



Report

2025 Performance Audit & Asset Management System Review – EGL26

Wind Portfolio Pty Ltd

09 October 2025

→ **The Power of Commitment**



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Executive summary

Wind Portfolio Pty Ltd (referred to hereafter as Wind Portfolio) is a subsidiary of APA Group Ltd (referred to hereafter as APA). Wind Portfolio holds a generation licence for Badgingarra Renewables Facility (BRF), which includes Badgingarra Wind Farm (BWF) and Badgingarra Solar Farm (BSF).

Changes to the business

Wind Portfolio's previous performance audit was conducted in 2020. There are no significant changes to the business since the previous audit.

Audit

GHD conducted an Electricity Generation Licence Performance Audit to assess Wind Portfolio's compliance with the conditions of their electricity generation licence EGL26 for the period from 1 July 2020 to 30 June 2025.

The objective of the audit was to assess compliance and the effectiveness of measures taken by the licensee, Wind Portfolio, to meet the conditions of their licence.

The audit was undertaken via documentation reviews and interviews with Wind Portfolio representatives. Additionally, GHD also conducted a site visit to Wind Portfolio's BRF site on 11 August 2025, visiting the BWF and BSF to review the assets and conduct face to face discussion with staff.

Response to recommendations from the previous report

In response to the recommendations from the previous audit report, Wind Portfolio Pty Ltd has:

- Improved the setup of its Vigilant system to allow for longer approval timeframes for key report outputs and in turn ensure reports are no longer published late, and fees to the ERA are paid on time.

Summary of findings and recommendations

This audit found no evidence of non-compliance during the audit period. For more detailed audit findings, please refer to Appendix A.

Control environment

The document reviews and interviews conducted for the audit indicate that Wind Portfolio, in general, have well-developed and governed controls in place to manage their licence obligations. These controls include APA Group wide policies and procedures relating to accounting and finance, operations & management, asset management and HSE.

Overall assessment of compliance

As detailed in the audit plan, this audit assessed 42 obligations for Wind Portfolio. Of the 42 assessed obligations:

- 20 had a control rating of A, and compliance rating of 1
- The remaining 22 had a control rating of N/P, and compliance rating of N/R

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

Review

GHD conducted an Asset Management System (AMS) Review to assess the effectiveness of Wind Portfolio's AMS.

The review interviews were conducted at the APA Perth office, with attendees joining either in person or online via MS Teams. Wind Portfolio was found to perform effectively against the criteria in the Guidelines, and GHD made no recommendations as no performance criteria were rated under the required threshold.

No recommendations were made in the previous AMS Review.

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

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1. Introduction

1.1 Context

Wind Portfolio is an energy generation company, a subsidiary of APA Group Ltd (referred to hereafter as APA). Wind portfolio is licenced to construct and operate generating works or operate existing generating works for the licence area shown in [6].

Wind Portfolio's licence number is EGL26.

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

The previous performance audit for licence EGL26 was conducted in 2020. The key changes since the previous audit are:

- In 2021, the BSF O&M contractor changed from UGL to Vestas

APA engaged GHD, as an independent auditor, to undertake a performance audit for the period **1 July 2020 to 30 June 2025**. The appointment of GHD to conduct the audit was approved by ERA [2].

This report presents the findings of the performance audit conducted on Wind Portfolio's electricity licence and the review completed on Wind Portfolio's asset management system. The report has been completed in accordance with the Audit Plan [4] (approved by ERA on 19 May 2025 [3]) and ERA's *2019 Audit and Review Guidelines: Electricity and Gas Licences* [5].

1.2 Purpose of this Report

The purpose of this report is to:

- Describe the scope and objectives of the audit
- Present the audit findings, including the:
 - Auditor's observations
 - Auditor's recommendations
 - Status of the recommendations from the previous audit
- Describe the scope and objectives of the review
- Present the review findings by:
 - Describing the Reviewer's observations and findings
 - Giving recommendations as required
 - Reviewing the status of recommendations from the previous review

1.3 Limitations

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

GHD otherwise disclaims responsibility to any person other than Wind Portfolio Pty Ltd arising in connection with this report. GHD also excludes implied warranties and conditions, to the extent legally permissible.

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

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

The opinions, conclusions and any recommendations in this report are based on assumptions made by GHD described in this report (including those listed in section 1.4 of this report). GHD disclaims liability arising from any of the assumptions being incorrect.

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

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

Accessibility of documents

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

1.4 Assumptions

The audit has been completed based on the following assumptions:

- APA representatives interviewed during the audit provided, to the best of their ability, an accurate picture of their knowledge and understanding of APA's operations and activities for the audit period
- The documents provided by APA are currently in use and/or are authentic samples

The review has been completed based on the following assumptions:

- APA representatives interviewed during the review provided, to the best of their ability, an accurate picture of their knowledge and understanding of APA's operations and activities for the audit period
- The documents provided by APA are currently in use and/or are authentic samples

2. Audit

2.1 Auditor's Statement

I confirm that the audit review carried for Wind Portfolio on 21 July 2025 – 19 August 2025 and recorded in this report is an accurate presentation of our findings and opinions.

Signature	
Date	7 October 2025
Lead Auditor	Stephen Kamarudin
Contact details	999 Hay Street Perth 6000 +61 8 6222 8937 stephen.kamarudin@ghd.com

2.2 Scope and Methodology

2.2.1 Objective

The objective of this audit is to assess the compliance and effectiveness of measures taken by the licensee, Wind Portfolio, to meet the conditions of their licence (EGL26).

2.2.2 Scope of Work

The scope of the audit is to perform a reasonable assurance engagement on Wind Portfolio Pty Ltd's compliance with the requirements of their electricity generation license EGL26 for the period **1 July 2020 to 30 June 2025**, in line with the ERA's 2019 Audit and Review Guidelines: Electricity and Gas Licences [5].

Wind Portfolio's previous compliance audit, completed in 2020, covered the period 23 June 2017 – 30 June 2020.

2.2.3 Approach

The audit was conducted using the approach defined in the audit plan and in line with ERA's 2019 Audit and Review Guidelines: Electricity and Gas Licences (ERA Guidelines), and is summarized as follows:

1. Review materials:
 - a. Review recommendations from previous audit
 - b. Review documentation and evaluate evidence provided by the licensee
2. Conduct audit:
 - a. Conduct interviews with relevant personal against each EGL26 obligation
 - b. Follow up with any additional requests for information or interviews
3. Audit reporting:
 - a. Prepare draft report summarizing key findings and recommendations from the audit
 - b. Submit draft report for review by the ERA

c. Address ERA's feedback and submit final audit report

Furthermore, in conducting this audit, special consideration was placed on audit obligations that were rated at a higher priority. All EGL26 license obligations were rated with a priority of 4 or 5, and hence only the audit procedures used for lower priority items as listed in Table 1 below.

Table 1 *Audit procedure for each audit priority*

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

2.2.4 Site Visits

In person interviews for the performance audit were conducted with Wind Portfolio's regulatory, operational and technical personnel on 21 July 2025.

GHD also conducted a site visit to Wind Portfolio's BRF site on 11 August 2025, visiting the BWF and BSF to review the assets and conduct face to face discussion with business staff.

2.2.5 Licensee Personnel

The Wind Portfolio Pty Ltd representatives who participated in the audit are listed in Table 2.

Table 2 *Licensee personnel – Performance Audit*

Title	Role	Interview date/s
Regulatory Compliance Manager	Primary contact, interviewee	21 July 2025
SGRE	Interviewee	21 July 2025
Operations Manager	Interviewee	21 July 2025
Asset Manager	Interviewee	21 July 2025
Senior Commercial Contracts Advisor	Interviewee	21 July 2025
Senior Electrical Engineer (High Voltage)	Interviewee	21 July 2025
Senior Management Accountant	Interviewee	21 July 2025
Operations Risk, Compliance & Assurance Analyst	Interviewee	21 July 2025

2.2.6 Documentation

The documentation and information sources examined during the audit are listed in Section 5, and include the licensee's annual reports, financial reports, compliance reports, O&M documents, APA Group policies and procedures, and more.

2.2.7 Work Schedule

The audit was undertaken over the period 21 July 2025 to 19 August 2025. The audit team members, the activities performed, and the hours used by each team member are shown in Table 3.

Table 3 *Work Schedule and Hours – Performance Audit*

Name	Role	Hours per activity	
		Conduct audit	Reporting
Stephen Kamarudin	Lead Auditor	8	10
Faye Yang	Auditor	8	40
Henry Le	Report Review	8	2
Marcel Oosthuizen	Report Approver	-	1

2.2.8 Deviations from the Audit Plan

There were no deviations from the audit plan required when conducting the audit.

2.3 Audit Findings

2.3.1 Performance Summary

Wind Portfolio's performance in meeting each applicable licence obligation, as assessed during the audit, is summarised in Table 6 which shows:

- The licence obligation reference number and obligation, as defined by the Electricity Compliance Reporting Manuals applicable during the auditing period ([7], [8], [9], [10] and [11])
- The audit priority, as defined in the Audit Plan using a scale of 1 (highest priority) to 5 (lowest priority)
- The controls and compliance ratings, which use the rating scales defined by the ERA Guidelines and shown in Table 4 and Table 5 below:
 - Compliance is not rated for obligations where Wind Portfolio did not perform the activity during the audit period
 - A control rating is required for licence obligations with an audit priority of 1 to 3 or if the obligation has been assessed as non-compliant

Licence obligations that were assessed as 'not applicable' in the Audit Plan have not been rated or included in the performance summary.

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

A further summary of Wind Portfolio's performance is provided in the form of a compliance and controls rating summary table in Table 7.

Table 4 Controls Rating Scale (Audits)

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

Table 5 Compliance Rating Scale (Audits)

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

Table 6 Audit Performance Summary

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

Licence obligation reference no.	Licence Obligation	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
124	Electricity Industry Act, section 11	4	✓					✓				
125	Electricity Industry Act, section 11	4					✓					✓
126	Electricity Industry Act, section 11	4	✓					✓				
Electricity Industry Metering Code – Licence conditions and obligations												
324	Electricity Industry Metering Code, clause 3.3B	4					✓					✓
339	Electricity Industry Metering Code, clause 3.11(3)	4	✓					✓				
371	Electricity Industry Metering Code, clause 4.4(1)	5	✓					✓				
372	Electricity Industry Metering Code, clause 4.5(1)	5					✓					✓
373	Electricity Industry Metering Code, clause 4.5(2)	4					✓					✓
388	Electricity Industry Metering Code, clause 5.4(2)	4					✓					✓
401	Electricity Industry Metering Code, clause 5.16	4					✓					✓
402	Electricity Industry Metering Code, clause 5.17(1)	5					✓					✓
405	Electricity Industry Metering Code, clause 5.18	4					✓					✓
406	Electricity Industry Metering Code, clause 5.19(1)	5					✓					✓
407	Electricity Industry Metering Code, clause 5.19(2)	5	✓					✓				
408	Electricity Industry Metering Code, clause 5.19(3)	5					✓					✓
410	Electricity Industry Metering Code, clause 5.19(6)	5					✓					✓
416	Electricity Industry Metering Code, clause 5.21(5)	4					✓					✓

Licence obligation reference no.	Licence Obligation	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
417	Electricity Industry Metering Code, clause 5.21(6)	4					✓					✓
435	Electricity Industry Metering Code, clause 5.27	5					✓					✓
448	Electricity Industry Metering Code, clause 6.1(2)	4	✓					✓				
451	Electricity Industry Metering Code, clause 7.2(1)	4	✓					✓				
453	Electricity Industry Metering Code, clause 7.2(4)	4	✓					✓				
454	Electricity Industry Metering Code, clause 7.2(5)	4	✓					✓				
455	Electricity Industry Metering Code, clause 7.5	4					✓					✓
456	Electricity Industry Metering Code, clause 7.6(1)	4					✓					✓
457	Electricity Industry Metering Code, clause 8.1(1)	5					✓					✓
458	Electricity Industry Metering Code, clause 8.1(2)	5					✓					✓
459	Electricity Industry Metering Code, clause 8.1(3)	5					✓					✓
460	Electricity Industry Metering Code, clause 8.1(4)	4					✓					✓
461	Electricity Industry Metering Code, clause 8.3(2)	5					✓					✓

Of the 42 assessed obligations:

- 20 had a control rating of A, and compliance rating of 1
- The remaining 22 had a control rating of N/P, and compliance rating of N/R

The compliance and controls rating of the performance audit is summarized more concisely in the table below.

