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ROTTNEST ISLAND AUTHORITY

GOVERNMENT OF WESTERN AUSTRALIA

2026 Performance Audit

Electricity Integrated Regional Licence EIRL3

Report

Economic Regulation Authority
July 2026

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Limitations of this Report

This report was prepared for distribution to the Economic Regulation Authority and Rottnest Island Authority for the purpose of fulfilling Rottnest Island Authority's performance audit and asset management system review obligations under its Electricity Integrated Regional Licence. We disclaim any assumption of responsibility for any reliance on this report to any persons or users other than the Economic Regulation Authority and Rottnest Island Authority or for any purpose other than that for which it was prepared.

Because of the inherent limitations of any internal control environment, it is possible that fraud, error or non-compliance may occur and not be detected. An audit is not designed to detect all instances of non-compliance with the procedures and controls over the licence obligations of the Electricity Integrated Regional Licence, since we do not examine all evidence and every transaction. The audit and review conclusions expressed in this report have been formed on this basis.

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Independent Auditor's Report

Scope

The Rottnest Island Authority (RIA) has an Electricity Integrated Regional Licence (EIRL3) issued by the Economic Regulation Authority (ERA) under Sections 36(1) and 37(1) of the *Electricity Industry Act 2004* (WA). Version 6 of the licence is applicable from July 2018.

The RIA operates 45 kilometres of 11 kV distribution line and 3.3 megawatts of generation capacity, comprising a mix of solar, wind and diesel, on Rottnest Island 19 kilometres off the coast of Fremantle.

The licensee is for the generation and supply of electricity on Rottnest Island, including:

- construct and operate generating works or operate existing generating works;
- construct and operate a new distribution system or operate an existing distribution system; and
- sell electricity to customers; in accordance with the terms and conditions of this licence and for the purpose of supplying electricity to customers, otherwise than through the South West Interconnected System.

The RIA services 25 small use business customers.[1] Some businesses also have residential premises on the island for their staff.

We have performed a reasonable assurance engagement on RIA's compliance, in all material respects, with the conditions of EIRL3 and the *Electricity Industry Act 2004* for the period from April 2023 to 31 March 2026.

Our evaluation was made against the licence obligations listed in the Electricity Compliance Reporting Manual (January 2026 and previous version February 2023) and in accordance with the ERA's 2025 Audit and Review Guidelines: Electricity and Gas Licences.

The scope of this assurance work relates to assessing RIA's systems and effectiveness of processes and regulatory controls to ensure compliance with the obligations, standards, outputs and outcomes required by the Licence issued under the Act.

Independent Opinion

In our opinion, based on the procedures performed as outlined in the Audit Plan approved by the Economic Regulation Authority and the evidence we have obtained, the Rottnest Island Authority has complied, in all material respects, with its licence conditions and relevant legislative obligations for the period from 1 April 2023 to 31 March 2026.

Basis for opinion

During the period from 1 April 2023 to 31 March 2026, Rottnest Island Authority had 6 non-compliances with minor impact and no effect on customers for the following Licence Conditions:

Reporting Manual number and Licence obligation		Issue
280	**Service Standard Payments** *At least once a year, a retailer must provide a customer with written details of the retailer's and distributor's obligations to make payments to the customer under Part 14 or under any other written law, including the amount of the payment and the eligibility criteria for the payment.*	There has been no communication issued to any customer regarding the customers eligibility for the Service Standard Payments. This will be included moving forward in the next tariff letter to each customer for the 2026-27 financial year. There has been only one complaint re metering and this was resolved with the customer.

[1] A 'small use customer' is a customer who consumes not more than 160 megawatt hours of electricity per year.

Reporting Manual number and Licence obligation		Issue
342	**Metering Installation** *A network operator must ensure that each metering installation complies with at least the prescribed design requirements.*	As noted in the previous audit and upon enquiry with RIA and PFM, the audit noted that there are several current transformer (CT) metering installations that are non-compliant with the prescribed design requirements due to the age of the installations. This has no effect on customers and is considered a minor non-compliance. PFM and RIA confirmed the non-compliant metering units are being replaced as part of the State Electrical Network Upgrade program. The project is progressing. However, the expected completion date has been extended to December 2027 on the basis that some meter replacement works have been delayed over the past year. The majority of meters will be replaced by December 2026 with only a few remaining to be replaced in 2027. There is a Metrology procedure as approved by the ERA.
343	*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.*	
349	*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).*	
345	**Wiring Diagrams** *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.*	From review of documentation, the audit confirmed that PFM maintains drawings detailing metering installation of all meters at Rottnest Island, consistent with good electricity industry practice. An external independent body, Spring30 provides the drawings and sends them to RIA for approval. These drawings are maintained and updated in the Metrology Procedures - Meter Connection Types and Drawings document. However, the auditor observed during site visit that the wiring diagrams were not being maintained within the switchboard for easy access by maintenance crew, hence the performance was graded accordingly.
483	**Network Quality and Reliability of Supply (NQRS) Audit** *A distributor or transmitter must arrange for an independent audit and report on its systems for monitoring, and its compliance with specific requirements. This is to be carried out in respect of the operation of such systems during each reporting period of 3 years or as specified by the ERA.*	Through enquiry with RIA, the audit noted that the last internal independent audit and reporting on its systems for monitoring was conducted by Qualeng in 2020. No such internal independent audit was conducted by any third party for this audit period, although RIA have maintained their ERA compliance requirements.

We conducted our engagement in accordance with Australian Standard on Assurance Engagements ASAE 3100 Compliance Engagements (ASAE 3100). We believe that the assurance evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

In accordance with ASAE 3100 we have:

- Used our professional judgement to plan our procedures and assess the risks that may cause material non-compliance with each of the compliance requirements to be concluded upon;
- Considered internal controls implemented to meet the compliance requirements; however, we do not express a conclusion on their effectiveness; and
- Ensured that the engagement team possess the appropriate knowledge, skills and professional competencies.

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Summary of Procedures

Our procedures consisted primarily of:

- Utilising ERA's 2025 Audit and Review Guidelines: Electricity and Gas Licences ('the Guidelines') to develop a risk assessment;
- Developing an Audit and Review Plan and an associated work program, approved by the ERA on 29th April 2026;
- Interviewing relevant RIA staff and contractors to gain an understanding of process controls;
- Onsite visit to Rottnest Island, and conduct various meetings with stakeholders, including corporate services and plant operations management personnel, to determine the effectiveness of systems and procedures in place and to compare actual performance against the licence standards. The on-site visit included our Engineer;
- Assessing documents and performing walkthroughs of processes and controls to support the assessment of compliance and the effectiveness of the control environment in accordance with Licence obligations; and
- Performing procedures and testing based on the procedures listed in the approved Audit and Review Plan.

How We Define Reasonable Assurance and Material Non-Compliance

Reasonable assurance is a high level of assurance but is not a guarantee that it will always detect a material non-compliance with the compliance requirements.

Instances of non-compliance are considered material if, individually or in the aggregate, they could reasonably be expected to influence relevant decisions of the intended users taken on the basis of the Licensee's compliance with the compliance requirements.

Inherent Limitations

Because of the inherent limitations of an assurance engagement, together with the internal control structure it is possible that fraud, error, or non-compliance with the compliance requirements may occur and not be detected.

A reasonable assurance engagement throughout the specified period does not provide assurance on whether compliance with the compliance requirements will continue in the future.

Use of this Assurance Report

This report has been prepared for RIA and the ERA for the purpose of assessing compliance with the requirements of the License and may not be suitable for another purpose.

We understand that a copy of this report will be provided to the ERA for the purpose of reporting on the reasonable assurance engagement for the Licensee. We agree that a copy of this report may be provided to the ERA in connection with this purpose, but only on the basis that we accept no duty, liability or responsibility to the ERA in relation to the report.

We disclaim any assumption of responsibility for any reliance on this report, to any person other than the Licensee and the ERA, or for any other purpose other than that for which it was prepared.

Management's responsibility

RIA's management are responsible for:

- The compliance activities undertaken to meet the requirements of the Licence;
- Identifying risks that threaten the compliance requirements identified above being met and identifying, designing and implementing controls to enable the compliance requirements to be met and, monitoring ongoing compliance;
- Ensuring that it has complied in all material respects with the requirements of the Licence;
- Establishing and maintaining an effective system of internal control over its systems designed to achieve its compliance with the Licence requirements;
- Implementing processes for assessing its compliance requirements and for reporting its level of compliance to the ERA; and

- Implementing corrective actions for instances of non-compliance (if any).

Our responsibility

Our responsibility is to perform a reasonable assurance engagement in relation to RIA's compliance with its License requirements throughout the period and to issue an assurance report that includes our conclusion.

Our Independence and Quality Control

We have complied with our independence and other relevant ethical requirements of the *Code of Ethics for Professional Accountants* issued by the Australian Professional and Ethical Standards Board and complied with the applicable requirements of Australian Standard on Quality Control 1 to maintain a comprehensive system of quality control.

We confirm that the ERA's 2025 Audit and Review Guidelines: Electricity and Gas Licenses have been complied with in the conduct of this audit/review and the preparation of the report, and that the audit findings reflect our professional opinion.

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Geoff White CA
Director

11 August 2026

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1. Executive Summary

The Rottnest Island Authority ('RIA') has an Electricity Integrated Regional Licence (EIRL3) issued by the Economic Regulation Authority ('ERA') under Sections 36(1) and 37(1) of the *Electricity Industry Act 2004 (WA)*. Version 6 of the licence is applicable from July 2018.

The licensee is for the licence area of Rottnest Island to:

- construct and operate generating works or operate existing generating works;
- construct and operate a new distribution system or operate an existing distribution system; and
- sell electricity to customers; in accordance with the terms and conditions of this licence and for the purpose of supplying electricity to customers, otherwise than through the Southwest Interconnected System.

RIA is required to comply with the terms and conditions of their licence, including applicable legislative provisions and performance reporting as set out in the Electricity Compliance Reporting Manual (January 2026 and previous version February 2023).

Under Section14(1)(c) of the *Electricity Industry Act 2004 (WA)*, the RIA is required to provide to the ERA with a Performance Audit of the Rottnest Island EIRL3 Licence to cover the period from 1 April 2023 to 31 March 2026. The previous audit period was from 1 April 2021 to 31 March 2023.

Quantum Assurance has been engaged by RIA to complete this Performance Audit which is consistent with the requirements of the Australian Standard on Assurance Engagement ASAE3000 – Assurance Engagements Other than Audits or Reviews of Historical Financial Information and the ERA 2025 Audit and Review Guidelines – Electricity and Gas Licences ('ERA Guidelines').

The draft audit report is due to the ERA by 30 June 2026 and the final report by 31 July 2026.

This audit has been conducted to assess the licensee's level of compliance with the licence.

Through the execution of the Audit Plan and assessment and testing of the control environment, the information system, control procedures and compliance attitude, the audit team members have gained reasonable assurance that the Rottnest Island Authority has fully complied with its Electricity Integrated Regional Licence obligations except for 6 minor non-compliances with no impact on customers, during the audit period from 1 April 2023 to 31 March 2026.

Out of 97 applicable compliance obligations, the audit found:

- 92 obligations were rated compliant (53 with adequate controls, 2 with generally adequate controls and 36 with controls not reviewed).
- 6 were rated non-compliant – minor impact on customers or third parties (1 with generally adequate controls, 4 with inadequate controls and 1 with controls not reviewed).

The control environment is considered to be effective to manage compliance with the licence conditions. The audit also confirmed that RIA has complied with its information reporting obligations for the period 1 April 2023 to 31 March 2026.

There were 4 recommendations for improvements as follows:

1. As planned, customers should be provided with written details of the RIA's obligation to make Service Standard Payments and the eligibility criteria, at least once a year.
2. As planned, the non-compliant CT metering units should be replaced as part of the State Electrical Network Upgrade Program by December 2027.
3. The RIA should arrange for an independent audit as required by the Electricity Industry (Network Quality and Reliability of Supply) Code 2005 every 3 years. This obligation should be included in the CMS Compliance Register.
4. The RIA should maintain a printed copy of the wiring diagrams at the switchboards for easy reference.

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2. Performance Audit

2.1 Introduction

The Rottnest Island Authority (RIA) is required to comply with the terms and conditions of their licence, including applicable legislative provisions and performance reporting as set out in the Electricity Compliance Reporting Manual.

Under the Act, electricity services' licensees are required to provide reports on a performance audit ('audit') and an effectiveness review of their asset management system ('review') once every 24 months, or another period that has been specified by the ERA.

The RIA engaged Quantum Management Consulting and Assurance ('Quantum Assurance'), with the approval of the ERA, to perform an audit of the RIA's electricity supply services, to comply with the licensing requirements of the ERA. This audit covers the period from 1 April 2023 to 31 March 2026.

The audit approach is based on the compliance obligations set out in the License, applicable legislation and the regulatory guidelines (Electricity Compliance Reporting Manual – January 2026 and previous version February 2023).

2.2 Objectives and Scope

The objective was to provide the ERA with an independent assessment of the Licensee's compliance with relevant obligations under the licence.

The scope of the audit included the adequacy and effectiveness of performance against the requirements of the licence by considering the following:

Scope	Description
Control Environment	The licensee's management philosophy and operating style, organisational structure, assignment of authority and responsibilities, the use of internal audit, the use of information technology and the skills and experience of the relevant staff members.
Information Systems	The suitability of the licensee's information systems to record the information needed to comply with the licence, accuracy of data, security of data and documentation describing the information system.
Control Procedures	The presence of systems and procedures to monitor compliance with the licence or the effectiveness of the licensee's asset management system, and to detect or prevent instances of non-compliance or under-performance.
Compliance Attitude	The action taken by the licensee in response to any previous audit or review recommendations, and an assessment of the licensee's attitude towards compliance.
Outcome Compliance	The actual performance against standards prescribed in the licence throughout the audit or review period.
Integrity of Reporting	The completeness and accuracy of the compliance and performance reports provided to the ERA.
Compliance with individual licence conditions	The requirements imposed on the specific licensee by the ERA or specific issues that are advised by the ERA.

When assessing if a licensee has complied with its licence obligations, the auditor must apply a level of scrutiny that corresponds to a 'reasonable assurance engagement'. A reasonable assurance engagement is:

> *"An assurance engagement in which the assurance practitioner reduces engagement risk to an acceptably low level in the circumstances of the engagement as the basis for the assurance practitioner's conclusion. The assurance practitioner's conclusion is expressed in a form that conveys the assurance practitioner's opinion on the outcome of the measurement or evaluation of the underlying subject matter against criteria."* (ASAE3000)

The highest priority areas (priority 1, 2 or 3) based on inherent risk, the previous audit's assessed controls/processes and the reported non-compliances for this audit period are:

Priority 2

- Obligation 234 – Disconnection and support of life support equipment (High inherent risk).
- Obligations 257 and 258 – Pre-payment meters where life support equipment registered (High inherent risk).
- Obligations 297B to 297H and 297HH – Life support equipment scheme (High inherent risk).

Priority 3

- Obligation 342, 343, 349 – Non-compliance of metering installations with prescribed design requirements (previous audit finding).

The audit was designed to identify any areas where improvement was required and to recommend corrective action as necessary.

In accordance with the ERA Guidelines, recommendations are included in the report only for obligations rated as inadequate controls (C), no controls (D), non-compliant – minor impact (2), non-compliant – moderate impact (3) or non-compliant – major impact (4). Any other improvements identified in the audit are provided direct to the licensee. (refer Ratings Table in section 3.3).

The status of the previous audit recommendations reported in July 2023 was also reviewed. Refer section 2.6.

2.3 Obligations Not Applicable

The following obligations included in the Audit Plan were found to be not applicable and have not been included in the detailed obligations in section 2.8:

- Obligations 192 to196 and 200 – As there are no residential customers, these obligations re payment plans and financial hardship do not apply.
- Obligations 252 to 271C – RIA does not operate prepayment meters.
- Obligations 297B to 297N – As there are no residential customers, the obligations re life support equipment do not apply.
- Obligations 388 to 402 – There are no separate 'users' under the Code.
- Obligations 405 to 421 – There are no separate users under the Code.
- Obligations 435 to 448D – There are no separate users or network operators under the Code.
- Obligations 451 to 461 – There are no separate users or network operators under the Code.

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2.4 Audit Compliance and Controls Rating Scale

The adequacy of controls and compliance with the legislative obligations was assessed using the following ratings.

Adequacy of Controls Rating		Compliance Rating	
Rating	**Description**	**Rating**	**Description**
A	Adequate controls – no improvement needed	1	Compliant
B	Generally adequate controls – improvement needed	2	Non-compliant – minor impact on customers or third parties
C	Inadequate controls – significant improvement required	3	Non-compliant – moderate impact on customers or third parties
D	No controls evident	4	Non-compliant – major impact on customers or third parties
NP	Not performed – controls not assessed in the audit.	NR	Not rated – no activity in current period

2.5 Summary of Audit Ratings of Controls and Compliance

The current audit assessment of the ratings for the adequacy of controls and compliance with the legislative obligations is shown below in the summary table and detailed obligations table.

Out of 262 applicable obligations, 165 were not rated as no relevant activity took place in the audit period for these obligations. Of the remaining 97 obligations, 92 were rated compliant and 5 were rated as non-compliant (minor impact). These had no impact on customers.

Summary of Audit Ratings of Control and Compliance

Controls rating	Compliance Rating						
	Rating	**1 Compliant**	**2 Non-compliant (minor impact)**	**3 Non-compliant (moderate impact)**	**4 Non-compliant (major impact)**	**NR Not rated**	**Total**
	A -Adequate	53	-	-	-	27	**80**
	B – Generally adequate	2	1	-	-	1	**4**
	C - Inadequate	-	4	-	-	-	**4**
	D – No controls	-	-	-	-	-	**-**
	NP – Not performed	36	1	-	-	137	**174**
	Total	**91**	**6**	**-**	**-**	**165**	**262**

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Detailed Audit Ratings of Control and Compliance by Obligation

No.[2]	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating[3] (A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					Compliance Rating (1=Compliant 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)				
				A	B	C	D	NP	1	2	3	4	NR
Electricity Industry (Obligation to Connect) Regulations													
72	Connection to supply	Regulation 4	4	✓									✓
73	Connection to suitable point	Regulation 5(5)	4	✓									✓
74	Adequate supply capacity	Regulation 5(6)	4	✓									✓
75	Connection within timeframe	Regulation 6	4	✓									✓
76	Energise premises	Regulation 7(1)	4	✓									✓
77	Energise within timetable	Regulation 8	4	✓									✓
77A	Decommissioning supply	Regulation 12(1)	4	✓									✓
Electricity Industry Act 2004													
101	Provide ERA with performance audit	Section 13(1)	4	✓					✓				
102	Asset management system (AMS)	Section 14(1)(a)	4	✓					✓				
103	Notify changes to AMS	Section 14(1)(b)	4					✓					✓
104	Asset Management System Review report	Section 14(1)(c)	4	✓					✓				
104B	Asset management system to include measures for the proper maintenance of the assets	Section 14(2) *From 1 January 2026*	4	✓					✓				
105	Payment of license fees to ERA	ERA (Licencing Funding) Regs.2014	4	✓					✓				
106	Minimisation of unforeseen effects on electricity supply	Section 31(3)	4	✓					✓				
107	Payment of costs for easement	Section 41(6)	4					✓					✓
108	Supply only under contract	Section 54(1)	4	✓					✓				
109	Direction from ERA to amend standard contract	Section 54(2)	4					✓					✓
111	Member of approved scheme	Section 101	4	✓					✓				
114	Marketing agent	Section 11	4					✓					✓
116	Review of standard contract	Section 11	4					✓					✓
117	ERA direction re standard contract review	Section 11	4					✓					✓
118	Amend standard contract	Section 11	4					✓					✓
119	Maintaining accounting records	Section 11	4	✓					✓				
121	Comply with ERA's standard audit guidelines	Section 11	4					✓	✓				

[2] The number refers to the Obligation reference in the Electricity Compliance Reporting Manual January 2026 and previous version February 2023 where applicable.
[3] Refer Controls and Compliance Rating Scales in Section 3.3.

