

The Asset Partnership

Ord Hydro
Performance
Audit 2014
Performance Audit
Report

*Strictly Private and
Confidential*

September 2014

pwc



Darren Sexton
Pacific Hydro Pty Ltd
Executive Manager Operations, Australia
Level 11, 474 Flinders Street
Melbourne
Victoria
3000
Australia

25 September 2014

Dear Darren

Subject: Ord Hydro performance audit report 2014

With the Economic Regulation Authority's (the **Authority**) approval, PricewaterhouseCoopers The Asset Partnership (**PwC**) has prepared Ord Hydro's performance audit report for the performance audit period from 1st July 2011 to 30th June 2014 for the purpose of your reporting requirements as per Section 13 of the Act and Section 14.1 of your Electricity Integrated Regional Licence EIRL4 Versions 3 and 4 (**Licence**).

This audit report has been prepared in accordance with the requirements of the April 2014 issue of the *Audit and Review Guidelines: Electricity and Gas Licences (Audit Guidelines)* and May 2011 and 2014 issues of the *Electricity Compliance Reporting Manual: Electricity Industry Act 2004 (Act)*.

You are requested to review the findings of this report and present it to the Authority for approval.

Should you have any queries regarding this matter please contact me on 0419 275 548.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Phil Clarke', with a long horizontal flourish extending to the right.

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Executive summary

Introduction and background

Under section 13 of the Electricity Industry Act 2004 (WA) and as a condition of its current Electricity Integrated Regional Licence (EIRL4) version 4, Pacific Hydro appointed PricewaterhouseCoopers The Asset Partnership (**PwC**) to conduct an independent Performance Audit. The primary purpose of this audit is to ensure Ord Hydro is demonstrating a sufficient level of compliance with the conditions within its Licence.

The Ord Hydro, operating under the management of Pacific Hydro, operates a 30 MW hydroelectric power station located in the Kimberley Region of Western Australia. Ord Hydro supplies power via its transmission network to two customers, Argyle Diamond Mine (ADM) and Horizon Power (HP). Horizon Power then retails power to the township of Kununurra and Lake Argyle Resort.

The previous Performance Audit, dated 14 October 2011, resulted in a twelve month extension to the standard two yearly requirement for such audits. There have been no major changes to the business since the previous audit.

Following approval by the Economic Regulation Authority (the **Authority**) on May 14, 2014 to conduct the Performance Audit, PwC developed an audit plan in accordance with the Audit and Review Guidelines. This plan, approved by the Authority on June 26, 2014, was then carried out in accordance with the Audit and Review Guidelines.

During the audit it was identified that there were some obligations that were not applicable, i.e. the compliance obligation does not apply to the licensee's business operations. The reasons for the "not applicable" determination for these obligations are noted in section 5 of this report. Similarly, there were obligations that were not rated as a result of any activity having taken place during the audit period relevant to the obligation. These are also noted in the section 5 with a Statement of Non-Occurrence from Pacific Hydro in Appendix A2.

Observations

In considering Pacific Hydro's internal procedures, structure, and environment, its compliance culture and its information system specifically relevant to those licence obligations subject to audit, we observed that Pacific Hydro has:

- Maintained procedures and controls designed to meet its obligations relating to Power Purchase Agreements (**PPA**) with its customers;
- Continue to demonstrate improved awareness towards its regulatory compliance;
- Allocated responsibilities to specific managers and staff for meeting key compliance requirements; and
- Recognised a number of elements of non-compliance from the previous audit report and implemented associated control improvements.

We noted that Version 3 of its licence entitled Ord Hydro to perform the functions of a distributor. We found no evidence that Ord Hydro had exercised the privileges of this entitlement during the period of currency of version 3 of its licence during the Audit period.

Findings

Table 1 below summarises the assessments made by the audit on Pacific Hydro's compliance with the obligations of the Licence. On a scale of 1 to 4, "1" being compliant with the rating scale moving down through lower levels of non-compliance to "4". (Adequacy of controls and Compliance ratings definitions are in

accordance with the *Audit Guidelines: Electricity and Gas Licences April 2014*¹ definitions. These are also provided Section 3.3).

No of Obligations	Performance audit compliance and controls rating									
	Refer to audit plan	No activity during audit period	Adequacy of controls rating				Compliance rating			
Audit priority	NA	Not rated	A	B	C	D	1	2	3	4
1										
2		1	5	4			9			
3		5	2	4			3	3		
4	5	18	22	3			25			
5	8	42	25	4			28	1		
NA	53									
Total	66	66	54	15			65	4		

Table 1 Summary of findings

Two versions of Pacific Hydro's Licence² were current within the audit period, and the Electricity Compliance Reporting Manual³, Audit and Review Guidelines⁴, and the Electricity Industry (Network Quality and Reliability of Supply) Code⁵ have also been revised. Consequently, all relevant obligations that were current at any time during the period from July 2011 to June 2014 were assessed and their ratings included in the table above.

Pacific Hydro's response to previous audit recommendations

Our assessment of Pacific Hydro's progress in implementing recommended action during the previous audit is summarised below in Table 2 and detailed at section 7 of this report.

Compliance obligation reference	Completed ¹	Closed out ²	In progress	Outstanding
103.	0	1	0	0

1. Corrective action has been taken, 2. Recommendation was closed with no action.

Table 2 Status of 2011 performance audit action plan

It is PwC's opinion that the recommended action has been responded to in the appropriate manner in-line with the intentions of the previous auditor. It is recommend that Pacific Hydro action item 1.3 and complete the action plan.

¹ Audit and Review Guidelines: Electricity and Gas Licences, April 2014

² EIRL⁴ Versions 3 and 4

³ May 2011 and May 2014

⁴ August 2010 and April 2014

⁵ Electricity Supply and Reliability Code 2007; gg191 and gg233

Pacific Hydro's reporting to other statutory authorities

Pacific Hydro has confirmed that it has complied with the requirements of its Licence in regards with reporting to the Authority and other statutory organisations including:

- Department of State Development;
- Australian Energy Regulatory;
- Essential Services Commission Victoria;
- Essential Services Commission Of South Australia;
- Australian Energy Market Operator
- Australian Competition and Consumer Commission;
- Green Power Manager; and
- Clean Energy Regulator.

Recommendations and action plan

Table 3 is a summary of all the recommendations and action plans arising from this audit.

Compliance obligation reference	Issue	Recommendation	Post audit action plan
391	Pacific Hydro has confirmed that the standing data in the meter register does not fully comprise the items specified in the code. However, it includes most of the essential items related to the meter installations.	It is recommended that Pacific Hydro modify the standing data in the existing meter register by including items specified in the code. This recommendation should be implemented in conjunction with reference no 387 to avoid rework.	Modify standing data in the meter register by including items specified in the code.
407	Pacific hydro has confirmed that there is no data validation process in place. However, actual meter reading can be validated via the check meter energy data and SCADA data. (It should be noted that there are only 6 meters in the network and there is also partial check meters and SCADA data validation available.)	It is recommended to Pacific Hydro that a standard data validation process be developed and undertake validation once in every 12 months to satisfy the requirements in Appendix 2 of the code.	Develop a data validation process and update all relevant documentation. Nominate a responsible person to undertake data validation once in every 12 months.
432, 433	Pacific hydro has confirmed that there is no Energy Data Verification Request Form.	It is recommended that Pacific Hydro develops Energy Data Verification Request Form in accordance with the communication rules and information prescribed by the section 5.20 (1) (2) of the code.	Develop Energy Data Verification Request Form as per the section 5.20 (1) (2) of the code.

Table 3 Summary of recommendations and action plan

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Basis for Qualified Conclusion

The audit identified a compliance rating 2 (Non-compliant – minor impact on customers or third parties) for Compliance obligation reference numbers 391, 407, 432 and 433 as described in our “Summary of Findings” section 4.

Conclusion

In our opinion, except for the matter noted in the Basis for Qualified Conclusion section above, Pacific Hydro has complied, in all material respects with the performance conditions of its Electricity Integrated Regional Licence EIRL4 versions 3 and 4 as measured by the licence conditions within the Authority’s Audit and Review Guidelines: Electricity and Gas Licences, April 2014, for the period 1 July 2011 to 30 June 2014.

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1. *Independent Assurance Report to Management*

With the Economic Regulation Authority's (the **Authority**) approval, PwC's The Asset Partnership was engaged to conduct an independent reasonable assurance engagement of Pacific Hydro's compliance with the conditions of its Electricity Integrated Regional Licence EIRL4 versions 3 and 4 (**License**) for the period 1 July 2011 to 30 June 2014 (the "Period"). The criteria against which we assessed the compliance with the conditions of the License were derived from the Electricity Compliance Reporting Manual dated May 2011 and 2014.

1.1. *Pacific Hydro's responsibility*

Pacific Hydro is responsible for:

- Designing and implementing policies, procedures, and controls, which are designed to ensure compliance with the conditions of the License; and
- Implementing processes for assessing its compliance requirements and for reporting its level of compliance to the Authority.

1.2. *Our responsibility*

Our responsibility is to express an opinion based on our reasonable assurance procedures, on whether Pacific Hydro has complied, in all material respects, with the conditions of the License for the Period.

Our audit has been conducted in accordance with the Australian Standard on Assurance Engagements (ASAE 3000) "Assurance Engagements Other Than Audits or Reviews of Historical Financial Information" and April 2014 issue of the *Audit and Review Guidelines: Electricity and Gas Licences (Audit Guidelines)*. The work performed was designed to enable us to express the opinion below. Accordingly, we have conducted such tests and procedures as we considered appropriate. Our procedures were set out in the Audit Plan reviewed and agreed with the Authority on June 26, 2014 and set out in Appendix 3.

1.3. *Use of report*

This report was prepared solely for the internal use of Pacific Hydro for the purpose of its reporting requirements under section 13 of the Act. We disclaim any assumptions of responsibility for any reliance on this report to any persons or users other than the management of Pacific Hydro, or for any purpose other than that for which it was prepared.

1.4. *Inherent limitations*

Because of the inherent limitations of any internal control structure, it is possible that fraud, error or non-compliance may occur and not be detected. An audit is not designed to detect all instances of non-compliance of Pacific Hydro with the conditions of the License, as an audit is not performed continuously throughout the Period and the audit procedures performed in respect of compliance with License requirements as measured by the License criteria are undertaken on a test basis. The reasonable assurance conclusion expressed in this report has been formed on the above basis.

1.5. Independence

In conducting our engagement, we have complied with the independence requirements of the Australian professional accounting bodies.

1.6. Basis for Qualified Conclusion

The audit identified a compliance rating 2 (Non-compliant – minor impact on customers or third parties) for Compliance obligation reference numbers 391, 407, 432 and 433 as described in our “Summary of Findings” section 4.

1.7. Conclusion

In our opinion, except for the matter noted in the Basis for Qualified Conclusion section above, Pacific Hydro has complied, in all material respects with the performance conditions of its Electricity Integrated Regional Licence EIRL4 versions 3 and 4 as measured by the licence conditions within the Authority’s *Audit and Review Guidelines: Electricity and Gas Licences*, April 2014, for the period 1 July 2011 to 30 June 2014.

The logo for PricewaterhouseCoopers, written in a cursive script.

PricewaterhouseCoopers

A handwritten signature in cursive script, likely belonging to a partner at PricewaterhouseCoopers.

Partner

3 October 2014

2. Definitions

For the purpose of this audit report:

“**ADM**” means Argyle Diamond Mine

“**Comms**” means Communications

“**CT**” means Current Transformer

“**VT**” means Voltage Transformer

“**OSY**” means Ord Switch Yard

“**PPA**” means Power Purchase Agreement

3. Scope of the audit

3.1. Audit objectives

Under section 13 of the Electricity Industry Act 2004 (WA) and as a condition of its current Electricity Integrated Regional License, Pacific Hydro must provide the Authority with a performance audit within 24 months after the commencement date, and every 24 months thereafter.

PwC's The Asset Partnership was engaged to conduct the independent audit for the period between the 1st July 2011 and the 30th June 2014. An Audit Plan dated June 2014 was developed in accordance with the *Audit Guidelines: Electricity and Gas Licences April 2014*.

The purpose of the Performance audit is to ensure that Pacific Hydro is compliant with all relevant licence conditions. The conditions and obligations tested during the audit were derived from the Electricity Compliance Reporting Manual dated May 2011 and 2014.

3.2. Approach

Our approach for the audit involved the following activities, which were undertaken during the period June 2014 to July 2014:

- Utilising the Audit Guidelines and reporting Manual as a guide, development of a risk assessment which involved discussions with key staff and document review to assess controls;
- Development of an audit plan (see **Appendix 3**) for approval by the Authority and an associated work program;
- Interviews with relevant site level Ord Hydro staff to gain understanding of the process controls (see **Section 3.4**);
- Site visit to Ord Hydro Power Plant and Pacific Hydro Kununurra regional office to gain understanding of site based activities and procedures;
- Review of documents, processes, and controls to assess the overall compliance and effectiveness of those processes and controls in accordance with Licence obligations (see **Section 5**); and
- Reporting findings to Pacific Hydro for review and response.

3.3. Audit methodology

For each obligation/condition, the audit assessed Ord Hydro's audit compliance and controls rating according to the scale described in Table 4 below:

Performance audit compliance and controls rating scales			
Adequacy of controls rating		Compliance rating	
Rating	Description	Rating	Description
A	Adequate controls – no improvement needed	1	Compliant
B	Generally adequate controls – improvement needed	2	Non-compliant – minor impact on customers or third parties
C	Inadequate controls – significant improvement required	3	Non-compliant – moderate impact on customers or third parties
D	No controls evident	4	Non-compliant – major impact on customers or third parties

Table 4 Audit compliance and controls rating scales

The Authority expects recommendations to address the issue(s) where a compliance obligation is rated as C, D, 2, 3, or 4.

3.4. Audit participants

The performance audit was conducted largely at Pacific Hydro's Kununurra office over a three (3) day period. Pacific Hydro representatives present during the interview were Darren Sexton (Executive Manager Operations, Australia), Brian Walter (Ord Hydro Manager), and Stuart Lester (Maintenance Technician). Information in support of the audit was also provided by John Vendel (Pacific Hydro Regulatory Manager) and Kate Summers (Pacific Hydro Manager Electrical Engineering).

PwC audit team consisted of Phil Clarke and Chander Bansal. Both review team members were involved during the entire three days review.

