted. Section 15 further states that Ord Hydro estimates or substitutes energy data from metering installations in accordance with the applicable customer PPA.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
						The Senior Production Manager advised that check meter data was available during the audit period, however, was not utilised as there was no substitution or estimations of energy data during the audit period.
Part 6 – Documentation						
447	Electricity Industry Metering Code, clause 6.1(1) EIRL, condition 4.1.1	A network operator must, in relation to its network, comply with the agreements, rules, procedures, criteria and processes prescribed.	2	B	2	In accordance with the Electricity Industry Metering Code clause 6.1(1), Ord Hydro has the following documented processes in place which all users are required to comply with: ▪ Communication rules (*Ord Hydro and Horizon Power Communications Protocol*); ▪ Metrology procedure (*Ord Hydro Metrology Procedure - East Kimberly Power System*); and ▪ Any service level agreement entered into (*Horizon Power PPA* and *Argyle Diamond Mines PPA*). The *Ord Hydro Metrology Procedure - East Kimberly Power System* was developed on 31 August 2023. Our review confirmed that a Model Service Level Agreement and Mandatory Link Criteria have not been implemented. We acknowledge that a finding was raised in the 2022 Performance Audit and Asset Management System Review Report in relation to the absence of the following documents required under Clause 6 of the Electricity Industry Metering Code: ▪ Metrology Procedure; ▪ Model Service Level Agreement; and ▪ Mandatory Link Criteria. However, we note that the ERA have not specifically provided Ord Hydro with an exemption with this obligation requirement. The Senior Production Manager advised that Ord Hydro has in place PPAs in lieu of a Service Level Agreement as Ord Hydro supplies energy to a limited number of customers (i.e. Horizon Power). Furthermore, all meters allocated to Horizon Power are manually read, as such there is no mandatory link criteria in place.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
						Recommendation 03/2026 We recommend that Ord Hyrdro: ▪ Develop a Model Service Level Agreement and Mandatory Link Criteria; or ▪ Seek formal exemption from the ERA on the above requirement.
448A	Electricity Industry Metering Code, clause 6.2 EIRL, condition 4.1.1	A network operator must, as soon as practicable and in any event no later than 6 months after the date this Code applies to it, submit to the ERA for its approval the prescribed documents in subclauses 6.2(a)-(d).	5	N/P	N/R	Refer to **Licence Obligation 447** for observations.
448B	Electricity Industry Metering Code, clause 6.18 EIRL, condition 4.1.1	A network operator must publish the document within 10 business days after notification of the ERA's approval under subclauses 6.13(1)(a)(i), 6.16 or 6.17.	5	N/P	N/R	Refer to **Licence Obligation 447** for observations.
448C	Electricity Industry Metering Code, clause 6.19A(1) EIRL, condition 4.1.1	A network operator must publish its communication rules as soon as practicable, and in any event within 6 months after the date this Code applies to it.	5	N/P	N/R	Refer to **Licence Obligation 447** for observations.
448D	Electricity Industry Metering Code, clause 6.19B(1) EIRL, condition 4.1.1	Once communication rules have been published for a network under clause 6.19A, or amended under clause 6.21(3), the communication rules may only be amended thereafter in accordance with the communication rules made under subclause 6.7(1)(k) or clause 6.19C.	5	N/P	N/R	Refer to **Licence Obligation 447** for observations.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
449	Electricity Industry Metering Code, clause 6.20(4) EIRL, condition 4.1.1	A network operator must amend any document in accordance with the ERA's final recommendation.	5	N/P	N/R	Refer to **Licence Obligation 447** for observations.
450	Electricity Industry Metering Code, clause 6.20(5) EIRL, condition 4.1.1	The network operator must publish any document that has been amended under subclause 6.20(4).	4	N/P	N/R	Refer to **Licence Obligation 447** for observations.
Part 7 – Notices and Confidential Information						
451	Electricity Industry Metering Code, clause 7.2(1) EIRL, condition 4.1.1	Code participants must use reasonable endeavours to ensure that they can send and receive a notice by post, facsimile and electronic communication and must notify the network operator of a telephone number for voice communication in connection with the Code.	5	N/P	1	The PPAs with customers document the communication methods utilised between Ord Hydro and the customer. Specifically, how all notices and documents must be sent and received by post, facsimile and electronic communication in the following clauses: ▪ *Horizon Power PPA*: Clause 24; and ▪ *Argyle Diamond Mines PPA*: Clause 38.
452	Electricity Industry Metering Code, clause 7.2(2) EIRL, condition 4.1.1	A network operator must notify each Code participant of its initial contact details and of any change to its contact details at least 3 business days before the change takes effect.	4	N/P	N/R	The PPAs with customers include contact details for representatives of each involved party including ABN, address, telephone and email. Review of Ord Hydro's and customer details as per company website and the ASIC Connect website and noted no changes in contact details since the last audit.
453	Electricity Industry Metering Code, clause 7.2(4) EIRL, condition 4.1.1	If requested by a network operator with whom it has entered into an access contract, the Code participant must notify its contact details to a network operator within 3 business days after the request.	4	N/P	N/R	Refer to **Licence Obligation 452** for observations.