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No.[2]	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating[3] (A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					Compliance Rating (1=Compliant 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)				
				A	B	C	D	NP	1	2	3	4	NR
122	Comply with ERA's AMS review guidelines	Section 11	4					✓	✓				
123	Notify ERA of external administration or changes in license circumstances	Section 11	4	✓									✓
124	Providing ERA with any other information	Section 11	4	✓					✓				
125	Timeframe to publish information	Section 11	4	✓					✓				
126	Notices in writing	Section 11	4					✓	✓				
Code of Conduct for the Supply of Electricity to Small-Use Customers 2022													
	Marketing												
129A	Marketing agents' compliance	Clause 8	4					✓					✓
130	Entering standard form contracts	Clause 9(1)	4					✓	✓				
131	Timeframe to give customers information	Clause 9(2)	4					✓	✓				
132	Entering non-standard contracts	Clause 10(1)	4					✓	✓				
133	Information to customer prior to non-standard contract	Clause 10(2)	4					✓	✓				
133A	Information to non-standard contract customer	Clause 10(3)	4					✓	✓				
135	Customer consent	Clause 10(5)	4					✓	✓				
136	Clarity of concession inclusions	Clause 11(1)	4					✓					✓
137	Customer can contact agent	Clause 11(2)	4					✓	✓				
138	Agent to provided customer with information requested	Clause 12(1)	4					✓					✓
139	Face-to-face meeting – carry identification	Clause 12(2)	4					✓	✓				
140	Comply with any signs at premises that restrict sales representative	Clause 13	4					✓					✓
	Billing												
145	Timeframes for Issuing bill	Clause 13	4					✓	✓				
145A	Agreement to billing cycle	Clause 19(3) *From 1 January 2026*	4					✓					✓
146A	Customer re shortened billing cycle	Clause 20(1)	4					✓					✓
148	Written notice to shorten billing cycle	Clause 20(3)	4					✓					✓
149	Timeframe of shortened billing cycle	Clause 20(4)	4					✓					✓

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No.[2]	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating[3] (A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					Compliance Rating (1=Compliant 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)				
				A	B	C	D	NP	1	2	3	4	NR
150	Return customer to billing cycle if 3 consecutive bills paid by the due date.	Clause 20(5)	4					✓					✓
151	Informing customers about shortened billing cycles	Clause 20(6)	4					✓					✓
155A	Further information on bill	Clause 21(1)	4					✓	✓				
156	Billing of historical debt	Clause 21(9)	4					✓					✓
157A	Meter reading criteria	Clause 22(1)	4					✓	✓				
157B	Bill smoothing	Clause 22(2)	4					✓					✓
158	Obtain actual values	Clause 22(3)	4					✓	✓				
158A	Written billing method	Clause 22(4)	4	✓					✓				
160	Estimated bill – specify on bill	Clause 23(1)	3	✓					✓				
161	Reason for estimating	Clause 23(2)	4	✓					✓				
163	Replacing an estimated bill	Clause 24(2)	4					✓					✓
166	Alternate tariffs	Clause 25(2)	4					✓					✓
166A	Transfer of tariffs	Clause 25(3)	4					✓					✓
167	No longer eligible for beneficial tariffs	Clause 4.13	4					✓					✓
171	Reviewing customer bill	Clause 27(1)	4					✓	✓				
172	Reviewing customer bill - satisfied that it is correct	Clause 27(2)(a)	4					✓					✓
173	Reviewing customer bill – adjusting incorrect bill	Clause 27(2)(b)	4					✓	✓				
174	Reviewing customer bill – informing the outcome	Clause 27(3)	4					✓	✓				
175	Timeframe to inform the outcome of a bill review	Clause 27(4)	4					✓					✓
175A	Check of energy bill	Clause 28(1)	4					✓					✓
175B	Check of energy data	Clause 28(3)	4					✓					✓
175C	Customer instruction re credit	Clause 28(4) *From 1 January 2026*	4					✓					✓
175D	If no instruction, apply credit to next bill	Clause 28(5) *From 1 January 2026*	4					✓					✓
176	Recovering undercharged amounts	Clause 29(1)	4					✓					✓
177	Overcharged from error, defect or default	Clause 30(1)	4					✓					✓
178	Payment of overcharged amount	Clause 30(2)	4					✓					✓
179	Credit account of overcharged amount	Clause 30(3)	4					✓					✓

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No.[2]	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating[3] (A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					Compliance Rating (1=Compliant 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)				
				A	B	C	D	NP	1	2	3	4	NR
181	Written notice to use overcharged amount for debt owed	Clause 30(6)	4					✓					✓
181A	Financial hardship	Clause 30(7)	4					✓					✓
181B	Written notice to use overcharged amount for debt owed	Clause 30(8)	4					✓					✓
183A	Meter reading for final bill	Clause 31(1)	4					✓	✓				
183B	Credit balance for final bill	Clause 31(2)	4					✓					✓
183C	Transfer credit balance in final bill	Clause 31(3)	4					✓					✓
183D	Set off credit balance in final bill	Clause 31(4)	4					✓					✓
183E	Final credit balance in final bill	Clause 31(5)	4					✓					✓
184A	Bill delivery options	Clause 32(1)	4					✓	✓				
184B	Transfer of credit balance upon account closure	Clause 32(A) *From 1 January 2026*	4					✓					✓
	Payment												
187	Due date	Clause 33	4					✓	✓				
188	Payment methods	Clause 34(1)	4					✓	✓				
190	Payment in advance	Clause 35(1) to (3)	4					✓					✓
190A	Payment in advance	Clause 35(4) to (6)	4					✓					✓
191A	Redirect bill to new address	Clause 36	4					✓	✓				
197	Vacated address	Clause 38(1)	4					✓	✓				
198	Evicted/required to vacate supply address	Clause 38(2)	4					✓					✓
199	Previous electricity consumed	Clause 38(4)	4					✓					✓
201	Debt recovery limited to supply address	Clause 39(2)	4					✓					✓
201A	Transfer of debt to another customer	Clause 39(3)	4					✓					✓
214C	Provide payment plan information to customer	Clause 44(4)	4					✓					✓
214D	Cannot vary a payment plan without the customer's agreement.	Clause 44(5)	4					✓					✓
214E	Agreement must relate to the particular variation rather than a general agreement to future variations.	Clause 44(6)	4					✓					✓
215	Consider request for financial hardship	Clause 45(1)	4					✓					✓
216	Consider hardship policies and procedures	Clause 45(2)	4					✓					✓

No.[2]	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating[3] (A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					Compliance Rating (1=Compliant 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)				
				A	B	C	D	NP	1	2	3	4	NR
218	Advise customer of financial hardship information.	Clause 45(3)	4					✓					✓
220	Develop, maintain and implement hardship policy and procedures	Clause 46(1)	4					✓					✓
221	Criteria for hardship policy	Clause 46(2)	4					✓					✓
222	Criteria for hardship procedures	Clause 46(3)	4					✓					✓
223A	Consult with consumer representatives when developing policy or procedure or making material amendments	Clause 46(4)	4					✓					✓
223B	Provie a copy to the ERA of hardship policy, and if the retailer makes a material amendment.	Clause 46(5)	4					✓					✓
225	If directed by the ERA, a retailer must review its hardship policy and hardship procedures.	Clause 46(6)	4					✓					✓
228	Request for alternative payment arrangements from a business customer who is experiencing payment difficulties.	Clause 47	4					✓					✓
	Disconnection and Interruption												
229	Reminder notice prior to disconnection	Clause 48	4	✓									✓
230	Failure to pay a bill	Clause 49(a)	4	✓									✓
231	Failure to pay a bill – dual fuel contracts	Clause 50(2)	4	✓									✓
232	Denying access to the meter	Clause 51(2)	4	✓									✓
232A	Disconnection for denying access to the meter	Clause 51(4)	4	✓									✓
232	Denying access to the meter	Clause 51(2)	4	✓									✓
232A	Safe access to customer address for meter testing	Clause 51(4)	4	✓									✓
234	Limitations on disconnection	Clause 52	2	✓					✓				
	Reconnection												
242	Requests for reconnection	Clause 53(2)	4	✓									✓
243	Requests for reconnection	Clause 53(3)	4					✓					✓
244	Timeframe to reconnect	Clause 54(1)	4	✓									✓
244A	Timeframe to reconnect	Clause 54(3)	4	✓									✓

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				A	B	C	D	NP	1	2	3	4	NR
	Information and Communication												
271D	The retailer must publish on its website the information detailed in subclause 68(1).	Code of Conduct, clause 68(1)	4					✓	✓				
271E	If a customer requests information of the kind referred to subclause 68(1) the retailer must refer the customer to the retailer's website or provide information to the customer without charge.	Code of Conduct, clause 68(3)	4					✓	✓				
271F	If a customer requests a copy of information of the kind referred to in subclause 68(1), the retailer must provide a copy of the information to the customer without charge.	Code of Conduct, clause 68(4)	4					✓	✓				
273	Make available information on tariffs, fees and charges	Clause 69	4					✓					✓
273A	Tariffs, fees and charges set by State Government	Clause 70(1), (2) and (3)	4					✓					✓
273AA	A retailer must, at least once each year and at no charge, give every non-contestable customer the information referred to in subclause 69(1) and information about any other products offered by the retailer and available to the customer.	Clause 69(2) *From 1 January 2026*	4		✓								✓
274A	Notice of change in tariffs, fees and charges	Clause 71(2)	4					✓	✓				
275	Billing data	Clause 72(1)	4					✓					✓
276	Providing billing data at no charge	Clause 72(2)	4					✓					✓
280	Written details of obligations to make payments	Clause 73	4					✓		✓			
282	Information re distribution of electricity	Clause 74	4					✓					✓
283A	Publish information on website	Clause 75(1)	4					✓	✓				
283B	Refer customer to website	Clause 75(3)	4					✓					✓
283C	Provide information to customer	Clause 75(4)	4					✓					✓
283D	Provide information on supply quality	Clause 76	4					✓					✓
290	Format of written information	Clause 77	4					✓	✓				
294	Interpreting information for residential customer	Clause 78(1)	4					✓					✓
296	Information on types of meters	Clause 79(1)	4					✓					✓
297	Availability of different types of meters	Clause 79(2)	4					✓					✓

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				A	B	C	D	NP	1	2	3	4	NR
	Disconnection and Interruption for Emergencies												
297A	Disconnection for emergency reasons must have 24 hour information line and restore supply as soon as possible.	Clause 79(2)	4					✓	✓				
	Complaints and Dispute Resolution												
298	Internal process for handling complaints and resolving disputes	Clause 87(1)	4	✓					✓				
299	Compliance of complaint handling process with Code	Clause 87(2)	4	✓					✓				
299A	Compliance of complaint handling process with AS/NZS 10002:2014	Clause 87(3)	4	✓					✓				
301	Response timeframe for written complaint	Clause 88	4	✓									✓
301A	Inform customer of outcome	Clause 89	4	✓									✓
304	Advise customer of appropriate entity for a complaint	Clause 12.4	4					✓					✓
	Protection Relating to Family Violence												
307A	Develop Family Violence Policy	Clause 91(1)	4	✓					✓				
307B	Details	Clause 91(2)	4	✓					✓				
307C	Training	Clause 91(3)	4	✓					✓				
307D	Review	Clause 91(5)	4	✓									✓
307E	Consultation	Clause 91(6)	4					✓	✓				
307F	Restricted disconnection	Clause 92	2	✓									✓
307G	No written evidence required	Clause 93	4	✓									✓
	Service Standard Payments												
308A	Non-compliance with reconnection	Clause 94(1)	4					✓					✓
308B	Payment for late reconnection	Clause 94(2)	4					✓					✓
310	Compensation for retailer's non-compliance with procedures	Clause 95(1)	4					✓					✓
312	Failure to acknowledge complaint within the timeframe	Clause 96	4					✓					✓
313A	Payment for wrongful disconnection	Clause 97(1) and (2)	4					✓					✓
314A	Payment for not responding to complaint	Clause 98)1) and (2)	4					✓					✓
315	Manner of payment - Retailer	Clause 100(1)	4					✓					✓
316	Manner of payment - Distributor	Clause 100(2)	4					✓					✓
Electricity Industry Metering Code													
	Part 3 – Meters and metering installations												
319	Meters to comply with Metrology procedure etc.	Clause 3.1	4	✓					✓				

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				A	B	C	D	NP	1	2	3	4	NR
320	Display of meter measurements	Clause 3.2(1)	4	✓					✓				
321	Energy data interface	Clause 3.3(1)	4		✓				✓				
322	Communication link to have approved modem and isolation device	Clause 3.3(3)	4	✓									✓
323	No bi-directional flows unless separated by meter	Clause 3.3A(1)	4					✓					✓
324	User becomes aware of bi-directional electricity flow	Clause 3.3B	4					✓					✓
325	Accumulation meter to record net production and consumption	Clause 3.3C	4					✓					✓
326	Metering installation at each connection point	Clause 3.5(1) & (2)	4	✓					✓				
327	Maintain metering installation	Clause 3.5(3)	4	✓					✓				
328	Metering point to be located at connection point	Clause 3.5(4)	4	✓					✓				
329	Meter charges in accordance with service level agreement	Clause 3.5(6)	4					✓					✓
330	Advise affected parties of any non-compliance	Clause 3.5(9)	4					✓					✓
331	All devices compatible with telecommunication network etc.	Clause 3.7	4	✓					✓				
332	Secure meter from unauthorised access	Clause 3.8	4					✓	✓				
333	Metering installation to meet Code specifications	Clause 3.9(3)	4	✓					✓				
334	Accuracy requirements re supply above 1000 volts with VT and annual consumption below 750MWh	Clause 3.9(7)	4					✓					✓
335	Metering error as close to zero as practicable	Clause 3.9(8)	4					✓					✓
336	Programmable settings to comply with Metrology procedure etc.	Clause 3.10	4	✓					✓				
337	Consistent measurement and recording of data each year	Clause 3.11(1)	4	✓					✓				
338	Outage repairs in accordance with service level agreement	Clause 3.11(2)	4	✓					✓				
340	Meters to be sampled and tested for accuracy	Clause 3.11A(1)	4	✓					✓				
341	“Population” of failed meters to be removed	Clause 3.11A(2)	4					✓					✓
342	Metering installation to comply with prescribed design	Clause 3.12(1)	3			✓				✓			
343	Compliance of instruments transferring metering data	Clause 3.12(2)	3			✓				✓			

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				A	B	C	D	NP	1	2	3	4	NR
344	Isolation facilities to be provided	Clause 3.12(3)	4					✓	✓				
345	Maintain drawings and information	Clause 3.12(4)	4		✓					✓			
346	Procure user to install check metering installation	Clause 3.13(1)	4					✓					✓
347	Partial check metering installation physical arrangement	Clause 3.13(3)(c)	4					✓					✓
348	Check metering installation compliance	Clause 3.13(4)	4					✓					✓
349	Metering installation using class CTs and VTs that do not comply with Code	Clause 3.16(1)	3			✓				✓			
355	Request for enhanced technology features	Clause 3.20(1)	4					✓					✓
356	Charges to be in accordance with service level agreement	Clause 3.20(3)	4					✓					✓
357	Accurate internal real time clock measured over 1 month	Clause 3.21(1)	4					✓					✓
358	Storage onsite of internal data logger data	Clause 3.21(2)	4					✓					✓
359	Enhanced technology metering software licensed and programmable	Clause 3.22	4					✓					✓
360	Signals from meter to be isolated to prevent damage to meter	Clause 3.23(a)	4					✓					✓
361	Signals from meter for user to be compliant	Clause 3.23(b)	4					✓					✓
364	Metering installation only by registered operator	Clause 3.27	4		✓				✓				
365	Publish list of registering metering installation providers annually	Clause 3.29	4					✓	✓				
	Part 4 – The metering database												
366	Maintain metering database for each metering point	Clause 4.1(1)	4	✓					✓				
367	Metering database to be secure	Clause 4.1(2)	4	✓					✓				
368	Disaster Recovery Plan to rebuild metering database within 2 days	Clause 4.1(3)	4	✓					✓				
369	Registry to comply with the Code and market rules	Clause 4.2(1)	4	✓					✓				
370	Standing data requirements	Clause 4.3(1)	4	✓					✓				
371	Discrepancy between data in meter and database	Clause 4.4(1)	4					✓					✓
372	Not knowingly permit the registry to be materially inaccurate.	Clause 4.5(1)	4					✓					✓
373	Notify network operator of any inaccuracy in standing data	Clause 4.5(2)	4					✓					✓

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				A	B	C	D	NP	1	2	3	4	NR
374	Notification by Code participant of standing data change to registry	Clause 4.6(1)	4					✓					✓
375	Other notification of standing data change to registry	Clause 4.6(2)	4					✓					✓
376	Notify user within 2 business days of any update to registry	Clause 4.7(1)	4					✓					✓
377	User being retailer or generator to have remote access to energy data	Clause 4.8(3)	4					✓					✓
378	User being retailer or generator to have remote access to metering database	Clause 4.8(3A)	4					✓					✓
379	Energy data to be secure	Clause 4.8(4)(a)	4	✓					✓				
380	Metering database to be secure	Clause 4.8(4((b)	4	✓					✓				
381	Security of passwords	Clause 4.8(5)	4	✓					✓				
382	Retention of energy data	Clause 4.9	4					✓	✓				
	Part 5 – Metering services												
383	Code participant's requirement to obtain a metering service	Clause 5.1(1)	4					✓					✓
384	Request for service level agreement	Clause 5.1(2)	4					✓					✓
385	Transfer energy data into metering database within 2 business days	Clause 5.3(1)	3	✓									✓
386	Validation of meter reading at least every 12 months	Clause 5.4(1)	4	✓					✓				
387	Meter reading by skilled operator	Clause 5.4(1A)	4	✓					✓				
403	Provide metering data to a person associated with customer	Clause 5.17A(1)	4	✓									✓
404	Provide data within timeframe	Clause 5.17A(3)	4					✓					✓
422	Validate energy data in accordance with the Code	Clause 5.22(1)	4					✓					✓
423	Use check metering data	Clause 5.22(2)	4					✓					✓
424	If check metering data not available or energy data cannot be recovered	Clause 5.22(3)	4					✓					✓
425	Notify participants within 24 hours of loss of or error in data	Clause 5.22(4)	4					✓					✓
426	Substitution or estimation of energy data	Clause 5.22(5)	4					✓					✓
427	Review validation failures before substitution	Clause 5.22(6)	4					✓					✓
428	If actual value cannot be determined	Clause 5.23(1)	4					✓					✓
429	Repair or replace meter or component if actual value deemed	Clause 5.23(3)	4					✓					✓

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				A	B	C	D	NP	1	2	3	4	NR
430	Replace actual value with better quality actual or deemed value if available	Clause 5.24(1)	4					✓					✓
431	Replace deemed value with better quality actual or deemed value if available	Clause 5.24(2)	4					✓					✓
432	Replace estimated value with better quality actual, deemed or estimated value if available	Clause 5.24(3)	4					✓					✓
433	Request for estimated or substituted value	Clause 5.24(4)	4					✓					✓
434	Accuracy of estimated energy data	Clause 5.25	4	✓					✓				
	Part 6 – Documentation												
449	Amend document in accordance with ERA's final recommendation	Clause 6.20(4)	4					✓					✓
450	Publish amended document	Clause 6.20(5)	4					✓					✓
Electricity Industry Network Quality and Reliability of Supply Code													
462	Electrical supply to customer complies with standards	Clause 5(1)	4					✓					✓
463	Disconnection of supply	Clause 8	4					✓					✓
464	Maintain supply and minimise interruptions	Clause 9	4	✓					✓				
465	Reduce effect of interruption on customer	Clause 10(1)	4	✓					✓				
466	Alternative means of supply	Clause 10(2)	4	✓					✓				
467	Action in event of interruption	Clause 12(3)	4	✓					✓				
468	Minimise interruptions in certain areas	Clause 13(2)	4					✓	✓				
469	Calculation of average total length of supply interruptions	Clause 13(3)	4					✓	✓				
470	Provide affected customer free copy of any instrument issued by Minister or under the Code	Clause 14(8)	4					✓					✓
471	Modification of customer agreement	Clause 15(2)	4					✓					✓
472	Payment to customer for failure to give notice of planned interruption	Clause 18	4					✓					✓
473	Payment to customer if supply interruption exceeds 12 hours	Clause 19	4					✓					✓
474	Customer information about applying for payments for failure to meet the Code	Clause 21(1)	4					✓					✓
475	Provide written notice to eligible customers about payments available	Clause 21(2)	4					✓					✓

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				A	B	C	D	NP	1	2	3	4	NR
476	Provide written notice at least once every financial year	Clause 21(3)	4					✓					✓
477	Monitor operation of network to ensure compliance	Clause 23(1)	4	✓					✓				
478	Keep records of compliance information	Clause 23(2)	4	✓					✓				
479	Complete quality investigation requested by customer	Clause 24(3)	4					✓					✓
480	Report results of investigation to customer	Clause 24(4)	4					✓					✓
481	Make available complaints information	Clause 25(2)	4	✓					✓				
482	Complaint handling process must contain the specified information	Clause 25(3)	4	✓					✓				
483	Independent audit of systems	Clause 26(1) and (2))	4			✓				✓			
483A	Publish audit report	Clause 26(3) and (4)	4					✓					✓
483B	Provide report to Minister and ERA	Clause 26(5)	4					✓					✓
484	Publish annual performance report	Clause 27(1))	4	✓					✓				
485	Provide report to Minister and ERA	Clause 27(3)	4	✓					✓				

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2.6 Status of Previous Audit Recommendations

The previous audit covered the period from 1 April 2021 to 31 March 2023 and was reported in July 2023. The status of the previous recommendations is stated below.