Table 7 Audit Compliance and Controls Rating Summary

		Compliance rating					
		1	2	3	4	N/R	Total
Controls rating	A	20	-	-	-	-	20
	B	-	-	-	-	-	
	C	-	-	-	-	-	
	D	-	-	-	-	-	
	N/P	-	-	-	-	22	22
	Total	20				22	42

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

2.3.2 Recommendations from the Previous Audit

The previous audit found the licensee to breach obligations 105 and 124. The status of recommendations addressing non-compliances from the previous audit are addressed in the table below.

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

A: Resolved during current audit Period			
Recommendation reference (no./year):	License obligation number:	Date Resolved:	Further action required (Yes/No/Not applicable):
1/2020	105	2024-2025	No
	Controls and Compliance Rating: B3	The reason the previous audit failed to make payments in time was because payment dates had not been set up with enough lead times for approval/authorisation. However, this problem has now been rectified with dates being set up in Vigilant to allow for more sufficient timing.	Details of Further Action Required (Including Current Recommendation Reference, if Applicable): N/A
	Obligation description: A licensee must pay the prescribed licence fees to the ERA according to clauses 6, 7 and 8 of the Economic Regulation Authority (Licensing Funding) Regulations 2014.	The licensee has also provided an invoice reconciliation excel sheet which listed the invoice number, amount, description and payment number, as well as invoice and payment date to the ERA for the periods between 2021/2022 to 2023/2024. Examining this excel sheet sees that all payments are made to ERA within 30 days of the invoice being issued. The licensee has further provided the tax invoice for the annual EGL26 license payment to the ERA.	
	Details of inadequate controls or non-compliance: Standing Data Charges were paid outside the required payment terms on 2 occasions during the audit period.		

A: Resolved during current audit Period			
Recommendation reference (no./year): 2/2020	License obligation number: 124 Controls and Compliance Rating: B3 Obligation description: 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 Details of inadequate controls or non-compliance: Late submission of Annual Compliance Report 2017-2018 reporting year. Failure to submit standing data by due date.	Date Resolved: 2025 The Technical Regulatory Compliance document released by the licensee in 2025 lists out the KPIs required to meet ERA's regulatory obligations, and inspection periods. It describes the KPI name, KPI information and corresponding observations which would make the KPI green (good performance), amber (moderate performance) or red (bad performance). Furthermore, the causes for the non-compliance in the last audit period was due to insufficient lead times put in place to allow for approval/reviews from authorised personnel. As a safeguard for this non-compliance, Wind Portfolio's Vigilant system has been better set up to allow for longer approval timeframes for key report outputs and in turn ensure reports are no longer published late.	Further action required (Yes/No/Not applicable): No Details of Further Action Required (Including Current Recommendation Reference, if Applicable): N/A

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

B: Unresolved during current audit Period
N/A

2.3.3 Recommendations of Current audit

This audit found no evidence of non-compliance for obligations during the assessed audit period.

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

A: Resolved during current audit Period
N/A

Table 11 Status of recommendations addressing non-compliances from the current audit – unresolved

B: Unresolved during current audit Period
N/A

3. Review

3.1 Confirmation of the Review

I confirm that the AMS review carried for Wind Portfolio on 22 July 2025 – 15 August 2025 and recorded in this report is an accurate presentation of our findings and opinions.

Signature	
Date	24 September 2025
Lead Reviewer	p.p Henry Le (For and on behalf of Stuart Algera)
Contact details	999 Hay St Perth, 6000 +61 8 6222 8220

3.2 Scope and Methodology

3.2.1 Objectives

The objective of this limited assurance engagement review is to provide to the ERA an independent assessment of the effectiveness of Wind Portfolio's Asset Management System (AMS) in relation to EGL26 and provide recommendations to address any identified non-compliances.

3.2.2 Scope of Work

This review involves an assessment of the following key areas using a risk-based approach (similar to ISO31000:2009):

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

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

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

11. Capital expenditure planning
12. Review of AMS

3.2.3 Approach

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

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

3.2.4 Site Visits

GHD conducted a site visit to Wind Portfolio's BRF site on 11 August 2025, visiting the BWF and BSF to review the assets and conduct face to face discussion with business staff.

3.2.5 Licensee Personnel

The Wind Portfolio representatives who participated in the audit are listed in Table 12.

Table 12 Licensee Personnel – AMS Review

Title	Role	Interview date/s
Regulatory Compliance Manager	Primary contact, interviewee	22 July 2025
Asset Manager	Interviewee	22 July 2025
BRF Operations Manager	Interviewee	22 July 2025 11 August 2025
Senior Commercial Contracts Advisor	Interviewee	22 July 2025
Senior Management Accountant	Interviewee	22 July 2025
Operations Risk, Compliance & Assurance Analyst	Interviewee	22 July 2025
SGRE Service Operations Project Manager	Interviewee	22 July 2025
Representative for BWF Site Lead	Interviewee	11 August 2025
BSF Site Manager	Interviewee	22 July 2025 11 August 2025
Technical Specialist – O&M Contracted Services	Interviewee	11 August 2025
Security Risk & Assurance Manager	Interviewee	22 July 2025

3.2.6 Documentation

The documentation and information sources examined during the audit are listed in Section 5, and include the annual financial reports, the annual plans, and the AMS manual.

3.2.7 Work Schedule

The review was undertaken over the period 22 July 2025 to 15 August 2025. The review team members, the activities performed, and the hours used by each team member are shown in Table 13.

Table 13 Work Schedule and Hours – AMS Review

Name	Role	Hours per activity	
		Conduct audit	Reporting
Stuart Algera	Lead AMS Reviewer	8	10
Emily Singleton	AMS Review Support	8	40
Henry Le	Report Reviewer	-	2
Marcel Oosthuizen	Report Approver	-	1

3.2.8 Deviations from the Audit Plan

There was one deviation from the AMS review described in the Audit Plan submitted to the ERA:

- Personnel to be Interviewed: the BWF Site Lead was not available during the site visit, hence a representative attended instead.

3.3 Review Findings

3.3.1 Performance Summary

The AMS review assessed the effectiveness of Wind Portfolio's asset management system.

The review was conducted in accordance with the 2019 Audit and Review Guidelines, using the asset management adequacy and performance ratings as described in Table 14 and Table 15 respectively. A summary of outcomes of the review is provided in Table 16.

Table 14 *Process and Policy Rating Scale (Reviews)*

Rating	Description	Criteria
A	Adequately defined	Processes and policies are documented. Processes and policies adequately document the required performance of the assets. Processes and policies are subject to regular reviews and updated where necessary. The asset management information system(s) are adequate in relation to the assets being managed.
B	Requires some improvement	Processes and policies require improvement. Processes and policies do not adequately document the required performance of the assets. Reviews of processes and policies are not conducted regularly enough. The asset management information system(s) requires minor improvements (taking into consideration the assets being managed).
C	Requires significant improvement	Processes and policies are incomplete or require substantial improvement. Processes and policies do not document the required performance of the assets. Processes and policies are considerably out of date. The asset management information system(s) requires substantial improvements (taking into consideration the assets being managed).
D	Inadequate	Processes and policies are not documented. The asset management information system(s) is not fit for purpose (taking into consideration the assets being managed).

Table 15 *Performance Rating Scale (Reviews)*

Rating	Description	Criteria
1	Performing effectively	The performance of the process meets or exceeds the required levels of performance. Process effectiveness is regularly assessed, and corrective action taken where necessary.
2	Improvement required	The performance of the process requires some improvement to meet the required level. Process effectiveness reviews are not performed regularly enough. Recommended process improvements are not implemented.
3	Corrective action required	The performance of the process requires substantial improvement to meet the required level. Process effectiveness reviews are performed irregularly, or not at all. Recommended process improvements are not implemented
4	Serious action required	Process is not performed, or the performance is so poor the process is considered to be ineffective.

Table 16 *AMS Review Performance Summary*

AMS Component	Process and Policy Rating	Performance Rating
1. Asset Planning	A	1
Asset management plan covers the processes in this table	A	1
Planning processes and objectives reflect the needs of all stakeholders and are integrated with business planning	A	1
Service levels are defined in the asset management plan	A	1
Non-asset options (e.g. demand management) are considered	N/A	N/A
Lifecycle costs of owning and operating assets are assessed	A	1
Funding options are evaluated	A	1
Costs are justified and cost drivers identified	A	1
Likelihood and consequences of asset failure are predicted	A	1
Asset management plan is regularly reviewed and updated	A	1

AMS Component	Process and Policy Rating	Performance Rating
2. Asset creation and acquisition	A	1
Full project evaluations are undertaken for new assets, including comparative assessment of non-asset options	A	1
Evaluations include all life-cycle costs	A	1
Projects reflect sound engineering and business decisions	A	1
Commissioning tests are documented and completed	A	1
Ongoing legal / environmental / safety obligations of the asset owner are assigned and understood	A	1
3. Asset Disposal	A	1
Under-utilised and under-performing assets are identified as part of a regular systematic review process	A	1
The reasons for under-utilisation or poor performance are critically examined and corrective action or disposal undertaken	A	1
Disposal alternatives are evaluated	A	1
There is a replacement strategy for assets	A	1
4. Environmental Analysis	A	1
Opportunities and threats in the Asset Management System environment are assessed	A	1
Performance standards (availability of service, capacity, continuity, emergency response, etc.) are measured and achieved	A	1
Compliance with statutory and regulatory requirements	A	1
Service standard (customer service levels etc) are measured and achieved.	A	1
5. Asset operations	A	1
Operational policies and procedures are documented and linked to service levels required	A	1
Risk management is applied to prioritise operations tasks	A	1
Assets are documented in an asset register including asset type, location, material, plans of components, and an assessment of assets' physical/structural condition	A	1
Accounting data is documented for assets	A	1
Operational costs are measured and monitored	A	1
Staff resources are adequate and staff receive training commensurate with their responsibilities	A	1
6. Asset maintenance	A	1
Maintenance policies and procedures are documented and linked to service levels required	A	1
Regular inspections are undertaken of asset performance and condition	A	1
Maintenance plans (emergency, corrective, and preventative) are documented and completed on schedule	A	1
Failures are analysed and operational/maintenance plans adjusted where necessary	A	1
Risk management is applied to prioritise maintenance tasks	A	1
Maintenance costs are measured and monitored	A	1

AMS Component	Process and Policy Rating	Performance Rating
7. Asset management information system	A	1
Adequate system documentation for users and IT operators	A	1
Input controls include suitable verification and validation of data entered into the system	A	1
Security access controls appear adequate, such as passwords	A	1
Physical security access controls appear adequate	A	1
Data backup procedures appear adequate, and backups are tested	A	1
Computations for licensee performance reporting are accurate	A	1
Management reports appear adequate for the licensee to monitor licence obligations	A	1
Adequate measures to protect asset management data from unauthorised access	A	1
8. Risk management	A	1
Risk management policies and procedures exist and are applied to minimise internal and external risks	A	1
Risks are documented in a risk register and treatment plans are implemented and monitored	A	1
Probability and consequences of asset failure are regularly assessed	A	1
9. Contingency planning	A	1
Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks	A	1
10. Financial planning	A	1
The financial plan states the financial objectives and identifies strategies and actions to achieve those	A	1
The financial plan identifies the source of funds for capital expenditure and recurrent costs	A	1
The financial plan provides projections of operating statements (profit and loss) and statement of financial position (balance sheets)	A	1
The financial plan provides firm predictions on income for the next five years and reasonable predictions beyond this period	A	1
The financial plan provides for the operations and maintenance, administration and capital expenditure requirements of the services	A	1
Large variances in actual/budget income and expenses are identified and corrective action taken where necessary	A	1
11. Capital expenditure planning	A	1
There is a capital expenditure plan covering works to be undertaken, actions proposed, responsibilities and dates	A	1
The capital expenditure plan provides reasons for capital expenditure and timing of expenditure	A	1
The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan	A	1
There is an adequate process to ensure the capital expenditure plan is regularly updated and implemented	A	1

AMS Component	Process and Policy Rating	Performance Rating
12. Review of AMS	A	1
A review process is in place to ensure the asset management plan and the Asset Management System described in it remain current	A	1
Independent reviews (e.g. internal audit) are performed of the Asset Management System	A	1

3.4 Review Observations and Recommendations

3.4.1 Asset Management System Review

The AMS review conducted is in Table 17. As per the ERA guidelines, recommendations are only given to performance ratings of 3 and 4 or process and policy ratings of C and D.