Prior to the audit a list of documents were collected that were deemed relevant as evidence required for compliance rating. These documents are listed under each obligation in section 5 of this audit report.

4. Summary of findings

Refer to detailed findings at Section 5 and Audit Plan at Appendix A3 for description of obligations.

Compliance obligation reference no. (refer to Electricity Compliance Reporting Manuals May 2014 and May 2011)	Licence reference	Audit priority applied (rated 1 (highest) to 5 (lowest))	Adequacy of controls ratings (Refer to the 4-point rating scale in table 4 for details) (NP = Not Performed)							Compliance rating (Refer to the 4-point rating scale in table 4 for details)			
			A	B	C	D	NP	NA	1	2	3	4	
101.	Electricity Industry Act section 13(1)	2	√							√			
102.	Electricity Industry Act section 14(1)(a)	4		√						√			
103.	Electricity Industry Act section 14(1)(b)	5	√							√			
104.	Electricity Industry Act section 14(1)(c)	2	√							√			
105.	Electricity Industry Act section 17(1)	4	√							√			
106.	Electricity Industry Act section 31(3)	2		√						√			
107.	Electricity Industry Act section 41(6)	5	√							√			
110.	Electricity Industry Act section 76	5						√					
112.	Electricity Industry Act section 115(1)	5						√					
113.	Electricity Industry Act section 115(2)	5						√					
119.	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						√					

Compliance obligation reference no. (refer to Electricity Compliance Reporting Manuals May 2014 and May 2011)	Licence reference	Audit priority applied (rated 1 (highest) to 5(lowest))	Adequacy of controls ratings (Refer to the 4-point rating scale in table 4 for details) (NP = Not Performed)						Compliance rating (Refer to the 4-point rating scale in table 4 for details)				
			A	B	C	D	NP	NA	1	2	3	4	
124.	Electricity Industry Act section 11	5	√							√			
126.	Electricity Industry Act section 11	5	√							√			
338.	Electricity Industry Metering Code clause 2.2(1)(a)	5						√					
339.	Electricity Industry Metering Code clause 2.2(1)(b)	5						√					
340.	Electricity Industry Metering Code clause 3.1	4	√							√			
341.	Electricity Industry Metering Code clause 3.2(1)	4	√							√			
342.	Electricity Industry Metering Code clause 3.3(1)	4							√				
343.	Electricity Industry Metering Code clause 3.3(3)	4							√				
344.	Electricity Industry Metering Code clause 3.3A(1)	3						√					
345.	Electricity Industry Metering Code clause 3.3B	3						√					
346.	Electricity Industry Metering Code clause 3.3C	3						√					
347.	Electricity Industry Metering Code clause 3.5(1) and (2)	4	√							√			
348.	Electricity Industry Metering Code clause 3.5(3)	4	√							√			
349.	Electricity Industry Metering Code clause 3.5(4)	4	√							√			
350.	Electricity Industry Metering Code clause 3.5(6)	4	√							√			

Compliance obligation reference no. (refer to Electricity Compliance Reporting Manuals May 2014 and May 2011)	Licence reference	Audit priority applied (rated 1 (highest) to 5 (lowest))	Adequacy of controls ratings (Refer to the 4-point rating scale in table 4 for details) (NP = Not Performed)						Compliance rating (Refer to the 4-point rating scale in table 4 for details)				
			A	B	C	D	NP	NA	1	2	3	4	
351.	Electricity Industry Metering Code clause 3.5(9)	4					√						
352.	Electricity Industry Metering Code clause 3.7	3					√						
353.	Electricity Industry Metering Code clause 3.8	4	√							√			
354.	Electricity Industry Metering Code clause 3.9(3)	4	√							√			
355.	Electricity Industry Metering Code clause 3.9(7)	5	√							√			
356.	Electricity Industry Metering Code clause 3.9(9)	5							√				
357.	Electricity Industry Metering Code clause 3.10	5	√							√			
358.	Electricity Industry Metering Code clause 3.11(1)	5	√							√			
359.	Electricity Industry Metering Code clause 3.11(2)	5	√							√			
361.	Electricity Industry Metering Code clause 3.11A(1)	4	√							√			
362.	Electricity Industry Metering Code clause 3.11A(2)	4						√					
363.	Electricity Industry Metering Code clause 3.12(1)	5	√							√			
364.	Electricity Industry Metering Code clause 3.12(2)	4	√							√			
365.	Electricity Industry Metering Code clause 3.12(3)	4		√						√			

Compliance obligation reference no. (refer to Electricity Compliance Reporting Manuals May 2014 and May 2011)	Licence reference	Audit priority applied (rated 1 (highest) to 5 (lowest))	Adequacy of controls ratings (Refer to the 4-point rating scale in table 4 for details) (NP = Not Performed)						Compliance rating (Refer to the 4-point rating scale in table 4 for details)				
			A	B	C	D	NP	NA	1	2	3	4	
366.	Electricity Industry Metering Code clause 3.12(4)	4	√							√			
367.	Electricity Industry Metering Code clause 3.13(1)	5	√							√			
369.	Electricity Industry Metering Code clause 3.13(4)	4	√							√			
370.	Electricity Industry Metering Code clause 3.14(3)	5	√							√			
371.	Electricity Industry Metering Code clause 3.16(1)	5	√							√			
372.	Electricity Industry Metering Code clause 3.16(2)	5							√				
(361)	Electricity Industry Metering Code clause 3.16(5)	5							√				
(362)	Electricity Industry Metering Code clause 3.16(6)	5							√				
376.	Electricity Industry Metering Code clause 3.20(1)	5						√					
377.	Electricity Industry Metering Code clause 3.20(3)	5						√					
379.	Electricity Industry Metering Code clause 3.21(2)	5							√				
380.	Electricity Industry Metering Code clause 3.22	5	√							√			
(371)	Electricity Industry Metering Code clause 3.25	5							√				

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Compliance obligation reference no. (refer to Electricity Compliance Reporting Manuals May 2014 and May 2011)	Licence reference	Audit priority applied (rated 1 (highest) to 5(lowest))	Adequacy of controls ratings (Refer to the 4-point rating scale in table 4 for details) (NP = Not Performed)						Compliance rating (Refer to the 4-point rating scale in table 4 for details)				
			A	B	C	D	NP	NA	1	2	3	4	
383.	Electricity Industry Metering Code clause 3.24A(1)	5					√						
384.	Electricity Industry Metering Code clause 3.24B(1)	5					√						
385.	Electricity Industry Metering Code clause 3.27	5					√						
386.	Electricity Industry Metering Code clause 3.29	5						√					
387.	Electricity Industry Metering Code clause 4.1(1)	5		√						√			
388.	Electricity Industry Metering Code clause 4.1(2)	5		√						√			
389.	Electricity Industry Metering Code clause 4.1(3)	5	√							√			
390.	Electricity Industry Metering Code clause 4.2(1)	5		√						√			
391.	Electricity Industry Metering Code clause 4.3(1)	5		√							√		
392.	Electricity Industry Metering Code clause 4.4(1)	4	√							√			
393.	Electricity Industry Metering Code clause 4.5(1)	4	√							√			
394.	Electricity Industry Metering Code clause 4.5(2)	5					√						
395.	Electricity Industry Metering Code clause 4.6(1)	4					√						
396.	Electricity Industry Metering Code clause 4.6(2)	4					√						
397.	Electricity Industry Metering Code clause 4.7	4					√						
398.	Electricity Industry Metering Code clause 4.8(3)	5						√					

Compliance obligation reference no. (refer to Electricity Compliance Reporting Manuals May 2014 and May 2011)	Licence reference	Audit priority applied (rated 1 (highest) to 5(lowest))	Adequacy of controls ratings (Refer to the 4-point rating scale in table 4 for details) (NP = Not Performed)						Compliance rating (Refer to the 4-point rating scale in table 4 for details)				
			A	B	C	D	NP	NA	1	2	3	4	
400.	Electricity Industry Metering Code clause 4.8(4)(a)	5	√							√			
401.	Electricity Industry Metering Code clause 4.8(4)(b)	5	√							√			
402.	Electricity Industry Metering Code clause 4.8(5)	5					√						
403.	Electricity Industry Metering Code clause 4.9	5	√							√			
404.	Electricity Industry Metering Code clause 5.1 (1)	5					√						
405.	Electricity Industry Metering Code clause 5.1(2)	5					√						
406.	Electricity Industry Metering Code clause 5.3	5	√							√			
407.	Electricity Industry Metering Code clause 5.4(1)	3		√							√		
408.	Electricity Industry Metering Code clause 5.4(1A)	5	√							√			
410.	Electricity Industry Metering Code clause 5.5(2)	5					√						
411.	Electricity Industry Metering Code clause 5.5(2A)	5					√						
412.	Electricity Industry Metering Code clause 5.6(1)	4					√						
413.	Electricity Industry Metering Code clause 5.7	4					√						
414.	Electricity Industry Metering Code clause 5.8	4	√							√			
415.	Electricity Industry Metering Code clause 5.9	4	√							√			

Compliance obligation reference no. (refer to Electricity Compliance Reporting Manuals May 2014 and May 2011)	Licence reference	Audit priority applied (rated 1 (highest) to 5(lowest))	Adequacy of controls ratings (Refer to the 4-point rating scale in table 4 for details) (NP = Not Performed)						Compliance rating (Refer to the 4-point rating scale in table 4 for details)				
			A	B	C	D	NP	NA	1	2	3	4	
416.	Electricity Industry Metering Code clause 5.10	5					√						
418.	Electricity Industry Metering Code clause 5.12(1)	5					√						
419.	Electricity Industry Metering Code clause 5.13	5					√						
420.	Electricity Industry Metering Code clause 5.14(3)	5					√						
421.	Electricity Industry Metering Code clause 5.15	5					√						
422.	Electricity Industry Metering Code clause 5.16	5	√						√				
424.	Electricity Industry Metering Code clause 5.17A(1)	5					√						
425.	Electricity Industry Metering Code clause 5.17A(3)	5					√						
432.	Electricity Industry Metering Code clause 5.20(1)	3		√						√			
433.	Electricity Industry Metering Code clause 5.20(2)	3		√						√			
434.	Electricity Industry Metering Code clause 5.20(4)	5					√						
435.	Electricity Industry Metering Code clause 5.21(2)	5	√						√				
436.	Electricity Industry Metering Code clause 5.21(4)	4	√						√				
439.	Electricity Industry Metering Code clause 5.21(8)	5	√						√				

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Compliance obligation reference no. (refer to Electricity Compliance Reporting Manuals May 2014 and May 2011)	Licence reference	Audit priority applied (rated 1 (highest) to 5(lowest))	Adequacy of controls ratings (Refer to the 4-point rating scale in table 4 for details) (NP = Not Performed)						Compliance rating (Refer to the 4-point rating scale in table 4 for details)				
			A	B	C	D	NP	NA	1	2	3	4	
440.	Electricity Industry Metering Code clause 5.21(9)	3	√							√			
441.	Electricity Industry Metering Code clause 5.21(11)	5						√					
442.	Electricity Industry Metering Code clause 5.21(12)	5						√					
443.	Electricity Industry Metering Code clause 5.22(1)	3						√					
444.	Electricity Industry Metering Code clause 5.22(2)	4		√						√			
445.	Electricity Industry Metering Code clause 5.22(3)	4							√				
446.	Electricity Industry Metering Code clause 5.22(4)	5	√							√			
447.	Electricity Industry Metering Code clause 5.22(5)	5						√					
448.	Electricity Industry Metering Code clause 5.22(6)	5						√					
449.	Electricity Industry Metering Code clause 5.23(1)	4						√					
450.	Electricity Industry Metering Code clause 5.23(3)	4						√					
451.	Electricity Industry Metering Code clause 5.24(1)	4						√					
452.	Electricity Industry Metering Code clause 5.24(2)	4						√					

Compliance obligation reference no. (refer to Electricity Compliance Reporting Manuals May 2014 and May 2011)	Licence reference	Audit priority applied (rated 1 (highest) to 5 (lowest))	Adequacy of controls ratings (Refer to the 4-point rating scale in table 4 for details) (NP = Not Performed)						Compliance rating (Refer to the 4-point rating scale in table 4 for details)				
			A	B	C	D	NP	NA	1	2	3	4	
453.	Electricity Industry Metering Code clause 5.24(3)	4					√						
454.	Electricity Industry Metering Code clause 5.24(4)	5					√						
455.	Electricity Industry Metering Code clause 5.25	4					√						
461.	Electricity Industry Metering Code clause 5.34(2)	5						√					
462.	Electricity Industry Metering Code clause 5.37(1)(a)	5					√						
463.	Electricity Industry Metering Code clause 5.37(1)(b)	5					√						
464.	Electricity Industry Metering Code clause 5.37(1)(b)	5					√						
465.	Electricity Industry Metering Code clause 5.37(2)	5					√						
466.	Electricity Industry Metering Code clause 5.37(3)	5					√						
467.	Electricity Industry Metering Code clause 5.38	5					√						
468.	Electricity Industry Metering Code clause 6.1(1)	2	√							√			
470.	Electricity Industry Metering Code clause 6.20(4)	5	√							√			
471.	Electricity Industry Metering Code clause 6.20(5)	3	√							√			
472.	Electricity Industry Metering Code clause 7.2(1)	5	√							√			

Compliance obligation reference no. (refer to Electricity Compliance Reporting Manuals May 2014 and May 2011)	Licence reference	Audit priority applied (rated 1 (highest) to 5 (lowest))	Adequacy of controls ratings (Refer to the 4-point rating scale in table 4 for details) (NP = Not Performed)						Compliance rating (Refer to the 4-point rating scale in table 4 for details)				
			A	B	C	D	NP	NA	1	2	3	4	
473.	Electricity Industry Metering Code clause 7.2(2)	5					√						
476.	Electricity Industry Metering Code clause 7.5	4					√						
477.	Electricity Industry Metering Code clause 7.6(1)	5					√						
478.	Electricity Industry Metering Code clause 8.1(1)	4					√						
479.	Electricity Industry Metering Code clause 8.1(2)	4					√						
480.	Electricity Industry Metering Code clause 8.1(3)	2					√						
481.	Electricity Industry Metering Code clause 8.1(4)	4					√						
482.	Electricity Industry Metering Code clause 8.3(2)	5					√						
483.	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 5(1)	2	√							√			
484.	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 8	2	√							√			
485.	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 9	2		√						√			
486.	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 10(1)	2		√						√			
487.	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 10(2)	4							√				

Compliance obligation reference no. (refer to Electricity Compliance Reporting Manuals May 2014 and May 2011)	Licence reference	Audit priority applied (rated 1 (highest) to 5(lowest))	Adequacy of controls ratings (Refer to the 4-point rating scale in table 4 for details) (NP = Not Performed)						Compliance rating (Refer to the 4-point rating scale in table 4 for details)				
			A	B	C	D	NP	NA	1	2	3	4	
489.	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 13(2)	2		√						√			
490.	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 13(3)	3		√						√			
491.	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 14(8)	5					√						
492.	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 15(2)	5					√						
498.	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 23(1)	4	√							√			
499.	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 23(2)	4							√				
500.	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 24(3)	5					√						
501.	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 24(4)	5					√						

Table 5 Compliance summary

5. Detailed observations

Observations for each review criteria are summarised in Table 8 below.