Reference (no./year) and Rating	Previously Assessed Non-Compliance/Controls Improvement	Previous Auditor's Recommendation and *Action Taken*	Date Resolved	Further action required
A. Resolved before end of previous audit				
	Nil			
B. Resolved during current audit period				
	Nil			
B. UNresolved at end of current audit period				
01/2023 B2	**Metering Installations** *Obligation 342 - A network operator must ensure that each metering installation complies with at least the prescribed design requirements.* *Obligation 343 - 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* *Obligation 349 - 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).* As noted in the previous audit and upon enquiry with RIA and PFM, the audit noted that there are several current	As planned, non-compliant CT metering units should be replaced as part of the State Electrical Network Upgrade Program. Also, as part of the planned transfer of service responsibility to Horizon Power, metering will need to be updated as necessary at the latest prior to handover. **Status: In Progress** There are several RIA current transformer (CT) metering installations that do not comply with the prescribed design requirements. The impact of this breach is minor on the basis that no customers are affected. The 'aged' installation is now considered non-compliant. The non-compliant CT metering units will be replaced as part of the State Electrical Network Upgrade Program.	In progress for completion by December 2027	**Refer Recommendation 3/2026**

Reference (no./year) and Rating	Previously Assessed Non-Compliance/Controls Improvement	Previous Auditor's Recommendation and *Action Taken*	Date Resolved	Further action required
	transformer (CT) metering installations that are non-compliant with the prescribed design requirements due to the age of the installations. This has no effect on customers and is considered a minor non-compliance. PFM and RIA confirmed the non-compliant metering units are being replaced as part of the State Electrical Network Upgrade program by December 2024. There is a Metrology procedure as approved by the ERA. PFM and RIA should ensure that the metering installation complies with the prescribed design requirements. Metering survey checking and identifying all meters is complete. RIA have a development plan underway to replace non-compliant CT metering units.	The project is progressing. However, the expected completion date has been extended to December 2027 on the basis that some meter replacement works have been delayed over the past year. The majority of meters will be replaced by December 2026 with only a few remaining to be replaced in 2027.		

2.7 Detailed Audit Observations

SUMMARY OF COMPLIANCE OBLIGATIONS	
LEGISLATION:	
ELECTRICITY INDUSTRY ACT 2004	Refer Compliance Obligations 101 to 128 as applicable.
REGULATIONS:	
ELECTRICITY INDUSTRY (OBLIGATION TO CONNECT) REGULATIONS	Compliance Obligations 72 to 77A.
ENERGY COORDINATION ACT (CUSTOMER CONTRACTS) REGULATIONS	*Not applicable as no non-standard contracts.*
CODES:	
CODE OF CONDUCT FOR THE SUPPLY OF ELECTRICITY TO SMALL-USE CUSTOMERS	Compliance Obligations 129 to 316 as applicable.
ELECTRICITY INDUSTRY (METERING CODE)	Refer Compliance Obligations 317 to 461 as applicable.
ELECTRICITY INDUSTRY NETWORK QUALITY AND RELIABILITY OF SUPPLY CODE	Refer Compliance Obligations 462 to 485 as applicable.

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
ELECTRICITY INDUSTRY (OBLIGATION TO CONNECT) REGULATIONS *(applies to small use customers[8])*							
72	Regulation 3	Regulation 4	A distributor must attach, or connect, premises to a distribution system or provide a stand-alone power system for the supply of electricity to the premises if a retailer seeks to arrange with, or a customer applies to, the distributor to attach or connect the premises. The circumstances described in regulation 5(1) must be met for the distributor to be required to attach or connect the premises.	4	Through enquiry and system walkthrough, the audit noted that RIA has a Distribution and Connection Manual in place. Although the Manual does not specify the need for connection if customers take the prescribed action, there are limited premises on the Island and all are attached to the distribution system. There were 2 new connections in the audit period with new meters installed at Geordie Bay water main and Geordie Bay ablution block in 2022/23. These were not for customers.	A	NR
73	Regulation 3	Regulation 5 (5)	A distributor that decides to attach, or connect, premises to the distribution system to satisfy the obligation under regulation 4 must extend the distribution system to a suitable connection point.	4	Through enquiry and system walkthrough, the audit determined that RIA has a Distribution and Connection Manual in place. In section 3.4 of the Manual, it is stated that RIA as a distributor, is responsible for: • Metering arrangements • Type of connection • Date of connection or disconnection. Section 9.7 (Connection arrangements) of the Manual states that the customer's HV installation shall commence at the PoS, which will be the connection point agreed between the customer and	A	NR

[4] The number refers to the item reference in the Electricity Compliance Reporting Manual ERA – January 2026 (and previous version February 2023).
[5] The highest priority areas (priority 1, 2 or 3) based on inherent risk and expected controls/processes are highlighted in RED.
[6] Controls Rating Scale: A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed.
[7] Compliance Rating Scale: 1=Compliant, 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated.
[8] A 'small use customer' is a customer who consumes not more than 160 megawatt hours of electricity per year.

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
					the Network Operator (Facility Manager). Hence the RIA manual covers the requirements of the obligation. There were 2 new connections in the audit period with new meters installed at Geordie Bay water main and Geordie Bay ablution block in 2022/23. These were not for customers.		
74	Regulation 3	Regulation 5(6)	The capacity and standard of an extension or a stand-alone power system must be adequate for the supply required and in accordance with accepted good industry practice as would be applied by a prudent distributor.	4	Through enquiry and system walkthrough, the audit noted that RIA has a Distribution and Connection Manual in place. In section 3.4 of the Manual, it is stated that RIA as a distributor, is responsible for: • Metering arrangements • Type of connection • Date of connection or disconnection. Section 9.7 (Connection arrangements) of the Manual states that changes on the load/to the network must meet the standards stipulated by the Network Operator (Facility Manager), including but not limited to, power quality and general operational conditions for individual customers. Hence, the Manual covers the requirements of the obligation. There were no extensions or stand-alone power in the audit period.	A	NR
75	Regulation 3	Regulation 6	A distributor that decides to attach, or connect, premises to the distribution system to satisfy the obligation under regulation 4 must do so within a defined timeframe.	4	Through enquiry and system walkthrough, the audit noted that RIA has a Distribution and Connection Manual in place, which includes RIA's responsibility relating to the *Electricity Industry (Obligation to Connect) Regulations*. In section 3.4 of the Manual, it is stated that RIA as a distributor, is responsible for: • Metering arrangements • Type of connection	A	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
					• Date of connection or disconnection. Section 9.4.4.17 of the Manual states the estimated time frame and date for a connection shall be provided and agreed with the customer. Hence the RIA manual covers the requirements of the obligation. There were 2 new connections in the audit period with new meters installed at Geordie Bay water main and Geordie Bay ablution block in 2022/23. These were not for customers.		
76	Regulation 3	Regulation 7(1)	A distributor must energise premises in certain prescribed circumstances.	4	Through our enquiry and system walkthrough, the audit noted that RIA has in place, a Distribution and Connection Manual which includes RIA's responsibility relating to the *Electricity Industry (Obligation to Connect) Regulations*. In section 3.4 of the Manual, RIA as a distributor is responsible for: • Metering arrangements • Type of connection • Date of connection or disconnection. No premises were energised during the audit period.	A	NR
77	Regulation 3	Regulation 8	A distributor that is obliged to energise premises must do so within a defined timetable.	4	Through enquiry and system walkthrough, the audit noted that RIA has a Distribution and Connection Manual in place, which includes RIA's responsibility relating to the *Electricity Industry (Obligation to Connect) Regulations*. In section 3.4 of the Manual, it is stated that RIA as a distributor, is responsible for: • Metering arrangements • Type of connection	A	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
					• Date of connection or disconnection. Section 9.4.4.17 of the Manual states the estimated time frame and date for energising a connection shall be provided and agreed with the customer. No premises were energised during the audit period		
77A	Regulation 3	Regulation 12(1)	A distributor that proposes to decommission a distribution system or a part of a distribution system must notify: a) the owner of each premises attached to the distribution system or part; and b) the owner of each premises in relation to which the requirement in sub regulation 5(1)(a) is satisfied in relation to the distribution system or part.	4	Through enquiry and system walkthrough, the audit noted that RIA has a Distribution and Connection Manual in place, which includes RIA's responsibility relating to the *Electricity Industry (Obligation to Connect) Regulations*. In section 3.4 of the Manual, it is stated that RIA as a distributor, is responsible for: • Metering arrangements • Type of connection • Date of connection or disconnection. The Manual states the estimated time frame and date for decommissioning a connection shall be provided and agreed with the customer. No premises were "decommissioned" during the audit period	A	NR
ELECTRICITY INDUSTRY ACT 2004							
101	Condition 5.3.1	Section 13(1)	A licensee must provide the ERA with a performance audit conducted by an independent expert acceptable to the ERA, not less than once every 24 months.	4	This audit is being completed for the period 1 April 2023 to 31 March 2026 with the approval of the auditor by the ERA. The previous performance audit was performed in 2023 with the performance audit report published on the ERA website. This obligation is recorded in the Compliance Management System (CMS) Register – Compliance Obligations Register.	A	1

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
102	Condition 5.1.1	Section 14(1)(a)	A licensee must provide for an asset management system.	4	The audit confirmed by interviews and review of documentation that the licensee has an asset management system (AMS). This obligation is recorded in the CMS Compliance Obligations Register.	A	1
An 103	Condition 5.1.2 and 5.1.3	Section 14(1)(b)	A licensee must notify details of the asset management system and any substantial changes to it to the ERA.	4	On enquiry with PFM, and RIA, the audit noted that RIA has advised that no substantial changes have been made to the asset management system during the audit period.	NP	NR
104	Condition 5.1.4	Section 14(1)(c)	A licensee must provide the ERA with a report by an independent expert about the effectiveness of its asset management system every 24 months, or such longer period as determined by the ERA.	4	The asset management system review is being completed for the period 1 April 2023 to 31 March 2026 with the approval of the reviewer by the ERA. The previous review was performed in 2023 with the review report published on the ERA website. This obligation is recorded in the CMS Compliance Obligations Register.	A	1
104B	Condition 5.1.1	Section 14(2) *From 1 January 2026*	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	The Asset Management System (AMS) Review reported in May 2025 confirmed the RIA has an asset management system that includes the processes for the maintenance and operation of the electricity supply, and the construction of new assets. This audit has confirmed there have been no major changes to the asset management since the previous AMS review.	A	1
105	Condition 4.2.1	ERA (Licensing Funding) Regulations 2014	A licensee must pay the prescribed licence fees to the ERA according to clauses 6, 7 and 8 of the *Economic Regulation Authority*	4	The audit obtained the system screenshot of the annual license fees paid to ERA by RIA for across the audit period, from their internal payment system, SAGE and reviewed sample invoices. The invoices were paid by the due dates.	A	1

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
			(Licensing Funding) Regulations 2014.		This obligation is recorded in the CMS Licence Calendar.		
106	Condition 4.1.1	Section 31(3)	A licensee must take reasonable steps to minimise the extent, or duration, of any interruption, suspension or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause.	4	The RIA - Electrical - Service Recovery and Contingency Plan, the Restoration Priority Register, Electrical Services Procedure and the Emergency Response Management Plan include the action required to minimise the interruption of supply during unavoidable causes. The audit also obtained and reviewed the "FUSS Rottnest Facilities Utilities and Support Services Contract". This contract includes PFM's responsibilities regarding monitoring the operation of its electricity supply on the island. On enquiry with and document review with PFM, it was noted that there was no activity which involved accident, emergency, potential danger or other unavoidable cause.	A	1
107	Condition 4.1.1	Section 41(6)	A licensee must pay the costs of taking an interest in land or an easement over land.	4	The auditor confirmed with RIA that there were no interests in land or easements in the audit period.	NP	NR
108	Condition 6.4.1	Section 54(1)	A retail or integrated regional licensee must not supply electricity to a small use customer otherwise than under a standard form contract or a non-standard form contract that complies with the Act.	4	From enquiry with RIA, the auditor confirmed that all RIA customers at Rottnest Island are supplied electricity under the "Rottnest Island Standard Form Contract for The Supply of Electricity". The standard form contract Jan 2026 complies with the *Electricity Industry Act 2004* and has been approved by the ERA as it is published on their website.	A	1
109	Condition 6.6.1	Section 54(2)	A licensee must comply with any direction by the ERA to amend the standard form contract and do so within the period specified.	4	The auditor sighted the RIA's Standard Form Contract on the ERA website, which had been approved by ERA. The Standard Form Contract was last amended in January 2026.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
					Per inquiry with RIA, it was confirmed that there was no direction from the ERA to amend the Standard Form Contract.		
111	Condition 6.1.1	Section 101	A retail, distribution or integrated regional licensee must not supply electricity to small use customers unless the licensee is a member of an approved scheme and is bound by, and compliant, with any decision or direction of the electricity ombudsman under the approved scheme.	4	The auditor confirmed by review of the Energy and Water Ombudsman (WA) website that the licensee is a member of the Energy and Water Ombudsman scheme. This obligation is included in the CMS Compliance Obligations Register.	A	1
114	Condition 6.1.1	Section 11	A licensee must ensure that an electricity marketing agent of the licensee complies with the *Code of Conduct for the Supply of Electricity to Small Use Customers 2022.*	4	The RIA used Lease Equity to manage the leasing of properties on the Island to the end of the previous audit period to 31 March 2023. IN this audit period, the leasing is managed by the RIA Commercial & Residential Property Accountant. There are no electricity marketing agents.	NP	NR
116	Condition 6.1.1	Section 11	A licensee must, if directed by the ERA, review the standard form contract and submit to the ERA the results of that review within the time specified.	4	Refer obligation 109 above. The ERA has not directed RIA to review the standard form contract and therefore, no activity took place during the audit period.	NP	NR
117	Condition 6.4.3	Section 11	A licensee must comply with any direction given by the ERA in relation to the scope, process and methodology of the standard form contract review.	4	Refer obligation 109 above. The ERA has not directed RIA to review the standard form contract and therefore, no activity took place during the audit period.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
118	Condition 6.5.1	Section 11	A licensee can only amend the standard form contract with the ERA's approval.	4	Refer obligation 109 above. The ERA has not directed RIA to review the standard form contract and therefore, no activity took place during the audit period.	NP	NR
119	Condition 4.3.1	Section 11	A licensee and any related body corporate must maintain accounting records that comply with the Australian Accounting Standards Board Standards or equivalent International Accounting Standards.	4	The audit reviewed the RIA's Financial Reports for the years ended 30 June 2024 and 30 June 2025 and confirmed compliance. This obligation is included in the CMS Compliance Obligations Register.	A	1
121	Condition 5.3.2	Section 11	A licensee must comply, and require its auditor to comply, with the ERA's standard audit guidelines for a performance audit.	4	This audit is designed in accordance with the 2025 Audit and Review Guidelines. The licensee has fully co-operated. This obligation is included in the CMS Compliance Obligations Register.	NP	1
122	Condition 5.1.5	Section 11	A licensee must comply, and must require the licensee's expert to comply, with the relevant aspects of the ERA's standard audit guidelines for an asset management system review.	4	The 2025 asset management system review was designed in accordance with the 2025 Audit and Review Guidelines. The licensee has fully co-operated. This obligation is included in the CMS Compliance Obligations Register.	NP	1
123	Condition 4.4.1	Section 11	In the manner prescribed, a licensee must notify the ERA, if it is under external administration or if there is a significant change in the circumstances that the licence was granted which may affect the licensee's ability to meet its obligations.	4	The audit confirmed by interview and review of the RIA's Financial Reports for the audit period that there is no external administration. This obligation is included in the CMS Compliance Obligations Register.	A	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
124	Condition 4.5.1	Section 11	A licensee must provide the ERA, in the manner prescribed, with any information that the ERA requires in connection with its functions under the Electricity Industry Act.	4	In accordance with the CMS Compliance Obligations Register, the RIA is required to submit to the ERA: • Annual performance reports no later than 31 July for the reporting year ending 30 June; and • Annual compliance reports by 31 August for the year ending 30 June. The audit reviewed the RIA's correspondence with the ERA and the Compliance and Performance Reports for 2022/23, 2023/24 and 2024/25 and confirmed the reports had been submitted by the due dates. This obligation is included in the CMS Compliance Obligations Register and the Compliance Calendar.	A	1
125	Conditions 3.8.1 and 3.8.2	Section 11	A licensee must publish any information as directed by the ERA to publish, within the timeframes specified.	4	Per enquiry with RIA, the audit noted that RIA maintains a CMS Compliance Obligations Register that identifies all information and as directed by the ERA to publish and required timeframes. The 2024/25 Compliance and Performance Data Sheets are available on the RIA website. Email evidence of request to publish were viewed for 2023/2024 & 2024/2025. The 2024/25 reports were published on the RIA website by the due dates. This obligation is included in the CMS Compliance Obligations Register.	A	1
126	Condition 3.7.1	Section 11	All notices must be in writing, unless otherwise specified.	4	The RIA confirmed that all notices and correspondences between RIA and ERA have been in writing.	NP	1