Table 17 AMS Review Observations and Recommendations

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
1	Asset planning Asset planning strategies focuses on meeting customer needs in the most effective and efficient manner (delivering the right service at the right price).			A	1
1.1	Asset management plan covers the processes in this table	2	APA has evidenced an Asset Management Plan (AMP) which satisfied each of the applicable processes. See individual effectiveness criteria for detailed observations. Also presented is an Asset Management System (AMS) manual which serves to document APA's AMP and incorporate associated documentation by SGRE and Vestas.	A	1
1.2	Planning processes and objectives reflect the needs of all stakeholders and are integrated with business planning	4	APA has presented both an AMP for BRF and an Asset Strategy Plan for the wider WA Renewable Assets, which includes details of how their asset management planning strategy fits into the wider business planning. Also presented are annual plans for BRF which identify stakeholders and strategies to achieve stakeholder expectations.	A	1
1.3	Service levels are defined in the asset management plan	4	Service levels are separated into Administration Objectives under the responsibility of APA, and Operational Objectives under the responsibility of SGRE and Vestas for the BWF and BSF respectively. Targets and reporting methods are defined in the APA BRF annual plans.	A	1
1.4	Non-asset options (e.g. demand management) are considered	4	N/A Wind Portfolio has a long-term PPA with Alinta Energy which requires that all power and Large-Scale Renewable Generation Certificates generated by BRF be sold to Alinta Energy. There is no non-asset option for this asset.	N/A	N/A

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
1.5	Lifecycle costs of owning and operating assets are assessed	2	The life cycle costs, including provisions for decommissioning, are managed in accordance with the BRF financial management plan and APA's lifecycle planning procedure. An accounting system is made up the software platforms Adaptive Planning, and Workday are used to check the OPEX and CAPEX profiles against projected revenues and to value the asset over the asset's expected life. The WA Renewables Asset Strategy Plan covers the BRF as well as other APA facilities, and includes evidence of financial projections for multiple asset scenarios (base, upside, downside) out to 2045. More detailed budget planning is conducted annually, covering OPEX, CAPEX, asset refurbishment and renewals for a rolling 3-year period. APA provided documentation of the timetable for activities related to the FY25 budget & FY26 – FY27 forecast. Financial performance is tracked in monthly meetings, and the financial performance of the asset is assessed against budget targets using a variance to budget approach.	A	1
1.6	Funding options are evaluated	2	See item 1.5. Key costs of the asset are operation and maintenance costs rather than capital expenditure. These are set by long-term O&M contracts.	A	1
1.7	Costs are justified and cost drivers identified	2	The main costs are in operation and maintenance. Costs are justified with long term O&M contracts, and a long term PPA covering the sale of all generation. O&M contracts also outline performance incentives.	A	1
1.8	Likelihood and consequences of asset failure are predicted	4	APA holds liability for Balance of Plant assets, and risk of failure has been considered, documented in a risk assessment, as well as in the enterprise risk and compliance system Vigilant. O&M contracts cover maintenance requirements and asset failure risks for other BSF and BWF assets, where liability sits with site contractor.	A	1
1.9	Asset management plan is regularly reviewed and updated	2	AMP is reviewed every 3 years (previously every 5), or in the event of significant changes to assets or any O&M agreement. The current revision of the AMP is revision 3, dated 25 June 2025. Regular revisions conforming to the previous 5-year review period can be seen in its revision history.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
2	Asset creation and acquisition Asset creation/acquisition is the provision or improvement of assets			A	1
2.1	Full project evaluations are undertaken for new assets, including comparative assessment of non-asset options	2	APA provided project delivery and asset lifecycle planning procedure documentation outlining extensive project evaluation process. This is mainly carried out by the major projects group. BRF is operational and has had no major assets added during the audit period. The only asset addition during this period is the BSF Amenities Building, which is below the APA "Major Project" threshold. APA did provide evidence of documentation and decision-making process for this asset.	A	1
2.2	Evaluations include all life-cycle costs	2	See items 1.5 and 2.1	A	1
2.3	Projects reflect sound engineering and business decisions	2	See item 2.1 Project Delivery Framework and Asset Lifecycle Planning Procedure documents describe APA's approach to asset acquisition and associated projects. Documentation was provided for the small BSF Amenities Building asset acquired during the audit period, including an Installation Plan and IFC drawings, demonstrating sound engineering.	A	1
2.4	Commissioning tests are documented and completed	2	See items 2.1 and 2.3 Evidence of signed ITPs for BSF Amenities Building.	A	1
2.5	Ongoing legal / environmental / safety obligations of the asset owner are assigned and understood	2	Obligations are stored and monitored in the Vigilant system, including assigning an owner and linking controls. Screenshots of this system have been provided by APA.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
3	Asset disposal Asset disposal is the consideration of alternatives for the disposal of surplus, obsolete, under-performing or unserviceable assets.			A	1
3.1	Under-utilised and under-performing assets are identified as part of a regular systematic review process	4	Asset utilisation and performance is tracked in APA monthly O&M reports, including identification of specific assets which are underperforming or requiring unscheduled maintenance. Maintenance is the responsibility of O&M contractors SGRE & Vestas, who respectively use SAP and Salesforce maintenance systems to record, review, and dispatch maintenance activities as required based on the O&M contract and any additional purchase orders.	A	1
3.2	The reasons for under-utilisation or poor performance are critically examined and corrective action or disposal undertaken	4	See item 3.1 Where underperforming assets are identified, APA monthly O&M reports identify the causes of the performance issues, and list the subsequent implemented or planned maintenance actions to rectify them. Monthly meetings for both BWF and BSF track the backlog of maintenance activities in more detail.	A	1
3.3	Disposal alternatives are evaluated	2	Consideration of disposal has been made in the AMP, including site clearing of all above-ground works. To date, only small components of assets have required disposal, management of which is performed by O&M contractors.	A	1
3.4	There is a replacement strategy for assets	4	See item 3.3 O&M contractors are responsible for asset maintenance for BWF and BSF, including maintaining spare parts and replacement where necessary to maintain warranted availability levels. BOP does not have warranted availability under the O&M contracts but are also maintained by SGRE. Risks and associated controls including replacement for this equipment are identified in a Risk Assessment provided by APA, and any risks above moderate or requiring action are monitored in the Vigilant risk and compliance system.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
4	Environmental analysis Environmental analysis examines the Asset Management System environment and assesses all external factors affecting the Asset Management System.			A	1
4.1	Opportunities and threats in the Asset Management System environment are assessed	2	The asset strategy plan includes consideration of environmental changes. Risk analysis and management is demonstrated per items 8.1, 8.2 and 8.3. BRF has a long term PPA, and long-term O&M contracts which transfers some risks to the contractors.	A	1
4.2	Performance standards (availability of service, capacity, continuity, emergency response, etc.) are measured and achieved	2	The monthly reports track performance metrics such as safety, production, availability, compliance, and O&M contractor performance. O&M contracts have specific performance formulas and associated warranties. The AMP also includes an overview of key annual targets and performance. On average over the audit period the BSF met its irradiation target but was slightly under its production targets for energy output and availability, and the BWF met its availability and wind targets but was slightly under its target for energy output. Compliance and power quality standards were consistently met. The processes in place to manage performance standards are considered to be performing effectively.	A	1
4.3	Compliance with statutory and regulatory requirements	2	See item 2.5 A Compliance Management System (CMS) procedure is set out in the CMS Handbook provided by APA, detailing APA's approach to meeting compliance requirements. Compliance is monitored in Vigilant and Maximo systems; reportable incidents are raised in Vigilant, and operational incidents in Maximo. It is also summarised in monthly reports. APA provided exports of Vigilant and Maximo incident registers, as well as Compliance Plans for both BWF and BSF.	A	1
4.4	Service standard (customer service levels etc) are measured and achieved.	1	See item 4.2 The monthly and annual reports document customer service levels, including compliance with power supply Quality and Reliability requirements.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
5	Asset operations Asset operations is the day-to-day running of assets (where the asset is used for its intended purpose).			A	1
5.1	Operational policies and procedures are documented and linked to service levels required	4	The AMP provides an overview of the operation strategy for BRF. Operation is done by contractors under long-term O&M contracts. Service levels are warranted under these contracts. BRF annual plans give an overview of operations, including performance targets and expected operational expenditure.	A	1
5.2	Risk management is applied to prioritise operations tasks	2	See item 3.4 The AMP outlines the risk management approach for BRF. BWF and BSF risk management is contracted to SGRE and Vestas respectively under long-term O&M contracts. SGRE and Vestas both provide BRF annual O&M plans for their respective facilities which are incorporated into the BRF annual plan for BRF. Business and other risks not delegated to SGRE or Vestas are reviewed annually and included in the BRF annual plan. APA holds liability for the EBOP, and conducts annual risk assessments for these assets, including controls and contingency plans, which are included in the BRF annual plan. Any risks above moderate or requiring action are also entered into Vigilant for tracking.	A	1
5.3	Assets are documented in an asset register including asset type, location, material, plans of components, and an assessment of assets' physical/structural condition	2	SGRE maintains a register of BWF and EBOP assets, and Vestas maintains a register of BSF assets, as included in the AMP appendices. O&M contractors maintain live asset registers in their AMS. SGRE uses SAP for BWF assets, and Vestas uses salesforce for BSF assets.	A	1
5.4	Accounting data is documented for assets	4	The BWF/BSF Fixed Assets Register details the accounting data for each asset. Each asset is assigned its own depreciation rates and carrying value models.	A	1
5.5	Operational costs are measured and monitored	4	Operational costs are recorded in the BRF annual plans and the Adaptive Planning and Workday accounting system. They are mostly fixed by O&M contracts.	A	1
5.6	Staff resources are adequate and staff receive training commensurate with their responsibilities	2	It is a requirement of both O&M contracts that the contractors maintain adequate resources, and ensure their staff receive necessary training. An example of a site training matrix was provided by SGRE.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
6	Asset maintenance Asset maintenance is the upkeep of assets.			A	1
6.1	Maintenance policies and procedures are documented and linked to service levels required	4	The AMP provides an overview of the maintenance strategy for BRF. Maintenance is done by contractors under long-term O&M contracts. Service levels are warranted under these contracts. BRF annual plans give an overview of scheduled maintenance, and monthly reports provide details on maintenance and performance.	A	1
6.2	Regular inspections are undertaken of asset performance and condition	2	Routine inspections are scheduled, tracked and managed in by O&M contractors SGRE and Vestas. They have their own interface to input data on asset performance and condition. The BRF monthly reports and annual plans include an overview of scheduled maintenance tasks including regular inspections.	A	1
6.3	Maintenance plans (emergency, corrective, and preventative) are documented and completed on schedule	2	See item 6.2 O&M contractors have their own systems for scheduling and documenting maintenance activities; SGRE uses SAP and Vestas uses Salesforce. As discussed in item 4.2, monthly and annual reports also track maintenance tasks. A more detailed breakdown is documented in monthly O&M meeting notes.	A	1
6.4	Failures are analysed and operational / maintenance plans adjusted where necessary	2	See item 6.3 Monthly BRF reports include details of equipment failures and remedial actions. O&M contractor provides investigation report; for some incidents APA investigation and report is also triggered. During audit period, there was an arc flash incident with some BWF WTGs; recommendations and opportunities for improvement from an APA investigation report into this incident were provided. A new cleaning process was incorporated into the annual service checklist as a result.	A	1
6.5	Risk management is applied to prioritise maintenance tasks	4	See item 5.2	A	1
6.6	Maintenance costs are measured and monitored	3	Maintenance costs are included in O&M contracts; any additional costs are monitored as part of monthly meetings and in the Adaptive Planning and Workday accounting system.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
7	Asset management information system An asset management information system is a combination of processes, data and software supporting the asset management functions.			A	1
7.1	Adequate system documentation for users and IT operators	2	IT systems for BWF and BSF asset management are the responsibility of SGRE and Vestas respectively under the long-term O&M contracts. BRF AMP outlines overview of contractor IT systems, including requirement for documentation. There is evidence of contractor training for IT systems, and contractor staff demonstrated familiarity with systems. APA provided documentation of APA IT policies.	A	1
7.2	Input controls include suitable verification and validation of data entered into the system	2	Data acquisition for SCADA IT systems is automated, with 24/7 monitoring by O&M contractors. Per O&M contracts and BRF AMS manual, all access to IT systems is via authorised computer terminals and requires a valid account with password and 2FA. Authorised APA personnel have read-only access to SGRE SCADA and Forecasting systems, and the BSF SCADA system. Data from SCADA systems is used to reconcile tariff metering, which is maintained by external parties.	A	1
7.3	Security access controls appear adequate, such as passwords	2	All users require a valid account, current password and 2FA to access asset IT systems. Access is limited based on requirement as described in item 7.2. APA policies for acceptable use of technology and password requirements have been provided.	A	1
7.4	Physical security access controls appear adequate	2	Facility gates and buildings are locked when not supervised; substation is equipped with an intruder alarm. Evidence of unattended areas being locked was observed during GHD's site visit. BWF has a swipe-on system, and visitors to site are required to sign in. WTG access doors are kept locked. Monitoring stations require user login to access, as do contractor devices. Landowners also maintain communications with operators and have advised of potential breaches in the past.	A	1
7.5	Data backup procedures appear adequate, and backups are tested	3	APA's Service Continuity Management Standard describes APA's policy requirements for data backups, including testing. O&M contractors are responsible for maintaining their own backups of their systems in compliance with APA policy.	A	1
7.6	Computations for licensee performance reporting are accurate	4	Monthly reports contained detailed performance data provided from O&M contractor SCADA systems. SCADA system data is cross-checked with Western Power metering data.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
7.7	Management reports appear adequate for the licensee to monitor licence obligations	4	Monthly reports contain detailed information regarding performance requirements needed to monitor obligations. APA uses Vigilant compliance and risk monitoring system to monitor licence obligations, which includes a compliance plan for each asset and alerts for actions. O&M contracts include provisions for notification of APA in case of exceptional incidents.	A	1
7.8	Adequate measures to protect asset management data from unauthorised access	4	See items 7.3 and 7.4.	A	1
8	Risk management Risk management involves the identification of risks and their management within an acceptable level of risk.			A	1
8.1	Risk management policies and procedures exist and are applied to minimise internal and external risks	2	See items 1.8, 5.2 and 6.5 APA has also provided documentation of their risk management process, including a Risk Management Policy, Risk Management System Procedures, and Risk Appetite Statements. As per the AMS manual, BWF and BSF site risk management is the responsibility of SGRE and Vestas respectively.	A	1
8.2	Risks are documented in a risk register and treatment plans are implemented and monitored	2	See item 8.1 Risks are documented in an annual risk assessment document provided by APA, as well as being entered into the Vigilant system for monitoring if they are above moderate or require action. An export of the Vigilant risk register has been provided by APA. An operational dashboard shows risks needing review or action.	A	1
8.3	Probability and consequences of asset failure are regularly assessed	4	See items 8.1 and 8.2 APA conducts an annual risk assessment workshop for BRF, which is included in the BRF annual report appendices. Ratings and risk appetite are standard across APA as set out in their policy documents. Risks above moderate or requiring action are entered into Vigilant for active monitoring.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
9	Contingency planning Contingency plans document the steps to deal with the unexpected failure of an asset.			A	1
9.1	Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks	2	Emergency response plans are the responsibility of facility O&M contractors; evidence of these plans has been provided by both SGRE and Vestas. APA has also provided their business continuity management process.	A	1
10	Financial planning Financial brings together the financial elements of the service delivery to ensure its financial viability over the long term.			A	1
10.1	The financial plan states the financial objectives and identifies strategies and actions to achieve those	5	The BRF AMS manual outlines the financial plan, including financial objectives and overall financial management strategy. Annual plans include detailed objectives and strategies for the year. The asset strategic plan also includes further detail about lifecycle financial models and associated strategies. Adaptive Planning and Workday accounting system is used to track specific accounting data and plans for the asset.	A	1
10.2	The financial plan identifies the source of funds for capital expenditure and recurrent costs	4	Funding is performed at the company level. Planning for allocation of funds to the asset is integrated into the wider APA financial planning as outlined in the BRF financial plan. Budget planning is conducted annually, in which expenditure is planned for a rolling 3-year period. The main cost of the asset is recurrent costs of O&M, mainly fixed by long-term O&M contracts.	A	1
10.3	The financial plan provides projections of operating statements (profit and loss) and statement of financial position (balance sheets)	4	See item 10.2 The live financial plan is maintained in the Adaptive Planning and Workday accounting system. Relevant data is also summarised in the BRF annual plans, including projections for the coming year and summary of the previous year's data. Annual APA Group financial statements are released publicly and detail overall company financial position.	A	1
10.4	The financial plan provides firm predictions on income for the next five years and reasonable predictions beyond this period	4	See item 10.3 BRF has a PPA in place accounting for all generated energy and large-scale generation certificates until 2039. The financial plan forecasts revenue out until the end of this contract.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
10.5	The financial plan provides for the operations and maintenance, administration and capital expenditure requirements of the services	4	Expenses are mainly fixed by long-term O&M contracts; they are maintained in the live Adaptive Planning and Workday system financial plan, and an annual projection is detailed in BRF annual plans.	A	1
10.6	Large variances in actual/budget income and expenses are identified and corrective action taken where necessary	2	Per BRF AMS manual, asset financial performance is assessed against budget targets using a variance to budget approach. Income and expenses are reforecast every six months minimum, or in the event of significant changes to asset or asset operation.	A	1
11	Capital expenditure planning The capital expenditure plan provides a schedule of new works, rehabilitation and replacement works, together with estimated annual expenditure for these works over the next five or more years.			A	1
11.1	There is a capital expenditure plan covering works to be undertaken, actions proposed, responsibilities and dates	2	See item 10.1 and 10.4 Capital expenditure is planned and monitored in the Adaptive Planning and Workday accounting system. The BRF annual plans include capital expenditure plans for BWF and BSF, covering works, cost, and schedule. These are typically minimal compared to operational costs. Detailed actions are tracked and responsibility assigned in monthly O&M meetings.	A	1
11.2	The capital expenditure plan provides reasons for capital expenditure and timing of expenditure	4	See item 11.1 All capital spending requires a purchase order be raised in Adaptive Planning and Workday accounting system, requiring justification and approval to proceed.	A	1
11.3	The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan	4	See item 11.1 As expected at this stage in its lifecycle, capital expenses for the asset are low relative to operational expenses.	A	1
11.4	There is an adequate process to ensure the capital expenditure plan is regularly updated and implemented	2	See items 10.2 and 11.1 The AMS manual describes the budget review process, and BRF annual plans demonstrate yearly updating of the capital expenditure plan.	A	1