454	Electricity Industry Metering Code, clause 7.2(5) EIRL, condition 4.1.1	A Code participant must notify any affected network operator of any change to the contact details it notified to the network operator under subclause 7.2(4) at least 3 business days before the change takes effect.	4	N/P	N/R	Refer to **Licence Obligation 452** for observations.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
455	Electricity Industry Metering Code, clause 7.5 EIRL, condition 4.1.1	A Code participant must subject to subclauses 5.17A and 7.6 not disclose, or permit the disclosure of, confidential information provided to it under or in connection with the Code and may only use or reproduce confidential information for the purpose for which it was disclosed or another purpose contemplated by the Code.	4	N/P	N/R	The PPAs with the customers outline the definition of confidential information, protocols and obligations which must be adhered to in relation to the disclosure and non-disclosure of confidential information in the following clauses: ▪ *Horizon Power PPA*: Clause 37 ▪ *Argyle Diamond Mines PPA*: Clause 22 There have been no disclosures of confidential information during the audit period.
456	Electricity Industry Metering Code, clause 7.6(1) EIRL, condition 4.1.1	A Code participant must disclose or permit the disclosure of confidential information that is required to be disclosed by the Code.	4	N/P	N/R	Refer to **Licence Obligation 455** for observations.
Part 8 – Dispute Resolution						
457	Electricity Industry Metering Code, clause 8.1(1) EIRL, condition 4.1.1	If any dispute arises between any Code participants, then (subject to subclause 8.2(3)) representatives of disputing parties must meet within 5 business days after a notice given by a disputing party to the other disputing parties and attempt to resolve the dispute by negotiations in good faith.	5	N/P	N/R	The Senior Production Manager advised that there were no disputes between parties regarding metering during the audit period. PPAs document the protocols and obligations which must be adhered to when a dispute between parties arises, how the dispute is processed, dispute timelines, escalations (where applicable) and resolutions in the following clauses: ▪ *Horizon Power PPA*: Clause 18; and ▪ *Argyle Diamond Mines PPA*: Clauses 22.3 and 35. Specifically, each PPA includes the requirement of disputing party representatives meeting within 5 business days of dispute notice.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
458	Electricity Industry Metering Code, clause 8.1(2) EIRL, condition 4.1.1	If a dispute is not resolved within 10 business days after the dispute is referred to representative negotiations, the disputing parties must refer the dispute to a senior management officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.	5	N/P	N/R	The Senior Production Manager advised that there were no disputes between parties regarding metering during the audit period. PPAs document the protocols and obligations which must be adhered to when a dispute between parties arises, how the dispute is processed, dispute timelines, escalations (where applicable) and resolutions in the following clauses: ▪ *Horizon Power PPA*: Clause 18; and ▪ *Argyle Diamond Mines PPA*: Clauses 22.3 and 35. Specifically, PPAs include the requirement where a dispute is not resolved within 10 business days of representative negotiation, negotiations must be escalated to a senior management officer of each disputing party. However, review of the *Horizon Power PPA* noted no mention of dispute referral to a Senior Management Officer.
459	Electricity Industry Metering Code, clause 8.1(3) EIRL, condition 4.1.1	If the dispute is not resolved within 10 business days after the dispute is referred to senior management negotiations, the disputing parties must refer the dispute to the senior executive officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.	5	N/P	N/R	The Senior Production Manager advised that there were no disputes between parties regarding metering during the audit period. PPAs document the protocols and obligations which must be adhered to when a dispute between parties arises, how the dispute is processed, dispute timelines, escalations (where applicable) and resolutions in the following clauses: ▪ *Horizon Power PPA*: Clause 18; and ▪ *Argyle Diamond Mines PPA*: Clauses 22.3 and 35. Specifically, each PPA includes the requirement where a dispute is not resolved within 10 business days of Senior Management Officer negotiation, negotiations must be escalated to a Senior Executive Officer of each disputing party.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
460	Electricity Industry Metering Code, clause 8.1(4) EIRL, condition 4.1.1	If the dispute is resolved by representative negotiations, senior management negotiations or CEO negotiations, the disputing parties must prepare a written and signed record of the resolution and adhere to the resolution.	4	N/P	N/R	The Senior Production Manager advised that there were no disputes between parties regarding metering during the audit period. PPAs document the protocols and obligations which must be adhered to when a dispute between parties arises, how the dispute is processed, dispute timelines, escalations (where applicable) and resolutions in the following clauses: ▪ *Horizon Power PPA*: Clause 18; and ▪ *Argyle Diamond Mines PPA*: Clauses 22.3 and 35. Specifically, each PPA includes the requirement where resolutions must be signed in writing.
461	Electricity Industry Metering Code, clause 8.3(2) EIRL, condition 4.1.1	The disputing parties must at all times conduct themselves in a manner which is directed towards achieving the objective in subclause 8.3(1).	5	N/P	N/R	The Senior Production Manager advised that there were no disputes between parties regarding metering during the audit period. As such, all parties continued to conduct themselves in a manner which is directed towards achieving the objective in subclause 8.3(1) during the audit period.