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
CODE OF CONDUCT FOR THE SUPPLY OF ELECTRICITY TO SMALL-USE CUSTOMERS 2022 *(applies to small use customers[9])*							
			Marketing				
Act was sighted in this audit129A	Condition 6.3.1	Code of Conduct Clause 8	A retailer must ensure that its electricity marketing agents comply with Part 2.	4	The RIA used Lease Equity to manage the leasing of properties on the Island to the end of the previous audit period to 31 March 2023. In this audit period, the leasing is managed by the RIA Commercial & Residential Property Accountant. There are no electricity marketing agents.	NP	NR
130	Condition 6.3.1	Code of Conduct Clause 9(1)	A retailer or electricity marketing agent must ensure that standard form contracts, which are not unsolicited consumer agreements, are entered into according to the manner set out, and the contract is provided as specified, in clause 9(1).	4	Through inquiry and review of the standard from contract, the audit confirmed the contract includes the commencement date, and the required information. The signed standard form contract contains the date a copy is emailed to the customer at no charge immediately upon signing, therefore complying with clause 9(1) of the Code. There were 7 new customers in the audit period and the contracts were sighted in this audit.	NP	1
131	Condition 6.3.1	Code of Conduct Clause 9(2)	Subject to subclause 9(3), the retailer or electricity marketing agent must give to the customer the specified information in subclause 9(2) no later than on, or with, the customer's first bill.	4	The audit confirmed the standard contract includes the required information. There were 7 new customers in the audit period and the contracts were sighted in this audit. The contract is also available on the RIA website.	NP	1
132	Condition 6.3.1	Code of Conduct Clause 10(1)	A retailer or electricity marketing agent must ensure that non-standard contracts, which are not unsolicited consumer agreements,	4	The audit noted there is one non-standard contract and this was entered into in the required manner and the contract was provided to the customer. The contract includes the required information.	NP	1

9 A 'small use customer' is a customer who consumes not more than 160 megawatt hours of electricity per year.

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
			are entered into according to the manner set out, and the contract is provided as specified, in clause 10(1).				
133	Condition 6.3.1	Code of Conduct Clause 10(2)	A retailer or electricity marketing agent must ensure that the information specified in subclause 10(2) is provided to the customer before entering into a non-standard contract.	4	Refer obligation 132.	NP	1
133A	Condition 6.3.1	Code of Conduct Clause 10(3)	If subclause (4) applies, when a customer enters into a non-standard contract with a retailer, the retailer or an electricity marketing agent must give the information specified in clause 10(3).	4	Refer obligation 132.	NP	1
135	Condition 6.3.1	Code of Conduct Clause 10(5)	Subject to subclause 10(4), a retailer or electricity marketing agent must obtain the customer's verifiable confirmation that the specified information in subclause 10(2), as applicable, has been provided.	4	Refer obligation 132.	NP	1
136	Condition 6.3.1	Code of Conduct Clause 11(1)	A retailer or electricity marketing agent must ensure that the inclusion of concessions is made clear to residential customers of the retailer and that any prices that exclude concessions are disclosed.	4	The RIA does not have residential customers so this obligation is not rated.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
137	Condition 6.3.1	Code of Conduct Clause 11(2)	A retailer or electricity marketing agent must provide contact details, including their telephone number, to a customer and ensure that the customer is able to contact the retailer or electricity marketing agent during normal business hours for the purposes of enquiries, verifications and complaints.	4	The audit confirmed that the RIA's phone number, website details and physical location are clearly located on the RIA Standard Form Contract and the Tax Invoice issued by RIA to the commercial customers on the island. These details are also available on RIA's website.	NP	1
138	Condition 6.3.1	Code of Conduct Clause 12(1)	A retailer or electricity marketing agent must, on request, provide a customer with the information specified in subclause 12(1).	4	The Environment Office (Compliance) confirmed that the RIA did not contact a customer for the purposes of marketing.	NP	NR
139	Condition 6.3.1	Code of Conduct Clause 12(2)	A retailer or electricity marketing agent who meets with a customer face to face must: • display a clearly visible and legible identity card showing the information specified in subclause 12(2)(a); and • provide the written information specified in subclause 12(2)(b) as soon as practicable following a request by the customer.	4	The audit confirmed with the RIA during the site visit that all staff display identity cards and provide the written information if requested by the customer.	NP	1
140	Condition 6.3.1	Code of Conduct Clause 13	A retailer or electricity marketing agent who visits a person's premises for the purposes of marketing must comply with any clearly visible signs indicating that canvassing is not permitted at the	4	The Environment Office (Compliance) confirmed that the RIA did not contact a customer for the purposes of marketing.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
			premises, or no advertising is to be left at the premises.				
The 145	Condition 6.3.1	Code of Conduct Clause 19(1)	A retailer must issue a bill at least once every 100 days, except for the circumstances specified in subclause 19(2).	4	The audit confirmed that the 25 customers are billed on a monthly basis. This has been consistent throughout the entire audit period as confirmed by review of invoice listings from the Commercial & Residential Property Accountant.	NP	1
145A	Condition 6.3.1	Code of Conduct Clause 19(3) *From 1 January 2026*	A retailer and a customer may agree to a billing cycle with a regular recurrent period that differs from the customer's standard billing cycle if the conditions in subclauses 19(3)(a) and (b) have been met.	4	The Commercial & Residential Property Accountant confirmed that no customers were on a non-standard billing cycle.	NP	NR
146A	Condition 6.3.1	Code of Conduct Clause 20(1)	A retailer must not place a customer on a shortened billing cycle unless subclause 20(2) applies.	4	Refer obligation 146	NP	NR
148	Condition 6.3.1	Code of Conduct Clause 20(3)	A retailer must give a customer notice with the information specified in 20(3), within 10 business days after placing the customer on a shortened billing cycle under subclause 20(2).	4	Refer obligation 146.	NP	NR
149	Condition 6.3.1	Code of Conduct Clause 20(4)	A retailer must ensure that a shortened billing cycle under subclause 20(2) must be at least 10 business days.	4	Refer obligation 146.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
150	Condition 6.3.1	Code of Conduct Clause 20(5)	On request, a retailer must return a customer who is subject to a shortened billing cycle, under subclause 20(2), to the billing cycle that previously applied if the customer has paid 3 consecutive bills by the due date.	4	Refer obligation 146.	NP	NR
151	Condition 6.3.1	Code of Conduct Clause 20(6)	A retailer must inform a customer, who is subject to a shortened billing cycle, under subclause 20(2), at least every 3 months about the conditions upon which the customer can, upon request, be returned to the previous billing cycle under subclause 20(6).	4	Refer obligation 146.	NP	NR
155A	Condition 6.3.1	Code of Conduct Clause 21(1)	In addition to any information required to be included on a customer's bill under another provision of this code, a retailer must include the information set out in subclauses 21(2), (3), (4), (5) and (6).	4	The audit confirmed the required information is included on the customer bills. An example of a bill was sighted.	NP	1
156	Condition 6.3.1	Code of Conduct Clause 21(9)	If a retailer wishes to bill a customer for a historical debt, the retailer must advise the customer of the amount of the historical debt and its basis, no later than the next bill in the customer's billing cycle.	4	The Commercial & Residential Property Accountant confirmed that the RIA did not bill any of RIA's 25 customers for historical debt, during the audit period.	NP	NR
157A	Condition 6.3.1	Code of Conduct Clause 22(1)	A retailer must base a customer's bill on the criteria specified in 22(1).	4	The audit confirmed by review of a sample of 15 invoices across 25 customers in the audit period that invoices are based on meter readings.	NP	1

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
157B	Condition 6.3.1	Code of Conduct Clause 22(2)	A bill will be taken to comply with subclause 21(1)(a) if the bill reflects a smoothing or similar arrangement that has been entered into between the retailer and the customer.	4	The Commercial & Residential Property Accountant) confirmed there were no bill smoothing arrangements in the audit period.	NP	NR
158	Condition 6.3.1	Code of Conduct Clause 22(3)	If a retailer is required to comply with subclause 22(1)(a), the retailer must use its best endeavours to ensure that an actual value is obtained as frequently as required to prepare its bills.	4	The Environment Office (Compliance) confirmed that PFM is responsible for all monthly meter reading for RIA's 25 customers. PFM has consistently provided metering data in a timely manner throughout the audit period. It was noted that in the event PFM is unable to obtain a meter reading for one particular month, the Commercial & Residential Property Accountant will raise the electricity amount owing as $0 on the customer's invoice for that particular month. This will then be rectified in the following month's invoice, with both month's amounts being recognised. This is not deemed an estimated bill as no fee is being charged on the invoice. PFM will provide metering data to Energy Tech, an independent third party, who transform the data into a readable Excel spreadsheet. This is provided to the Commercial & Residential Property Accountant who inputs it into their invoicing system to generate the customer invoice.	NP	1
158A	Condition 6.3.1	Code of Conduct Clause 22(4)	The retailer must ensure that the customer is provided with a written record of any method agreed between the retailer and the customer under subclause 22(1)(c).	4	Invoice estimation procedures are covered under section 7.4 of the RIA's Standard Form Contract.	A	1

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
160	Condition 6.3.1	Code of Conduct Clause 23(1)	If a retailer has based a customer's bill on an estimation, a retailer must clearly specify on the bill the information required under subclause 23(1).	3	The Commercial & Residential Property Accountant confirmed there were some customers with estimated bills in the audit period. The required information was specified on the invoice example provided. The invoice estimation procedures are included in section 7.4 of the RIA's Standard Form Contract.	A	1
161	Condition 6.3.1	Code of Conduct Clause 23(2)	On request, a retailer must provide to a customer of the basis and the reason for the estimation.	4	Refer obligation 160. The invoice example sighed included the basis and reason for the estimation. The invoice estimation procedures are included in section 7.4 of the RIA's Standard Form Contract.	A	1
163	Condition 6.3.1	Code of Conduct Clause 24(2)	If a customer satisfies the requirements specified in subclause 24(1), a retailer must use its best endeavours to replace an estimated bill with a bill based on an actual reading.	4	The Commercial & Residential Property Accountant confirmed there were no customers with estimated bills in the audit period. The audit confirmed that all customers provided access to the meter and therefore bills were not based on an estimate because a customer failed to provide access to the meter.	NP	NR
166	Condition 6.3.1	Code of Conduct Clause 25(2)	If a retailer offers alternative tariffs and a customer meets the circumstances in subclause 25(1)(a) and (b), the retailer must transfer the customer to the other tariff within 10 business days of the customer satisfying subclause 25(1)(b).	4	The Commercial & Residential Property Accountant) confirmed that the RIA does not offer alternative tariffs to customers. As such, no customers have applied for an alternative tariff in the audit period. The audit reviewed a listing of tariffs during the audit period, noting that the process is consistent for all customers, and is reviewed and updated on an annual basis.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
166A	Condition 6.3.1	Code of Conduct Clause 25(3)	If a customer transfers from one tariff to another under clause 25, the effective date is as subscribed under subclause 25(3).	4	Refer obligation 166.	NP	NR
167	Condition 6.3.1	Code of Conduct Clause 26(2)	If a customer is no longer eligible to receive a tariff, a retailer must notify the customer prior to changing the customer to another tariff.	4	Refer obligation 166.	NP	NR
171	Condition 6.3.1	Code of Conduct Clause 27(1)	If a customer, after receiving a bill, disputes the amount to be paid, the retailer must review the bill on request by the customer, subject to the customer paying: • that portion of the bill under review that the customer and the retailer agree is not in dispute; or • an amount equal to the average amount of the customer's bill over the previous 12 months (excluding the bill in dispute).	4	The Commercial & Residential Property Accountant advised there was one request for a bill review in the audit period due to an unusually high consumption in one month. This was due to a water leak and a higher consumption of hot water. The invoice was reviewed and adjusted to the same month's electricity supply in the previous year with the agreement of the customer. The audit sighted the correspondence and invoices to confirm this review and the outcome.	NP	1
172	Condition 6.3.1	Code of Conduct Clause 27(2)(a)	If a retailer has reviewed a customer's bill and is satisfied that the bill is correct, the retailer may require the customer to pay the amount outstanding (if any). The retailer must advise the customer that the customer may request for a meter test and also the existence and operation of the retailer's standard complaints and dispute	4	Refer obligation 171.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
			resolution procedures and details about making a complaint to the electricity industry ombudsman.				
173	Condition 6.3.1	Code of Conduct Clause 27(2)(b)	If a retailer has reviewed a customer's bill and is satisfied that the bill is incorrect, the retailer must comply with clause 29 or 30 as the case requires and may require the customer to pay the amount (if any) of the bill that is outstanding.	4	Refer obligation 171.	NP	1
174	Condition 6.3.1	Code of Conduct Clause 27(3)	A retailer must inform a customer of the outcome of the review of a bill as soon as practicable after it is completed.	4	Refer obligation 171.	NP	1
175	Condition 6.3.1	Code of Conduct Clause 27(4)	If a retailer has not informed a customer of the outcome of the review of a bill within 20 business days from the date of receipt of the request for review, the retailer must notify the customer with notification of the status of the review as soon as practicable after the expiration of that period.	4	Refer obligation 171.	NP	NR
175A	Condition 6.3.1	Code of Conduct Clause 28(1)	If a customer, after receiving a bill, requests that the energy data be checked or the meter be tested, the retailer must arrange for a check of the energy data or testing of the meter (as the case requires).	4	Refer obligation 171.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
175B	Condition 6.3.1	Code of Conduct Clause 28(3)	If the energy data is checked and found to be incorrect or the meter is tested and found to be defective, the retailer must refund any payment made under subclause 28(2).	4	Refer obligation 171.	NP	NR
175C	Condition 6.3.1	Code of Conduct Clause 28(4) *From 1 January 2026*	If a retailer receives instructions from a customer under subclause 28(3), the retailer must apply the credit in accordance with those instructions within 12 business days.	4	Refer obligation 171.	NP	NR
175D	Condition 6.3.1	Code of Conduct Clause 28(5) *From 1 January 2026*	If a retailer does not receive instructions from a customer under subclause 28(3) within 5 business days after making the request, the retailer must use reasonable endeavours to credit the amount to the customer's next bill.	4	Refer obligation 171.	NP	NR
176	Condition 6.3.1	Code of Conduct Clause 29(1)	If a retailer proposes to recover an amount undercharged a retailer must do so in the manner specified in subclause 29(1).	4	The Commercial & Residential Property Accountant confirmed that no recovery of amounts from a customer had occurred due to, an error, defect, or default for which the retailer or distributor is responsible (including where a meter has been found to be defective).	NP	NR
177	Condition 6.3.1	Code of Conduct Clause 30(1)	If a customer (including a customer who has vacated the supply address) has been overcharged the retailer must: • use its best endeavours to inform the customer of the	4	The Commercial & Residential Property Accountant confirmed this had not occurred during the audit period.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
			amount overcharged within 10 business days after the retailer becomes aware of the overcharging; and • subject to this clause ask the customer for instructions for the credit or repayment of the amount.				
178	Condition 6.3.1	Code of Conduct Clause 30(2)	If a retailer receives instruction under subclause 30(1), the retailer must deal with the amount overcharged in accordance with the customer's instructions within 12 business days after receiving the instructions.	4	As per obligation 171, there was one instance of a higher than normal consumption. This was not an overcharge by RIA. The Commercial & Residential Property Accountant confirmed there were no instances of a customer being overcharged and a subsequent refund being made during the audit period. From review of the Electrical Customer Complaints Reporting Register, there were no customer complaints regarding overcharging of a bill.	NP	NR
179	Condition 6.3.1	Code of Conduct Clause 30(3)	If a retailer does not receive instructions under subclause 30(1) within 5 business days after making the request, the retailer must use reasonable endeavours to credit the amount overcharged to the customer's next bill.	4	Refer obligation 178.	NP	NR
181	Condition 6.3.1	Code of Conduct Clause 30(6)	Despite subclauses 30(1) to (5), if a customer has been overcharged and the customer owes a debt to the retailer, the retailer may, after giving notice to the customer, use	4	Refer obligation 178.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
			the amount of the overcharged to set-off the debt.				
181A	Condition 6.3.1	Code of Conduct Clause 30(7)	Subclause 30(6) does not apply if the customer is a customer experiencing financial hardship.	4	Refer obligation 178.	NP	NR
181B	Condition 6.3.1	Code of Conduct Clause 30(8)	If there remains an amount in credit after a set-off under subclause 30(6), the retailer must deal with the amount in accordance with subclauses 30(1) to (4) (depending on the amount that remains in credit).	4	Refer obligation 178.	NP	NR
183A	Condition 6.3.1	Code of Conduct Clause 31(1)	If a customer requests the retailer to arrange for the preparation and issue of a final bill for the customer's supply address, the retailer must use its best endeavours to arrange for a meter reading and the preparation and issue of a final bill for the supply address in accordance with the customer's request.	4	Through enquiry with the Commercial & Residential Property Accountant, it was noted that there have been some final bills based on final meter readings requested by the customer. Meter readings were promptly obtained.	NP	1
183B	Condition 6.3.1	Code of Conduct Clause 31(2)	Unless subclause 31(4) applies, if a customer's account is in credit at the time of the account closure, a retailer must, at the time of the final bill, ask the customer for instructions to transfer the credit amount either to another account the customer has or will have with	4	There were no final accounts in credit at the time of account closure as bills are issued on a monthly cycle and to the final date.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
			the retailer, or a bank account nominated by the customer.				
183C	Condition 6.3.1	Code of Conduct Clause 31(3)	The retailer must, in accordance with the customer's instructions under subclause 31(2), transfer the amount of the credit within 12 business days after receiving the instructions or another period agreed with the customer.	4	Refer obligation 183B.	NP	NR
183D	Condition 6.3.1	Code of Conduct Clause 31(4)	If a customer's account is in credit at the time of account closure and the customer owes a debt to the retailer, the retailer may, after giving notice to the customer, use the credit to set-off the debt.	4	Refer obligation 183B.	NP	NR
183E	Condition 6.3.1	Code of Conduct Clause 31(5)	If after a set-off under subclause 31(4), there remains an amount of credit, the retailer must deal with the amount in accordance with subclauses (2) and (3).	4	Refer obligation 183B.	NP	NR
184A	Condition 6.3.1	Code of Conduct Clause 32(1)	Despite any other arrangement or agreement that may be in place between the retailer and the customer in relation to paying bills, the retailer must allow the customer who has entered into a standard form contract to choose to receive bills, by post as paper bills or by email sent to an email address provided by the customer.	4	Through enquiry and system walkthrough, the audit confirmed that all bills are emailed to customers. Customers have the option of receiving the bill by mail if required.	NP	1

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
184B	Condition 6.3.1	Code of Conduct Clause 32A *From 1 January 2026*	A retailer must not charge a fee for paper bills to customers receiving concessions, customers experiencing financial hardship, or vulnerable customers.	4	The Commercial & Residential Property Accountant confirmed there were no customers on concessions, financial hardship or vulnerable customers.	NP	NR
			Payment				
187	Condition 6.3.1	Code of Conduct Clause 33	The due date by which a bill must be paid must not be earlier than 12 business days from the bill issue date.	4	The Commercial & Residential Property Accountant confirmed that all bills sent to customers are due at least 12 business days from their despatch date. The audit reviewed a sample of 15 invoices across the 25 customers and noted that the due date was 14 days from despatch date.	NP	1
188	Condition 6.3.1	Code of Conduct Clause 34(1)	Unless otherwise agreed with a customer, a retailer must offer the customer at least the payment methods prescribed in clause 5.2.	4	Through enquiry and system walkthrough, the audit confirmed that all bills sent to customers include several payment terms on the invoice: 1. BPay 2. Debit/Credit cards 3. EFT 4. Cash or Cheque. The information required is made available on invoices to customers to pay by the methods stipulated in clause 5.2 i.e. provide telephone number, BPay option, mailing address for cheques and an in-person payment address. There are no residential customers on the island therefore a Centrepay option is not required. The audit reviewed 15 invoices and confirmed payment terms were clearly offered on the invoice.	NP	1