No.	AMS Effectiveness Criteria	Review Priority	Observations and Recommendations	Process and Policy Rating	Performance Rating
12	Review of AMS The Asset Management System is regularly reviewed and updated.			A	1
12.1	A review process is in place to ensure the asset management plan and the Asset Management System described in it remain current	1	See 1.9	A	1
12.2	Independent reviews (e.g. internal audit) are performed of the Asset Management System	2	See 1.9 The AMP revision history shows regular revisions conforming to the previous 5-year review period. O&M contracts have a compliance audit provision; APA has not undertaken any such audit to date but has plans to complete one.	A	1

4. Terms and Abbreviations

AASBS	Australian Accounting Standards Board Standards
AMS	Asset Management System
APA	APA Group Ltd, ABN: 99 091 344 704
EGL26	Wind Portfolio Pty Ltd's Licence Number
ERA	Economic Regulation Authority
ERA Guidelines	Reference [5]
GHD	GHD Pty Ltd, ABN: 39 008 488 373
MS Teams	Microsoft Teams, business communication software
MWh	Megawatt hour
N/P	(Controls rating) not performed, refer to Table 4 on Page 6
N/A	(Compliance) not applicable, refer to Table 5 on Page 6
PPA	Power Purchase Agreement
Wind Portfolio	Wind Portfolio Pty Ltd, ABN: 84 114 267 695
WA	Western Australia
Western Power	Electricity Networks Corporation, ABN 18 540 492 861
WTG	Wind Turbine Generator

5. References and Audit Documentation

References

- [1] Legislation WA 2020, *Electricity Industry Act 2004*, ver. 03-e0-00 as at 15/08/25, Perth (available at www.legislation.wa.gov.au).
- [2] Letter from Sara O'Connor (ERA) to Anna Priya (APA Group), *Approval of auditor – 2025 performance audits and asset management system reviews*, 19 May 2025.
- [3] Letter from Noel Vassallo (ERA) to Anna Priya (APA Group), *Approval of audit plan – 2025 performance audit*, sent by email 28 July 2025.
- [4] GHD 2025, EGL26 – Badgingarra Wind and Solar Farm: *Audit Plan*, rev. 0, GHD, Perth.
- [5] Economic Regulation Authority 2022, *2019 Audit and Review Guidelines: Electricity and Gas Licences*, Economic Regulation Authority, Perth.
- [6] Economic Regulation Authority, *ELECTRICITY INDUSTRY ACT 2004: BADGINGARRA WIND FARM GENERATION: LICENSEE: Wind Portfolio Pty Ltd* (plan number ERA-EL-146), Economic Regulation Authority, Perth [uncontrolled/unsigned copy, dated 2017]
- [7] Economic Regulation Authority 2020, *Electricity Compliance Reporting Manual: Electricity Industry Act 2004: June 2020* (D214851), Economic Regulation Authority, Perth
- [8] Economic Regulation Authority 2022, *Electricity Compliance Reporting Manual: Electricity Industry Act 2004: 7 February 2022* (D242791), Economic Regulation Authority, Perth.
- [9] Economic Regulation Authority 2023a, *Electricity Compliance Reporting Manual: Electricity Industry Act 2004: 03 January 2023* (D242791), Economic Regulation Authority, Perth.
- [10] Economic Regulation Authority 2023b, *Electricity Compliance Reporting Manual: Electricity Industry Act 2004: 20 February 2023* (D257714), Economic Regulation Authority, Perth.
- [11] Economic Regulation Authority 2023c, *Electricity Compliance Reporting Manual: Electricity Industry Act 2004: 14 March 2023* (D257714), Economic Regulation Authority, Perth

Audit documentation and information sources

Table 18 Performance Audit and AMS Review Reference Documents

Doc #	Document Title	Description
1	OPS-MAN-AM-800	Asset Management System manual for BRF
2	WA Renewables Asset Strategic Management Plan (2)_Redacted	Asset strategy plan for APA's WA Renewables Assets
3	BWF OM Contract	O&M contract with SGRE for BWF
4	APA.WA.OM.959 BSF OM Contract Vestas 2021 Final Executed	O&M contract with Vestas for BSF
5.1	33140301R0 - BRF Year Plan 2024-25	Annual plan for BRF for FY25
5.2	33120302R2 BRF Year Plan	Annual plan for BRF for FY24
5.3	33110301R1 BRF Year Plan	Annual plan for BRF for FY22
5.4	33100303R0 BRF Year Plan 2020-2021	Annual plan for BRF for FY21
6.1	BRF OM Report - July 2023 to June 2024	Annual report for BRF for FY24
6.2	BRF OM Report - July 2022 to June 2023	Annual report for BRF for FY23
6.3	BRF OM Report - July 2021 to June 2022	Annual report for BRF for FY22
7.1	BRF OM Report - May 2025	Monthly report for BRF for May 2025