5.1. Obligations determined to be “not applicable” during the audit

The following obligations are determined not applicable to Pacific Hydro’s operations during the audit.

Compliance obligation reference	Reason
342	Pacific Hydro has confirmed that it only uses accumulation revenue and check meters. Therefore, the obligation related to interval meters does not apply to Ord Hydro’s operations.
343, 372	Pacific Hydro has confirmed that the newly installed revenue meters include provision of a communication link. However, the link is not in use by Ord Hydro or its customers. SCADA and PLC are used to transmit and read the meter readings remotely from Kununurra and Melbourne offices. Therefore, the obligation related to a communication link does not apply to Ord Hydro’s operations
356	Pacific Hydro has confirmed, and the auditor verified during the audit, that the revenue and check meters are installed at the connection points and hence there is no need to apply compensation. Therefore, the obligation related to meter compensation does not apply to Ord Hydro’s operations.
(361)	Pacific Hydro has confirmed that it has not entered into any new service level agreements within the audit period, and since this obligation was withdrawn from the Electricity Industry Metering Code 2012, it no longer applies to Ord Hydro’s operations.
(362)	Pacific Hydro has confirmed that it has charged its customers according to the applicable service level agreements, and since this obligation was withdrawn from the Electricity Industry Metering Code 2012, it no longer applies to Ord Hydro’s operations.
379	Pacific Hydro has confirmed, and the auditor verified during the audit, that Ord Hydro does not use internal data loggers at the same site where meters have been installed. Therefore, the obligation related to onsite storing of interval energy data does not apply to Ord Hydro’s operations.
(371)	Pacific Hydro has confirmed that it has not and does not currently use any pre-payment meters on its network during the period subject to the audit, and since this obligation was withdrawn from the Electricity Industry Metering Code 2012, it no longer applies to Ord Hydro’s operations.
386	Pacific Hydro has confirmed that it has not use any metering installation service providers during the period subject to the audit. Therefore, the obligation related to publishing a list of service providers does not apply to Ord Hydro’s operations.
398	Pacific Hydro has confirmed that Ord Hydro and its customer (Horizon Power, HP) do not use a communication link for the revenue meters. Remote access has not been requested by HP and has not been provided to HP nor. Therefore, the obligation related to providing a remote access with password to the energy data to a retail customer does not apply to Ord Hydro’s operations.
445	It has been verified during the audit that there are check meters in place and remote access to meter readings via SCADA and PLC. There were only six (6) meters in the

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Compliance obligation reference	Reason
	network during the period subject to the audit. The probability of failure of all means to access energy data from the metering installation is minimal. Therefore, Pacific Hydro has no need to use substitution method contained in Appendix 3 of the code. Considering the simplicity of the metering installation and that Ord Hydro might never use the substitution method to recover the energy data, this obligation does not apply to Ord Hydro's operations.
461	Pacific Hydro has confirmed that it has no metering data agency agreement in place. Therefore, the obligation related to costs which may be recovered from the electricity networks corporation does not apply to Ord Hydro's operations.
487	Pacific Hydro has confirmed that it has no alternative means of supplying electricity to its customer Argyle Diamond Mine in specified circumstances. It also confirmed that ADM has its own power backup facility to supply electricity to the mine facilities during Ord Hydro outages. Therefore, the obligation related to supply electricity by alternative means to a customer does not apply to Ord Hydro's operations.
499	As per the code ⁶ , "arrange for an audit and report" under section 26 and "prepare a report" under section 27 subject to the audit period are not needed if there are no small use customers. Pacific Hydro has confirmed that it has had no small use customers during the audit period.

Table 6 Obligations found not applicable during the audit

⁶ No. 191 Special, Electricity Industry (Network Quality and Reliability of Supply) Amendment Code 2007; Clause 28

5.2. Obligations determined to be “not rated”

Compliance obligation reference	Reason
110	Pacific Hydro has confirmed that Ord Hydro has not been designated as a supplier of last resort. Therefore, assessment of Ord Hydro’s compliance with this obligation cannot be made for the period subject to audit.
112, 113	Pacific Hydro has confirmed that Ord Hydro has not established any access contracts except Power Purchase Agreements with ADM and Horizon Power for its network. Consequently, these obligations cannot be rated for the period subject to audit.
123	During the period subject to audit, Ord Hydro was not under external administration and had not undergone any significant change in the circumstances upon which the licence was granted which may affect a licence’s ability to meet its obligation. Therefore, there was no obligation to report to the authority.
338, 339	Pacific Hydro has confirmed that Ord Hydro did not have any associates that are code participants. Therefore, these obligations cannot be rated for the period subject to audit.
344, 345, 346	There were only six (6) revenue meter installations in the network during the period subject to the audit. Manager, Ord Hydro is aware of an additional bi-directional meter installation in the network which is owned by Argyle Diamond Mine. However, this meter has not been operational and therefore this obligation cannot be rated for compliance.
351, 376, 383, 384, 394-397, 404, 405, 410-413, 416, 418-421, 424, 434, 447, 448, 454, 462-467, 491, 500, 501	As there were no such requests made by any network operators, code participants, retailers, or customers during the period subject to the audit, these obligations cannot be rated for compliance.
352	Manager, Ord Hydro has confirmed that no telecommunication links are in use with respect to the metering installations in the network. The basic telecommunication service is provided by Telstra, which is considered to be in compliance with the applicable requirements. Therefore, this obligation cannot be rated for compliance.
362, 441, 442	Manager, Ord Hydro has confirmed that the new SEL revenue meters were installed in 2011 and they are due for calibration and testing later in 2014 as per applicable customer Power Purchase Agreements. As there were no instances when those meters were tested during the period subject to audit, this obligation cannot be rated for compliance.
377	Pacific Hydro has confirmed that charges for the provision of metering installations with enhanced technology features are not covered by the Current Power Purchase Agreements with its customers. Section 3.20(2) covers items outside PPAs. Therefore, this obligation cannot be rated for compliance.
385	Pacific Hydro and Manager, Ord Hydro has confirmed that no new meter installations took place during the period subject to the audit. Therefore, this obligation cannot be rated for compliance.
402	Pacific Hydro has confirmed that they have not issued remote access with electronic passwords to the meter installations to personnel other than employed by Pacific Hydro. Therefore, this obligation cannot be rated for compliance.
443, 449-453, 455	It has been verified during the audit that there are check meters in place and remote access to meter readings via SCADA and PLC. Pacific Hydro had no instance where substitution method contained in Appendix 3 of the code was used. Therefore, this obligation cannot be rated for compliance.

Compliance obligation reference	Reason
476,477	Pacific Hydro has confirmed that there has been no disclosure of confidential information during the period subject to the audit and no event of disclosure of information. Therefore, these obligations cannot be rated for compliance.
478-482	Pacific Hydro has confirmed that there have been no disputes between code participants regarding metering during the period subject to the audit. Therefore, these obligations cannot be rated for compliance.
492	Pacific Hydro has confirmed that neither Power Purchase Agreements have been modified nor any provisions have been excluded from the PPAs during the period subject to the audit. Therefore, this obligation cannot be rated for compliance.

Table 7 Obligations not rated

5.3. Observations and recommendations

Compliance obligation reference	Controls and compliance rating	Audit priority applied	Observations
Section 12 Electricity Act			
101. A licensee must, not less than once every 24 months, provide the Authority with a performance audit conducted by an independent expert acceptable to the Authority.	A1	2	Pacific Hydro has confirmed that The Asset Partnership conducted the performance audit in 2011. As an outcome of the previous audit, Pacific Hydro was granted one (1) year extension by the Authority to provide the Authority with the next performance audit. The previous audit report and the extension letter issue by the Authority were sighted by the auditors.
Recommendation: Nil			Action plan: Nil
102. A licensee must provide for an asset management system.	B1	4	Pacific Hydro's Asset Management System was sighted. A very comprehensive high level framework for managing assets over their lifecycles is in place.
Recommendation: Nil			Action plan: Nil
103. A licensee must notify details of the asset management system and any substantial changes to it to the Authority.	A1	5	Pacific Hydro has confirmed that it has included changes recommended in the previous review by the auditors in the asset management system. Confirmation of the changes sent to the Authority along with implemented changes was sighted by the auditors. A new computerised maintenance management systems (WTG) is being implemented to replace the existing MEX CMMS within the asset management system framework. However, this has not been communicated to the Authority as the work is still in progress and WTG fully implemented. Pacific Hydro has confirmed its intentions to inform the Authority upon completion of the implementation.
Recommendation: Nil			Action plan: Nil
104. A licensee must provide the Authority with a report by an independent expert as to the effectiveness of its asset management system every 24 months, or such longer period as determined by the Authority.	A1	2	Pacific Hydro has confirmed that The Asset Partnership conducted the asset management system review in 2011. As an outcome of the previous review, Pacific Hydro was granted one (1) year extension by the Authority to provide the Authority with the next review report. The previous review report and the extension letter issue by the Authority were sighted by the auditors.
Recommendation: Nil			Action plan: Nil

105. A licensee must pay to the Authority the prescribed licence fee within one month after the day of grant or renewal of the licence and within one month after each anniversary of that day during the term of the licence.	A1	4	Payment notice ERA239 sighted for licence fee. Pacific Hydro has confirmed that it has paid the previous payment notice for its licence fee received from the Authority.
Recommendation: Nil			Action plan: Nil
106. 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.	B1	2	Pacific Hydro has confirmed that it plans the outages and informs its customers about the upcoming outage to keep the occurrence and duration of interruptions to a minimum. Following observations were made by the auditors: <ul style="list-style-type: none"> Planned outage in April to install the new 132kV breaker has been communicated to the customers. Coordinated with customers to use their power backup (diesel powered generators) during this period. For unplanned outages, it has been mutually agreed that Horizon Power and ADM would start diesel generators if the power has not been restored within 20 mins. Horizon Power Annual Reconciliation reports dated July 2012 and July 2013 sighted which outlines the number and duration of outages. All incidents are recorded in a spread sheet "Incident.xls" and root cause of failures analysed.
Recommendation: Nil			Action plan: Nil
107. A licensee must pay the costs of taking an interest in land or an easement over land.	A1	5	Easement payment advice dated December 6, 2013 sighted. Pacific Hydro has confirmed that the payment was made for the lease of land to build a shed for spare parts onsite. The shed is located next to the switchyard at Lake Argyle. The auditors have verified that onsite construction of the shed is progressing.
Recommendation: Nil			Action plan: Nil
Section 13 Electricity Licences			
119. 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.	A1	4	Independent auditors reports for years 2011, 2012, and 2013 on the annual financial report were sighted which state that the financial report of Pacific Hydro Pty Ltd is in accordance with the Corporation Act 2001 and complies with Australian Accounting Standards and corporation regulations 2001 (and also complies with international reporting standards).
Recommendation: Nil			Action plan: Nil

121. A licensee must comply, and require its auditor to comply, with the Authority's standard audit guidelines dealing with the performance audit.	A1	4	The Authority's letter dated May 14, 2014 giving approval of the auditor, and the Authority's letter sent on June 26, 2014 giving approval of audit and review plan sighted.
Recommendation: Nil		Action plan: Nil	
122. A licensee must comply, and must require the licensee's expert to comply, with the relevant aspects of the Authority's standard guidelines dealing with the asset management system.	A1	4	Statement of compliance in the auditor's report.
Recommendation: Nil		Action plan: Nil	
124. A licensee must provide the Authority, in the manner prescribed, any information the Authority requires in connection with its functions under the Electricity Industry Act.	A1	5	Pacific Hydro has confirmed that it has provided, when the Authority required, information in connection with its functions under the Electricity Industry Act. The auditors sighted: <ul style="list-style-type: none"> Compliance Report dated July 25, 2012 sent to the Authority; Regular requests - post-review implementation plan updates sent to the Authority.
Recommendation: Nil		Action plan: Nil	
126. Unless otherwise specified, all notices must be in writing.	A1	5	Pacific Hydro has confirmed that it has provided in writing, when the Authority or its customers required, information in connection with its licence obligations. The auditors sighted: <ul style="list-style-type: none"> Metering Equipment Accuracy Checks dated July 6, 2012 sent to Horizon Power; Compliance Report dated July 25, 2012 sent to the Authority; Argyle Diamond Mine's (ADM) Power Station Controls Impact on the East Kimberley Power System dated December 5, 2013 sent to ADM.
Recommendation: Nil		Action plan: Nil	
Section 15 Electricity Industry Metering Code			

<p>340. A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and also comply with any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act.</p>	A1	4	<p>Pacific Hydro has confirmed that the Meters ADM Main SEL 734 and KNX T1 Main SEL 734 meet the requirements and comply with the applicable specifications and guidelines. OEM provided calibration and testing certificates were sighted. Calibration of the meters is due later in 2014.</p>
<p>Recommendation: Nil</p>			<p>Action plan: Nil</p>
<p>341. An accumulation meter must at least conform to the requirements specified in the applicable metrology procedure and display, or permit access to a display of the measurements specified in subclauses 3.2(1)(a)(b) using dials, a cyclometer, an illuminated display panel or some other visual means.</p>	A1	4	<p>Manager, Ord Hydro has confirmed that all revenue and check meters have accumulation readouts and are manually read from the meter or from SCADA display in Kununurra office and entered into the Energy.xls spreadsheet on a monthly basis.</p>
<p>Recommendation: Nil</p>			<p>Action plan: Nil</p>
<p>347. A network operator must ensure that there is a metering installation at every connection point on its network which is not a Type 7 connection point. Unless it is a Type 7 metering installation, the metering installation must meet the functionality requirements prescribed.</p>	A1	4	<p>Pacific Hydro has confirmed that it has a total of six (6) meter installations in its network. All meter installations comply with Type 1 – Type 4 functional specifications. The auditors have sighted the schematic showing meters at the customer's switching (document 07-E-002).</p>
<p>Recommendation: Nil</p>			<p>Action plan: Nil</p>
<p>348. A network operator must, unless otherwise agreed, for each metering installation on its network, on and from the time of its connection to the network, provide, install, operate and, subject to subclause 3.7(5), maintain the metering installation in the manner prescribed.</p>	A1	4	<p>Pacific Hydro has confirmed that the SEL type revenue meters are maintenance free as recommended by the OEM. A 3 yearly calibration schedule is in place to comply with the requirements of the power purchase agreements in place with the customers. These meters are sent offsite to a contractor's facility for calibration. Check meters and SCADA readouts are used during that period.</p>
<p>Recommendation: Nil</p>			<p>Action plan: Nil</p>