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
190	Condition 6.3.1	Code of Conduct Clause 35(1) to (3)	A retailer must accept payment in advance from a customer. This will not require a retailer to credit any interest to the amounts paid in advance. The amount of $20 is the minimum amount that a retailer is required to accept from a customer (although a retailer may accept a lower amount if it thinks fit).	4	Through inquiry and system walkthrough, the audit noted that it is rare for customers to pay their electricity bills in advance. The audit confirmed this by reviewing the tenant reconciliation which shows all payments during the current audit period and confirmed no payments in advance had occurred.	NP	NR
190A	Condition 6.3.1	Code of Conduct Clause 35(4) to (6)	A retailer may determine an amount (a maximum credit amount) that a customer's account may be in credit and must publish the amount on its website. The maximum credit amount must not be less than $100.	4	The Standard Contract Form– section 7.6 states that "if the Customer has overpaid an account, the Rottnest Island Authority will refund the money to the Customer or place a bill credit on the account ." Credit balances are not retained so this obligation is not rated.	NP	NR
191A	Condition 6.3.1	Code of Conduct Clause 36	A retailer must redirect a customer's bill to a different address (including an email address or a different email address) on the customer's request and at no charge.	4	The RIA confirmed that the Commercial & Residential Property Accountant is advised of any request from customers to redirect their bills. This is completed at no charge.	NP	1
197	Condition 6.3.1	Code of Conduct Clause 38(1)	A retailer must not require a customer, who has vacated a supply address, to pay for electricity consumed at the customer's supply address in the circumstances specified in subclause 38(1).	4	The Commercial & Residential Property Accountant and review of the Invoice Summaries for the audit period noted there were 2 changes in tenancy during the audit period. The audit confirmed the final bills are for supply up to the date of change of tenancy.	NP	1

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
198	Condition 6.3.1	Code of Conduct Clause 38(2)	If a customer reasonably demonstrates to a retailer that the customer was evicted or otherwise required to vacate the supply address, the retailer must not require the customer to pay for electricity consumed at that supply address from the date the customer gave the notice to the retailer.	4	Refer obligation 197.	NP	NR
199	Condition 6.3.1	Code of Conduct Clause 38(4)	Despite subclauses 38(1) and (2), a retailer must not require a previous customer to pay for electricity consumed at the supply address in the circumstances specified in subclause 38(4).	4	Refer obligation 197.	NP	NR
201	Condition 6.3.1	Code of Conduct Clause 39(2)	A retailer must not recover, or attempt to recover, a debt from a person relating to a supply address other than the customer who the retailer has, or had, entered into a contract for the supply of electricity to that supply address.	4	The Commercial & Residential Property Accountant confirmed that there were no instances where a debt was required to be recovered during the audit period.	NP	NR
201A	Condition 6.3.1	Code of Conduct Clause 39(3)	A retailer may transfer one customer's debt to another customer if requested by the customer owing the debt, if the retailer obtains the other customer's verifiable consent to the transfer.	4	The Commercial & Residential Property Accountant confirmed there were no customer debts requiring transfer during the audit period.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
214C	Condition 6.3.1	Code of Conduct, clause 44(4)	The retailer must, within 5 business days after the customer accepts an offer to vary the payment plan, provide the customer with information that clearly explains, and assists the customer to understand, the variation.	4	The Commercial & Residential Property Accountant confirmed there were no customers on payment plans during the audit period.	NP	NR
214D	Condition 6.3.1	Code of Conduct, clause 44(5)	The retailer must not vary a payment plan without the customer's agreement.	4	Refer obligation 214C.	NP	NR
214E	Condition 6.3.1	Code of Conduct, clause 44(6)	An agreement under subclause 44(5) must relate to the particular variation rather than under a general agreement to future variations.	4	Refer obligation 214C.	NP	NR
215	Condition 6.3.1	Code of Conduct, clause 45(1)	A retailer must give reasonable consideration to a request by a customer experiencing financial hardship, or a relevant consumer representative for the customer, for a reduction of the customer's fees, charges or debt.	4	The Commercial & Residential Property Accountant advised that RIA's electricity customers request financial hardship assistance or payment plans via rent assistance, not via utilities. There are no utility payment plans or requests for financial assistance in the audit period.	NP	NR
216	Condition 6.3.1	Code of Conduct, clause 45(2)	In acting under subclause 45(1), a retailer must take into account its hardship policies and procedures under clause 46.	4	Refer obligation 215.	NP	NR
218	Condition 6.3.1	Code of Conduct, clause 45(3)	A retailer must advise a customer experiencing financial hardship of	4	The Commercial & Residential Property Accountant advised that RIA's electricity customers request financial hardship assistance or payment plans via	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
			the information specified in subclause 45(3).		rent assistance, not via utilities. There are no utility payment plans or requests for financial assistance in the audit period.		
220	Condition 6.3.1	Code of Conduct, clause 46(1)	A retailer must develop, maintain and implement a hardship policy and hardship procedures to assist customers experiencing financial hardship to meet their financial obligations and responsibilities to the retailer.	4	RIA does not have residential customers and is not required to have a financial hardship policy.	NP	NR
221	Condition 6.3.1	Code of Conduct, clause 46(2)	A retailer must ensure that its hardship policy complies with the criteria specified in subclause 46(2).	4	Refer obligation 220.	NP	NR
222	Condition 6.3.1	Code of Conduct, clause 46(3)	A retailer must ensure that its hardship procedures comply with the criteria specified in subclause 46(3).	4	Refer obligation 220.	NP	NR
223A	Condition 6.3.1	Code of Conduct, clause 46(4)	A retailer must consult with relevant consumer representatives whenever the retailer is developing a hardship policy or procedure or making material amendment to its hardship policy.	4	Refer obligation 220.	NP	NR
223B	Condition 6.3.1	Code of Conduct, clause 46(5)	A retailer must provide a copy to the ERA of: • its hardship policy, and a copy of the policy if the retailer makes a material amendment.	4	Refer obligation 220.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
225	Condition 6.3.1	Code of Conduct, clause 46(6)	If directed by the ERA, a retailer must review its hardship policy and hardship procedures in consultation with relevant consumer representatives for the purposes of the review and submit the results of that review to the ERA within the period specified by the ERA.	4	Refer obligation 220.	NP	NR
228	Condition 6.3.1	Code of Conduct, clause 47	A retailer must consider any reasonable request for alternative payment arrangements from a business customer who is experiencing payment difficulties.	4	The Commercial & Residential Property Accountant confirmed there were no request from business customers for alternative payment arrangements in the audit period.	NP	NR
			Disconnection				
229	Condition 6.3.1	Code of Conduct, clause 48	Before arranging for a disconnection of a customer's supply address for failure to pay a bill, a retailer must give the customer a written notice (a reminder notice), which contains the information specified in subclause 48(1)(a), not less than 15 business days from the dispatch date of the bill. The retailer must use its best endeavours to contact the customer to advise of the proposed disconnection and give the customer a disconnection warning, in the manner and	4	The Commercial & Residential Property Accountant and PFM confirmed there have been no disconnections for failure to pay a bill during the audit period. Disconnection requirements are outlined in the Standard Form Contract and these are in line with the Code of Conduct requirements. The disconnection process is further outlined in the Rottnest Island Distribution and Connection Manual.	A	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
			timeframes specified in subclause 48(1)(c).				
230	Condition 6.3.1	Code of Conduct, clause 49(a)	A retailer must not arrange for a disconnection of a customer's supply address for failure to pay a bill in the circumstances specified in subclause 49(a).	4	Refer obligation 229.	A	NR
231	Condition 6.3.1	Code of Conduct, clause 50(2)	A retailer must not arrange for disconnection of a customer's supply address for failure to pay a bill within 15 business days from the date of disconnection of that customer's gas supply when the circumstances specified in subclause 50(1)(a) apply.	4	Refer obligation 229.	A	NR
232	Condition 6.3.1	Code of Conduct, clause 51(2)	If the conditions specified in subclause 51(1) are satisfied, a retailer may arrange for the disconnection of a customer's supply address for denying access to the meter.	4	Refer obligation 229.	A	NR
232A	Condition 6.3.1	Code of Conduct, clause 51(4)	A retailer may arrange for the disconnection of a customer's supply address if the customer has not provided the safe access to the customer's supply address for the purposes of testing, maintaining, inspecting, altering or replacing a meter, or checking the accuracy of the customer's consumption at the supply address.	4	Refer obligation 229.	A	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
234	Condition 6.3.1	Code of Conduct, clause 52	Subject to subclause 52(3), a retailer or distributor must comply with the limitations specified in subclauses 52(1)-(2) when arranging for disconnection or disconnecting a customer's supply address.	2	The Environment Office (Compliance) confirmed that there were no complaints raised by a customer during the audit period relating to proposed disconnections, nor were there any disconnections to customer supply. There were some planned outages for maintenance purposes, which were compliant with the requirements of the Code of Conduct, clause 7.6. The disconnection process is further outlined in the Rottnest Island Distribution and Connection Manual.	A	1
			Reconnection				
242	Condition 6.3.1	Code of Conduct, clause 53(2)	A retailer must arrange to reconnect a customer's supply address if the customer rectified the matter that led to the disconnection or made arrangements to the satisfaction of the retailer, makes a request for reconnection and pays the retailer's reasonable charges (if any) for reconnection, or enters into a payment plan for the charges.	4	The RIA and PFM confirmed that there have been no reconnections as there were no customers that were disconnected or failed to pay charges during the audit period. The audit confirmed that the reconnection requirements are outlined in the Standard Form Contract and these are in line with the Code of Conduct requirements. The reconnection process is further outlined in the Rottnest Island Distribution and Connection Manual.	A	NR
243	Condition 6.3.1	Code of Conduct, clause 53(3)	A retailer must forward the request for reconnection to the distributor within the timeframes specified in subclause 53(3).	4	The RIA is the retailer and distributor so this would always be communicated.	NP	NR
244	Condition 6.3.1	Code of Conduct, clause 54(1)	A distributor must reconnect the customer's supply address on the request of a retailer within the	4	The Commercial & Residential Property Accountant and PFM confirmed that there have been no disconnections or reconnections during the audit	A	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
	Condition 6.3.1		timeframes specified in subclause 54(4), if the circumstances specified in subclause 54 (1) apply.		period, apart from disconnections/reconnections during planned outages as per the Outages Register 2023/24 to 2025/26. The audit confirmed that the reconnection requirements are outlined in the Standard Form Contract and these are in line with the Code of Conduct requirements. The reconnection process is further outlined in the Rottnest Island Distribution and Connection Manual.		
244A	Condition 6.3.1	Code of Conduct, clause 54(3)	A distributor must reconnect the customer's supply address on the request of a retailer within the timeframes specified in subclause 54(4), if the circumstances specified in subclause 54 (2) apply.	4	Refer obligation 244.	A	NR
			Information and Communication				
271D	Condition 6.3.1	Code of Conduct, clause 68(1)	The retailer must publish on its website the information detailed in subclause 68(1).	4	The Utilities Customer Complaints Procedure on the RIA's website includes the complaints procedure, the contact details for the Energy and Water Ombudsman and a link to the Code of Conduct. The RIA Utilities (Family and Domestic Violence) Policy is on the RIA website. There are no concessions and no hardship policy as there are no residential customers. The Statement of Design Intent, Project Overview – Staff Accommodation, Guideline 03: Sustainable Development and the Standard Form Contract on the RIA website includes energy efficiency information. The required information is published on the RIA website.	NP	1

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
271E	Condition 6.3.1	Code of Conduct, clause 68(3)	If a customer requests information of the kind referred to subclause 68(1) the retailer must refer the customer to the retailer's website or provide information to the customer without charge.	4	The Commercial & Residential Property Accountant confirmed that any of the information referred to in obligation 271D would be made available to a customer upon request and free of any charge.	NP	1
271F	Condition 6.3.1	Code of Conduct, clause 68(4)	If a customer requests a copy of information of the kind referred to in subclause 68(1), the retailer must provide a copy of the information to the customer without charge.	4	Refer obligation 271E.	NP	1
273	Condition 6.3.1	Code of Conduct, clause 69	On request and at no charge, a retailer must give or make available to a customer reasonable information on its tariffs, fees or charges, including any alternative tariffs that may be available to that customer.	4	The Commercial & Residential Property Accountant confirmed that no further information on tariffs was requested by RIA customers. There were no complaints noted in the audit period.	NP	NR
273A	Condition 6.3.1	Code of Conduct, clause 70(1), (2) and (3)	If a customer's tariffs, fees or charges are regulated or set by the State Government, a retailer must give notice to a customer of any variation to its tariffs, fees or charges, that affects the customer no later than the next bill in the customer's billing cycle.	4	The tariffs are set by the RIA so this obligation is not rated.	NP	NR
273AA	Condition 6.3.1	Code of Conduct Clause 69(2) *From 1 January 2026*	A retailer must, at least once each year and at no charge, give every non-contestable customer the information referred to in subclause 69 (1) and information about any other products offered by the	4	As this obligation did not commence until 1 January 2026, the annual notification to the customer is not yet due in the audit period to 31 March 2026. The Commercial & Residential Property Accountant confirmed that RIA will give or make available to a customer on request, at no charge, reasonable	B	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
			retailer and available to the customer.		information on the RIA's tariffs, fees or charges, including any alternative tariffs that may be available to that customer. *An improvement is that the RIA should include this obligation in the CMS Compliance Obligations Register.*		
274A	Condition 6.3.1	Code of Conduct, clause 71(2)	If a customer's tariffs, fees or charges are not regulated or set by the State Government, a retailer must give notice to a customer of any variation to its tariffs, fees or charges, that affects the customer in the manner specified in subclauses 71(3) and (4).	4	Tariffs are assigned based on occupant type and consumption in the last financial year. The charges are aligned with Horizon Power charges. Written notice is provided to customers at ;east 5 business days before the change via email with the required information. The audit sighted an example for the 2024/25 tariffs.	NP	1
275	Condition 6.3.1	Code of Conduct, clause 72(1)	On request, a retailer must provide a non-contestable customer with their billing data.	4	The Commercial & Residential Property Accountant confirmed that no requests for billing data were made by non-contestable customers during the audit period.	NP	NR
276	Condition 6.3.1	Code of Conduct, clause 72(2)	If a non-contestable customer requests billing data for a period less than the previous 2 years and no more than once a year, or in relation to a dispute with a retailer, the retailer must provide the data at no charge.	4	Refer obligation 275.	NP	NR
280	Condition 6.3.1	Code of Conduct, clause 73	At least once a year, a retailer must provide a customer with written details of the retailer's and distributor's obligations to make payments to the customer under	4	There has been no communication issued to any customer regarding the customers eligibility for the Service Standard Payments. This will be included moving forward in the next tariff letter to each customer for the 2026-27 financial year.	NP	2

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
			Part 14 or under any other written law, including the amount of the payment and the eligibility criteria for the payment.		There has been only one complaint re metering and this was resolved with the customer. ***Recommendation 1/2026*** *As planned, customers should be provided with written details of the RIA's obligation to make Service Standard payments and the eligibility criteria, at least once a year.*		
282	Condition 6.3.1	Code of Conduct, clause 74	If asked by a customer for information relating to the distribution of electricity, a retailer must give the information to the customer or refer the customer to the distributor for a response.	4	The Commercial & Residential Property Accountant confirmed that no requests have been made for such information during the audit period.	NP	NR
283A	Condition 6.3.1	Code of Conduct, clause 75(1)	A distributor must publish on its website the information detailed in subclause 75(1)(a) to (k).	4	The audit confirmed the required information is published on the RIA website.	NP	1
283B	Condition 6.3.1	Code of Conduct, clause 75(3)	If a customer requests information of the kind referred to subclause 75(1) the distributor must refer the customer to the distributor's website or provide the information to the customer without charge.	4	The Commercial & Residential Property Accountant confirmed that no requests have been made for such information during the audit period.	NP	NR
283C	Condition 6.3.1	Code of Conduct, clause 75(4)	If a customer requests a copy of information of the kind referred to in subclause 75(1), the distributor must provide a copy of the information to the customer without charge.	4	The Commercial & Residential Property Accountant confirmed that no requests have been made for such information during the audit period.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
283D	Condition 6.3.1	Code of Conduct, clause 76	A distributor must give to a customer on request, at no charge an explanation for any unplanned or approved change in the quality of supply of electricity to the customer's supply address outside of the limits prescribed by law, and an explanation for any unplanned interruption of supply of electricity to the customer's supply address.	4	The Commercial & Residential Property Accountant confirmed that no requests have been made for such information during the audit period.	NP	NR
290	Condition 6.3.1	Code of Conduct, clause 77	To the extent practicable, a retailer or distributor must ensure that any written information that must be given to a customer by the retailer or distributor or its electricity marketing agent under the Code of Conduct is expressed in clear, simple, concise language and in a format that is easy to understand.	4	The audit noted that based on the documentation provided during our walkthrough (including Standard Form Contracts, invoices to customers, agreements, email communications and notices), written information is expressed in clear, simple and concise language during the audit period. Where a customer wants to know specific information regarding their invoice, it can be provided by the Commercial & Residential Property Accountant immediately and sent to the customer via email.	NP	1
294	Condition 6.3.1	Code of Conduct, clause 78(1)	On request and at no charge, a retailer and a distributor must make services available to a residential customer to by the retailer or distributor (including independent interpreter services for customers with speech or hearing impairment, and large print copies).	4	There are no residential customers on the island. Therefore, this service is not required.	NP	NR
296	Condition 6.3.1	Code of Conduct, clause 79(1)	On request and at no charge, a distributor must advise a customer of the availability of different types of meters, as well as their	4	The Commercial & Residential Property Accountant confirmed that no requests for information on the type of meters were made by customers during the audit period. The Commercial & Residential	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
			suitability for the customer's supply address, purpose, costs, and installation, operation and maintenance procedures.		Property Accountant would provide this information upon request via email.		
297	Condition 6.3.1	Code of Conduct, clause 79(2)	On request, a retailer must advise a customer of the availability of different types of meters or refer the customer to the distributor for a response.	4	Refer obligation 296.	NP	NR
			Disconnection or Interruption for Emergencies				
297A	Condition 6.3.1	Code of Conduct, clause 80	A distributor who disconnects or interrupts a customer's supply address for emergency reasons must provide a 24-hour emergency line, as prescribed under subclause 80(a) and use its best endeavours to restore supply as soon as possible	4	The 24-hour emergency line contact number is on the RIA website and the monthly invoices issued to customers. The RIA confirmed any supply interruptions are rectified as soon as possible. The Important Contacts for Emergency and Essential Services on Wadjemup is available on the RIA website by searching on "Emergency". By interview with the Director Infrastructure and review of the Outage Register, the audit confirmed that RIA use their best endeavours to restore supply as soon as possible.	NP	1
			Complaints and Dispute Resolution				
298	Condition 6.3.1	Code of Conduct, clause 87(1)	Each retailer and distributor must develop, maintain and implement a standard complaint and dispute resolution procedure.	4	The audit confirmed that clause 16 of the RIA's Standard Form Contract includes links to procedures for dispute resolution and complaints resolution. Both links are working. These procedures are: • Utilities Customer Complaints Procedure	A	1