Doc #	Document Title	Description
7.2	BRF OM Report - April 2025	Monthly report for BRF for Apr 2025
7.3	BRF OM Report - March 2025	Monthly report for BRF for Mar 2025
7.4	BRF OM Report - February 2025	Monthly report for BRF for Feb 2025
7.5	BRF OM Report - January 2025	Monthly report for BRF for Jan 2025
7.6	BRF OM Report - December 2024	Monthly report for BRF for Dec 2024
7.7	BRF OM Report - November 2024	Monthly report for BRF for Nov 2024
7.8	BRF OM Report - October 2024	Monthly report for BRF for Oct 2024
7.9	BRF OM Report - September 2024	Monthly report for BRF for Sep 2024
7.10	BRF OM Report - August 2024	Monthly report for BRF for Aug 2024
7.11	BRF OM Report - July 2024	Monthly report for BRF for Jul 2024
7.12	BRF OM Report - June 2024	Monthly report for BRF for Jun 2024
7.13	BRF OM Report - May 2024	Monthly report for BRF for May 2024
7.14	BRF OM Report - April 2024	Monthly report for BRF for Apr 2024
7.15	BRF OM Report - March 2024	Monthly report for BRF for Mar 2024
7.16	BRF OM Report - February 2024	Monthly report for BRF for Feb 2024
7.17	BRF OM Report - January 2024	Monthly report for BRF for Jan 2024
8	Power Performance Report Extract	Screenshot of Power Performance Report in OBI system
9	2025-06-19 BWF Monthly Meeting	Meeting Minutes for BWF monthly O&M meeting - example
10	2025-06-18 EDSF BSF Monthly Meeting	Meeting Minutes for BSF monthly O&M meeting - example
11.1	BRF - EBOP Critical Plant RA - Workshop 17 March 2025 Rev 0	Risk assessment for BRF 2025
11.2	BRF Risk Assessment - 26 July 2024	Risk assessment for BRF 2024
12	Risk Register - BRF	Export of Vigilant risks for BRF
13.1	Vigilant - Tracking & Monitoring of Prescribed fees	Screenshots from Vigilant system
13.2	Vigilant - Tracking of Annual Compliance Reports (2)	Screenshots from Vigilant system
14	BADGINGARRA - BREACHES _ INCIDENTS RECORDED IN VIGILANT	Export of Vigilant breaches and incidents for BRF
15	Incident dump Maximo 22_25	Export of Maximo incidents for BRF
16	Badgingarra Solar Farm Compliance Plan	Compliance plan for BSF
17	Badgingarra Wind Farm Compliance Plan	Compliance plan for BWF
18	Operational Performance Dashboard (BRF) Screenshots	Screenshots from Operational Performance Dashboard for BRF
19	APA 1H25 Interim Results	Financial Statement for APA Group Pty for FY25 first half
20.1	APA Annual Report FY24	Financial Statement for APA Group Pty for FY24
20.2	APA Annual Report FY23	Financial Statement for APA Group Pty for FY23
20.3	APA Annual Report FY22	Financial Statement for APA Group Pty for FY22
20.4	APA Annual Report FY21	Financial Statement for APA Group Pty for FY21
21.1	BSF Financials FY25 (WD)	Financial record for BSF for FY25
21.2	BSF Financials FY24 (WD)	Financial record for BSF for FY24

Doc #	Document Title	Description
21.3	BSF Financials FY23 (HP)	Financial record for BSF for FY23
21.4	BSF Financials FY22 (HP)	Financial record for BSF for FY22
21.5	BSF Financials FY21 (HP)	Financial record for BSF for FY21
22.1	BWF Financials FY25 (WD)	Financial record for BWF for FY25
22.2	BWF Financials FY24 (WD)	Financial record for BWF for FY24
22.3	BWF Financials FY23 (HP)	Financial record for BWF for FY23
22.4	BWF Financials FY22 (HP)	Financial record for BWF for FY22
22.5	BWF Financials FY21 (HP)	Financial record for BWF for FY21
23	BWF_BSF Fixed Assets Register	Asset register for BRF for accounting data
24	FY25 Budget_FY26-FY27 Forecast Timetable	Timetable for budget forecast for BRF for FY25 to FY27
25	21105-PL-A-0001	Installation plan for BSF Amenities Building
26	21105_Presentation Standalone Solar Power System	Presentation of solar option for BSF Amenities Building
27.1	BGN.1255-DWG-C-0032.01_2_1APA	IFC drawing for BSF Amenities Building
27.2	BGN.1255-DWG-C-0033.01_2_1APA	IFC drawing for BSF Amenities Building
27.3	BGN.1255-DWG-C-0034.01_2_1APA	IFC drawing for BSF Amenities Building
27.4	BGN.1255-DWG-C-0035.01_2_1APA	IFC drawing for BSF Amenities Building
27.5	BGN.1255-DWG-C-0037.01_2_1APA	IFC drawing for BSF Amenities Building
27.6	BGN.1255-DWG-E-0082.01_2_1APA (1)	IFC drawing for BSF Amenities Building
28	4061403 APA ITP	ITP for BSF Amenities Building
29	Acceptable Use of Technology Standard	APA Policy/Procedure - Acceptable use of technology
30	Asset Life-cycle Planning Procedure V5.2	APA Policy/Procedure - Asset Lifecycle Planning
31	Asset Management Planning v2.0 2025-04.docx	APA Policy/Procedure - Asset Management Planning
32	Operations Business Continuity Procedure	APA Policy/Procedure - Business continuity
33	APA Group Procedure - Compliance Management System Handbook (3).pdf	APA Policy/Procedure - Compliance Management System handbook
34	APA Policy - Enterprise Resilience	APA Policy/Procedure - Enterprise resilience
35	2.6 Financial Performance v1.1 2025-06	APA Policy/Procedure - Financial performance
36	2.4b - Project Delivery Framework	APA Policy/Procedure - Project Delivery
37	Physical Access Management Standard	APA Policy/Procedure - Physical access management
38	Risk Appetite Statements - Approved FY 25 - without measures	APA Policy/Procedure - Risk appetite
39	1.1 Operations Risk & Opportunities	APA Policy/Procedure - Risk and opportunities
40	APA Policy - Risk Management	APA Policy/Procedure - Risk management
41	APA Group Procedures – Risk Management System Processes	APA Policy/Procedure - Risk management system processes
42	Service Continuity Management Standard	APA Policy/Procedure - Service continuity management
43	Creating Strong Passwords FAQs	APA Policy/Procedure - Passwords
44	2022 06 27 APA Risk Library and Target Risk Tool v1.4	APA Policy/Procedure - Risk target tool
45.1	2024-2025 Annual Operating and Maintenance Plan BWF (1)	Annual plan for BWF for FY25 (SGRE)

Doc #	Document Title	Description
45.2	2022-2023 Annual Operating and Maintenance Plan BWF Rev 1 (1)	Annual plan for BWF for FY23 (SGRE)
45.3	2021-2022 Annual Operating and Maintenance Plan BWF V1.0 (1)	Annual plan for BWF for FY22 (SGRE)
45.4	2020-2021 Annual Operating and Maintenance Plan BWF V1.0	Annual plan for BWF for FY21 (SGRE)
46	PRO-31716 Ap3 Emergency Response Plan Badgingarra	Emergency Response Plan for BWF (SGRE)
47	SGRE Internal Audit - Emergency Response Requirements and Equipment - Badgingarra - Rev 1.0	Emergency Response Plan for BWF internal audit (SGRE)
48	INS-19676.Ap1.en - BU SE HSE Plans Onshore - Badgingarra - Rev2.3 290722 (BWP initialled)	HSE Plan for BWF (SGRE)
49	SGRE Site Training Matrix - Badgingarra - 2023	Training matrix for BWF (SGRE)
50	2024_25-BSF - Annual Plan (Rev. 1) (1)	Annual plan for BSF for FY25 (Vestas)
51	ANZ Badgingarra Emergency Response Plan (v4)	Emergency Response Plan for BSF (Vestas)
52	BRF Preliminary Report - January 2024	Correspondence discussing BRF 2024 arc flash incident investigation outcomes
53	Notice---2020-audit-and-review---Wind-Portfolio-Pty-Ltd---EGL026	Notice of Wind Portfolio's 2020 Audit and Review
54	ATTENDEE LIST	List of attendees for interviews
55	Licence invoice recon.xlsx	List of license payments to the ERA
56	Annual licence payment 2025 - Workday.jpg	Screenshot of annual license payment for 2025
57	O&M Meeting Notes 2021-25.zip	Meeting notes from 2021 - 25
58	202506 BRF Lease_RCTI-A D Panizza Jun 2025	Lease document 1
59	202506 BRF Lease_RCTI-Deutscher Jun 2025.pdf	Lease document 2
60	202506 BRF Lease_RCTI-P Panizza Jun 2025.pdf	Lease document 3
61	202506 BRF Lease_RCTI-P Sudholz Jun 2025.pdf	Lease document 4
62	202506 BRF Lease_RCTI-R D Sudholz Jun 2025.pdf	Lease document 5
63	202506 BRF Lease_RCTI-Rural Jun 2025.pdf	Lease document 6
64	APA Policy – Accounting.pdf	APA's Accounting policy
65	_EXT__RE_ Auditor Nomination - 2025 audit and review.msg	Auditor's nomination for the 2025 Audit and Review
66	BRF Compliance Report - FY2022.pdf	BRF's FY2022 Compliance Report
67	BRF Compliance Report - FY2023.pdf	BRF's FY2023 Compliance Report
68	Compliance Report - EGL26 2024.pdf	Compliance Report for EGL26 2024
69	5.3 Technical Regulatory Compliance v3.0 2025-05.docx.pdf	KPI ratings for Technical Regulatory Compliance for 2025
70	_EXT__Contact update - 2025 audit and review - EIRL007 & EGL026_.msg	Contact update email for 2025 audit and review
71	_EXT__Commencement of 2025 audit and review EGL26 - Wind Portfolio Pty Ltd_.msg	Email for EGL26 audit and review commencement
72	_EXT__RE_ Change of Primary Contact - Emu Downs and Badgingarra.msg	Email for change of primary contact for Emu Downs and Badgingarra

Doc #	Document Title	Description
73	_EXT_ Reminder from the ERA - Submission of 2023_24 annual compliance reports.msg	Reminder from the ERA for the submission of the 2023 – 24 annual compliance reports
74	Fw_ BRF - Badgingarra WF Contact Details Update for WP Operating Protocol.msg	Email for change in contact for WP's operating protocol
75	1 BRF Graphs - SCADA Energy.xlsb	Excel workbook containing SCADA energy
76	3 BRF Metering May 2025.xlsx	Excel sheet containing metering data for May 2025
77	Metering data - SCADA Cross Check Example.pdf	Screenshot for example of SCADA data crosscheck
78	Fw_ Certificate of compliance.msg	Email for certificate of compliance
79	CoC information.docx	NMI and site addresses for Badgingarra
80	CCM screenshots.docx	Screenshot for contracts management system of APA
81	APA Group Standard - Customer and Commercial Contracting.pdf	APA Group standard for customer and commercial contracting
82	BADGINGARRA - BREACHES _ INCIDENTS RECORDED IN VIGILANT.xlsx	Badgingarra breaches and incidents recorded in Vigilant
83	2024 Monthly Reports.zip	Zip folder for monthly reports provided by APA
84	O&M Meeting Notes 2021-25.zip	Zip folder for Operational and Management meeting notes from 2021 - 25
85	New regulatory compliance contact for WA power assets.msg	Email exchange for new regulatory compliance contract for WA Power assets
86	APA Group Procedure - Ring Fencing.pdf	APA Group Procedure for protecting confidential information
87	EXT RE EXTERNAL RE Missing Meter Data Emu Downs Wind Farm (EDWF) Badgingarra Wind Farm (Wind Portfolio).msg	Email detailing missing metering data from ERA
88	EXT RE EXTERNAL Urgent Request Missing Badgingarra Meter Data Aug.msg	Second email detailing missing metering data from ERA
89	EXT RE No Reports in Portal.msg	Email from Wind Portfolio to WP asking about missing meter data reports
90	2022.02.08 Badgingarra Operational Incident Response.pdf –	Badgingarra Operational Incident Response detailing root cause, immediate actions and mitigation strategies
91	Re_ BRF - Badgingarra WF contact details.eml	Email detailing Badgingarra contact details update following incident
92	[EXT]_ RE_ [EXTERNAL] RE_ Badgingarra WF contact details.eml	Email detailing Badgingarra contact details update following incident followup