349. A network operator must ensure that, except for a Type 7 metering installation, the metering point for a revenue metering installation is located as close as practicable to the connection point in accordance with good electricity industry practice.	A1	4	Pacific Hydro has confirmed that the metering points for all revenue metering installations are located as close as possible to the connection point. The auditors sighted the schematic showing meters at the customer's switching (document O7-E-002).
Recommendation: Nil			Action plan: Nil
350. A network operator may only impose a charge for providing, installing, operating or maintaining a metering installation in accordance with the applicable service level agreement between it and the user.	A1	4	Pacific Hydro has confirmed that all charges imposed were in accordance with the applicable Power Purchase Agreements. There were no additional / new charges imposed outside PPAs.
Recommendation: Nil			Action plan: Nil
353. Subject to clause 3.27, a network operator must, for each metering installation on its network, ensure that the metering installation is secured by means of devices or methods which, to the standard of good electricity industry practice, hinder unauthorized access and enable unauthorized access to be detected.	A1	4	Pacific Hydro has confirmed that the switchyard at Kununurra and Lake Argyle Tourist Village is kept locked with padlocks and protected with barbed wire fencing to prohibit any unauthorized access. The auditors have confirmed the arrangements in place during their visit onsite.
Recommendation: Nil			Action plan: Nil
354. Subject to subclauses 3.9(4), 3.9(5) and 3.9(7), each metering installation must meet at least the requirements for that type of metering installation specified in Table 3 in Appendix 1 of the Code.	A1	4	SEL-734 meter installations comply with Type 2 requirements specified in Table 3 in Appendix 1 of the code.
Recommendation: Nil			Action plan: Nil

<p>355. For a metering installation used to supply a customer with requirements above 1000 volts that require a VT and whose annual consumption is below 750MWh, the metering installation must meet the relevant accuracy requirements of a Type 3 metering installation for active energy only.</p>	A1	5	<p>Pacific Hydro has confirmed that for both its customers (ADM and Horizon Power), consumption is over 750 MWh. Therefore, SEL-734 meter installations comply with Type 2 requirements specified in Table 3 in Appendix 1 of the code</p>
<p>Recommendation: Nil</p>			<p>Action plan: Nil</p>
<p>357. A network operator must ensure that any programmable settings within any of its metering installations, data loggers or peripheral devices, that may affect the resolution of displayed or stored data, meet the relevant requirements specified in the applicable metrology procedure and comply with any applicable specifications or guidelines specified by the National Measurement Institute under the National Measurement Act.</p>	A1	5	<p>Pacific Hydro has confirmed that the SEL type revenue meters are maintenance free as recommended by the OEM. A 3 yearly calibration schedule is in place to comply with the requirements of the power purchase agreements in place with the customers. These meters are sent offsite to a contractor's facility for calibration. OEM provided calibration records indicate minimal error. The next calibration is due late in 2014.</p>
<p>Recommendation: Nil</p>			<p>Action plan: Nil</p>
<p>358. A network operator must ensure that a metering installation on its network is operating consistently with good electricity industry practice to measure and record data, and to permit collection of data within the time specified in the applicable service level agreement, for at least the percentages of the year specified.</p>	A1	5	<p>Pacific Hydro has confirmed that SCADA reads the energy data from the metering installations every hour and the data can be read and recorded into the spreadsheet at any time.</p>
<p>Recommendation: Nil</p>			<p>Action plan: Nil</p>

359. If an outage or malfunction occurs to a metering installation, the network operator must make repairs to the metering installation in accordance with the applicable service level agreement.	A1	5	Pacific Hydro has confirmed that there was only one (1) instance during the period subject to the audit when the revenue meter stopped working after a scheduled outage restoration. The revenue meter was rebooted and it was reported working as per normal. Check meter and SCADA data was used to determine the correct meter reading. This information was not communicated to the customer due to check meter working correctly.
Recommendation: Nil			Action plan: Nil
361. A network operator must ensure that the meters on its network are systematically sampled and tested for accuracy in accordance with AS 1284.13.	A1	4	Pacific Hydro has confirmed that the SEL type revenue meters are maintenance free as recommended by the OEM. A three (3) yearly calibration schedule is in place to comply with the requirements of the Power Purchase Agreements in place with the customers. These meters are sent offsite to a contractor's facility for calibration.
Recommendation: Nil			Action plan: Nil
363. A network operator must ensure that each metering installation complies with at least, the prescribed design requirements.	A1	5	Manager, Ord Hydro has confirmed that all the revenue meters have been upgraded in 2011 as recommended in the calibration reports. The existing CTs and VTs have been used with the new meters. There have been no changes to the original metering installation design of CTs and VTs. The new meters comply with the prescribed design requirements.
Recommendation: Nil			Action plan: Nil
364. A network operator must ensure that instrument transformers in its metering installations comply with the relevant requirements of any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act and any requirements specified in the applicable metrology procedure.	A1	4	Manager, Ord Hydro has confirmed that all the revenue meters have been upgraded in 2011 as recommended in the calibration reports. The original CTs and VTs are still in use with the new meters. There have been no changes to the original metering installation design of CTs and VTs. The original CTs and VTs and new meters comply with the prescribed design requirements.
Recommendation: Nil			Action plan: Nil
365. A network operator must provide isolation facilities, to the standard of good electricity industry practice, to facilitate testing and calibration of the metering installation.	B1	4	Maintenance staff is able to short the CT and open the VT before metering is removed for testing. The Manager, Ord Hydro has confirmed that the meters are sent offsite to a contractor's facility for calibration due to high cost and resource constraints.
Recommendation: Nil			Action plan: Nil

366. A network operator must maintain drawings and supporting information, to the standard of good electricity industry practice, detailing the metering installation for maintenance and auditing purposes.	A1	4	The auditors have sighted the current design drawings and OEM meter manuals. NEXO system is used for managing and storing documents, manuals, drawings and guidelines electronically. Pacific Hydro has confirmed that no changes have been made outside of documented drawings.
Recommendation: Nil		Action plan: Nil	
367. A network operator must procure the user or the user's customer to install (or arrange for the installation of) a full check metering installation or partial check metering installation in accordance with the prescribed requirements.	A1	5	Pacific Hydro has confirmed that partial check metering is installed in accordance with the prescribed requirements. The auditors have sighted check metering installation at the Kununurra switchyard. Schematic shows Lake Argyle Village and ADM check meter installations.
Recommendation: Nil		Action plan: Nil	
369. A check metering installation for a metering point must comply with the prescribed requirements.	A1	4	Pacific Hydro has confirmed that the CTs and VTs for the main revenue meters are in use for the check meters. The metering installations for revenue meters, CTs and VTs, and check meters comply with the prescribed requirements.
Recommendation: Nil		Action plan: Nil	
370. If, under clause 3.14(2), a metering installation uses metering class CTs and VTs that do not comply with the Table 3 in Appendix 1, then the network operator must either or both install meters of a higher class accuracy and apply accuracy calibration factors within the meter to compensate for CT and VT errors, in order to achieve the accuracy requirements in Table 3 in Appendix 1.	A1	5	Pacific Hydro has confirmed that all CTs and VTs comply with error requirements as sighted in the calibration data and specifications (0.5 CT/VT for type 2).
Recommendation: Nil		Action plan: Nil	
371. The network operator must ensure that a Type 1 metering installation to Type 5 metering installation on the network has the facilities and functionality prescribed.	A1	5	Type 1 metering is used where type 2 would satisfy minimum functionality.
Recommendation: Nil		Action plan: Nil	

380. A network operator providing one or more metering installations with enhanced technology features must be licensed to use and access the metering software applicable to all devices being installed and be able to program the devices and set parameters.	A1	5	OEM has provided to Pacific Hydro all required software to use and access SEL type 734 meter installations. Manager, Ord Hydro has confirmed that he is capable of and trained in setting the parameters of the meters. However, no such instances of reprogramming or resetting have occurred during the period subject to the audit.
Recommendation: Nil			Action plan: Nil
387. A network operator must establish, maintain and administer a metering database containing, for each metering point on its network, standing data and energy data.	B1	5	Meter register sighted with all metering points. The spread sheet is maintained by the Manager, Ord Hydro at Kununurra office. The energy data is read from the metering installations and recorded into the “ <i>Energy.xls</i> ” spreadsheet. There is another spread sheet “ <i>Electrical Meters Summary Database.xls</i> ” used to record standing data of metering installations. The storage of energy data and standing data in two databases represent no significant risk to the business and compliance with the obligation. Merging the two databases would be easier to maintain and update database.
Recommendation: Nil.			Action plan: Nil.
388. A network operator must ensure that its metering database and associated links, circuits, information storage and processing systems are secured by means of devices or methods which, to the standard of good electricity industry practice, hinder unauthorized access and enable unauthorized access to be detected.	B1	5	Pacific Hydro has confirmed that the metering database is stored on the network which requires passwords to access as well as access to the building which has security measures in place.
Recommendation: Nil			Action plan: Nil
389. A network operator must prepare, and if applicable, must implement a disaster recovery plan to ensure that it is able, within 2 business days after the day of any disaster, to rebuild the metering database and provide energy data to Code participants.	A1	5	Pacific Hydro has confirmed that the IT Disaster Recovery Plan (DRP) is used when Disaster Recovery System (DRS) is activated. Metering databases get backed up on servers in Melbourne office every night, so metering database can be recovered once the DRS is activated. However, no such instance has occurred during the period subject to the audit.
Recommendation: Nil			Action plan: Nil

390. A network operator must ensure that its registry complies with the Code and the prescribed clause of the market rules.	B1	5	Metering register sighted and verified to comply with the code and requirements outlined in section 8.3.1 of the Electricity Industry Regulations 2004.
Recommendation: Nil			Action plan: Nil
391. The standing data for a metering point must comprise at least the items specified.	B2	5	Pacific Hydro has confirmed that the standing data in the meter register does not fully comprise the data items specified in the code. However, it includes most of the essential items related to the meter installations.
Recommendation: It is recommended that Pacific Hydro modify the standing data in the existing meter register by including items specified in the code. This recommendation should be implemented in conjunction with reference no 387 to avoid rework.			Action plan: Modify standing data in the meter register by including items specified in the code.
392. If there is a discrepancy between energy data held in a metering installation and data held in the metering database, the affected Code participants and the network operator must liaise together to determine the most appropriate way to resolve a discrepancy.	A1	4	Pacific Hydro has confirmed that there was only one (1) instance when ADM enquired about the invoice for June 2013 related to the PPAs and Pacific Hydro's Operations Accountant had resolved the issue by responding via email. However, this particular instance was not directly related to the discrepancy in the energy data.
Recommendation: Nil			Action plan: Nil
393. A Code participant must not knowingly permit the registry to be materially inaccurate.	A1	4	Pacific Hydro has confirmed that there are only six (6) meter installations for the two customers in the network to be maintained within the registry. There have been no new meter installations or any changes to the existing meter installations.
Recommendation: Nil			Action plan: Nil
400. A network operator must have devices and methods in place that ensure that energy data held in its metering installation is secured from unauthorised local or remote access using the methods prescribed.	A1	5	The auditors confirmed while visiting switchyard in Kununurra and OSY. Security fences with padlocks exist. IT security requires password to access the database and access to the building to access the computer.
Recommendation: Nil			Action plan: Nil

401. A network operator must have devices and methods in place that ensure that the data held in its metering database is secured from unauthorised local or remote access using the methods prescribed.	A1	5	The auditors confirmed while visiting switchyard in Kununurra and OSY. Security fences with padlocks exist. IT security requires password to access the database and access to the building to access the computer.
Recommendation: Nil			Action plan: Nil
403. A network operator must retain energy data in its metering database for each metering point on its network (including any energy data that has been replaced under subclause 5.24) for at least the periods, and with the level of accessibility, prescribed.	A1	5	Energy data is retained in the spread sheet which is maintained by the Manager, Ord Hydro at Kununurra office. The energy data is read from the metering installations and recorded into the “Energy.xls” spreadsheet. The historical data is retained in the spread sheet and accessible for a period prescribed. Historic energy data readings are also held in SCADA.
Recommendation: Nil			Action plan: Nil
406. A network operator must, for each metering point on its network, obtain energy data from the metering installation and transfer the energy data into its metering database by no later than 2 business days after the date for the scheduled meter reading for the metering point (or such other time as is specified in the applicable service level agreement).	A1	5	Meter register sighted with all metering points. The spread sheet is maintained by the Manager, Ord Hydro at Kununurra office. The energy data is read from the metering installations and recorded into the “Energy.xls” spreadsheet the same day as per schedule. ADM representative read the meter and provide the meter reading to Manager, Ord Hydro the same day as scheduled and Manager enters the reading into “Energy.xls” spreadsheet.
Recommendation: Nil			Action plan: Nil
407. A network operator must, for each meter on its network, at least once in every 12 month period undertake a meter reading that provides an actual value that passes the validation processes in Appendix 2.	B2	3	Pacific hydro has confirmed that there is no data validation process in place. However, actual meter reading can be validated via the check meter energy data and SCADA data.
Recommendation: Considering there are only 6 meters in the network and there is also partial check meters and SCADA data available, it is recommended to Pacific Hydro that a standard data validation process be developed and undertake validation once in every 12 months to satisfy the requirements in Appendix 2 of the code.			Action plan: Develop a data validation process and update all relevant documentation. Nominate a responsible person to undertake data validation once in every 12 months.