4.4 Electricity Industry (Network Quality and Reliability of Supply) Code 2005

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
16. 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) EIRL, condition 4.1.1	A distributor or transmitter must, as far as reasonably practicable, ensure that electricity supply to a customer's electrical installations complies with prescribed standards.	5	N/P	1	Electricity supply requirements (including voltage fluctuations and harmonic voltage distortion levels) are documented in signed customer PPAs such as the Horizon Power PPA (dated 15 October 2020) and Argyle Diamond Mines PPA (closed in 2020).

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
463	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 8 EIRL, condition 4.1.1	A distributor or transmitter must, so far as reasonably practicable, disconnect the supply of electricity to installations or property in specified circumstances, unless it is in the interest of the customer to maintain the supply.	5	N/P	N/R	The Senior Production Manager advised that there were no instances where the supply of electricity had to be disconnected during the audit period. The *Emergency Response Plan* (last reviewed 2 December 2025) documents remote shutdown capabilities through the SCADA system by Perth based operational staff and Ord Hydro site personnel. The plan states that electricity supply should be disconnected (if qualified and safe to do so) in the event of an equipment fire / explosion or electrical incident (as defined in sections 3.3 and 3.4). Review of the *Business Continuity Plan Procedure* (last reviewed 2 September 2025) provides guidance on the quick recovery of business operations while minimising the impact of crises, emergencies and incidents. The procedure establishes incident classification, escalations, recovery planning and remediation actions to ensure an effective and timely response to disruptive events. Specific *Contingency Plans for Ord Hydro Powerline Access, Power Transformers and Substations and Switchyards* are also maintained.
464	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 9 EIRL, condition 4.1.1	A distributor or transmitter must, as far as reasonably practicable, ensure that the supply of electricity is maintained and the occurrence and duration of interruptions is kept to a minimum.	5	N/P	1	The *Emergency Response Plan*, *Business Continuity Plan Procedure*, *Contingency Plans for Ord Hydro Powerline Access, Power Transformers and Substations and Switchyards* documents processes to ensure continuous maintenance and where required, quick recovery of electricity supply to customers as a result of any potential or actual supply interruptions. Ord Hydro tracks all supply outages through the SCADA system. Review of the SCADA system incidents extract identified the following electricity supply between 2022 and 2026: ▪ 2022/23: KNX Supply (99.98%) and PATV Supply (99.99%); ▪ 2023/24: KNX Supply (99.95%) and PATV Supply (99.93%); ▪ 2024/25: KNX Supply (99.94%) and PATV Supply (99.94%); and ▪ 2025/26: KNX Supply (99.98%) and PATV Supply (99.93%).