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
					• Utilities Customer Complaints Form It was stated on the Standard Contract form and observed that both forms are available on the RIA website and via the Standard Contract Form link to the Utilities Complaints procedure. The procedure also states the Energy and Water Ombudsman's contact details and procedure.		
299	Condition 6.3.1	Code of Conduct, clause 87(2)	The standard complaints and dispute resolution procedure under subclause 87(1) must comply with the requirements specified in subclauses 87(2)(a), (b), (c) and (d).	4	The audit confirmed the complaints process complies with the Code and is available to all customers through Links provide on the Standard Form Contract, and the RIA's website.	A	1
299A	Condition 6.3.1	Code of Conduct, clause 87(3)	The standard complaints and dispute resolution procedure must comply with AS/NZS 10002:2014.	4	The audit confirmed the complaints process within the Standard Form Contract complies with AS/NZS 10002:2014.	A	1
301	Condition 6.3.1	Code of Conduct, clause 88	On receipt of a written complaint by a customer, a retailer or distributor must acknowledge the complaint within 10 business days and respond to the complaint within 20 business days.	4	The audit confirmed the Rottnest Island Utilities Customer Complaints Procedure, includes the following: *"The RIA will aim to acknowledge written queries or complaints by a customer within 10 business days and respond to queries or complaints by addressing the matters within 15 business days".* There were no written complaints received within the audit period.	A	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
301A	Condition 6.3.1	Code of Conduct, clause 89	A retailer or distributor must inform the customer of the outcome of a complaints process and, unless the customer has advised the retailer or distributor that the complaint has been resolved in a manner acceptable to the customer, information as detailed in 89(b)(i) to (iii).	4	The audit confirmed the Rottnest Island Utilities Customer Complaints Procedure, includes the following: *"The RIA will aim to acknowledge written queries or complaints by a customer within 10 business days and respond to queries or complaints by addressing the matters within 15 business days".* There were no written complaints received within the audit period.	A	NR
304	Condition 6.3.1	Code of Conduct, clause 90	If a retailer, distributor or electricity marketing agent receives a complaint from a customer that does not relate to its functions, it must advise the customer of the entity that it reasonably considers to be appropriate to deal with the complaint (if known).	4	The Environment Officer (Compliance) confirmed there were no formal instances noted of a complaint lodged which did not relate to RIA functions.	NP	NR
			Protection Relating to Family Violence				
307A	Condition 6.3.1	Code of Conduct, clause 91(1)	A retailer must develop, maintain and implement a family violence policy to assist vulnerable customers.	4	RIA has the Rottnest Island Authority Utilities (Family Violence) Policy that was effective from 2021 and was updated in September 2025. The Policy is available on the RIA website.	A	1
307B	Condition 6.3.1	Code of Conduct, clause 91(2)	The family violence policy must provide for the details as prescribed in subclauses 91(2)(a) to (j).	4	The Rottnest Island Authority Utilities (Family Violence) Policy includes the prescribed details.	A	1
307C	Condition 6.3.1	Code of Conduct, clause 91(3)	The training required under subclause 91(2)(a) must satisfy at	4	The Policy states that RIA will train all relevant staff and agents on this Policy and implement systems to:	A	1

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
			least one of the requirements detailed in subclause 91(3).		• Flag customer accounts confidentially, so victims are not required to repeat disclosures. • Ensure records relating to FDV are securely stored and access restricted. • Provide guidance on when FDV automatically qualifies as financial hardship or payment difficulty under the *Code of Conduct (Customer Service Standards) 2024*. The Commercial & Residential Property Accountant confirmed that staff are provided training by the Human Resources team. The Training Model was provided.		
307D	Condition 6.3.1	Code of Conduct, clause 91(5)	If directed by the ERA, a retailer must review its family violence policy or related procedures and submit the results of the review to the ERA within a period specified by the ERA.	4	The RIA has not received any direction from the ERA to review the Policy. The Policy states the Policy will be reviewed every 5 years or if required by the ERA.	A	NR
307E	Condition 6.3.1	Code of Conduct, clause 91(6)	A retailer must consult with persons or bodies that may reasonably be expected to represent the interests of persons who may be experiencing family violence whenever the retailer is developing its family violence policy or reviewing its family violence policy because of a direction of the ERA under subclause 91(5).	4	The Policy was developed in consultation with the WA Government Family and Domestic Violence Support.	NP	1
307F	Condition 6.3.1	Code of Conduct, clause 92	Unless the circumstances under subclause 92(1)((a) to (e) apply, a retailer must ensure that the	2	The Commercial & Residential Property Accountant confirmed that no customers were disconnected in the audit period. .	A	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
			residential supply address of a vulnerable customer is not disconnected for a period of 9 months from the date on which the retailer becomes aware that the customer is a vulnerable customer.		The Policy states that "customers identified as affected by FDV are automatically covered by the non-payment disconnection moratorium, unless they choose to opt out with verifiable consent. Customers may later opt back in at any time."		
307G	Condition 6.3.1	Code of Conduct, clause 93	A retailer must not require written evidence of family violence from a customer unless the evidence is reasonably necessary to enable the retailer to determine action prescribed under subclause 93(1)(a) and (b).	4	The Commercial & Residential Property Accountant confirmed that no customers advised of family or domestic violence in the audit period. The Policy does not require written evidence of any communication re domestic or family violence.	A	NR
			Service Standard Payments				
308A	Condition 6.3.1	Code of Conduct, clause 94(1)	Unless clause 99 applies, a retailer must make the payment specified under subclause 94(2), if the retailer is required to arrange a reconnection of a customer's supply address under part 8, and either the retailer has not complied with clause 53(3) or (4) or the retailer has complied with clause 53(3), but a distributor has not complied with the timeframes set out in clause 54(4).	4	The Commercial & Residential Property Accountant confirmed that RIA has not made any service standard payments. Meters for customers remain connected regardless of arrears, therefore, no meters are reconnected, delayed in reconnection, or disconnected. RIA has received no complaints for electricity, as such, RIA has not failed to respond to a written complaint.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
308B	Condition 6.3.1	Code of Conduct, clause 94(2)	A retailer must pay the customer $60 for each day that the retailer or the distributor (as the case may be) is late, up to a maximum of $300.	4	Refer obligation 308A.	NP	NR
310	Condition 6.3.1	Code of Conduct, clause 95(1)	Unless clause 99 applies, a retailer must make the payment specified under subclause 95(2) if the retailer: • fails to comply with any of the procedures set out under Part 6 (if applicable and other than clauses 45(3) and 46), or clause 48 or 82(1), before arranging for disconnection of, or disconnecting the customer for failure to pay a bill; • or arranges for disconnection of, or disconnects the customer for failure to pay a bill in contravention of clause 49, 50 or 52 for failure to pay a bill.	4	The Commercial & Residential Property Accountant confirmed that no bill payment failures were noted for the audit period. It was also confirmed that there have been no planned disconnections or reconnections during the audit period, apart from disconnections/ reconnections during planned outages. Furthermore, there were no formal customer complaints during the audit period.	NP	NR
312	Condition 6.3.1	Code of Conduct, clause 96	Unless clause 99 applies, if a retailer fails to acknowledge or respond to a complaint within the timeframes set out in clause 88, the retailer must pay the customer $20.	4	Refer obligation 310.	NP	NR
313A	Condition 6.3.1	Code of Conduct, clause 97(1) and (2)	Unless clause 99 applies, a distributor must pay the customer $100, for each day that the customer is wrongfully disconnected, if the	4	The Commercial & Residential Property Accountant confirmed that there have been no disconnections or reconnections during the audit period, apart from disconnections/ reconnections during planned	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
			distributor disconnects a customer's supply address other than under the circumstances detailed in subclause 97(1)(a) and (b).		outages. Furthermore, there were no formal customer complaints during the audit period.		
314A	Condition 6.3.1	Code of Conduct, clause 98(1) and (2)	Unless clause 99 applies, if a distributor fails to acknowledge or respond to a written complaint made by a customer within the timeframes set out in clause 88, the distributor must pay the customer one payment of $20 for each complaint.	4	Refer obligation 313A.	NP	NR
315	Condition 6.3.1	Code of Conduct, clause 100(1)	A retailer that is required to make a payment under clause 94, 95 or 96 must do so in the manner specified in subclause 100(1).	4	Refer obligation 313A.	NP	NR
316	Condition 6.3.1	Code of Conduct, clause 100(2)	A distributor that is required to make a payment under clause 97 or 98 must do so in the manner specified in subclause 100(2).	4	Refer obligation 313A.	NP	NR
Electricity Industry Metering Code							
319	Condition 6.3.1	Clause 3.1	A network operator must ensure that its meters meet the requirements specified in the applicable Metrology procedure and comply with any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute	4	The meters are supported by Certificates of Conformance, which provides assurance that the meters were calibrated and verified independently by Energy-Tec to ensure conformance to relevant accuracy requirements of AS62053 and the specifications and guidelines issued by the National Measurements Institute as stated in the Meter Installation and Calibration Procedure.	A	1

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
			under the *National Measurement Act.*				
320	Condition 6.3.1	Clause 3.2(1)	An accumulation meter must at least conform to the requirements specified in the applicable Metrology procedure and display or permit access to a display of the measurements that are specified in subclauses 3.2(1)(a)(b) using dials, a cyclometer, an illuminated display panel or some other visual means.	4	It was noted that the RIA has a Metrology Procedure in place, which defines accumulation meters and provides the minimum requirements for these types of meters. As newly installed meters are to comply with the Metrology Procedure, they therefore comply with the *Metering* Code 2012.	A	1
321	Condition 6.3.1	Clause 3.3(1)	An interval meter must at least have an interface to allow the interval energy data to be downloaded in the manner prescribed using an interface compatible with the requirements specified in the applicable Metrology procedure.	4	The audit confirmed that RIA has a Metrology Procedure in place, which defines an interface, and provides the minimum requirements for an interface which allows interval energy data to be downloaded. This is required for a Type 5 Meter. The Metering Database shows that RIA has Type 5 and Type 6 meters only. The Metrology Procedure was last updated in 2017, although there was an independent update conducted by Qualeng in 2020, providing recommendations on updating the Metrology Procedure. *An improvement is that RIA should review and update the Metrology Procedure which has not been updated since 2017.*	B	1

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
322	Condition 6.3.1	Clause 3.3(3)	If a metering installation is required to include a communications link, the link must, where necessary, include a modem and isolation device approved under the relevant telecommunications regulations that allows the interval energy data to be downloaded in the manner prescribed.	4	The audit confirmed the RIA has a Metrology Procedure in place. Section 1.6 of the Procedure defines Metering Installation Components, which includes information relating to communications links. At the time of audit, RIA confirmed that Smart meters are equipped with SIM cards so data may be accessed remotely by RIA. SBS Digital who manage the service also have access to download data on behalf of RIA.	A	1
323	Condition 6.3.1	Clause 3.3A(1)	A network operator must ensure that bi-directional electricity flows do not occur at a metering point unless the metering installation for the metering point is capable of separately measuring and recording electricity flows in each direction.	4	Per inquiry at the time of this audit, it was noted that RIA no longer accepts any solar applications or installations. There is only one PV (solar powered) system on Rottnest Island, situated at the Rottnest Hotel. This PV system is supported by an independent engineering compliance report which confirms that the system complies with all relevant codes, legislation and requirements set out by Western Power. Hence, no requirements for bi-directional meters were noted.	NP	NR
324	Condition 4.1.1	Clause 3.3B	If a user is aware of bi-directional electricity flows at a metering point that was not previously subject to a bi- directional flows or any changes in a customer's or user's circumstances in a metering point that will result in bi- directional flows, the user must notify the network operator within 2 business days.	4	Refer obligation 323.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
325	Condition 4.1.1	Clause 3.3C	An accumulation meter or an interval meter that separately measures and records bi-directional electricity flows at the metering point must record: • the net electricity production transferred into the network. • the net electricity consumption transferred out of the network.	4	The RIA and PFM confirmed that RIA does not offer any returns for electricity exported to the grid and therefore this is not recorded.	NP	NR
326	Condition 4.1.1	Clause 3.5(1) and (2)	A network operator must ensure that there is a metering installation at every connection point on its network that is not an unmetered connection point. Unless it is a Type 7 metering installation, the metering installation must meet the functionality requirements prescribed.	4	The audit confirmed that all metering connections on the island meet the functionality requirements as mentioned in *Electricity Industry Metering Code, clause 3.5(1) and (2)* The ERA confirmed with RIA in August 2021 that this obligation is not applicable to the holiday accommodation units as selling of electricity only applies to the customers and commercial metering points on the island. RIA owns all the holiday accommodation units and therefore self-supplies electricity. All commercial metering installations are either Type 5 or Type 6 meters that meet all functionality requirements of Metering Code and as outlined in the Metrology Procedure.	A	1
327	Condition 4.1.1	Clause 3.5(3)	For each metering installation on its network, a network operator must provide, install, operate and, subject to subclause 3.7(5), maintain the metering installation in the manner prescribed, unless otherwise agreed.	4	The audit confirmed that RIA maintain a Metrology Policy which covers the installation and operation of meters on Rottnest island. The Metering Database provides data on installation and operation of meters and this data is in line with specifications mentioned in subclause 3.7(5).	A	1

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
328	Condition 4.1.1	Clause 3.5(4)	Except for a Type 7 metering installation, a network operator must ensure that the metering point for a revenue metering installation is located as close as practicable to the connection point in accordance with good electricity industry practice.	4	The RIA confirmed that all meters are installed within 30 meters of the load. The Metrology Procedure and Distribution & Connection Manual set out the meter connection requirements in accordance with this obligation.	A	1
329	Condition 4.1.1	Clause 3.5(6)	A network operator may only impose a charge for providing, installing, operating or maintaining a metering installation in accordance with the applicable service level agreement that it has with the user.	4	The RIA confirmed there are no charges for metering installations as all properties are owned by RIA and leased to customers.	NP	NR
330	Condition 4.1.1	Clause 3.5(9)	If a network operator becomes aware that a metering installation does not comply with the Code, it must advise affected parties of the non-compliance and arrange for the non-compliance to be corrected as soon as practicable.	4	The RIA has not become aware of any non-compliant metering installations, so this obligation is not rated. All metering installations are by RIA's contractor, PFM.	NP	NR
331	Condition 4.1.1	Clause 3.7	All devices that may be connected to a telecommunications network must be compatible with the telecommunications network and comply with all applicable State and Commonwealth enactments.	4	All meters including smart meters are reviewed and read manually by PFM staff on a monthly basis. At the time of audit, RIA confirmed that Smart meters are equipped with SIM cards so data may be accessed remotely by RIA. SBS Digital who manage the service also have access to download data on behalf of RIA. This network link complies	A	1

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
					with all applicable State and Commonwealth enactments.		
332	Condition 4.1.1	Clause 3.8	Subject to clause 3.27, a network operator must ensure that, consistent with the standards of good electricity industry practice, each metering installation on its network is secured by devices or methods that hinder unauthorised access and enable unauthorised access to be detected.	4	It was confirmed with PFM that all the meters on Rottnest Island have a seal which prevents unauthorised access. It was further noted that PFM conducts a monthly review of all meters which involves recording the reading on the meter. This will ensure that any unauthorised access or tampering with meters is detected.	NP	1
333	Condition 4.1.1	Clause 3.9(3)	Subject to subclauses 3.9(4), 3.9(5) and 3.9(7), each metering installation must meet at least the requirements for that type of metering installation as specified in Table 3 in Appendix 1 of the Code for metering installations on the SWIN or in Table 3A in Appendix 1 for metering installations on a network other than the SWIN.	4	Review of the Metering Database that all meters on Rottnest Island are type 6 meters per Table 3 of Appendix 1 in the code. RIA has the Metrology Procedure in place, to ensure that any changes to the classification/type of these meters are updated appropriately.	A	1
334	Condition 4.1.1	Clause 3.9(7)	A metering installation used to supply a customer with requirements above 1000 volts that requires a VT and whose annual consumption is below 750MWh must meet the relevant accuracy requirements of a Type 3 metering installation for active energy only.	4	It was noted that none of the meters on Rottnest Island supplied more than 1,000 volts of electricity (HV) during the audit period.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
335	Condition 4.1.1	Clause 3.9(9)	If compensation is carried out within the meter, then the resultant metering system error must be as close as practicable to zero.	4	It was noted that compensation has not been carried out within any of the meters on Rottnest Island in the past. RIA use NMI approved meters which have regular calibration procedures in place as dictated by the RIA Metrology Procedure. NMI approved meters are accurate meters which automatically adjust the meter as required. The NMI number is included in the Metering Database.	NP	NR
336	Condition 4.1.1	Clause 3.10	A network operator must ensure that any programmable settings in any of its metering installations, data loggers or peripheral devices, which may affect the resolution of displayed or stored data, satisfy the relevant requirements specified in the applicable Metrology procedure and comply with any applicable instructions by the National Measurement Institute under the National Measurement Act.	4	It was noted that some of the new meter installations on Rottnest Island are smart meters and their programmable settings are calibrated regularly and checked manually on a monthly basis by PFM. The audit confirmed with RIA that all meters are NMI approved and compliant meters.	A	1
337	Condition 4.1.1	Clause 3.11(1)	A network operator must ensure that a metering installation on its network is operating consistently with good electricity industry practice to measure and record data and permits the collection of data within the time specified in the applicable service level agreement, for at least the percentages of the year specified.	4	The audit confirmed that all meters on Rottnest Island are NMI approved and are manually checked on a monthly basis by PFM. These meters are calibrated and reviewed in accordance with the RIA Metrology Procedure, which is consistent with good electricity industry practice.	A	1

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
338	Condition 4.1.1	Clause 3.11(2)	If an outage or malfunction occurs to a metering installation, the network operator must repair the metering installation in accordance with the applicable service level agreement.	4	The RIA confirmed that all service level agreements are held by the property manager, on behalf of RIA. The service level agreement specified the maximum wait time should a power outage or malfunction occur on Rottnest Island. The average length of customer interruptions in minutes for 2023/24 was 33.96 and for 2024/25 was 21. However, the average number of interruptions were 1.15 and 3.98 respectively. These were largely due to planned interruptions during transformer upgrades.	A	1
340	Condition 4.1.1	Clause 3.11A(1)	A network operator must ensure that the meters on its network are systematically sampled and tested for accuracy in accordance with AS 1284.13.	4	The audit noted from the Metering Database spreadsheet that all meters have been tested for accuracy and also calibration as per NMI regulations. The RIA Metrology Procedure in section 3.6 requires sampling of meters on its network. to be done in accordance with AS 1284.13 as well as Schedules 1,2, or 3 within the Metrology Procedure.	A	1
341	Condition 4.1.1	Clause 3.11A(2)	Subject to clause 3.11A(3), if a “population” of meters is deemed to have failed under AS 1284.13, the network operator must ensure that all of the meters in that population are removed and replaced with new meters within 3 years of the testing of the population.	4	The RIA confirmed that no meters were deemed to have failed during the audit period. The RIA has a Metrology Procedure and details regarding the replacement of meters should they fail sample testing are contained in section 3.8 of the Metrology Procedure. It notes that “Where a population of meters has been sampled and tested in accordance with section 3.6.1 and deemed to have failed, the Network Operator will remove and replace all meters within that population in accordance with the requirements of the Code.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
342	Condition 4.1.1	Clause 3.12(1)	A network operator must ensure that each metering installation complies with at least the prescribed design requirements.	3	As noted in the previous audit and upon enquiry with RIA and PFM, the audit noted that there are several current transformer (CT) metering installations that are non-compliant with the prescribed design requirements due to the age of the installations. This has no effect on customers and is considered a minor non-compliance. PFM and RIA confirmed the non-compliant metering units are being replaced as part of the State Electrical Network Upgrade program and the current schedule forecasts the completion of this task by December 2027 with 90% or more scheduled for completion by December 2026. There is a Metrology procedure as approved by the ERA although this procedure has not been revised since 2017. PFM and RIA should ensure that the metering installation complies with the prescribed design requirements. ***Recommendation 2/2026*** *As planned, the non-compliant CT metering units should be replaced as part of the State Electrical Network Upgrade Program by December 2027.*	C	2
343	Condition 4.1.1	Clause 3.12(2)	A network operator must ensure that instrument transformers in its metering installations comply with the relevant requirements of any applicable specifications or guidelines, including any transitional arrangements,	3	As noted in the previous audit and upon enquiry with RIA and PFM, the audit noted that there are several current transformer (CT) metering installations that are non-compliant with the prescribed design requirements due to the age of the installations. This has no effect on customers and is considered a minor non-compliance.	C	2