Appendices

Appendix A

Performance Audit

Table 19 Performance Audit Observations and Recommendations

Compliance Manual No	Obligation under Licence condition	Description	Type (1, 2, 3 or NR)	Audit Priority (1=high est, 5=lowest)	Control rating						Compliance rating					
					A	B	C	D	N/P	Control observation	1	2	3	4	N/R	Compliance observation
101	Electricity Industry Act, section 13(1)	A licensee must provide the ERA with a performance audit conducted by an independent expert acceptable to the ERA, not less than once every 24 months (or any longer period that the ERA allows).	2	4	✓					The licensee has a regulatory & compliance management system Vigilant which keeps tracks of compliance and performance reports. This system assigns an obligation owner, priority level, level of required control, obligation status, certification status, due date, amongst other tags. Hence, this obligation is well controlled. Documents/Evidence: Vigilant - Tracking of Annual Compliance Reports.docx	✓					The licensee's last audit was performed by Geographe Environmental Services in October 2020 and appears on ERA's webpages. The previous audit covers the period 23 June 2017 to 30 June 2020. On 3 February 2021, the ERA issued a notice to the licensee notifying that the findings from the previous audit indicates that 'Wind Portfolio has achieved a high level of compliance with its licence and has an effective asset management system'. Hence ERA had decided to increase the audit and review period from 36 months to 60 months, where the next audit and review will cover the period 1 July 2020 to 30 June 2025, with the report due by 30 September 2025. The timing of this audit fulfills ERA's required timelines. Hence, this obligation has been rated as compliant. Documents/Evidence: Notice---2020-audit-and-review---Wind-Portfolio-Pty-Ltd---EGL026 (1).pdf
102	Electricity Industry Act, section 14(1)(a)	A licensee must provide for an asset management system.	2	4	✓					On top of the BRF asset management system manual which describes its system in accordance with ERA's requirements, the licensee also has an asset life-cycle planning procedure document. This document describes the key management practices used in Asset Lifecycle planning to support the AMS in achieving its strategic objectives. Documents/Evidence: Asset Life-cycle Planning Procedure V5.2 (3).pdf	✓					The licensee has provided an Asset Management System (AMS) Manual for Badgingarra Renewable Facility (BRF), dated 25/06/2025. The BRF contains both the Badgingarra Wind Farm (BWF) and Badgingarra Solar Farm (BSF). This asset management system is based on BRF's and ERA's requirements and includes: an Asset management plan, financial management plan, risk management plan, asset management information system and review of AMS. It was identified that Siemens Gamesa (SGRE) were responsible for the operations and maintenance of (O&M) of BWF, meanwhile Vestas is responsible for the O&M of the BSF and associated BOP. The principal is responsible for all other business activities not delegated to SGRE or Vestas. Documents/Evidence: OPS-MAN-AM-8000.pdf
103	Electricity Industry Act, section 14(1)(b)	A licensee must notify details of the asset management system and any substantial changes to it to the ERA.	2	4	✓					The licensee's Vigilant system supports compliance through assignment of regulatory and statutory requirements to the appropriate responsible staff. Notifications and escalations are generated automatically and action close out is managed by the responsible actioner and approver. Documents/Evidence: Vigilant - Tracking of Annual Compliance Reports.docx	✓					Staff interviews indicated that no substantial changes to the licensee's AMS occurred during this audit period. These include interviews with the Regulatory compliance manager, operations manager, asset manager, senior commercial contracts advisor, senior management accountant, operations risk, compliance & assurance analyst, SGRE site lead, VESTAS site supervisor, SGRE service operations project management and manager of asset operations for renewables. Documents/Evidence: - ATTENDEE LIST.docx - OPS-MAN-AM-8000.pdf

Compliance Manual No	Obligation under Licence condition	Description	Type (1, 2, 3 or NR)	Audit Priority (1=high est, 5=lowest)	Control rating						Compliance rating					
					A	B	C	D	N/P	Control observation	1	2	3	4	N/R	Compliance observation
104	Electricity Industry Act, section 14(1)(c)	A licensee must provide the ERA with a report by an independent expert about the effectiveness of its asset management system every 24 months, or such longer period as determined by the ERA.	2	4	✓					The licensee has a regulatory & compliance management system Vigilant which keeps tracks of compliance and performance reports. This system assigns an obligation owner, priority level, level of required control, obligation status, certification status, due date, amongst other tags. Documents/Evidence: Vigilant - Tracking of Annual Compliance Reports.docx	✓					As described in obligation 101, the ERA issued a notice to the licensee notifying that the findings from the previous audit indicates that 'Wind Portfolio has achieved a high level of compliance with its licence and has an effective asset management system'. Hence ERA had decided to increase the audit and review period from 36 months to 60 months, where the next audit and review will cover the period 1 July 2020 to 30 June 2025, with the report due by 30 September 2025. The timing of this audit fulfills ERA's required timelines. Furthermore, GHD was contracted as the independent auditor for this audit period. Documents/Evidence: Notice---2020-audit-and-review---Wind-Portfolio-Pty-Ltd---EGL026 (1).pdf
105	Economic Regulation Authority (Licensing Funding) Regulations 2014	A licensee must pay the prescribed licence fees to the ERA according to clauses 6, 7 and 8 of the Economic Regulation Authority (Licensing Funding) Regulations 2014.	2	4	✓					The licensee has provided evidence of the Vigilant system which tracks its required ERA generation license and associated license fees. This system sets up the recurring actions required to pay the annual licensee fee and standing data charges. It further assigns an assignee and approver for the fee, as well as its frequency and due date. Documents/Evidence: Vigilant - Tracking & Monitoring of Prescribed fees.docx	✓					The previous audit period noted 2 instances where prescribed license fees were not paid in line with the ERA's required timeframes. Hence, special focus has been placed on this obligation for this audit period. The reason the previous audit failed to make payments in time was because payment dates had not been set up with enough lead times for approval/authorisation. However, this problem has now been rectified with dates being set up in Vigilant to allow for more sufficient timing. Evidence of this set up in Vigilant has been observed and is attached below. The licensee has also provided an invoice reconciliation excel sheet which listed the invoice number, amount, description and payment number, as well as invoice and payment date to the ERA for the periods between 2021/2022 to 2023/2024. Examining this excel sheet sees that all payments are made to ERA within 30 days of the invoiced being issued. The licensee has further provided the tax invoice for the annual EGL26 license payment to the ERA. Documents/Evidence: - Licence invoice recon.xlsx - Annual licence payment 2025 - Workday.jpg - Vigilant - Tracking & Monitoring of Prescribed fees.docx
106	Electricity Industry Act, section 31(3)	A licensee must take reasonable steps to minimise the extent, or duration, of any interruption, suspension or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause.	NR	5	✓					The licensee released monthly O&M reports detailing the safety, environmental, production performance, sent out energy, plant availability and O&M contractor performance for both BWF, BSF and the combined BRF facility. These reports outline the production performance of the facilities and described any losses in production from events such as de-rated turbines, scheduled and unscheduled maintenance, forced outages, curtailment, environmental factors, etc. These reports further detail the required actions and due dates to address any interruptions in electricity supply. Further to these monthly reports, the licensee has published monthly O&M meeting minutes. These meeting minutes list any O&M concerns and assign actions to mitigate these concerns to an actioner, with an initiation date and due date. Additionally, as described in the monthly O&M reports, the contractor's required measured period availability (MPA) is written into their contracts. Documents/Evidence: 2024 Monthly Reports.zip - O&M Meeting Notes 2021-25.zip	✓					Findings: The licensee released monthly O&M reports detailing the safety, environmental, production performance, sent out energy, plant availability and O&M contractor performance for both BWF, BSF and the combined BRF facility. These reports outline the production performance of the facilities and described any losses in production from events such as de-rated turbines, scheduled and unscheduled maintenance, forced outages, curtailment, environmental factors, etc. These reports further detail the required actions and due dates to address any interruptions in electricity supply. Hence, this obligation is rated as compliant. Documents/Evidence: 2024 Monthly Reports.zip

Compliance Manual No	Obligation under Licence condition	Description	Type (1, 2, 3 or NR)	Audit Priority (1=high est, 5=lowest)	Control rating							Compliance rating						
					A	B	C	D	N/P	Control observation	1	2	3	4	N/R	Compliance observation		
107	Electricity Industry Act, section 41(6)	A licensee must pay the costs of taking an interest in land or an easement over land.	2	4	✓						The BRF is located on six private adjoining farms approximately 200km north of Perth and includes the Badgingarra Wind Farm (BWF) and the Badgingarra Solar Farm (BSF). Interviews with the staff at Wind Portfolio revealed that there were no expansions during the audit period. RCTIs describing these leases were released to GHD. This indicates the leases are well documented and sufficiently controlled. Documents/Evidence: – 202506 BRF Lease_RCTI-A D Panizza Jun 2025.pdf – 202506 BRF Lease_RCTI-Deutscher Jun 2025.pdf – 202506 BRF Lease_RCTI-P Panizza Jun 2025.pdf – 202506 BRF Lease_RCTI-P Sudholz Jun 2025.pdf – 202506 BRF Lease_RCTI-R D Sudholz Jun 2025.pdf – 202506 BRF Lease_RCTI-Rural Jun 2025.pdf	✓						The BRF is located on six private adjoining farms approximately 200km north of Perth and includes the Badgingarra Wind Farm (BWF) and the Badgingarra Solar Farm (BSF). Interviews with the staff at Wind Portfolio revealed that there were no expansions during the audit period. RCTIs describing these leases were released to GHD. Hence, this obligation is assessed as compliant. Documents/Evidence: – 202506 BRF Lease_RCTI-A D Panizza Jun 2025.pdf – 202506 BRF Lease_RCTI-Deutscher Jun 2025.pdf – 202506 BRF Lease_RCTI-P Panizza Jun 2025.pdf – 202506 BRF Lease_RCTI-P Sudholz Jun 2025.pdf – 202506 BRF Lease_RCTI-R D Sudholz Jun 2025.pdf – 202506 BRF Lease_RCTI-Rural Jun 2025.pdf
119	Electricity Industry Act, section 11	A licensee and any related body corporate must maintain accounting records that comply with the Australian Accounting Standards Board Standards or equivalent International Accounting Standards.	2	4	✓						The licensee complies with International Financial Reporting Standards (IFRS) and reconciliation to statutory audited financial statements. The APA Group's Accounting Policy further documents the policies required by the Group to ensure that consistent and appropriate accounting practices are applied to all transactions across APA Group (APA), ensuring compliance with applicable accounting standards and interpretations, and legal requirements. Documents/Evidence: – APA Policy – Accounting.pdf	✓						APA's Annual Report for FY2024 contains a consolidation of their financial statements including statement of profit or loss, statement of financial position and cash flows. It further states that the general-purpose financial report has been prepared in accordance with the requirements of the Corporations Act 2001, Australian Accounting Standards and other authoritative pronouncements of the Australian Accounting Standards Board ("AASB") and complies with International Financial Reporting Standards ("IFRS") as issued by the International Accounting Standards Board. The audit of the financial statements had been prepared by Deloitte. The licensee has further provided financial reports for both BSF and BWF for the financial years from 2021 to 2025. Documents/Evidence: – fy24-annual-report.pdf
120	Electricity Industry Act, section 11	A licensee must comply with any individual performance standards prescribed by the ERA.	2	4	✓						The licensee conducted ongoing communication with GHD to comply with ERA's required obligations and guidelines. Copies of the communication regarding the EGL26 audit between the licensee and ERA were sent through to GHD. Documents/Evidence: – _EXT__RE_ Auditor Nomination - 2025 audit and review.msg	✓						The licensee conducted ongoing communication with GHD to comply with ERA's required obligations and guidelines. Copies of the communication regarding the EGL26 audit between the licensee and ERA were sent through to GHD. Documents/Evidence: – _EXT__RE_ Auditor Nomination - 2025 audit and review.msg
121	Electricity Industry Act, section 11	A licensee must comply, and require its auditor to comply, with the ERA's standard audit guidelines for a performance audit.	2	4	✓						As per obligation 120, the licensee conducted ongoing communication with GHD to comply with ERA's required obligations and guidelines. Copies of the communication regarding the EGL26 audit between the licensee and ERA were sent through to GHD. Documents/Evidence: – _EXT__RE_ Auditor Nomination - 2025 audit and review.msg	✓						As per obligation 120, the licensee conducted ongoing communication with GHD to comply with ERA's required obligations and guidelines. Copies of the communication regarding the EGL26 audit between the licensee and ERA were sent through to GHD. Documents/Evidence: – _EXT__RE_ Auditor Nomination - 2025 audit and review.msg