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
						A total of 19 outages were identified, 74% of which were attributed to lightning strikes with a total accumulation of 1,935 minutes (32.25 hours) of power outages across all meter / connection points between 2022 and 2026. The longest outage across any meter / connections point occurred at the ADM meter on 31 December 2023 for a total of 220 minutes (3.67 hours). As the mine closed in 2020, this outage did not impact the customer's electricity supply.
465	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 10(1) EIRL, condition 4.1.1	A distributor or transmitter must, so far as reasonably practicable, reduce the effect of any interruption on a customer.	5	N/P	1	Refer to **Licence Obligation 464** for observations.
466	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 10(2) EIRL, condition 4.1.1	A distributor or transmitter must consider whether, in specified circumstances, it should supply electricity by alternative means to a customer who will be affected by a proposed interruption.	5	N/P	1	Alternative means of electricity supply is documented in individual customer PPAs such as the *Horizon Power PPA* (dated 15 October 2020) which refers to generation facilities (renewable and non-renewable), small-scale solar generating facilities and commercial / residential and centralised solar generating facilities. Utilisation of each alternate power source is documented in clauses 6.7 and Sch 1 para 1.3 of the PPA.
470	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 14(8) EIRL, condition 4.1.1	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.	4	N/P	N/R	The Senior Production Manager confirmed that there were no requests received from its customers to provide a free copy of an instrument issued by the Minister or any notices given under section 14(7) of the Electricity Industry (Network Quality and Reliability of Supply) Code.
471	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 15(2) EIRL, condition 4.1.1	A distributor or transmitter that agrees with a customer to exclude or modify certain provisions must set out the advantages and disadvantages to the customer of doing so in their agreement.	4	N/P	N/R	The Senior Production Manager confirmed that there were no provisions of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005 which were excluded or modified by Ord Hydro.

No.	Obligation Reference	Obligation Description	Audit Priority	Control Adequacy	Compliance Rating	Observations and Findings
477	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 23(1) EIRL, condition 4.1.1	A distributor or transmitter must take all such steps as are reasonably necessary to monitor the operation of its network to ensure compliance with specified requirements.	5	N/P	1	Review of Ord Hydro's maintenance records for the period 1 July 2022 to 30 June 2026 in CMMS, confirmed that routine inspections and maintenance of key equipment (including generators, turbines, cranes, fire equipment, transmitters, and batteries) were performed in accordance with Clause 23(1) of the Electricity Industry (Network Quality and Reliability of Supply) Code. Review of the Monthly Operations Reports for July and December 2022, 2023, 2024 and 2025 and February 2026 also note that maintenance activities (scheduled and unscheduled) are included and shared during Monthly Operation Meetings attended by all site leads, the Senior Production Manager and the Executive Manager Operations.
479	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 24(3) EIRL, condition 4.1.1	A distributor or transmitter must complete a quality investigation requested by a customer in accordance with specified requirements.	4	N/P	N/R	The Senior Production Manager confirmed that there was no quality investigation requested by its customers during the audit period.
480	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 24(4) EIRL, condition 4.1.1	A distributor or transmitter must report the results of an investigation to the customer concerned.	4	N/P	N/R	The Senior Production Manager confirmed that there was no quality investigation requested by its customers during the audit period.