408. The meter reading referred to in clause 5.4(1) must not be undertaken by the customer associated with the meter, and must be undertaken by a person who is employed or appointed by the network operator and who is suitably skilled in accordance with good electricity industry practice to carry out meter readings.	A1	5	Pacific hydro has confirmed that Manager, Ord Hydro reads and records all meter energy data except ADM meter which is read by ADM. However, Manager, Ord Hydro can verify the reading provided by ADM by reading SCADA data remotely.
Recommendation: Nil			Action plan: Nil
414. A network operator must provide a user with whatever information the network operator has that is necessary to enable the user to comply with its obligations under the Code of Conduct, within the time necessary for the user to comply with the obligations.	A1	4	Pacific Hydro has confirmed that there was only one (1) instance when ADM enquired about the invoice for June 2013 related to the PPAs and Pacific Hydro's Operations Accountant had resolved the issue by responding via email.
Recommendation: Nil			Action plan: Nil
415. A network operator must provide standing data, provided to or obtained by it under this Code, to users where required to do so under any enactment.	A1	4	Pacific Hydro has confirmed that Contracts Manager, Horizon Power had enquired in July 2012 about the Metering Accuracy and standing data details of the new meters to replace the existing meters. Pacific Hydro responded to that query in writing on August 13, 2012 to satisfy Horizon Power's query. The auditors have sighted the communication email trail and response letter.
Recommendation: Nil			Action plan: Nil
422. 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.	A1	5	Pacific hydro has confirmed that Manager, Ord Hydro reads and records all meter energy data except ADM meter which is read by ADM representative. Manager, Ord Hydro has confirmed that ADM provides the energy data to him as per the schedule.
Recommendation: Nil			Action plan: Nil

432. A network operator must, by not later than 6 months after the date this Code applies to the network operator, develop, in accordance with the communication rules, an Energy Data Verification Request Form.	B2	3	Pacific hydro has confirmed that there is no Energy Data Verification Request Form.
433. An Energy Data Verification Request Form must require a Code participant to provide the information prescribed.	B2	3	
Recommendation: It is recommended that Pacific Hydro develops Energy Data Verification Request Form in accordance with the communication rules and information prescribed by the section 5.20 (1) (2) of the code.			Action plan: Develop Energy Data Verification Request Form as per the section 5.20 (1) (2) of the code.
435. A network operator must comply with any reasonable request under subclause 5.21(1).	A1	5	Pacific Hydro has confirmed that Contracts Manager, Horizon Power had enquired in July 2012 about the Metering Accuracy and standing data details of the new meters to replace the existing meters. Pacific Hydro responded to that query in writing on August 13, 2012 to satisfy Horizon Power's query. The auditors have sighted the communication email trail and response letter.
Recommendation: Nil			Action plan: Nil
436. A test or audit under subclause 5.21(1) is to be conducted in accordance with the metrology procedure and the applicable service level agreement.	A1	4	Pacific Hydro has confirmed that Contracts Manager, Horizon Power had enquired in July 2012 about the Metering Accuracy and standing data details of the new meters to replace the existing meters. Pacific Hydro responded to that query in writing on August 13, 2012 to satisfy Horizon Power's query. The auditors have sighted the communication email trail and response letter.
Recommendation: Nil			Action plan: Nil
439. A network operator may only impose a charge for the testing of the metering installations, or auditing of information from the meters associated with the metering installations, or both, in accordance with the applicable service level agreement between it and the user.	A1	5	Pacific Hydro has confirmed that the revenue meters were replaced with the SEL type meters in 2011. These meters are sent offsite to a contractor's facility for calibration once in every three (3) years to comply with the requirements of the power purchase agreements with its customers. There have been no instances where the user has asked for additional testing.
Recommendation: Nil			Action plan: Nil

440. Any written service level agreement entered into under subclause 5.21(7) must include a provision that no charge is to be imposed if the test or audit reveals a non-compliance with this Code.	A1	3	Pacific Hydro has confirmed that the revenue meters were replaced with the SEL type meters in 2011 as a result of routine calibration testing of the old meters. There have been no instances where the user has asked for additional testing.
Recommendation: Nil			Action plan: Nil
444. The network operator must use check metering data, where available, to validate energy data provided that the check metering data has been appropriately adjusted for differences in metering installation accuracy in accordance with subclause 3.13.	B1	4	Pacific Hydro has confirmed that the revenue meters were replaced with the SEL type meters in 2011. These meters are sent offsite to a contractor's facility for calibration once in every three (3) years to comply with the requirements of the power purchase agreements with its customers. However, check meters are not calibrated separately and the energy data from the check meters is appropriately checked against the revenue meter for any inaccuracies. No instances reported during the period subject to the audit.
Recommendation: Nil			Action plan: Nil
446. If a network operator detects a loss of energy data or incorrect energy data from a metering installation, it must notify each affected Code participant of the loss or error within 24 hours after detection.	A1	5	Pacific Hydro has confirmed that there was only one (1) instance during the period subject to the audit when the revenue meter stopped working after a scheduled outage restoration. The revenue meter was rebooted and it was reported working as per normal. Check meter and SCADA data was used to determine the correct meter reading. This information was not communicated to the customer due to check meter working correctly.
Recommendation: Nil			Action plan: Nil
468. A network operator must, in relation to its network, comply with the agreements, rules, procedures, criteria and processes prescribed.	A1	2	Pacific Hydro has confirmed that it has complied with the requirements of the PPAs at all times. The auditors have checked annual reconciliation report and quality reports sent to Horizon Power.
Recommendation: Nil			Action plan: Nil
470. A network operator must amend any document in accordance with the Authority's final findings.	A1	5	Pacific Hydro has confirmed that it has amended its asset management system as per the action plan and agreed with the Authority.
Recommendation: Nil			Action plan: Nil
471. The network operator must publish any document that has been amended under subclause 6.20(4).	A1	3	Although Pacific Hydro has confirmed that it has amended its asset management system as per the action plan and agreed with the Authority, the changes have not been published by Pacific Hydro.
Recommendation: Nil.			Action plan: Nil.

472. 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.	A1	5	Emails to and from ADM and Horizon Power sighted. The contact details have not changed since last audit.
Recommendation: Nil		Action plan: Nil	
Section 16 Electricity Industry (Network Quality and Reliability of Supply) Code			
483. A distributor or transmitter must, as far as reasonably practicable, ensure that electricity supply to a customer's electrical installations complies with prescribed standards.	A1	2	Pacific Hydro has confirmed that supply quality requirements are specified in the relevant PPAs. Following observations were made by the auditors: <ul style="list-style-type: none"> • Quality and reliability trends are monitored by Manager, Ord Hydro online via SCADA monitors; • There are various alarms set point to monitor quality and reliability are within the prescribed standards; • One electrical engineer in Melbourne office is appointed to monitor power supply across Pacific Power, including the Ord Hydro network; • Faults and system disturbances are analysed with the help of the trends.
Recommendation: Nil		Action plan: Nil	
484. A distributor or transmitter must, so far as reasonably practicable, disconnect the supply of electricity to installations or property in specified circumstances, unless it is in the interest of the customer to maintain the supply.	A1	2	Pacific Hydro has confirmed that only one (1) instance of disconnection occurred during the period subject to the audit. A letter to ADM " <i>Argyle Diamond Mine's (ADM) Power Station Controls Impact on the East Kimberley Power System</i> " dated December 5, 2013 was sighted by the auditors.
Recommendation: Nil		Action plan: Nil	

485. A distributor or transmitter must, as far as reasonably practicable, ensure that the supply of electricity is maintained and the occurrence and duration of interruptions is kept to a minimum.	B1	2	<p>Pacific Hydro has confirmed that it plans the outages and informs its customers about the upcoming outage to keep the occurrence and duration of interruptions to a minimum. Following observations were made by the auditors:</p> <ul style="list-style-type: none"> Planned outage in April to install the new 132kV breaker has been communicated to the customers. Coordinated with customers to use their power backup (diesel powered generators) during this period. For unplanned outages, it has been mutually agreed that Horizon Power and ADM would start diesel generators if the power has not been restored within 20 mins. Horizon Power Annual Reconciliation reports dated July 2012 and July 2013 sighted which outlines the number and duration of outages.
Recommendation: Nil		Action plan: Nil	
486. A distributor or transmitter must, so far as reasonably practicable, reduce the effect of any interruption on a customer.	B1	2	As above the duration has been minimised and therefore the effect minimised on the customers. Planned outage timings are developed in conjunction with customers to minimise the effect of the outages.
Recommendation: Nil		Action plan: Nil	
489. A distributor or transmitter must, so far as reasonably practicable, ensure that customers in specified areas do not have average total lengths of interruptions of supply greater than specified durations.	B1	2	Horizon Power Annual Reconciliation reports dated July 2012 and July 2013 sighted which outlines the number and duration of outages are within the PPA limits.
Recommendation:		Action plan:	
490. The average total length of interruptions of supply is to be calculated using the specified method.	B1	3	Pacific Hydro has confirmed that the method used for calculating the average total length of interruptions of supply is not as specified by the code. However, ADM PPA states the requirement is based on the total hour's interruption for a contract year as opposed to the average of the previous 4 financial years as stated in the Code. This PPA was developed and agreed between Ord Hydro and ADM. Similarly, Horizon Power PPA does not specify limits for interruption duration as per the Code.
Recommendation: Nil.		Action plan: Nil.	

498. A distributor or transmitter must take all such steps as are reasonably necessary to monitor the operation of its network to ensure compliance with specified requirements.	A1	4	The auditors have sighted SCADA system which provides monitoring of all relevant inputs and outputs including interruptions and power quality.
Recommendation: Nil			Action plan: Nil

Table 8 Detailed observations, recommendations, and action plan

6. Recommendations

The recommendations resulting from this audit is detailed in the Table 9 below:

Licence condition reference	Recommendations
391	It is recommended that Pacific Hydro modify the standing data in the existing meter register by including items specified in the code. This recommendation should be implemented in conjunction with reference no 387 to avoid rework.
407	It is recommended to Pacific Hydro that a standard data validation process be developed and undertake validation once in every 12 months to satisfy the requirements in Appendix 2 of the code.
432, 433	It is recommended that Pacific Hydro develops Energy Data Verification Request Form in accordance with the communication rules and information prescribed by the section 5.20 (1) (2) of the code.

Table 9 Recommendations

7. Actions from the previous audit

This audit considers how Pacific Hydro has progressed against the post audit implementation plan detailed in the June 2011 performance audit report. Our assessment of Pacific Hydro’s progress in implementing the action plan specified in the post audit implementation plan is provided below in both a summarised and detailed follow up format.

There was only one (1) action recommended during the previous audit to address identified non-conformances. The recommendation is listed in the Table 10 below.

7.1. Pacific Hydro’s arrangement for monitoring progress

- Pacific Hydro utilises the “Risk Wizard” program to monitor compliance with its Licence obligations;
- Action plans for each recommendation from the previous performance audit are maintained centralised NEXO system;
- The Risk and Compliance Manager is responsible for monitoring compliance with regulatory obligations, including management of compliances in the Risk Wizard; and
- Designated managers are responsible for managing and reporting compliance with obligations.

7.2. Summary of post audit implementation plan progress

The table below shows one (1) recommendation made during the previous performance audit which has been completed.

Licence Condition Reference	Recommendation	Licencee’s Action	Documents / Evidence Gathered	Further Action Required
103. A licensee must notify details of the asset management system and any substantial changes to it to the Authority.	Formally provide the Authority with the details of the improvements to Pacific Hydro’s Asset Management System.	Licencee wrote a letter to ERA, the Authority, outlining status update and completion of the post audit review implementation plan.	Copies of the letter including status update and plan completion dated August 2013.	Complete item 1 “Include in the requirement for assessment of non-asset solutions in the AMF and any other necessary documentation” and advise the Authority.

Table 10 Previous audit implementation plan progress

8. *Changes to the Licence*

PwC has no recommendations to make with regards to changes to the Licence EIRL4.

The changes occurred in the Licence EIRL4 during the audit period are summarised in Table 11 below:

Licence EIRL4	Changes occurred
Version 3	Licence version 3 was the previous version since January 13, 2011.
Version 4	Licence Version 4 is the current version since January 1, 2013.

Table 11 Changes to the Licence

Appendix A. - Appendices

A.1. Statement of non-occurrence from Pacific Hydro

A separate signed version of this statement for the Authority from Pacific Hydro is dated 8 September 2014.

A.2. Post audit implementation plan

Table 12 below outlines the implementation plan for the recommendations made as a result of the Performance Audit. While the recommendations were developed as part of the audit process, the actions assigned, person responsible and completion date have been developed by the licensee and do not form part of PwC's opinion.