Compliance Manual No	Obligation under Licence condition	Description	Type (1, 2, 3 or NR)	Audit Priority (1=high est, 5=lowest)	Control rating						Compliance rating					
					A	B	C	D	N/P	Control observation	1	2	3	4	N/R	Compliance observation
122	Electricity Industry Act, section 11	A licensee must comply, and must require the licensee's expert to comply, with the relevant aspects of the ERA's standard audit guidelines for an asset management system review.	2	4	✓					As per obligation 120, the licensee conducted ongoing communication with GHD to comply with ERA's required obligations and guidelines. Copies of the communication regarding the EGL26 audit between the licensee and ERA were sent through to GHD. Documents/Evidence: – _EXT__RE_Auditor Nomination - 2025 audit and review.msg	✓					As per obligation 120, the licensee conducted ongoing communication with GHD to comply with ERA's required obligations and guidelines. Copies of the communication regarding the EGL26 audit between the licensee and ERA were sent through to GHD. Documents/Evidence: – _EXT__RE_Auditor Nomination - 2025 audit and review.msg
123	Electricity Industry Act, section 11	In the manner prescribed, a licensee must notify the ERA, if it is under external administration or if there is a significant change in the circumstances that the licence was granted which may affect the licensee's ability to meet its obligations.	2	4					✓	Findings: Under license clause 15.1 the license is required to report relevant information to ERA pertaining to the event that the license: a) Is under external administration b) Experiences a change in its corporate financial or technical circumstances upon which this license was granted; and that change may materially affect the licensee's ability to perform its obligations under this license c) Changes its name, ABN or address. Interviews with Wind Portfolio staff confirmed that no such changes occurred during the audit period. Hence controls are not accessed.					✓	Findings: Under license clause 15.1 the license is required to report relevant information to ERA pertaining to the event that the license: a) Is under external administration b) Experiences a change in its corporate financial or technical circumstances upon which this license was granted; and that change may materially affect the licensee's ability to perform its obligations under this license c) Changes its name, ABN or address. Interviews with Wind Portfolio staff confirmed that no such changes occurred during the audit period. Hence this obligation is assessed as compliant.
124	Electricity Industry Act, section 11	A licensee must provide the ERA, in the manner prescribed, with any information that the ERA requires in connection with its functions under the Electricity Industry Act.	2	4	✓					The Technical Regulatory Compliance document released by the licensee in 2025 lists out the KPIs required to meet ERA's regulatory obligations, and inspection periods. It describes the KPI name, KPI information and corresponding observations which would make the KPI green (good performance), amber (moderate performance) or red (bad performance). Furthermore, the causes for the non-compliance in the last audit period was due to insufficient lead times put in place to allow for approval/reviews from authorised personnel. As a safeguard for this non-compliance, Wind Portfolio's Vigilant system has been better set up to allow for longer approval timeframes for key report outputs and in turn ensure reports are no longer published late. Documents/Evidence: – 5.3 Technical Regulatory Compliance v3.0 2025-05.docx.pdf – Vigilant - Tracking of Annual Compliance Reports	✓					The previous audit found the late submission of the annual compliance report for the 2017-18 reporting year. Hence special attention was placed on this obligation for this audit. The compliance reports for FY2022, FY2023, FY2024 were published to GHD, hence this obligation is rated as compliant. Documents/Evidence: – BRF Compliance Report - FY2022.pdf – BRF Compliance Report - FY2023.pdf – Compliance Report - EGL26 2024.pdf
125	Electricity Industry Act, section 11	A licensee must publish any information as directed by the ERA to publish, within the timeframes specified.	2	4					✓	No instances where the ERA requested the licensee to publish information occurred during this audit period.					✓	No instances where the ERA requested the licensee to publish information occurred during this audit period.

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					A	B	C	D	N/P	Control observation	1	2	3	4	N/R	Compliance observation		
126	Electricity Industry Act, section 11	All notices must be in writing, unless otherwise specified.	2	4	✓						All correspondences between the licensee and ERA have been issued to GHD in writing. Evidence is provided to the auditor in relation to ERA and the licensee's communications. Documents/Evidence: – _EXT_ Commencement of 2025 audit and review EGL26 - Wind Portfolio Pty Ltd_.msg – _EXT_ Contact update - 2025 audit and review - EIRL007 & EGL026_.msg – _EXT_ RE_ Auditor Nomination - 2025 audit and review.msg – _EXT_ RE_ Change of Primary Contact - Emu Downs and Badgingarra.msg – _EXT_ Reminder from the ERA - Submission of 2023_24 annual compliance reports.msg	✓						All correspondences between the licensee and ERA have been issued to GHD in writing. Evidence is provided to the auditor in relation to ERA and the licensee's communications. Documents/Evidence: – _EXT_ Commencement of 2025 audit and review EGL26 - Wind Portfolio Pty Ltd_.msg – _EXT_ Contact update - 2025 audit and review - EIRL007 & EGL026_.msg – _EXT_ RE_ Auditor Nomination - 2025 audit and review.msg – _EXT_ RE_ Change of Primary Contact - Emu Downs and Badgingarra.msg – _EXT_ Reminder from the ERA - Submission of 2023_24 annual compliance reports.msg
324	Electricity Industry Metering Code, clause 3.3B	If a user is aware of bi-directional electricity flows at a metering point that was not previously subject to a bi-directional flows or any changes in a customer's or user's circumstances in a metering point that will result in bi-directional flows, the user must notify the network operator within 2 business days.	2	4						✓	Staff interviews indicated that no changes to electricity flows or customer/users' circumstances at metering points have occurred during the audit period. As such no notifications to the network operator have been required.						✓	Staff interviews indicated that no changes to electricity flows or customer/users' circumstances at metering points have occurred during the audit period. As such no notifications to the network operator have been required.
339	Electricity Industry Metering Code, clause 3.11(3)	A Code participant who becomes aware of an outage or malfunction of a metering installation must advise the network operator as soon as practicable.	2	4	✓						Interviews with staff indicated that there were some instances where the communications dropped out with Western Power (WP), the network operator. An email correspondence where the licensee notified WP that a SCADA notification outage was sent to the wrong email and corrections to provide WP with the updated email address was sent to WP on 9 May 2025. Documents/Evidence: – Fw_ BRF - Badgingarra WF Contact Details Update for WP Operating Protocol.msg	✓						The licensee promptly notified WP of the correct email address for their SCADA outage notifications. Documents/Evidence: – Fw_ BRF - Badgingarra WF Contact Details Update for WP Operating Protocol.msg
371	Electricity Industry Metering Code, clause 4.4(1)	If there is a discrepancy between energy data held in a metering installation and in the metering database, the affected Code participants and the network operator must liaise to determine the most appropriate way to resolve the discrepancy.	NR	5	✓						The licensee has provided excel workbooks containing metering data for both BSF and BRF. The licensee further performs crosschecks of SCADA data – with screenshots provided as evidence. Evidence: – 1 BRF Graphs - SCADA Energy.xlsb – 3 BRF Metering May 2025.xlsx – Metering data - SCADA Cross Check Example.pdf	✓						Exchanges between Western Power and the APA Group have been provided regarding missing metering data for Wind Portfolio. However, in these exchanges, Wind Portfolio responds with re-uploading/rectification of metering databases. And hence this obligation is assessed as compliant. Evidence: – EXT RE EXTERNAL RE Missing Meter Data Emu Downs Wind Farm (EDWF) Badgingarra Wind Farm (Wind Portfolio).msg – EXT RE EXTERNAL Urgent Request Missing Badgingarra Meter Data Aug.msg – EXT RE No Reports in Portal.msg

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372	Electricity Industry Metering Code, clause 4.5(1)	A Code participant must not knowingly permit the registry to be materially inaccurate.	NR	5					✓	As per obligation 372, the licensee has provided excel workbooks containing metering data for both BSF and BRF. The licensee further performs crosschecks of SCADA data – with screenshots provided as evidence. Evidence: – 1 BRF Graphs - SCADA Energy.xlsb – 3 BRF Metering May 2025.xlsx – Metering data - SCADA Cross Check Example.pdf					✓	As per obligation 372, the licensee has provided excel workbooks containing metering data for both BSF and BRF. The licensee further performs crosschecks of SCADA data – with screenshots provided as evidence. Furthermore. Business interest is tied to metering data being accurate and hence this obligation is recorded as compliant. Evidence: – 1 BRF Graphs - SCADA Energy.xlsb – 3 BRF Metering May 2025.xlsx – Metering data - SCADA Cross Check Example.pdf		
373	Electricity Industry Metering Code, clause 4.5(2)	Subject to subclause 5.19(6), if a Code participant, other than a network operator, becomes aware of a change to, or inaccuracy in, an item of standing data in the registry, then it must notify the network operator and provide details of the change or inaccuracy within the timeframes prescribed.	2	4					✓	As per obligation 372, the licensee has provided excel workbooks containing metering data for both BSF and BRF. The licensee further performs crosschecks of SCADA data – with screenshots provided as evidence. Evidence: – 1 BRF Graphs - SCADA Energy.xlsb – 3 BRF Metering May 2025.xlsx – Metering data - SCADA Cross Check Example.pdf					✓	As per obligation 371, exchanges between Western Power and the APA Group have been provided regarding missing metering data for Wind Portfolio. However, in these exchanges, Wind Portfolio responds with re-uploading/rectification of metering databases. And hence this obligation is assessed as compliant. Evidence: – EXT RE EXTERNAL RE Missing Meter Data Emu Downs Wind Farm (EDWF) Badgingarra Wind Farm (Wind Portfolio).msg – EXT RE EXTERNAL Urgent Request Missing Badgingarra Meter Data Aug.msg – EXT RE No Reports in Portal.msg		
388	Electricity Industry Metering Code, clause 5.4(2)	A user must, when reasonably requested by a network operator, assist the network operator to comply with the network operator's obligation under subclause 5.4(1).	2	4					✓	Staff interviews indicate that there have been no requests from the network operator to comply with obligation 5.4(1) during the audit period.					✓	Staff interviews indicate that there have been no requests from the network operator to comply with obligation 5.4(1) during the audit period.		
401	Electricity Industry Metering Code, clause 5.16	If a user collects or receives energy data from a metering installation, then the user must provide the network operator with the energy data (in accordance with the communication rules) within the timeframes prescribed.	2	4					✓	There are no meters maintained by the licensee to collect information and/or data for the purposes of billing. The Network Operator WP is responsible for metering installations.					✓	There are no meters maintained by the licensee to collect information and/or data for the purposes of billing. The Network Operator WP is responsible for metering installations.		
402	Electricity Industry Metering Code, clause 5.17(1)	A user must provide standing data and validated, and where necessary substituted or estimated, energy data to the user's customer to which that information relates where the user is required by an enactment or an agreement to do so for billing purposes or for the purpose of providing metering services to the customer.	NR	5					✓	There is no requirement between APA and customers to provide metering services.					✓	There is no requirement between APA and customers to provide metering services.		