5. Recommendations and Management Actions

5. Recommendations and Management Actions

Listed below are the actions taken by Ord Hydro to address licence obligations that were rated non-compliant in the previous and current audits.

A. Resolved during current audit period			
Recommendation reference from previous audit	**Non-Compliance / Control Improvement**	**Date resolved & action taken by the licensee**	**Auditor's comments**
03/2022	**B2** **319 Electricity Industry Metering Code Clause 3.1** The Licensee had not established a Metrology Procedure as required by the Metering Code. A non-compliance was noted in relation to the frequency of calibration of ADM-T1.	**1 September 2023** Ord Hydro maintains their previous audit position that requirements to establish a Model Service Level Agreement and Mandatory Link Criteria do not apply. Ord Hydro established the *Ord Hydro Metrology Procedure - East Kimberly Power System* on 31 August 2023.	No further action required.
04/2022	**B2** **348 Electricity Industry Metering Code Clause 3.13(4)** The check metering installations on the Ord Hydro network were not calibrated although the main revenue meters were subject to calibration.	**1 September 2023** Ord Hydro undertook a review of the calibration requirements of the check meters and included check meter calibrations as part of ongoing checks.	No further action required.
05/2022	**B2** **369 Electricity Industry Metering Code Clause 4.2(1)** The Licensee Electrical Meters Summary (i.e. registry) was not compliant with all requirements of the Metering Code. Standing Data items 5, 12, 18 and 19 were omitted from the Metering Database (i.e. refer Standing Data Clause 4.3(1)).	**1 July 2023** Ord Hydro updated the Ord Electrical Meters Summary Standing Data to include all Standing Data items in accordance with the Electricity Industry Metering Code.	No further action required.
06/2022	**B2** **370 Electricity Industry Metering Code Clause 4.3(1)** The Licensee Electrical Meters Summary (i.e. registry) was not compliant with all requirements of the Metering Code. Standing Data items 5, 12, 18 and 19 were omitted from the Metering Database (i.e. refer Standing Data Clause 4.3(1)).	Refer to actions taken by Ord Hydro in the **previous audit recommendation reference 05/2022**.	No further action required.

A. Resolved during current audit period			
Recommendation reference from previous audit	**Non-Compliance / Control Improvement**	**Date resolved & action taken by the licensee**	**Auditor's comments**
08/2022	**B2** **448A Electricity Industry Metering Code Clause 6.2** The Licensee had not established the following in accordance with 6.2 of the Metering Code. (a) a proposed model service level agreement; and *(continued to next page)* (b) [not used] (c) a proposed metrology procedure; and (d) proposed mandatory link criteria under clause 3.6.	Refer to actions taken by Ord Hydro in the **previous audit recommendation reference 03/2022**.	No further action required.
09/2022	**A2** **448C Electricity Industry Metering Code Clause 6.19A(1)** The Licensee had not developed or published communication rules within 6 months of the Code applying to its operations.	Refer to actions taken by Ord Hydro in the **previous audit recommendation reference 03/2022**.	No further action required.

Listed below are the recommendations on the actions Ord Hydro should take to address licence obligations that were rated non-compliant.

B. Unresolved at end of current audit period			
Recommendation reference	**Non-Compliance / Control Improvement**	**Auditor's Recommendation**	**Action taken by the Licensee by end of audit period**
01/2026	**B2** **124 EIRL, Condition 4.5.1** The 2018 and 2019 Annual Compliance Reports and the 2020 and 2021 Standing Charges data were submitted outside the required timeframes. The Licensee updated the Breach Register in October 2022, however, for the duration of the audit period there were inconsistencies between the licensee's breach register and the annual compliance reports. Additionally, it was determined during the audit that the compliance reports were consistent with the details in the AMPs and LCM compliance data. It was noted that the Licensee had established a process for review of its non-compliances (i.e. Obligations Register, however, it was not specific enough to facilitate compliance and as such was not effective).	Review of the Compliance Register noted inclusion of all Licence Obligations except for Obligation 104B established January 2026. Ord Hydro advised that the Compliance Register is reviewed annually, hence this new obligation may not have been entered into the register due to the timing of review. We recommend that Ord Hydro implement a requirement for ad-hoc reviews to capture any instances	A high-level ad-hoc review of the Compliance Register was conducted with the potential gaps identified. A further review will be conducted during the annual Asset Management Planning period with the target to update the Compliance Register in Q4 2026 and Q1 2027. To minimise the risk of delays in regulatory report submissions, a more robust process for tracking regulatory reporting obligations, submission requirements and reporting