Recommendation	Action	Person responsible	Completion date
It is recommended that Pacific Hydro modify the standing data in the existing meter register by including items specified in the code. This recommendation should be implemented in conjunction with reference no 387 to avoid rework.	Modify standing data in the meter register by including items specified in the code.	Executive Manager Operations	31 December 2014
It is recommended to Pacific Hydro that a standard data validation process be developed and undertake validation once in every 12 months to satisfy the requirements in Appendix 2 of the code.	Develop a data validation process and update all relevant documentation. Nominate a responsible person to undertake data validation once in every 12 months.	Executive Assistant Generation	30 June 2015
It is recommended that Pacific Hydro develops Energy Data Verification Request Form in accordance with the communication rules and information prescribed by the section 5.20 (1) (2) of the code.	Develop Energy Data Verification Request Form as per the section 5.20 (1) (2) of the code.	Executive Assistant Generation	30 June 2015

Table 12 Post audit implementation plan

A.3. Audit plan

Revised No. (No. in May 2011)	Ord Hydro's Licence condition	Ord Hydro's Obligations under Condition	Description	Consequence (1=minor, 2=moderate, 3=major)	Likelihood (A=likely, B=probable, C=unlikely)	Inherent Risk (low, medium, high)	Adequacy of existing controls (S=strong, M=moderate, W=weak)	Audit Priority						The audit will check the following working documents and procedures as appropriate	Persons to be interviewed	Comment
								1	2	3	4	5	NA			
Section 12 Electricity Act																
101.	Integrated Regional Licence condition 14.1	Electricity Industry Act section 13(1)	A licensee must, not less than once every 24 months, provide the Authority with a performance audit conducted by an independent expert acceptable to the Authority.	3	C	High	S	√						Check ERA reminder letter, Previous audit reports, audit extension letter, JIRA Task Database reminder	Darren Sexton	Verify 1 year extension
102.	Integrated Regional Licence condition 20.1	Electricity Industry Act section 14(1)(a)	A licensee must provide for an asset management system.	2	C	Medium	S				√			Asset Management Codes are based upon PAS55 framework,	Darren Sexton	Verify alignment of the asset management system with good industry practice

103.	Integrated Regional Licence condition 20.2 and 20.3	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 Authority.	1	B	Low	W						√	Check Asset Management System	Darren Sexton	
104.	Integrated Regional Licence condition 20.4	Electricity Industry Act section 14(1)(c)	A licensee must provide the Authority with a report by an independent expert as to the effectiveness of its asset management system every 24 months, or such longer period as determined by the Authority.	3	C	High	S					√		Check ERA reminder letter, Previous review reports, review extension letter, JIRA Task Database reminder	Darren Sexton	Verify 1 year extension
105.	Integrated Regional Licence condition 4.1	Electricity Industry Act section 17(1)	A licensee must pay to the Authority the prescribed licence fee within one month after the day of grant or renewal of the licence and within one month after each anniversary of that day during the term of the licence.	2	C	Medium	S					√		Previous Tax Invoices or Payment Receipt	Darren Sexton	
106.	Integrated Regional Licence condition 5.1	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.	3	B	High	M					√		Maintenance Inspection programs, History of faults recorded, Incident register	Darren Sexton Brian Walter Stuart Lester	Check for evidence of accidents, interruptions and faults
107.	Integrated Regional Licence condition 5.1	Electricity Industry Act section 41(6)	A licensee must pay the costs of taking an interest in land or an easement over land.	1	C	Low	S					√		Previous Tax Invoices or Payment Receipt	Darren Sexton	

112.	Integrated Regional Licence condition 5.1	Electricity Industry Act section 115(1)	A licensee that is a network service provider or an associate of a network service provider, in relation to network infrastructure covered by the Code, must not engage in conduct for the purpose of hindering or prohibiting access by any person to services in accordance with the Code, the making of access agreements or any particular agreement in respect of those facilities, or the access to which a person is entitled under an access agreement or a determination made by way of arbitration.	1	C	Low	M							√	Verify any previous non hindrance instances	Darren Sexton	Evidence of positive engagement with Kimberly Agriculture. No access arrangement and therefore not applicable to Ord Hydro.
113.	Integrated Regional Licence condition 5.1	Electricity Industry Act section 115(2)	A licensee that has, or is an associate of a person that has, access to services under an access agreement must not engage in conduct for the purpose of hindering or prohibiting access.	1	C	Low	M							√		Darren Sexton	No access arrangement and therefore not applicable to Ord Hydro
Section 13 Electricity Licences																	
114.	Integrated Regional Licence condition 23.1	Electricity Industry Act section 11	A licensee must ensure that an electricity marketing agent of the licensee complies with the applicable codes.											NA			Appointment of a Marketing Agent is not required
115.	Integrated Regional Licence condition 23.2	Electricity Industry Act section 11	The licensee must report a breach of the applicable code conditions by an electricity marketing agent to the Authority within the prescribed timeframe.											NA			Appointment of a Marketing Agent is not required

121.	Integrated Regional Licence condition 14.2	Electricity Industry Act section 11	A licensee must comply, and require its auditor to comply, with the Authority's standard audit guidelines dealing with the performance audit.	2	B	Medium	S						√		Auditor selection process prescribed by the authority	Darren Sexton	Verify the compliance with the process
122.	Integrated Regional Licence condition 20.5	Electricity Industry Act section 11	A licensee must comply, and must require the licensee's expert to comply, with the relevant aspects of the Authority's standard guidelines dealing with the asset management system.	2	B	Medium	S						√		Auditor selection process prescribed by the authority	Darren Sexton	Verify the compliance with the process
123.	Integrated Regional Licence condition 15.1	Electricity Industry Act section 11	A licensee must report to the Authority, in the manner prescribed, if a licensee is under external administration or there is a significant change in the circumstances upon which the licence was granted which may affect a licensee's ability to meet its obligations.	2	C	Medium	M						√		Check for any evidence of administration during the audit period or written letters/notices	Darren Sexton	
124.	Integrated Regional Licence condition 16.1	Electricity Industry Act section 11	A licensee must provide the Authority, in the manner prescribed, any information the Authority requires in connection with its functions under the Electricity Industry Act.	1	C	Low	S						√		Check samples of requests, reports, letters provided to the authority during the audit period	Darren Sexton	
125.	Integrated Regional Licence condition 17.1 and 17.2	Electricity Industry Act section 11	A licensee must publish any information it is directed by the Authority to publish, within the timeframes specified.											NA		Kate Summers	Pacific Hydro is not a covered network so prescribed standards by authority do not apply

126.	Integrated Regional Licence condition 18.1	Electricity Industry Act section 11	Unless otherwise specified, all notices must be in writing.	1	C	Low	M							√	Evidence of written notices during the audit period	Darren Sexton	
127.	Integrated Regional Licence condition 29.1	Electricity Industry Act section 11	A distributor must create and maintain a Priority Restoration Register.											NA			Condition is not included in Ord Hydro's licence.
128.	Integrated Regional Licence condition 29.1	Electricity Industry Act section 11	The Priority Restoration Register must comply with any criteria determined by the Minister.											NA			Condition is not included in Ord Hydro's licence.
Section 15 Electricity Industry Metering Code																	
338.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 2.2(1)(a)	A network operator must treat all Code participants that are its associates on an arms-length basis.	1	C	Low	M							√	Interaction of three companies under Pacific Hydro Group name	Darren Sexton	Need more information on various companies under one licence
339.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 2.2(1)(b)	A network operator must ensure that no Code participant that is its associate receives a benefit in respect of the Code unless the benefit is attributable to an arm's length application of the Code or is also made available to all other Code participants on the same terms and conditions.	1	C	Low	M							√	Interaction of three companies under Pacific Hydro Group name	Darren Sexton	Need more information on various companies under one licence

340.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.1	A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and also comply with any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act.	2	B	Medium	M								√		Meter Testing and Purchasing records or certificates	Darren Sexton	Verify meter purchasing and testing records
341.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.2(1)	An accumulation meter must at least conform to the requirements specified in the applicable metrology procedure and display, or permit access to a display of the measurements specified in subclauses 3.2(1)(a)(b) using dials, a cyclometer, an illuminated display panel or some other visual means.	2	B	Medium	M								√		Meter specifications	Brian Walter	Physically and visually verify the conformance
342.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.3(1)	An interval meter must at least have an interface to allow the interval energy data to be downloaded in the manner prescribed using an interface compatible with the requirements specified in the applicable metrology procedure.	1	C	Low	M								√		Previous records of the download, Meter Specifications	Brian Walter	Verify appropriate interface for downloading meter data

343.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.3(3)	If a metering installation is required to include a communications link, the link must (where necessary), include a modem and isolation device approved under the relevant telecommunications regulations, to allow the interval energy data to be downloaded in the manner prescribed.	2	B	Medium	M										Meter Specifications, installation and commissioning documents	Darren Sexton Brian Walter	Contractors manage communication s protocols, Verify any communication link included
344.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.3A(1)	A network operator must ensure that bidirectional electricity flows do not occur at a metering point unless the metering installation for the metering point is capable of separately measuring and recording electricity flows in each direction.	2	B	Medium	W										Meter installation and commissioning documents	Darren Sexton	Verify onsite the applicable protection or control mechanisms, if required
345.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.3B	A user who is aware of bi-directional flows at a metering point which was not previously subject to a bi-directional electricity flows or any changes in a customer's or user's circumstances in a metering point which will result in bi-directional electricity flows must notify the network operator within 2 business days.	2	B	Medium	W										Any previous changes to the meter connections, meter installation and commissioning documents	Darren Sexton	Check for evidence of any changes or notifications created

346.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.3C	An accumulation meter or an interval meter that separately measures and records bi-directional electricity flows at the metering point must record the net electricity production transferred into the network that exceeds electricity consumption and the net electricity consumption transferred out of the network that exceeds electricity production.	2	B	Medium	W									Types of meter, meter specifications	Darren Sexton	Check types of meter installed, Most probably not applicable to Ord Hydro's metering system
347.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.5(1) and (2)	A network operator must ensure that there is a metering installation at every connection point on its network which is not a Type 7 connection point. Unless it is a Type 7 metering installation, the metering installation must meet the functionality requirements prescribed.	2	C	Medium	S									Meter types and specifications. Location of meters installed	Brian Walter	Verify location and types of meters installed
348.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.5(3)	A network operator must, unless otherwise agreed, for each metering installation on its network, on and from the time of its connection to the network, provide, install, operate and, subject to subclause 3.7(5), maintain the metering installation in the manner prescribed.	2	C	Medium	S									Records of meter replacement and appropriate inspection routines	Brian Walter	Verify the compliance with the requirements

349.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.5(4)	A network operator must ensure that, except for a Type 7 metering installation, the metering point for a revenue metering installation is located as close as practicable to the connection point in accordance with good electricity industry practice.	2	C	Medium	S							√		Meter Single Line diagrams	Darren Sexton Brian Walter	Verify the location of meters installed in accordance with the good practice
350.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.5(6)	A network operator may only impose a charge for providing, installing, operating or maintaining a metering installation in accordance with the applicable service level agreement between it and the user.	2	B	Medium	S							√		PPAs, Metering clause and requirements, Previous records of charges imposed	Darren Sexton	Verify and Confirm the agreed terms in the PPAs
351.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.5(9)	If a network operator becomes aware that a metering installation does not comply with the Code, the network operator must advise affected parties of the non-compliance and arrange for the non-compliance to be corrected as soon as practicable.	2	B	Medium	M							√		Records of previous communication, Incident register, audit reports	Darren Sexton Brian Walter	Check for evidence of any previous such communication
352.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.7	All devices that may be connected to a telecommunications network must be compatible with the telecommunications network and comply with all applicable State and Commonwealth enactments.	2	B	Medium	W							√		Telecom network specifications	Brian Walter	Verify telecoms protocols onsite and any devices connected to the meters

353.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.8	Subject to clause 3.27, a network operator must, for each metering installation on its network, ensure that the metering installation is secured by means of devices or methods which, to the standard of good electricity industry practice, hinder unauthorized access and enable unauthorized access to be detected.	2	C	Medium	S									Physical verification of meter location in HV switchyard (locked and protected)	Brian Walter	Confirm the level of security onsite
354.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.9(3)	Subject to subclauses 3.9(4), 3.9(5) and 3.9(7), each metering installation must meet at least the requirements for that type of metering installation specified in Table 3 in Appendix 1 of the Code.	2	B	Medium	S									Meter specifications, installation documents	Brian Walter	Verify the types of meters, check with operator the requirements
355.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.9(7)	For a metering installation used to supply a customer with requirements above 1000 volts that require a VT and whose annual consumption is below 750MWh, the metering installation must meet the relevant accuracy requirements of a Type 3 metering installation for active energy only.	1	C	Low	M									Meter installation documents	Darren Sexton Brian Walter ONSITE	Verify annual consumption is more than 750MWh
356.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.9(9)	If compensation is carried out within the meter then the resultant metering system error must be as close as practicable to zero.	1	C	Low	M									Meter Specifications, Compensation reports	Kate Summers	Check meters are installed at the connection point, no compensation is applied

357.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.10	A network operator must ensure that any programmable settings within any of its metering installations, data loggers or peripheral devices, that may affect the resolution of displayed or stored data, meet the relevant requirements specified in the applicable metrology procedure and comply with any applicable specifications or guidelines specified by the National Measurement Institute under the National Measurement Act.	1	C	Low	M							√	Meter installation compliance reports and data storage reports	Kate Summers	Verify that there are no programmable settings on the meters
358.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.11(1)	A network operator must ensure that a metering installation on its network is operating consistently with good electricity industry practice to measure and record data, and to permit collection of data within the time specified in the applicable service level agreement, for at least the percentages of the year specified.	1	C	Low	M							√	Meter reports, Regular data collection reports	Darren Sexton	Check data collection is in compliance with good electricity industry practice
359.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.11(2)	If an outage or malfunction occurs to a metering installation, the network operator must make repairs to the metering installation in accordance with the applicable service level agreement.	1	C	Low	S							√	PPAs, Incident register, fault register, maintenance history	Darren Sexton Brian Walter	Verify any such action during the audit period

364.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.12(2)	A network operator must ensure that instrument transformers in its metering installations comply with the relevant requirements of any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act and any requirements specified in the applicable metrology procedure.	2	C	Medium	M								√		Meters Specifications, Design guidelines	Brian Walter	Check compliance with the design guidelines
365.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.12(3)	A network operator must provide isolation facilities, to the standard of good electricity industry practice, to facilitate testing and calibration of the metering installation.	2	B	Medium	M								√		Single Line Diagram, Isolation procedures, testing and calibration records	Brian Walter Darren Sexton	Check for appropriate isolation facilities
366.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.12(4)	A network operator must maintain drawings and supporting information, to the standard of good electricity industry practice, detailing the metering installation for maintenance and auditing purposes.	2	C	Medium	S								√		Engineering Drawings/Circuit Diagrams, audit reports, maintenance plans	Darren Sexton Brian Walter	Verify versions of the technical drawings and supporting information

367.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.13(1)	A network operator must procure the user or the user's customer to install (or arrange for the installation of) a full check metering installation or partial check metering installation in accordance with the prescribed requirements.	1	C	Low	S						√	PPAs, meter purchasing records	Kate Summers	PH manages all the meters (revenue and check) at their end as per PPA requirements. No new connection made.
368.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.13(3)(c)	A partial check metering installation must be physically arranged in a manner determined by the network operator, acting in accordance with good electricity industry practice.										NA		Kate Summers	No partial check metering is installed
369.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.13(4)	A check metering installation for a metering point must comply with the prescribed requirements.	2	C	Medium	M						√	PPAs, Check Metering specifications and installation documents	Kate Summers Brian Walter	Check the compliance with the requirements
370.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.14(3)	If, under clause 3.14(2), a metering installation uses metering class CTs and VTs that do not comply with the Table 3 in Appendix 1, then the network operator must either or both install meters of a higher class accuracy and apply accuracy calibration factors within the meter to compensate for CT and VT errors, in order to achieve the accuracy requirements in Table 3 in Appendix 1.	1	C	Low	S						√	Meter Specifications	Kate Summers	Check CTs VTs comply with Table 3 in Appendix 1 Check Compliance with Type 1 of 0.2 highest grade accuracy

371.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.16(1)	The network operator must ensure that a Type 1 metering installation on the network has the facilities and functionality prescribed.	1	C	Low	M							√	Metering Specifications	Brian Walter Darren Sexton Kate Summers	Check Compliance with Type 1 of 0.2 highest grade accuracy
372.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.16(2)	The network operator must ensure that a Type 1 metering installation on the network includes a communications link.	1	C	Low	M							√	Meter specifications	Brian Walter	Verify if any communication links are in use
373.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.16(3)	If a device is used as a data logger, the energy data for a metering point on the network must be collated in trading intervals or sub-multiples of a trading interval within the metering installation.											NA	PPAs		Fixed contract, No trading intervals specified
374.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.16(3A)	If, under subclause 3.16(3), energy data for a metering point on the network is collated in sub-multiples of a trading interval, then unless the Code participant agrees otherwise, the network operator must aggregate the energy data into trading intervals before providing it to a Code participant.											NA	PPAs		Fixed Contracts, No trading

(361)	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.16(5)	A network operator or a user may require the other to negotiate and enter into a written service level agreement in respect of the matters in the metrology procedure dealt with under clause 3.16(4) of the Code.	1	C	Low	W						√	PPAs	Darren Sexton	Check and verify evidence of a request for a SLA
(362)	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.16(6)	A network operator may only impose a charge for the matters dealt with in the metrology procedure in accordance with the applicable service level agreement between it and the user.	1	C	Low	W						√	PPAs	Darren Sexton	Check and verify evidence of a request for a SLA
375.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.18(1)	If the Electricity Retail Corporation supplies electricity to a contestable customer at a connection point under a non-regulated contract, and in circumstances where immediately before entering into the contract, the electricity retail corporation supplied electricity to the contestable customer under a regulated contract, then the metering installation for the connection point must comply with the prescribed wholesale market metering installation requirements.										NA			No new small use customer during the audit period.