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
			specified by the National Measurement Institute under the National Measurement Act and any requirements specified in the applicable Metrology procedure.		PFM and RIA confirmed the non-compliant metering units are being replaced as part of the State Electrical Network Upgrade program which is forecasted for completion by December 2027. ***Refer Recommendation 2/2026***		
344	Condition 4.1.1	Clause 3.12(3)	A network operator must provide isolation facilities of a standard consistent with good electricity industry practice, to facilitate testing and calibration of the metering installation.	4	Based on our inquiry with PFM, the audit confirmed that fuse isolation is used throughout the metering installations on Rottnest Island. It was further noted that a Metrology Procedure is in place and Schedule 1 within the procedure requires suitable isolation facilities to be provided to facilitate testing and calibration of the metering installation.	NP	1
345	Condition 4.1.1	Clause 3.12(4)	A network operator must maintain drawings and supporting information, of a standard consistent with good electricity industry practice, to detail the metering installation for maintenance and auditing purposes.	4	From review of documentation, the audit confirmed that PFM maintains drawings detailing metering installation of all meters at Rottnest Island, consistent with good electricity industry practice. An external independent body, Spring30 provides the drawings and sends them to RIA for approval. These drawings are maintained and updated in the Metrology Procedures - Meter Connection Types and Drawings document available online. However, the auditor observed during site visit that the wiring diagrams were not available within the switchboard for easy access by the maintenance crew, hence the performance was graded accordingly. ***Recommendation 3/2026*** *The RIA should maintain a printed copy of the wiring diagrams at the switchboards for easy reference*.	B	2

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
346	Condition 4.1.1	Clause 3.13(1)	A network operator must procure the user, or the user's customer, to install, or arrange for the installation of, a full check metering installation or partial check metering installation in accordance with the prescribed requirements.	4	The RIA did not use check metering in the audit period, so this obligation is not rated.	NP	NR
347	Condition 4.1.1	Clause 3.13(3) (c)	A partial check metering installation must be physically arranged in a manner determined by the network operator, acting in accordance with good electricity industry practice.	4	Refer obligation 346.	NP	NR
348	Condition 4.1.1	Clause 3.13(4)	A check metering installation for a metering point must comply with the prescribed requirements.	4	Refer obligation 346.	NP	NR
349	Condition 4.1.1	Clause 3.16(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).	3	As noted in the previous audit and upon enquiry with RIA and PFM, the audit noted that there are several current transformer (CT) metering installations that are non-compliant with the prescribed design requirements due to the age of the installations. This has no effect on customers and is considered a minor non-compliance. PFM and RIA confirmed the non-compliant metering units are being replaced as part of the State Electrical Network Upgrade program which is forecasted for completion by December 2027. ***Refer recommendation 2/2026.***	C	2

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
355	Condition 4.1.1	Clause 3.20(1)	If reasonably requested by a Code participant, a network operator must provide enhanced technology features in a metering installation.	4	Most of the metering installations are Type 6 at the Rottnest Island	NP	NR
356	Condition 4.1.1	Clause 3.20(3)	A network operator may only impose a charge for the provision of metering installations with enhanced technology features in accordance with its applicable service level agreement with the user.	4	The RIA did not use meters with enhanced technology features in the audit period, so this obligation is not rated.	NP	NR
357	Condition 4.1.1	Clause 3.21(1)	Meters containing an internal real time clock must maintain time accuracy as prescribed. Time drift must be measured over a period of 1 month.	4	The RIA did not use check metering in the audit period, so this obligation is not rated.	NP	NR
358	Condition 4.1.1	Clause 3.21(2)	If a metering installation includes measurement elements and an internal data logger at the same site, it must include facilities on-site for storing the interval energy data for the periods prescribed.	4	The RIA did not use meters with enhanced technology features in the audit period, so this obligation is not rated.	NP	NR
359	Condition 4.1.1	Clause 3.22	A network operator providing one or more metering installations with enhanced technology features must be licensed to use, and access, the metering software applicable to all devices being installed and be able to program the devices and set parameters.	4	The RIA did not use meters with enhanced technology features in the audit period, so this obligation is not rated.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
360	Condition 4.1.1	Clause 3.23(a)	Where signals are provided from the meter for the user or the user's customer, a network operator must ensure that signals are isolated by relays or electronic buffers to prevent accidental or malicious damage to the meter.	4	The RIA did not use meters where signals are provided in the audit period, so this obligation is not rated. All meters are read manually each month.	NP	NR
361	Condition 4.1.1	Clause 3.23(b)	Where signals are provided from the meter for the user or the user's customer, a network operator must provide the user, or the user's customer, with sufficient details of the signal specification to enable compliance with clause 3.23(c) of the Code.	4	Refer obligation 360.	NP	NR
364	Condition 4.1.1	Clause 3.27	A person must not install a metering installation on a network unless the person is the network operator or a registered metering installation provider for the network operator doing the type of work authorised by its registration.	4	PFM performs the installations and also contracts out to Energy Safety approved contractors for electrical installations. PFM website includes the electrical license of the approved contractor. There were some new meters installed in the audit period by the approved contractor. B&E has undertaken safety audits of the customer switchboards. However, future audit dates were not displayed on these switchboards. *An improvement is that the future safety audit dates should be displayed on the switchboards for easy reference.*	B	1

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
365	Condition 4.1.1	Clause 3.29	A network operator must publish a list of registered metering installation providers, including the prescribed details, and update the list at least annually.	4	The RIA has published its registered metering installation providers on its website which includes all details prescribed under the *Electricity Industry Metering Code*, clause 3.29 and is updated annually.	NP	1
Part 4 – The metering database							
366	Condition 4.1.1	Clause 4.1(1)	A network operator must establish, maintain and administer a metering database containing standing data and energy data for each metering point on its network.	4	The audit confirmed the Metering database is in place and supported by the Meter Reading Procedure.	A	1
367	Condition 4.1.1	Clause 4.1(2)	A network operator must ensure that its metering database with its associated links, circuits, information storage and processing systems are secured by devices or methods consistent with a good industry practice (to hinder unauthorised access and enable unauthorised access to be detected).	4	The metering database in an Excel spreadsheet, password protected and saved on the local network drive which has back-ups in place. There is sufficient documentation available at PFM for users and operators of systems. System documentation governing the use and access of IT systems is available through RIA and these include: • Corporate Policy Statement 63 - Information and Related Technology • Corporate Policy Statement 70 - Information Security Management.	A	1
368	Condition 4.1.1	Clause 4.1(3)	A network operator must prepare and, if applicable, implement a disaster recovery plan to ensure that it is able, to rebuild the metering database and provide energy data to Code participants within 2 business days after the day of any disaster.	4	The Metering Database and Meter Reading Spreadsheets are Excel spreadsheets that are saved on the RIA network. The system is backed up at least daily and a copy stored offsite as part of the standard IT data backup procedure. The backups are regularly tested by recovery of data files.	A	1

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
369	Condition 4.1.1	Clause 4.2(1)	A network operator must ensure that its registry complies with the Code and the prescribed clause of the market rules.	4	The audit confirmed through our walkthrough that the Metering database is in place and supported by the Meter Reading Procedure, which includes the elements set out for compliance with *Electricity Industry Metering Code*, clause 4.1(3).	A	1
370	Condition 4.1.1	Clause 4.3(1)	The standing data for a metering point must comprise at least the items specified.	4	The audit confirmed through our walkthrough that the Metering database is in place and supported by the Meter Reading Procedure, which includes the elements set out for compliance with *Electricity Industry Metering Code*, clause 4.1(3).	A	1
371	Condition 4.1.1	Clause 4.4(1)	If there is a discrepancy between energy data held in a metering installation and in the metering database, the affected Code participants and the network operator must liaise to determine the most appropriate way to resolve the discrepancy.	4	As there are no applicable Code participants, this obligation is not rated.	NP	NR
372	Condition 4.1.1	Clause 4.5(1)	A Code participant must not knowingly permit the registry to be materially inaccurate.	4	Refer obligation 371.	NP	NR
373	Condition 4.1.1	Clause 4.5(2)	Subject to subclause 5.19(6), if a Code participant, other than a network operator, becomes aware of a change to, or inaccuracy in, an item of standing data in the registry, then it must notify the network operator and provide details of the change or inaccuracy within the timeframes prescribed.	4	Refer obligation 371.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
374	Condition 4.1.1	Clause 4.6(1)	If the network operator is notified of a change to, or inaccuracy in, an item of standing data by a Code participant that is the designated source for the item of standing data under Table 2 in clause 4.3(1) then the network operator must update the registry to address the issue.	4	Refer obligation 371.	NP	NR
375	Condition 4.1.1	Clause 4.6(2)	If a network operator is notified of a change to, or inaccuracy in, an item of standing data by a Code participant which is not the designated source for the item of standing data, or otherwise becomes aware of a change to or inaccuracy in an item of standing data, then the network operator must determine whether the registry should be updated, and update the registry as required.	4	Refer obligation 371.	NP	NR
376	Condition 4.1.1	Clause 4.7(1)	If standing data for a metering point is updated in the registry, the network operator must, within 2 business days after the update (or such other time as is specified in the applicable service level agreement) notify the update to the current user and each previous user, if the updated standing data relates to a period or periods	4	Refer obligation 371.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
			when the previous user was the current user.				
377	Condition 4.1.1	Clause 4.8(3)	A network operator must allow a user who is a retailer or a generator to have local and, where a suitable communications link is installed, remote access to the energy data for metering points at its associated connection points, using a password provided by the network operator that provides 'read only' access.	4	Refer obligation 371.	NP	NR
378	Condition 4.1.1	Clause 4.8(3A)	A network operator must allow a user who is a retailer or a generator to have access to data held in its metering database for metering points at its associated connection points, by the prescribed methods, using a password provided by the network operator which provides 'read only' access.	4	Refer obligation 371.	NP	NR
379	Condition 4.1.1	Clause 4.8(4)(a)	A network operator must have devices and methods in place to ensure that energy data held in its metering installation is secured from unauthorised local or remote access using the methods prescribed.	4	Through inquiry with PFM, it was noted that all meters on Rottnest Island are covered with locked seals. Section 5.49 of RIA's Metrology Procedure highlights this meter security requirement.	A	1

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
380	Condition 4.1.1	Clause 4.8(4)(b)	A network operator must have devices and methods in place to ensure that the data held in its metering database is secured from unauthorised local, or remote, access using the methods prescribed.	4	The audit confirmed with RIA and PFM that all confidential information held in the Metering Database is password protected. Furthermore, access to this database is only available to the PFM, Manager - Compliance and Manager Electricity and Fuel Infrastructure. This procedure is compliant with Corporate Policy Statement no. 70 - Information Security Management.	A	1
381	Condition 4.1.1	Clause 4.8(5)	Without limiting subclause 4.8(4), a network operator must ensure that electronic passwords and other electronic security controls are only issued to the specified authorised personnel and otherwise keep its records of electronic passwords, and other electronic security controls, secure from unauthorised access.	4	Refer obligation 380.	A	1
382	Condition 4.1.1	Clause 4.9	A network operator must retain energy data in its metering database for each metering point on its network, including any energy data that has been replaced under subclause 5.24, for at least the periods, and with the level of accessibility, prescribed.	4	Energy data is not recorded within the Metering Database. It is recorded separately on Meter Reading Spreadsheets. At least 7 years of data is retained in these spreadsheets.	NP	1

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
Part 5 – Metering Services							
383	Condition 4.1.1	Clause 5.1(1)	A network operator must use all reasonable endeavours to accommodate another Code participant's requirement to obtain a metering service and requirements in connection with the negotiation of a service level agreement.	4	As there are no other Code participants, this obligation is not rated.	NP	NR
384	Condition 4.1.1	Clause 5.1(2)	Without limiting subclause 5.1(1), a network operator must: • expeditiously and diligently process all requests for a service level agreement; • negotiate in good faith with a Code participant regarding the terms for an agreement; and • to the extent reasonably practicable in accordance with good electricity industry practice, permit a Code participant to acquire a metering service containing only those elements of the metering service which the Code participant wishes to acquire.	4	Refer obligation 383.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
385	Condition 4.1.1	Clause 5.3(1)	A network operator must, for each metering point on its network, obtain energy data from the metering installation and transfer the energy data into its metering database by no later than 2 business days after the date for the scheduled meter reading for the metering point (or such other time as is specified in the applicable service level agreement).	3	The audit confirmed via enquiry and review of the 'Meter Readings Monthly Procedure' that meter readings of the energy data are to be carried out during the end of each month over two (2) days. It further states that the PFM Manager/Supervisor, will enter data into the spreadsheet ('Monthly Meter Reading' spreadsheet). The audit confirmed that meter readings are recorded in the database as scheduled each month.	A	1
386	Condition 4.1.1	Clause 5.4(1)	A network operator must, for each meter on its network, at least once in every 12-month period undertake a meter reading that provides an actual value that passes the validation processes in Appendix 2.	4	Clause 4.3 "Energy Data Collection from Metering Installations" of the RIA's Metrology Procedure includes a requirement to undertake a meter reading at least once in every 12 month period. The audit reviewed the 'Meter Read Spreadsheet and the 'Metering Database Spreadsheet' to ensure that RIA is compliant with this obligation, as meter readings are done every month.	A	1
387	Condition 4.1.1	Clause 5.4(1A)	The meter reading referred to in clause 5.4(1) must not be undertaken by the customer associated with the meter and must be undertaken by a person who is employed or appointed by the network operator and who is suitably skilled in accordance with good electricity industry practice to carry out meter readings.	4	Per inquiry with PFM, the audit confirmed that meter readings are performed by PFM electricians who are all licensed electricians. The electricians use the Promapp software - An interface application which the electricians log on to check the required work and are also able to update the status of the metering work completed. This is later updated in the Metering Database. PFM does monthly meter readings (in-house) and provides these to the property manager for billing. The procedure is stated in the Meter Readings Monthly Procedure.	A	1

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
403	Condition 4.1.1	Clause 5.17A(1)	A network operator must provide data for a metering point from its metering database to a person if (and to the extent that) the customer associated with the metering point gives the network operator a direction to do so that complies with subclause 5.17A(2).	4	No customer requests for metering data were noted during the audit period. The FUSS contract between RIA and PFM includes responsibilities for compliance to metering license requirements including the provision of data to customers	A	NR
404	Condition 4.1.1	Clause 5.17A(3)	A network operator must comply with a direction under subclause 5.17A(1) within the timeframes prescribed.	4	Per enquiry with RIA and PFM, the audit noted that no customer requests for metering data were received during the audit period.	NP	NR
422	Condition 4.1.1	Clause 5.22(1)	A network operator must validate energy data in accordance with this Code applying, as a minimum, the prescribed rules and procedures set out in Appendix 2 and must, where necessary, substitute and estimate energy data under this Code applying, as a minimum, the prescribed rules and procedures set out in Appendix 3.	4	The RIA and review of the Meter Readings spreadsheet confirmed there were no estimated energy data readings during the audit period.	NP	NR
423	Condition 4.1.1	Clause 5.22(2)	The network operator must use check metering data, where available, to validate energy data provided that the check metering data has been appropriately adjusted for differences in metering installation accuracy in accordance with subclause 3.13.	4	The RIA does not use check metering and there were no estimated meter readings in the audit period.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
424	Condition 4.1.1	Clause 5.22(3) *(Amended Feb. 2022)*	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	There are no other Code participants.	NP	NR
425	Condition 4.1.1	Clause 5.22(4)	If a network operator detects a loss of energy data or incorrect energy data from a metering installation, it must notify each affected Code participant of the loss or error within 24 hours after detection.	4	There are no other Code participants.	NP	NR
426	Condition 4.1.1	Clause 5.22(5)	Substitution or estimation of energy data is required when energy data is missing, unavailable or corrupted, including in the circumstances described in this subclause.	4	The audit confirmed with RIA and PFM that no instances were noted where data was corrupted, missing or unavailable in the audit period.	NP	NR
427	Condition 4.1.1	Clause 5.22(6)	A network operator must review all validation failures before undertaking any substitution.	4	The audit confirmed with RIA and PFM that no instances were noted of validation failures in the audit period.	NP	NR
428	Condition 4.1.1	Clause 5.23(1)	If a network operator determines that there is no possibility of determining an actual value for a metering point, then the network	4	The audit confirmed with RIA and PFM that no instances were noted where data was corrupted, missing or unavailable in the audit period.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
			operator must designate an estimated or substituted value for the metering point to be a deemed actual value for the metering point.				
429	Condition 4.1.1	Clause 5.23(3)	If a network operator has designated a deemed actual value for a metering point, then the network operator must: • repair or replace the meter or one or more of components of metering equipment (as appropriate) at the metering point; and • subclauses 5.24(3(c) and 5.24(4) apply in respect of the estimated or substituted value which was designated to be the deemed actual value.	4	Refer obligation 428.	NP	NR
430	Condition 4.1.1	Clause 5.24(1)	If a network operator uses an actual value (first value) for energy data for a metering point, and a better quality actual or deemed actual value is available (second value), the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice.	4	The audit confirmed that actual values are used for all invoices and are consistent with good industry practices	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
431	Condition 4.1.1	Clause 5.24(2)	If a network operator uses a deemed actual value (first value) for energy data for a metering point, and a better quality deemed actual value is available (second value), then the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice.	4	Refer obligation 430.	NP	NR
432	Condition 4.1.1	Clause 5.24(3)	If a network operator uses an estimated or substituted value (first value) for energy data for a metering point, and a better quality actual, deemed, estimated or substituted value is available (second value), then the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice or the user and its customer jointly request it to do so.	4	Refer obligation 430.	NP	NR
433	Condition 4.1.1	Clause 5.24(4)	A network operator (acting in accordance with good electricity industry practice) must consider any reasonable request from a Code participant for an estimated or substituted value to be replaced under subclause 5.24.	4	Refer obligation 430.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
434	Condition 4.1.1	Clause 5.25	A network operator must ensure the accuracy of estimated energy data in accordance with the methods in its Metrology procedure and ensure that any transformation or processing of data preserves its accuracy in accordance with the Metrology procedure.	4	The RIA's Metrology Procedure includes clause 12.2 "Requirement to Produce Substitute or Estimated Energy Data" that complies with this obligation. The meter readings complied with this procedure.	A	1
Part 6 - Documentation							
449	Condition 4.1.1	Clause 6.20(4)	A network operator must amend any document in accordance with the ERA's final recommendation.	4	There were no notices issued by ERA to amend documents in the audit period.	NP	NR
450	Condition 4.1.1	Clause 6.20(5)	The network operator must publish any document that has been amended under subclause 6.20(4).	4	There were no notices issued by ERA to amend documents in the audit period.	NP	NR
ELECTRICITY INDUSTRY NETWORK QUALITY AND RELIABILITY OF SUPPLY CODE							
462	Condition 4.1.1	Clause 5(1))	A distributor or transmitter must, as far as reasonably practicable, ensure that electricity supply to a customer's electrical installations complies with prescribed standards.	4	There were no notices issued by ERA to amend documents during the audit period.	NP	NR
463	Condition 4.1.1	Clause 8	A distributor or transmitter must, so far as reasonably practicable, disconnect the supply of electricity to installations or property in specified circumstances, unless it is in the	4	The audit confirmed with RIA and PFM that there were no disconnections identified during the audit period. The RIA's Standard Form Contract section 5 "Disconnection and Reconnection" provides details of situations when disconnection will occur. The	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
			interest of the customer to maintain the supply.		Standard Form Contract has been approved by the ERA and is listed on the ERA's website.		
464	Condition 4.1.1	Clause 9	A distributor or transmitter must, as far as reasonably practicable, ensure that the supply of electricity is maintained and the occurrence and duration of interruptions is kept to a minimum.	4	The Electrical Service Recovery and Contingency Plan notes that the purpose of this plan is to maintain the supply of electricity on Rottnest Island with a minimum number and duration of interruptions. As per section 2 "Power Supply System" of this Plan, we note that the RIA holds 3 generators on the island at all times, and therefore in the event of a significant interruption, customers can immediately be connected to an alternative supply. The audit noted in the Planned Outages Register (2023/24 and 2024/25) that interruptions were kept to a minimum in the audit period.	A	1
465	Condition 4.1.1	Clause 10(1)	A distributor or transmitter must, so far as reasonably practicable, reduce the effect of any interruption on a customer.	4	Refer obligation 464.	A	1
466	Condition 4.1.1	Clause 10(2)	A distributor or transmitter must consider whether, in specified circumstances, it should supply electricity by alternative means to a customer who will be affected by a proposed interruption.	4	Refer obligation 465.	A	1
467	Condition 4.1.1	Clause 12(3)	A distributor must take prescribed action in the event of a significant interruption to a small use customer.	4	There have been no significant interruptions with all being short length during the audit period.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
468	Condition 4.1.1	Clause 13(2)	A distributor or transmitter must, so far as reasonably practicable, ensure that customers in specified areas do not have average total lengths of interruptions of supply greater than specified durations.	4	On enquiry with RIA and review of the Network Quality and Reliability of Supply Reports for 2023/24 and 2024/25), the audit noted that the total length of interruptions of supply is calculated using the specified method over a four year period. (i.e. Calculation of year average: As prescribed in the System Performance Measures SAIDI SAIFI) CAIDI Procedure - The total sum of customer interruption duration (in hours) connections is divided by the number of customers served). The average figure should not be more than the four year average. For the audit period, we noted that the yearly average was less than the 4 year average for all years in this audit period. This is compliant. There have been no significant interruptions with all being short length during the audit period.	NP	1
469	Condition 4.1.1	Clause 13(3)	The average total length of interruptions of supply is to be calculated using the specified method.	4	Refer obligation 468.	NP	1
470	Condition 4.1.1	Clause 14(8)	A distributor or transmitter must, on request, provide to an affected customer a free copy of an instrument issued by the Minister and of any notice given under section 14(7) of *the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.*	4	The RIA confirmed that no instrument/notice was issued by the Minister during the audit period.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
471	Condition 4.1.1	Clause 15(2)	A distributor or transmitter that agrees with a customer to exclude or modify certain provisions must set out the advantages and disadvantages to the customer of doing so in their agreement.	4	Per enquiry with PFM and RIA , the audit noted that no modifications or changes to customer agreements have occurred during the audit period.	NP	NR
472	Condition 4.1.1	Clause 18	A distributor operating a relevant distribution system must, in specified circumstances, make a payment to a customer within a specific timeframe for a failure to give required notice of planned interruption.	4	There have been no significant interruptions with all being short length during the audit period. The RIA confirmed the required notice has been given to customers.	NP	NR
473	Condition 4.1.1	Clause 19	A distributor operating a relevant distribution system must, in specified circumstances, make a payment to a customer within a specific timeframe if a supply interruption exceeds 12 hours.	4	There have been no significant interruptions with all being short length during the audit period.	NP	NR
474	Condition 4.1.1	Clause 21(1)	A distributor operating a relevant distribution system must provide eligible customers with information about applying for payments for failure to meet the requirements in sections 18 and 19 of the *Electricity Industry (Network Quality and Reliability of Supply) Code 2005*.	4	As there are no residential customers, this obligation is not rated.	NP	NR