B. Unresolved at end of current audit period			
Recommendation reference	**Non-Compliance / Control Improvement**	**Auditor's Recommendation**	**Action taken by the Licensee by end of audit period**
		where the Licence Obligations may change during the year. Review of the Internal Audit Schedule 2023 - 2026 noted that all compliance checks for the Ord Hydro Station occur from May – July annually.	timeframe was developed and implemented in August 2026.
02/2026	**B2** **369 Electricity Industry Metering Code, Clause 4.2(1)** The *Ord Electrical Meters Summary Standing Data* did not meet all requirements of the Electricity System and Market Rules (1 July 2026).	We recommend that Management update the *Ord Electrical Meters Summary Standing Data* to include the following Electricity System and Market Rules (1 July 2026) requirements: ▪ Record the Market Participant(s) whose generation or consumption is measured by the meter; and ▪ Facilitate changes to the identity of the Market Participant(s) whose generation or consumption is measured by a meter as of a specified time.	We acknowledge that the Senior Production Manager updated the *Ord Electrical Meters Summary Standing Data* on 10 September 2026, prior to the completion of this audit, to include the following requirements in compliance with the Electricity System and Market Rules (1 July 2026): ▪ Record the Market Participant(s) whose generation or consumption is measured by the meter; and ▪ Facilitate changes to the identity of the Market Participant(s) whose generation or consumption is measured by a meter as of a specified time.
03/2026	**B2** **447 Electricity Industry Metering Code Clause 6.1(1)** The Licensee has not developed documentation as required by the Metering Code. Appreciation as the nature of the operations was made by the Audit Team, however, an exemption was not provided, and the documentation still remained outstanding. Given non-compliances related to calibration and meter registry standing data, the absence of internal operational and maintenance metrology procedures and the failure to comply following the renewal of the HP PPA.	We acknowledge that a finding was raised in the 2022 Performance Audit and Asset Management System Review Report in relation to the absence of the following documents required under Clause 6 of the Electricity Industry Metering Code: ▪ Metrology Procedure; ▪ Model Service Level Agreement; and ▪ Mandatory Link Criteria. The *Ord Hydro Metrology Procedure - East Kimberly Power System* was developed on 31 August 2023.	Ord Hydro does not propose to take any further action in relation to this recommendation. Given Ord Hydro's single customer arrangement, the existing Power Purchase Agreement is considered to adequately address the metering and service requirements that would otherwise be addressed through a Model Service Level Agreement and Mandatory Link Criteria.

B. Unresolved at end of current audit period			
Recommendation reference	**Non-Compliance / Control Improvement**	**Auditor's Recommendation**	**Action taken by the Licensee by end of audit period**
		However, we note that the ERA have not specifically provided Ord Hydro with an exemption with this obligation requirement in relation to the Model Service Level Agreement and Mandatory Link Criteria. We recommend that Ord Hydro: ▪ Develop a Model Service Level Agreement and Mandatory Link Criteria; or ▪ Seek formal exemption from the ERA on the above requirement.	