376.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.20(1)	A network operator must, if reasonably requested by a Code participant, provide enhanced technology features in a metering installation.	1	C	Low	M							√	Meter installation and specifications	Brian Walter	Verify any Previous technology upgrades or code participants requests received
377.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.20(3)	A network operator may only impose a charge for the provision of metering installations with enhanced technology features in accordance with the applicable service level agreement between it and the user.	1	C	Low	M							√	Metering agreements, PPAs	Darren Sexton	Check for evidence of any charges imposed during the audit period
378.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.21(1)	Meters containing an internal real time clock must maintain time accuracy as prescribed. Time drift must be measured over a period of 1 month.											NA			No real time internal clock operation within the meters
379.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.21(2)	If a metering installation includes measurement elements and an internal data logger at the same site, it must include facilities on site for storing the interval energy data for the periods prescribed.	1	C	Low	M							√	Metering Specifications, data loggers	Brian Walter	Verify meters are installed with internal data loggers at the same site

380.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.22	A network operator providing one or more metering installations with enhanced technology features must be licensed to use and access the metering software applicable to all devices being installed and be able to program the devices and set parameters.	1	C	Low	M								√	Meter Specifications and software specs	Brian Walter	Check for evidence of any such installations
381.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.23(a)	Where signals are provided from the meter for the user or the user's customer use, a network operator must ensure that signals are isolated by relays or electronic buffers to prevent accidental or malicious damage to the meter.												NA			No Signal is coming out to the users. No new small use customer during the audit period.
382.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.23(b)	Where signals are provided from the meter for the user or the user's customer use, a network operator must provide the user or the user's customer with sufficient details of the signal specification to enable compliance with clause 3.23© of the Code.	1	C	Low	M								NA			No Signal is coming out to the users. No new small use customer during the audit period.

(371)	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.25	A network operator that operates and maintains a pre-payment meter on its network must operate and maintain the pre-payment meter in accordance with good electricity industry practice and, as far as reasonably practicable, minimise any departure from what the requirements of the Code would have been in respect of the pre-payment meter if clause 3.24 were deleted.	1	C	Low	W							√	Meter Specifications Prep Payment Meters	Darren Sexton	Check and verify any prepayment meters exist and are in accordance with the requirements of the code.
383.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.24A(1)	If a retailer requests a network operator to install a pre-payment meter at a connection point, then the pre-payment meter must be sufficient to enable the retailer to comply with the retailer's obligations under the Code of Conduct.	1	C	Low	M							√	Previous request made by the retailer	Brian Walter Darren Sexton	Check for the evidence of any such requests
384.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.24B(1)	If a retailer requests a network operator to replace a pre-payment meter at a connection point with a meter that is not a pre-payment meter then the network operator must do so in accordance with this Code and the Code of Conduct.	1	C	Low	M							√	Previous request made by the retailer	Brian Walter Darren Sexton	No such request of replacement made

385.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.27	A person must not install a metering installation on a network unless the person is the network operator or a registered metering installation provider for the network operator doing the type of work authorised by its registration.	1	C	Low	M							√	Meter installation and commissioning documents	Brian Walter	Verify previous meter installation by Ord Hydro
386.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 3.29	A network operator must publish a list of registered metering installation providers, including the prescribed details, and at least annually, update the list.	1	C	Low	M							√	Meter installation register	Brian Walter	Check the register of registered meter installations
387.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 4.1(1)	A network operator must establish, maintain and administer a metering database containing, for each metering point on its network, standing data and energy data.	1	C	Low	M							√	Metering database	Darren Sexton	Verify Database and its currency
388.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 4.1(2)	A network operator must ensure that its metering database and associated links, circuits, information storage and processing systems are secured by means of devices or methods which, to the standard of good electricity industry practice, hinder unauthorized access and enable unauthorized access to be detected.	1	C	Low	W							√	Metering database	Darren Sexton	Verify and confirm access to the database

389.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 4.1(3)	A network operator must prepare, and if applicable, must implement a disaster recovery plan to ensure that it is able, within 2 business days after the day of any disaster, to rebuild the metering database and provide energy data to Code participants.	1	C	Low	S						√	Contingency plans, Metering database recovery plan, IT system manual	Darren Sexton	Check evidence of database recovery plan
390.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 4.2(1)	A network operator must ensure that its registry complies with the Code and the prescribed clause of the market rules.	1	C	Low	M						√	Meter installation register	Darren Sexton	Verify registry compliance with good practice
391.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 4.3(1)	The standing data for a metering point must comprise at least the items specified.	1	B	Low	W						√	Metering database	Darren Sexton	Check compliance with the table in clause 4.3
392.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 4.4(1)	If there is a discrepancy between energy data held in a metering installation and data held in the metering database, the affected Code participants and the network operator must liaise together to determine the most appropriate way to resolve a discrepancy.	2	C	Medium	M						√	check invoices and meter readings	Darren Sexton	revisit audit risk after verification
393.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 4.5(1)	A Code participant must not knowingly permit the registry to be materially inaccurate.	2	C	Medium	M						√	Meter reading spreadsheet, reading records, dispute resolution register, PPAs	Darren Sexton	Check and verify the accuracy of the reading recorded in the spreadsheet

394.	Integrated Regional Licence condition 5.1	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 an 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.	1	C	Low	M						√	Meter reading spreadsheet, reading records, dispute resolution register, PPAs	Brian Walter	Check evidence of any such notifications received during the audit period
395.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 4.6(1)	If the network operator is notified of a change to, or inaccuracy in, an item of standing data by a Code participant which is the designated source for the item of standing data under Table 2 in clause 4.3(1), then the network operator must update the registry to reflect the change to, or correct the inaccuracy in, the standing data.	2	B	Medium	M						√	Meter reading spreadsheet, reading records, dispute resolution register, PPAs	Darren Sexton	Check for evidence of any previous inaccurate reporting or missing data
396.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 4.6(2)	If a network operator is notified of a change to or inaccuracy in an item of standing data by a Code participant which is not the designated source for the item of standing data, or otherwise becomes aware of a change to or inaccuracy in an item of standing data, then the network operator must undertake investigations to the standard of good electricity industry practice to determine whether the registry should be updated, and update the registry as required.	2	C	Medium	M						√	Meter reading spreadsheet, reading records, dispute resolution register, PPAs	Darren Sexton	Check for evidence of any previous inaccurate reporting or missing data

397.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 4.7	If standing data for a metering point is updated in the registry, the network operator must, within 2 business days after the update (or such other time as is specified in the applicable service level agreement) notify the update to the current user and each previous user, if the updated standing data relates to a period or periods when the previous user was the current user.	2	B	Medium	M							√		Meter reading spreadsheet, reading records, dispute resolution register, PPAs	Darren Sexton	Verify evidence of updates and reporting to Horizon Power
398.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 4.8(3)	A network operator must allow a user who is a retailer or a generator to have local and (where a suitable communications link is installed) remote access to the energy data for metering points at its associated connection points, using a password provided by the network operator which provides 'read only' access.	1	C	Low	S							√		Meter installation guide, PPAs, meter specifications	Brian Walter	Local access to meters is provided to the users, Confirm remote access to the meters

399.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 4.8(3A)	A network operator must allow a user who is a retailer or a generator to have access to data held in its metering database for metering points at its associated connection points, by means of a website (or otherwise by remote access to a “data storage device” as that expression is defined in the Electronic Transactions Act 2003), using a password provided by the network operator which provides ‘read only’ access.														NA	Metering database, Meter installation guide, single line diagrams	Brian Walter	Only Horizon Power is the customer with up to 8 meters. Probably a website is not necessary. Verify remote access using password		
400.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 4.8(4)(a)	A network operator must have devices and methods in place that ensure that energy data held in its metering installation is secured from unauthorised local or remote access using the methods prescribed.	1	C	Low	M											√	Metering database and spreadsheets, PPAs, IT security policy	Brian Walter	Verify the security of the metering data	
401.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 4.8(4)(b)	A network operator must have devices and methods in place that ensure that the data held in its metering database is secured from unauthorised local or remote access using the methods prescribed.	1	C	Low	M												√	Metering database and spreadsheets, IT security policy, PPAs	Brian Walter	Verify the security of the metering data

402.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 4.8(5)	Without limiting subclause 4.8(4), a network operator must ensure that electronic passwords and other electronic security controls are only issued to the specified authorised personnel and otherwise keep its records of electronic passwords and other electronic security controls secure from unauthorised access.	1	C	Low	M						√	IT Security policy, database access level register	Darren Sexton	Verify that the data can only be accessed by the authorized personnel
403.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 4.9	A network operator must retain energy data in its metering database for each metering point on its network (including any energy data that has been replaced under subclause 5.24) for at least the periods, and with the level of accessibility, prescribed.	1	C	Low	S						√	Metering database	Darren Sexton	Check and verify the old metering data in the database
404.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.1 (1)	A network operator must use all reasonable endeavours to accommodate another Code participant's requirement to obtain a metering service and requirements in connection with the negotiation of a service level agreement.	1	C	Low	M						√	PPAs	Darren Sexton	Check evidence of any previous requests made by code participants

405.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.1(2)	Without limiting subclause 5.1(1), a network operator must expeditiously and diligently process all requests for a service level agreement and negotiate its terms in good faith, and, to the extent reasonably practicable in accordance with good electricity industry practice, permit a Code participant to acquire a metering service containing only those elements of the metering service which the Code participant wishes to acquire.	1	C	Low	M						√	PPAs	Darren Sexton	Check evidence of any previous requests made by code participants
406.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.3	A network operator must, for each metering point on its network, obtain energy data from the metering installation and transfer the energy data into its metering database by no later than 2 business days after the date for the scheduled meter reading for the metering point (or such other time as is specified in the applicable service level agreement).	1	C	Low	S						√	Metering data and database, PPAs	Darren Sexton	Check evidence of obtaining metering data and transfer into database
407.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.4(1)	A network operator must, for each meter on its network, at least once in every 12 month period undertake a meter reading that provides an actual value that passes the validation processes in Appendix 2.	2	B	Medium	W						√	Records of data validation	Brian Walter	No data validation process is currently in use

408.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.4(1A)	The meter reading referred to in clause 5.4(1) must not be undertaken by the customer associated with the meter, and must be undertaken by a person who is employed or appointed by the network operator and who is suitably skilled in accordance with good electricity industry practice to carry out meter readings.	1	C	Low	S						√	Meter reading records, Operator training matrix	Brian Walter	Verify that the operator is skilled and experienced to undertake the readings
409.	Integrated Regional Licence condition 5.1	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).										NA			The meters are located at Ord Hydro's HV switchyards with full access at all times.
410.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.5(2)	Subject to subclause 5.5(2A)(b), a network operator may impose a charge for the provision of data, but only if a user has requested the energy data to the extent permitted by, and in accordance with the applicable service level agreement between it and the user, and if a customer has given a direction under subclause 5.17A(1), in accordance with the prescribed conditions.	1	C	Low	S						√	Service level agreement, PPAs	Darren Sexton	Verify evidence of any such charges imposed during the audit period

411.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.5(2A)	A network operator must not impose a charge for the provision of standing data and for the provision of energy data if another enactment prohibits it doing so.	1	C	Low	S						√	Service level agreement, PPAs	Darren Sexton	Check evidence of any such charges imposed during the audit period
(395)	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.5(3)	A user must not impose any charge for the provision of the data under this Code unless it is permitted to do so under another enactment.										NA			Ord Hydro is both the user and the network operator
412.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.6(1)	Subject to subclause 5.6(2), a network operator must provide validated, and where necessary, substituted or estimated energy data for a metering point to the user for the metering point and the IMO within the timeframes prescribed in subclause 5.6(1)(2).	2	B	Medium	M						√	Meter database	Darren Sexton	Check and verify meter data
413.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.7	If a replacement energy data value is inserted in a metering database for a metering point, the network operator must provide replacement energy data to the user for the metering point and the IMO within the timeframes prescribed.	2	B	Medium	M						√	Meter database	Darren Sexton	Check and verify meter data

414.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.8	A network operator must provide a user with whatever information the network operator has that is necessary to enable the user to comply with its obligations under the Code of Conduct, within the time necessary for the user to comply with the obligations.	2	B	Medium	M						√		PPAs, Meter data	Darren Sexton	Check evidence of any previous requests by Horizon Power
415.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.9	A network operator must provide standing data, provided to or obtained by it under this Code, to users where required to do so under any enactment.	2	B	Medium	M						√		Meter Data, PPAs, communication documents	Darren Sexton	Check evidence of any previous communication
416.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.10	A network operator must provide a subset of the standing data to a retailer in accordance with the provisions of Annex 4 of the Customer Transfer Code.	1	C	Low	M						√		Communication and meter data documents	Darren Sexton	Check evidence of previous communication with Horizon Power
417.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.11	If a transfer occurs at a connection point, then within 2 business days after the transfer date, as defined in the Customer Transfer Code, the network operator must provide the incoming retailer with a copy of the standing data for each metering point associated with the connection point.											NA			No new small use customer during the audit period where transfer of connection point may occur.