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405	Electricity Industry Metering Code, clause 5.18	If a user collects or receives information regarding a change in the energisation status of a metering point then the user must provide the network operator with the prescribed information, including the stated attributes, within the timeframes prescribed.	2	4					✓	The Network Operator WP is responsible for metering installations. There have been no changes in the energisation status of the metering points for the licensee.					✓	The Network Operator WP is responsible for metering installations. There have been no changes in the energisation status of the metering points for the licensee.
406	Electricity Industry Metering Code, clause 5.19(1)	A user must, when requested by the network operator acting in accordance with good electricity industry practice, use reasonable endeavours to collect information from customers, if any, that assists the network operator in meeting its obligations described in the Code and elsewhere, and provide that information to the network operator.	NR	5					✓	There have been no instances of requests from users to collect information during this audit period.					✓	There have been no instances of requests from users to collect information during this audit period.
407	Electricity Industry Metering Code, clause 5.19(2)	A user must, to the extent that it is able, collect and maintain a record of the prescribed information in relation to the site of each connection point with which the user is associated.	NR	5	✓					To support this obligation, the licensee has a customer contract management portal which details the contract, account counterparty, company name, ABN, ACN and contact persons. They further provide an APA Group Standard for customer and commercial contracting. The purpose of this standard is to ensure APA effectively prioritises and manages customer relationships whilst minimising risk in development, execution and management of commercial contracts. Documents/Evidence: – CCM screenshots.docx – APA Group Standard - Customer and Commercial Contracting.pdf	✓					The licensee is the owner of the customer NMI which the network operator WP requires. Wind Portfolio have provided a screenshot and email correspondence showing WP's portal which details the customer and site notification information of Badgingarra, their NMI, site address, voltage classification, substation, DLF code, etc. Documents/Evidence: – Fw_ Certificate of compliance.msg – CoC information.docx
408	Electricity Industry Metering Code, clause 5.19(3)	Subject to subclauses 5.19(3A) and 5.19(6), the user must, within 1 business day after becoming aware of any change in an attribute described in subclause 5.19(2), notify the network operator of the change.	NR	5					✓	This obligation assesses whether there have been any changes in customer information including name, NMI, address, etc. Interviews with the licensee's staff notified that there have been no changes in these details during the effective audit period.					✓	This obligation assesses whether there have been any changes in customer information including name, NMI, address, etc. Interviews with the licensee's staff notified that there have been no changes in these details during the effective audit period.
410	Electricity Industry Metering Code, clause 5.19(6)	The user must use reasonable endeavours to ensure that it does not notify the network operator of a change in an attribute described in subclause 5.19(2) that results from the provision of standing data by the network operator to the user.	NR	5					✓	Staff interviews revealed that there were no instances of the network operator provisioning standing data to the licensee that resulted in the user notifying the network operator of a change in attribute described in subclause 5.19(2) during this audit period.					✓	Staff interviews revealed that there were no instances of the network operator provisioning standing data to the licensee that resulted in the user notifying the network operator of a change in attribute described in subclause 5.19(2) during this audit period.

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416	Electricity Industry Metering Code, clause 5.21(5)	A Code participant must not request a test or audit under subclause 5.21(1) unless the Code participant is a user and the test or audit relates to a time or times at which the user was the current user or the Code participant is the IMO.	2	4					✓	Staff interviews revealed that no tests/audits were requested under subclause 5.21(1) during this audit period.					✓	Staff interviews revealed that no tests/audits were requested under subclause 5.21(1) during this audit period.
417	Electricity Industry Metering Code, clause 5.21(6)	A Code participant must not make a request under subclause 5.21(1) that is inconsistent with any access arrangement or agreement.	2	4					✓	Staff interviews revealed that the licensee did not make any requests under subclause 5.21(1) that is inconsistent with any access agreement or agreement during this audit period.					✓	Staff interviews revealed that the licensee did not make any requests under subclause 5.21(1) that is inconsistent with any access agreement or agreement during this audit period.
435	Electricity Industry Metering Code, clause 5.27	Upon request from a network operator, the current user for a connection point must provide the network operator with customer attribute information that it reasonably believes are missing or incorrect within the timeframes prescribed.	NR	5					✓	Staff interviews revealed that no requests have been made from the network operator to provide customer attribute information.					✓	Staff interviews revealed that no requests have been made from the network operator to provide customer attribute information.
448	Electricity Industry Metering Code, clause 6.1(2)	A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed.	2	4	✓					No incidents were found to be in breach of the Electricity Industry metering code. As part of their BAU, the licensee also publishes Monthly Reports and meeting notes summarizing the capacity outputs and KPIs of their facilities as well as any identified safety, O&M incidents, etc. These items are assigned an actioner and due date to ensure actions are carried out to comply with the rules established in the generation license. Documents/Evidence: – O&M Meeting Notes 2021-25.zip	✓					Staff interviews and review of monthly meeting notes revealed no breach of this obligation. Documents/Evidence: – O&M Meeting Notes 2021-25.zip
451	Electricity Industry Metering Code, clause 7.2(1)	Code participants must use reasonable endeavours to ensure that they can send and receive a notice by post, facsimile and electronic communication and must notify the network operator of a telephone number for voice communication in connection with the Code.	NR	5	✓					Various correspondence and documents were provided by the licensee which provides contact name, number, email and website details the licensee's methods of communication. Documents/Evidence: – _EXT__RE_Change of Primary Contact - Emu Downs and Badgingarra.msg – New regulatory compliance contact for WA power assets.msg – _EXT__Contact update - 2025 audit and review - EIRL007 & EGL026_.msg	✓					The licensee has a primary contact email, number and website which allows the network operator to contact them. Furthermore, on 20 May 2024, the licensee notified the ERA that there were changes in the primary contact point for BRF as a new regulatory compliance manager had stepped in. The ERA replied to this message noting they have updated this detail accordingly. Another email dated 17 March 2025 correspondence noted that there was a new regulatory compliance manager. Messages between the ERA and the regulatory compliance manager indicate ERA does have the manager's contact details available. Documents/Evidence: – _EXT__RE_Change of Primary Contact - Emu Downs and Badgingarra.msg – New regulatory compliance contact for WA power assets.msg – _EXT__Contact update - 2025 audit and review - EIRL007 & EGL026_.msg

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453	Electricity Industry Metering Code, clause 7.2(4)	If requested by a network operator with whom it has entered into an access contract, the Code participant must notify its contact details to a network operator within 3 business days after the request.	2	4	✓						Staff interviews revealed that the network operator did not submit a request to the licensee to provide any contact detail updates. However, when noticing that the SCADA outage notification email was sent to people no longer involved in the BRF facility, the licensee issued an email to Western Power updating contact details of key personnel. This shows the licensee proactively notifying the network operator of any outdated contact information. Documents/Evidence: – Fw_ BRF - Badgingarra WF Contact Details Update for WP Operating Protocol.msg	✓						Staff interviews revealed that the network operator did not submit a request to the licensee to provide any contact detail updates. However, when noticing that the SCADA outage notification email was sent to people no longer involved in the BRF facility, the licensee issued an email to Western Power updating contact details of key personnel. This shows the licensee proactively notifying the network operator of any outdated contact information. Documents/Evidence: – Fw_ BRF - Badgingarra WF Contact Details Update for WP Operating Protocol.msg
454	Electricity Industry Metering Code, clause 7.2(5)	A Code participant must notify any affected network operator of any change to the contact details it notified to the network operator under subclause 7.2(4) at least 3 business days before the change takes effect.	2	4	✓						As per obligation 453, staff interviews revealed that the network operator did not submit a request to the licensee to provide any contact detail updates. However, when noticing that the SCADA outage notification email was sent to people no longer involved in the BRF facility, the licensee issued an email to Western Power updating contact details of key personnel. This shows the licensee proactively notifying the network operator of any outdated contact information. Documents/Evidence: – Fw_ BRF - Badgingarra WF Contact Details Update for WP Operating Protocol.msg	✓						As per obligation 453, staff interviews revealed that the network operator did not submit a request to the licensee to provide any contact detail updates. However, when noticing that the SCADA outage notification email was sent to people no longer involved in the BRF facility, the licensee issued an email to Western Power updating contact details of key personnel. This shows the licensee proactively notifying the network operator of any outdated contact information. Documents/Evidence: – Fw_ BRF - Badgingarra WF Contact Details Update for WP Operating Protocol.msg
455	Electricity Industry Metering Code, clause 7.5	A Code participant must subject to subclauses 5.17A and 7.6 not disclose, or permit the disclosure of, confidential information provided to it under or in connection with the Code and may only use or reproduce confidential information for the purpose for which it was disclosed or another purpose contemplated by the Code.	2	4						✓	The licensee has an APA Group Procedure: Ring Fencing Procedure which details the principles, roles and responsibilities APA must comply with to ensure that APA acts in accordance with legal requirements as well as deals with customers who may also be competitors, in an appropriate manner to maintain customer confidence. Documents/Evidence: – APA Group Procedure - Ring Fencing.pdf						✓	The licensee was not required to publish any confidential information under the code during the audit period.
456	Electricity Industry Metering Code, clause 7.6(1)	A Code participant must disclose or permit the disclosure of confidential information that is required to be disclosed by the Code.	2	4						✓	The licensee has an APA Group Procedure: Ring Fencing Procedure which details the principles, roles and responsibilities APA must comply with to ensure that APA acts in accordance with legal requirements as well as deals with customers who may also be competitors, in an appropriate manner to maintain customer confidence. Documents/Evidence: – APA Group Procedure - Ring Fencing.pdf						✓	During this audit period, the licensee was not required to disclose any confidential information as required by the code.
457	Electricity Industry Metering Code, clause 8.1(1)	If any dispute arises between any Code participants, then (subject to subclause 8.2(3)) representatives of disputing parties must meet within 5 business days after a notice given by a disputing party to the other disputing parties and attempt to resolve the dispute by negotiations in good faith.	NR	5						✓	There were no disputes which occurred during the audit period and hence this obligation is not rated.						✓	There were no disputes which occurred during the audit period and hence this obligation is not rated.

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458	Electricity Industry Metering Code, clause 8.1(2)	If a dispute is not resolved within 10 business days after the dispute is referred to representative negotiations, the disputing parties must refer the dispute to a senior management officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.	NR	5					✓	There were no disputes which occurred during the audit period and hence this obligation is not rated.					✓	There were no disputes which occurred during the audit period and hence this obligation is not rated.
459	Electricity Industry Metering Code, clause 8.1(3)	If the dispute is not resolved within 10 business days after the dispute is referred to senior management negotiations, the disputing parties must refer the dispute to the senior executive officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.	NR	5					✓	There were no disputes which occurred during the audit period and hence this obligation is not rated.					✓	There were no disputes which occurred during the audit period and hence this obligation is not rated.
460	Electricity Industry Metering Code, clause 8.1(4)	If the dispute is resolved by representative negotiations, senior management negotiations or CEO negotiations, the disputing parties must prepare a written and signed record of the resolution and adhere to the resolution.	2	4					✓	There were no disputes which occurred during the audit period and hence this obligation is not rated.					✓	There were no disputes which occurred during the audit period and hence this obligation is not rated.
461	Electricity Industry Metering Code, clause 8.3(2)	The disputing parties must at all times conduct themselves in a manner which is directed towards achieving the objective in subclause 8.3(1).	NR	5					✓	There were no disputes which occurred during the audit period and hence this obligation is not rated.					✓	There were no disputes which occurred during the audit period and hence this obligation is not rated.



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