Appendices

Appendix A – References

Ord Hydro Personnel participating in the Performance Audit

Position Title	Name
Executive Manager Legal and Regulatory Affairs	[redacted]
Compliance Analyst	
Executive Manager Asset Management	
Senior Production Manager	
Ord Hydro site Manager (FIFO)	

Key Documents Reviewed

Please note that this list is not exhaustive:

- Ord Electrical Meters Summary Standing Data
- Ord Hydro Metrology Procedure
- Pacific Blue Generation Decision-Making Procedure
- PHA ORD Asset Management Plan (2026, 2025, 2024, 2023 and 2022)
- Strategic Asset Management Plan
- Asset Management Plan Update Procedure
- Asset Management Policy
- Ord Hydro Emergency Response Plan
- IT Disaster Recovery Plan
- Business Continuity Plan
- Contingency Plans (Powerline Access, Power Transformer, Substations and Switchyards)
- Ord Hydro Health and Safety Management Plan
- Asset Register
- Pacific Hydro PPA (Fully Executed dated 15.10.20)
- Argyle Diamond Mines PPA
- Ord Hydro and Horizon Power Communications Protocol
- Internal Audit Schedule 2026

- Organisation Chart
- Ord Hydro - Compliance Register Update 05.01.23
- Risk Management Framework
- Third-party Cyber Assurance Policy
- Security Incident Response Plan
- Operational Technology System Standard
- IT Change Management Standard
- IT Acceptable Use Procedure
- Information Security Framework
- Information and Records Management Policy
- Checklist A and B – The Ord Hydro Station
- Ord Hydro Annual Compliance Report (2023, 2024, 2025 and 2026)
- 2022 Ord Hydro Performance Audit and Asset Management System Review Report
- Operations Job Based Training report 12082026
- Monthly Operations Reports (February, July and December 2022 – 2026)
- ERA Annual Payments (2022 – 2026)
- Ord Hydro Energy Revenue Meter Data Base
- Ord Hydro meter checks
- Ord Hydro – Incidents
- work-undertaken-20250701-20260630
- Internal Annual Environment Audit (Ord Hydro Plant) 2026
- Ord Hydro Supply System Single Line Diagram

Appendix B – Work Schedule

RSM Staff

RSM Staff who were involved in the Performance Audit include:

- [redacted] – Engagement Partner
- [redacted] – Director
- [redacted] – Manager
- [redacted] – Senior Consultant

Resumes for the RSM staff were outlined in the proposal accepted by Ord Hydro and the Auditors Approval Submission document presented to the ERA.

Timeframe and Work Schedule

The planning and risk assessment phases of the Performance Audit were completed in July 2026 after which the draft Audit Plan and risk assessment was presented to Ord Hydro for comment prior to submission to the ERA for review and approval. The Final Audit Plan was approved by the ERA on 24 July 2026.

Fieldwork and detailed compliance testing were undertaken during the months of August and September 2026 as follows:

- On-site at 3001b Lake Argyle Road, Lake Argyle, WA and 14 Papuana Street, Kununurra, WA.
- Remotely through the use of an online sharefile and video conferencing tools.

This enabled a draft report to be submitted to the ERA by the due date of 30 September 2026.

In summary, the time allocated for each task per team member was as follows:

Task	RSM Personnel	Days	Total Days
Planning & Commencement 1 to 7 July 2026	[redacted] – Engagement Partner	1	**3.5**
	[redacted] – Director	1	
	[redacted] – Manager	1	
	[redacted] – Senior Consultant	0.5	

Appendix B – Work Schedule (Cont.)

Task	RSM Personnel	Days	Total Days
Risk Assessment 8 to 24 July 2026	[redacted] – Engagement Partner	0.5	**3**
	[redacted] – Director	1	
	[redacted] – Manager	1	
	[redacted] – Senior Consultant	0.5	
Detailed Compliance Testing 27 July to 11 September 2026	[redacted] – Engagement Partner	0.5	**17.5**
	[redacted] – Director	1	
	[redacted] – Manager	1	
	[redacted] – Senior Consultant	15	
Completion & Reporting 14 September – 20 October 2025	[redacted] – Engagement Partner	1	**10**
	[redacted] – Director	2	
	[redacted] – Manager	3	
	[redacted] – Senior Consultant	4	

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