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
475	Condition 4.1.1	Clause 21(2)	A distributor operating a relevant distribution system must provide written notice to customers about payments for failure to meet the requirements in sections 18 and 19 of the *Electricity Industry (Network Quality and Reliability of Supply) Code 2005*.	4	As there are no residential customers, this obligation is not rated.	NP	NR
476	Condition 4.1.1	Clause 21(3)	A distributor operating a relevant distribution system must provide written notice to eligible customers about payments for failure to meet the requirements in sections 18 and 19 of the *Electricity Industry (Network Quality and Reliability of Supply) Code 2005* not less than once in each financial year.	4	As there are no residential customers, this obligation is not rated.	NP	NR
477	Condition 4.1.1	Clause 23(1)	A distributor or transmitter must take all such steps as are reasonably necessary to monitor the operation of its network to ensure compliance with specified requirements.	4	The audit reviewed the FUSS Rottnest Facilities Utilities and Support Services Contract and noted that this contract includes PFM's responsibilities regarding monitoring the operation of its electricity supply on the island. The RIA maintain FUSS Planned Maintenance Activity Annual Reports to monitor the operation of its network to ensure compliance with specified requirements	A	1
478	Condition 4.1.1	Clause 23(2)	A distributor or transmitter must keep records of information regarding its compliance with specific requirements for the period specified.	4	The audit reviewed the "FUSS Rottnest Facilities Utilities and Support Services Contract" and noted that this contract includes PFM's responsibilities. The audit confirmed the Metering Data Spreadsheets are retained for at least 7 years.	A	1

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
479	Condition 4.1.1	Clause 24(3)	A distributor or transmitter must complete a quality investigation requested by a customer in accordance with specified requirements.	4	Per enquiry with RIA, the audit noted that there were no customer requests for a quality investigation during the audit period. No specific documented procedures were evidenced supporting the process to conduct power quality investigations and reporting the findings to the customer however given the small number of customers for the RIA this is deemed reasonable.	NP	NR
480	Condition 4.1.1	Clause 24(4)	A distributor or transmitter must report the results of an investigation to the customer concerned.	4	Refer obligation 479.	NP	NR
481	Condition 4.1.1	Clause 25(2)	A distributor or transmitter must make available, at no cost, a copy of a document setting out its complaint handling processes to a small customer who makes an enquiry.	4	The audit confirmed the ERIA has a Utilities Complaints Procedure and Utilities Complaints Form. There were no complaints lodged or handled in this audit period.	A	1
482	Condition 4.1.1	Clause 25(3)	A document setting out a distributor's or transmitter's complaint handling process must contain the specified information.	4	The audit confirmed the ERIA has a Utilities Complaints Procedure that includes the specified information.	A	1

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
483	Condition 4.1.1	Clause 26(1) and (2)	A distributor or transmitter must arrange for an independent audit and report on its systems for monitoring, and its compliance with specific requirements. This is to be carried out in respect of the operation of such systems during each reporting period of 3 years or as specified by the ERA.	4	Through enquiry with RIA, the audit noted that the last internal independent audit and reporting on its systems for monitoring was conducted by Qualeng in 2020. No such internal independent audit was conducted by any third party for this audit period, although RIA have maintained their ERA compliance requirements. ***Recommendation 4/2026*** *a) The RIA should arrange for an independent audit as required by the Electricity Industry (Network Quality and Reliability of Supply) Code 2005 every 3 years.* b) *This obligation should be included in the CMS Compliance Register.*	C	2
483A	Condition 4.1.1	Clause 26(3) and (4)	A distributor or transmitter must publish the audit report not later than 1 October following the reporting period.	4	Refer obligation 483.	NP	NR
483B	Condition 4.1.1	Clause 26(5)	A distributor or transmitter must give a copy of its audit report to the Minister and the ERA not less than 7 days before it is published.	4	Refer obligation 483.	NP	NR
484	Condition 4.1.1	Clause 27(1)	A distributor or transmitter must annually prepare and publish a report about its performance in respect of each year ending on 30 June.	4	The audit confirmed the Annual performance Report, Network Quality and Reliability of Supply Performance Audit Reports for 2024/25. Publishing emails were produced to evidence the 2023/2024 publication on RIA website. The requirement and control for publishing this report on the specific date, is included in the 'License and Compliance Register', maintained by RIA.	A	1

No[4]	Licence Condition	Legislative Reference	Description	Audit Priority[5]	Systems, Processes, Controls in Place to Comply with Licence *(including any recommendations)*	Adequacy of Controls Rating[6]	Compliance Rating[7]
485	Condition 4.1.1	Clause 27(3)	A distributor or transmitter must give a copy of its report about its performance to the Minister and the ERA not less than 7 days before it is published.	4	The audit confirmed the Network Quality and Reliability of Supply Performance Audit Reports and the Annual Performance Reports for 2022/23 and 2023/24 and 2024/25 were provided to the ERA and the Minister at least 7 days before being published on the RIA website. The requirement and control for publishing this report on the specific date, has been included in the 'License and Compliance Register', maintained by RIA.	A	1

2.8 Audit Recommendations

Table of Current Audit Non- Compliances and Recommendations

A. Resolved during current audit period			
Recommendation (no./year)	**Non-Compliance/Controls Improvement** (Rating/Licence obligation ref. and obligation/Non-compliance or inadequacy of control)	**Date Resolved** (& management action taken)	**Auditor's Comments**
	Nil		

B. Unresolved at end of current audit period			
Recommendation (no./year)	**Non-Compliance/Controls Improvement** (Rating/Licence obligation ref. and obligation/Non-compliance or inadequacy of control)	**Auditor's Recommendation**	**Action taken by the licensee by end of audit period**
1/2026	**Service Standard Payments** **Rating: NP/2** (Adequacy of controls – Not performed/Compliance – Non-compliant (minor impact) *Obligation 280 - At least once a year, a retailer must provide a customer with written details of the retailer's and distributor's obligations to make payments to the customer under Part 14 or under any other written law, including the amount of the payment and the eligibility criteria for the payment.* There has been no communication issued to any customer regarding the customers eligibility for the Service Standard Payments. This will be included moving forward in the next tariff letter to each customer for the 2026-27 financial year. There has been only one complaint re metering and this was resolved with the customer.	As planned, customers should be provided with written details of the RIA's obligation to make Service Standard payments and the eligibility criteria, at least once a year.	

B. Unresolved at end of current audit period			
Recommendation (no./year)	**Non-Compliance/Controls Improvement** (Rating/Licence obligation ref. and obligation/Non-compliance or inadequacy of control)	**Auditor's Recommendation**	**Action taken by the licensee by end of audit period**
2/2026	**Metering Installation** **Rating: C2** (Adequacy of controls – Inadequate/Compliance – Non-compliant (minor impact)) *Obligation 342 - A network operator must ensure that each metering installation complies with at least the prescribed design requirements.* *Obligation 343 - 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.* *Obligation 349 - 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).* As noted in the previous audit and upon enquiry with RIA and PFM, the audit noted that there are several current transformer (CT) metering installations that are non-compliant with the prescribed design requirements due to the age of the installations. This has no effect on customers and is considered a minor non-compliance. PFM and RIA confirmed the non-compliant metering units are being replaced as part of the State Electrical Network Upgrade program. The project is progressing. However, the expected completion date has been extended to December 2027 on the basis that some meter replacement works have been delayed over the past year. The majority of meters will be replaced by December 2026 with only a few remaining to be replaced in 2027. There is a Metrology procedure as approved by the ERA.	As planned, the non-compliant CT metering units should be replaced as part of the State Electrical Network Upgrade Program by December 2027.	Ongoing

B. Unresolved at end of current audit period			
Recommendation (no./year)	**Non-Compliance/Controls Improvement** (Rating/Licence obligation ref. and obligation/Non-compliance or inadequacy of control)	**Auditor's Recommendation**	**Action taken by the licensee by end of audit period**
3/2026	**Wiring Diagrams** **Rating: B2** (Adequacy of controls – Adequate/Compliance – Non-compliant (minor impact)) *Obligation 345 - 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.* From review of documentation, the audit confirmed that PFM maintains drawings detailing metering installation of all meters at Rottnest Island, consistent with good electricity industry practice. An external independent body, Spring30 provides the drawings and sends them to RIA for approval. These drawings are maintained and updated in the Metrology Procedures - Meter Connection Types and Drawings document available online. However, the auditor observed during site visit that the wiring diagrams were not available within the switchboard for easy access by the maintenance crew, hence the performance was graded accordingly.	The RIA should maintain a printed copy of the wiring diagrams at the switchboards for easy reference.	Nil
4/2026	**Network Quality and Reliability of Supply (NQRS) Audit** **Rating: C2** (Adequacy of controls – Inadequate/Compliance – Non-compliant (minor impact)) *Obligation 483 – A distributor or transmitter must arrange for an independent audit and report on its systems for monitoring, and its compliance with specific requirements. This is to be carried out in respect of the operation of such systems during each reporting period of 3 years or as specified by the ERA.* Through enquiry with RIA, the audit noted that the last internal independent audit and reporting on its systems for monitoring was conducted by Qualeng in 2020. No such internal independent audit was conducted by any third party for this audit period, although RIA have maintained their ERA compliance requirements.	a) The RIA should arrange for an independent audit as required by the Electricity Industry *(Network Quality and Reliability of Supply) Code 2005* every 3 years. b) This obligation should be included in the CMS Compliance Register.	Nil

Quantum Assurance

Appendix A - Methodology

A1. Audit Approach

Our approach to meeting the requirements for the performance audit is set out below.

Audit Planning

- Conduct an initial meeting with the ERA to confirm the audit/review approach and timing for the audit (*not required).*
- Contact the licensee to gain an understanding of the business, relevant management plans and systems that may affect the risk assessment for planning purposes.
- Prepare a risk assessment including any specific factors or changes relevant to the licensee (in tabular form against each licence condition and asset management system component).
- Submit a draft **Audit Plan**, including the risk assessment and proposed approach, to the ERA for review and approval.
- Send a **Pre-Visit Checklist** of information and documentation to the licensee to enable staff to prepare for the visit (and where possible, send us information prior to the site visit).

Fieldwork

- Undertake a visit to the licensee and conduct various meetings with stakeholders, including corporate services and works/facilities management personnel, to determine the effectiveness of systems and procedures in place and to compare actual performance against the licence standards. The on-site visit on 11th May 2026 included our Director and Consulting Engineer. Other meetings were held remotely.
- Obtain copies of the latest asset management plans, performance reporting statistics and relevant correspondence between the licensee and the ERA for the audit period.
- The audit steps for the **Performance Audit** will include:
    - **analysis of documented procedures** to assess whether they are consistent with regulatory requirements or arrangements under the licence;
    - **review of systems and procedures** to assess whether they reflect compliance obligations and performance standards, including assessing and testing the following:
        - **control environment** – management's philosophy and operating style, organisational structure, assignment of authority and responsibilities, the use of internal audit, the use of information technology and the skills and experience of the key staff members;
        - **information system** – the appropriateness of the information systems to record the information needed to comply with the licence, accuracy of data, security of data, cyber security and documentation describing the information system;
        - **control procedures** – the presence of systems and procedures to monitor compliance with the licence or the effectiveness of the asset management system and to detect and correct non-compliance or under-performance;
        - **compliance attitude** - the action taken by the licensee in response to the previous audit/review recommendations, and an assessment of management's attitude towards compliance; and
        - **outcome compliance** – the actual performance against standards prescribed in the licence throughout the audit period.

- Update the risk assessment with any new information obtained in the course of the audit testing and, in instances of significant non-compliance, assess the licensee's plan to ensure compliance and recommend any further improvements to achieve compliance.

Audit Reporting

- Prior to the conclusion of the visit, the lead auditor will discuss any observations and recommendations with the licensee's management to confirm our understanding of the issues and to discuss the action to be taken.
- Provide a draft report to the ERA for review no later than two weeks before the final report is due and make any revisions necessary.
- Provide the updated draft report to the ERA for review and feedback prior to finalising the report.
- Issue the final report to the ERA.
- The ERA will arrange responses to the proposed actions in the Post Audit Implementation Plan.

A2. Key Documents Reviewed

Regulatory Compliance

• Energy Coordination Act 1994 • Electricity Industry Act 2004 • Electricity Industry (Metering Code) 2012 • Economic Regulation Authority (Licensing Funding) Regulations 2014 • Electricity Compliance Reporting Manual (January 2026 and previous version February 2023) • Electricity Integrated Regional Licence EIRL3 (Version 6)	• Operating Area Map (ERA-EL-076(A) • Performance Audit Report (July 2023) • Performance reporting datasheets to the ERA for 2022/23, 2023/24 and 2024/25 and acknowledgment of receipt • Compliance Reports to the ERA for 2022/23, 2023/24 and 2024/25 and acknowledgment of receipt • Information on fees paid to the ERA (amounts and dates paid)

Performance Audit

• Post Audit Implementation Plan (latest) • Network Quality and Reliability of Supply Independent Audit Report (latest) • 2022/23, 2023/24 and 2024/25 Electricity License Reporting Datasheets • 2022/23, 2023/24 and 2024/25 Electricity Licence Report Datasheets - Distribution • 2022/23, 2023/24 and 2024/25 Electricity Licence Reporting Datasheets NQR Code	• Email - RIA submission of 2023, 2024 and 2025 Annual Reporting and Performance Reporting under ERA integrated regional licence • Email from RIA re publishing of ERA Electrical Performance Reports • Fees paid to ERA for 2022/23, 2023/24 and 2024/25 (payment advice/s)
Contracts and Billing • Invoice Examples-Electricity Audit • Commercial Lease with included Standard Form Contract • Standard Form Contract Supply of Electricity (website) • List of Invoices sent to tenants on Rottnest Island (April 2023 to March 2026) • Utility, tariffs, fees & charges 2022/23, 2023/24 and 2024/25 • Estimation Electricity Invoice (example) • Estimation Electricity Statement (example)	***Metering*** • Rottnest Electrical Metrology Procedure • Meter Installation and Calibration Procedure • Meter Connection Types and Drawings • RIA Metering Standard Wiring • Electrical Metering Database - Rottnest Island • Electrical Power System Update • SAIDI figures • Meter Read Spreadsheet • Meter Readings Monthly Procedure • PFM meter replacement test sheet

• Final Electricity Bill (example) • Billing out of order (late bill) (example)	• Certificate of Conformance (Calibration Evidence) • ALL Meter Readings June 2024 • ALL Meter Readings Feb. 2026 • Evidence of when Meters were last replaced Meter Reading request (example)
Complaints • Utilities Customer Complaints Procedure • Utilities Customer Complaints Flowchart • Utilities Customer Complaints Form • Electrical Customer Complaints Reporting Register	***Compliance*** • Compliance Management System Manual Framework. • Compliance Management System Register. • Licence and Compliance Register • CMS - Example of calendar reminder. • CMS - Examples of quarterly email sent by Compliance.
Asset Management • Rottnest Island Management Plan (RIMP) • Rottnest Island Master Plan (latest) • Rottnest Multi Utility Asset Management Plan (MUAMP). • Strategic Asset Management Plan (SAMP). • Electrical Infrastructure Asset Management Plan (EIAMP).	• FUSS Service KPI Report – 2023/24, 2024/25 and YTD to March 2026 • Email Notification to Customers (example re outages) • Power Outages 2022/23 to 2025/26

A3. Key Contacts

The licensee's representatives participating in the audit were:

RIA

- Brigid Ward - Environment Officer (Compliance)
- Roger Petit – Manager Electrical & Fuel Infrastructure
- Martin Marerwa – Director Infrastructure.
- Luke Bennett - Commercial & Residential Property Accountant

Programmed Facility Management (PFM)

- Wayne Phillips - Island Operations Manager
- Jay Petterwood – Quality and Compliance Officer
- Andrew Bekker - Electrical Compliance Manager
- Clint McDonald – Electrical Supervisor (Rottnest Island)
- Pat Slevin - Electrical Leading Hand.

A4. Consultants

NAME AND POSITION	HOURS
Geoff White - Director	30
Susan Smith - Manager	50
Tanuja Sanders – Engineering Consultant	30
TOTAL	**110**

End of Report