418.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.12(1)	If a user gives a network operator an energy data request for a metering point in accordance with the communication rules, and the energy data request relates only to a time or times for which the user was the current user at the metering point, then the network operator must provide a user with a complete set of energy data for the metering point within the timeframes prescribed.	1	C	Low	M							√	Verify any requests by the users.	Darren Sexton	User did not request metering data.
419.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.13	If the current user for a metering point gives the network operator a standing data request for the metering point in accordance with the communication rules then the network operator must provide the current user with a complete current set of standing data for a metering point and advise whether there is a communications link for the metering point, within the timeframes prescribed.	1	C	Low	M							√	Verify any requests by the users.	Darren Sexton	User did not request metering data.
420.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.14(3)	If a user makes a bulk standing data request, the network operator must in accordance with the communication rules, acknowledge receipt of the request and provide the requested standing data within the timeframes prescribed.	1	C	Low	M							√	Verify any requests by the users.	Darren Sexton	User did not request metering data.

421.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.15	If a network operator provides energy data to a user or the IMO it must also provide the date of the meter reading in accordance with the requirements specified.	1	C	Low	S						√	Meter reading is provided to the user via tax invoice	Darren Sexton	Check invoices to verify information provided
422.	Integrated Regional Licence condition 5.1	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.	1	C	Low	M						√	Check evidence of request made to the user to collect energy meter data	Darren Sexton	Limited to Argyl Mine considering its remote location
423.	Integrated Regional Licence condition 5.1	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.										NA			Ord Hydro is not a user with in the terms of the code
424.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.17A(1)	A network operator must provide data for a metering point from its metering database to a person if (and to the extent that) the customer associated with the metering point gives the network operator a direction to do so that complies with subclause 5.17A(2).	1	C	Low	M						√	Communication or correspondence documents, PPAs	Darren Sexton	Check evidence of any previous requests made

425.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.17A(3)	A network operator must comply with a direction under subclause 5.17A(1) within the timeframes prescribed.	1	C	Low	M							√	Communication or correspondence documents, PPAs		Check for any previous requests made Time frame - 10 business days
426.	Integrated Regional Licence condition 5.1	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.											NA			Ord Hydro is neither a user nor a customer under the clause
427.	Integrated Regional Licence condition 5.1	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.											NA			Ord Hydro is neither a user nor a customer under the clause
428.	Integrated Regional Licence condition 5.1	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.											NA			Ord Hydro is neither a user nor a customer under the clause

432.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.20(1)	A network operator must, by not later than 6 months after the date this Code applies to the network operator, develop, in accordance with the communication rules, an Energy Data Verification Request Form.	2	B	Medium	W											Data verification request form	Brian Walter	Check and verify the request form and its contents
433.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.20(2)	An Energy Data Verification Request Form must require a Code participant to provide the information prescribed.	2	B	Medium	W											Data verification request form	Brian Walter	Check and verify the request form and its contents
434.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.20(4)	If a Code participant requests verification of energy data under subclause 5.20(3), the network operator must, in accordance with the metrology procedure, subject to subclause 5.20(5), use reasonable endeavours to verify energy data and inform the requesting Code participant of the result of the verification and provide the verified energy data within the timeframes prescribed.	1	C	Low	M											Communication or correspondence documents, PPAs	Brian Walter	Check for any previous requests made
435.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.21(2)	A network operator must comply with any reasonable request under subclause 5.21(1).	1	C	Low	W											Metering tests, accuracy test reports	Brian Walter	Check for any previous requests made

436.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.21(4)	A test or audit under subclause 5.21(1) is to be conducted in accordance with the metrology procedure and the applicable service level agreement.	2	B	Medium	M						√		Metrology procedure, test reports	Brian Walter Darren Sexton	Verify the contents of the metrology procedure
437.	Integrated Regional Licence condition 5.1	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.											NA			Ord Hydro is not a user
438.	Integrated Regional Licence condition 5.1	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.											NA			Ord Hydro is not a user
439.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.21(8)	A network operator may only impose a charge for the testing of the metering installations, or auditing of information from the meters associated with the metering installations, or both, in accordance with the applicable service level agreement between it and the user.	1	C	Low	M						√		Service level agreements / Contract requirements, PPAs, invoices	Darren Sexton	Check for any charges imposed during the audit period

440.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.21(9)	Any written service level agreement entered into under subclause 5.21(7) must include a provision that no charge is to be imposed if the test or audit reveals a non-compliance with this Code.	2	B	Medium	W								PPAs	Darren Sexton	Verify that the Conditions are Included in the PPA
441.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.21(11)	If a test or audit shows that the accuracy of the metering installation or information from the meter associated with the metering installation does not comply with the requirements under this Code, the network operator must advise the affected parties as soon as practicable of errors detected under a test or audit, the possible duration of the errors, and must restore the accuracy of the metering installation in accordance with the applicable service level agreement.	1	C	Low	M								Communication or correspondence documents, PPAs	Darren Sexton	Check any previous records of reporting of errors
442.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.21(12)	The original stored error correction data in a meter must not be altered except during accuracy testing and calibration of a metering installation.	1	C	Low	M								Calibration records, meter testing reports	Brian Walter	Check for any reported errors

443.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.22(1)	A network operator must validate energy data in accordance with this Code applying, as a minimum, the prescribed rules and procedures set out in Appendix 2 and must, where necessary, substitute and estimate energy data under this Code applying, as a minimum, the prescribed rules and procedures set out in Appendix 3.	2	B	Medium	W								Calibration records, meter testing reports	Darren Sexton Brian Walter	Check meter and revenue meters are installed
444.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.22(2)	The network operator must use check metering data, where available, to validate energy data provided that the check metering data has been appropriately adjusted for differences in metering installation accuracy in accordance with subclause 3.13.	2	B	Medium	M								Check meters are calibrated as per the requirements	Darren Sexton	Calibration certification is provided by the external service provider
445.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.22(3)	If a check meter is not available or energy data cannot be recovered from the metering installation within the time required under this Code, then the network operator must prepare substitute values using a method contained in Appendix 3 and agreed where necessary with the relevant Code participants.	2	B	Medium	M								High speed data recorders to capture KWh at the metering points, SCADA recorders, monthly invoicing	Brian Walter	Check and verify installation of check meters

446.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.22(4)	If a network operator detects a loss of energy data or incorrect energy data from a metering installation, it must notify each affected Code participant of the loss or error within 24 hours after detection.	1	C	Low	M						√	SCADA recorders, monthly invoicing, meter databases	Brian Walter	Verify any previous losses and reporting
447.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.22(5)	Substitution or estimation of energy data is required when energy data is missing, unavailable or corrupted, including in the circumstances described in this subclause.	1	B	Low	S						√	Data is substituted by check meters and data loggers	Brian Walter	Verify data substitution if occurred during the audit period
448.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.22(6)	A network operator must review all validation failures before undertaking any substitution.	1	B	Low	M						√	Data between main and check meter is recorded for inconsistencies, monthly check reports	Brian Walter Darren Sexton	Verify substitution occurrences
449.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.23(1)	If a network operator determines that there is no possibility of determining an actual value for a metering point, then the network operator must designate an estimated or substituted value for the metering point to be a deemed actual value for the metering point.	2	C	Medium	M						√	Meter data recorders, fault register, incident reports	Brian Walter	Check for previous records where substitution value was deemed actual

450.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.23(3)	If a network operator has designated a deemed actual value for a metering point then the network operator must repair or replace the meter or one or more of components of metering equipment (as appropriate) at the metering point and subclauses 5.24(3(c) and 5.24(4) apply in respect of the estimated or substituted value which was designated to be the deemed actual value.	2	C	Medium	M								√		Failure reports, mater database	Brian Walter	Check for the records of meter replacement as a result.
451.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.24(1)	If a network operator uses an actual value (first value) for energy data for a metering point, and a better quality actual or deemed actual value is available (second value), the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice.	2	C	Medium	M								√		Failure reports, mater database	Brian Walter	Verify actions taken to replace the first actual or deemed second better quality data
452.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.24(2)	If a network operator uses a deemed actual value (first value) for energy data for a metering point, and a better quality deemed actual value is available (second value), then the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice.	2	C	Medium	M								√		Failure reports, mater database, PPAs	Brian Walter	Verify actions taken to replace the first actual or deemed second better quality data

453.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.24(3)	If a network operator uses an estimated or substituted value (first value) for energy data for a metering point, and a better quality actual, deemed, estimated or substituted value is available (second value), then the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice or the user and its customer jointly request it to do so.	2	B	Medium	M								√		Failure reports, meter database, PPAs	Brian Walter	Check and verify any examples
454.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.24(4)	A network operator (acting in accordance with good electricity industry practice) must consider any reasonable request from a Code participant for an estimated or substituted value to be replaced under subclause 5.24.	1	C	Low	M								√		Communication or correspondence documents, PPAs	Brian Walter	Check for any requests made
455.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.25	A network operator must ensure the accuracy of estimated energy data in accordance with the methods in its metrology procedure and ensure that any transformation or processing of data preserves its accuracy in accordance with the metrology procedure.	2	B	Medium	W								√		Metrology procedure, PPAs	Darren Sexton Brian Walter	Check and verify accuracy of the meter data

467.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 5.38	Network operator must keep such records of information as are required for the purposes of subclause 5.37, and must retain the information (in a format that is accessible within a reasonable period of time) for at least 7 years after the day on which a report containing the information is published under subclause 5.37(1)(c)	1	C	Low	W							√		Darren Sexton	Check evidence of any reports published during the audit period
468.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 6.1(1)	A network operator must, in relation to its network, comply with the agreements, rules, procedures, criteria and processes prescribed.	3	B	High	M						√		Check the relevant section of PPAs, Audit reports	Darren Sexton	Verify the compliance with prescribed PPAs
469.	Integrated Regional Licence condition 5.1	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.											NA			Ord Hydro is the user and network operator
470.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 6.20(4)	A network operator must amend any document in accordance with the Authority's final findings.	1	C	Low	M						√		Check for evidence of any requests from authority	Kate Summers	No requests received from the authority
471.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 6.20(5)	The network operator must publish any document that has been amended under subclause 6.20(4).	2	B	Medium	W						√		Company website, hardcopies of published information	Darren Sexton	Check if any amendments have been made

472.	Integrated Regional Licence condition 5.1	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.	1	C	Low	M							√	Check for available mechanisms of communication between customers	Darren Sexton	Verify examples
473.	Integrated Regional Licence condition 5.1	Electricity Industry Metering Code clause 7.2(2)	A network operator must notify each Code participant of its initial contact details and of any change to its contact details at least 3 business days before the change takes effect.	1	C	Low	M							√	Check for last notifications from customers	Darren Sexton	
474.	Integrated Regional Licence condition 5.1	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.											NA			No Access Contract in place during the audit period
475.	Integrated Regional Licence condition 5.1	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.											NA			Ord Hydro has no network operator to report any changes

476.	Integrated Regional Licence condition 5.1	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	C	Medium	M							√	Evidence of any communication /and or disclosure of confidential info	Darren Sexton	Check for examples
477.	Integrated Regional Licence condition 5.1	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.	1	C	Low	M							√	Previous examples of disclosure of confidential info		Check for examples
478.	Integrated Regional Licence condition 5.1	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.	2	B	Medium	M							√	Dispute resolution process; check its effectiveness	Darren Sexton	Verify the effectiveness of the process

479.	Integrated Regional Licence condition 5.1	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.	2	B	Medium	M							√		Check compliance of PPA process with required clause 8.1	Darren Sexton	No Previous examples exist
480.	Integrated Regional Licence condition 5.1	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.	3	C	High	M							√		Check compliance of PPA process with required 8.1	Darren Sexton	No Previous examples exist
481.	Integrated Regional Licence condition 5.1	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	C	Medium	M							√		Examples of dispute resolutions	Darren Sexton	No reported resolution executed
482.	Integrated Regional Licence condition 5.1	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).	1	C	Low	S							√		Company code of behavior	Darren Sexton	Check and verify compliance

Section 16 Electricity Industry (Network Quality and Reliability of Supply) Code														
483.	Integrated Regional Licence condition 5.1	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 5(1)	A distributor or transmitter must, as far as reasonably practicable, ensure that electricity supply to a customer's electrical installations complies with prescribed standards.	3	C	High	S	√				Engineering design specifications, Guidelines and Standards, quality of electricity supply	Kate Summers	Verify compliance with the prescribed standards
484.	Integrated Regional Licence condition 5.1	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 8	A distributor or transmitter must, so far as reasonably practicable, disconnect the supply of electricity to installations or property in specified circumstances, unless it is in the interest of the customer to maintain the supply.	3	C	High	S	√				Design guidelines, PPAs, Power quality obligations covered in the contracts, Standard Operating Procedures	Kate Summers	Disconnecting a customer will be the last resort as it will result in breach of the contract
485.	Integrated Regional Licence condition 5.1	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 9	A distributor or transmitter must, as far as reasonably practicable, ensure that the supply of electricity is maintained and the occurrence and duration of interruptions is kept to a minimum.	2	A	High	S	√				Interruption register, Maintenance Plans, Outage planning, Incident register, SCADA data	Darren Sexton	Check for evidence of any occurrence of interruption
486.	Integrated Regional Licence condition 5.1	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 10(1)	A distributor or transmitter must, so far as reasonably practicable, reduce the effect of any interruption on a customer.	2	A	High	S	√				Customer notification register, Interruption register, Maintenance Plans, Outage planning, Incident register, SCADA data	Darren Sexton	Check for evidence of any occurrence of interruption

487.	Integrated Regional Licence condition 5.1	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 10(2)	A distributor or transmitter must consider whether, in specified circumstances, it should supply electricity by alternative means to a customer who will be affected by a proposed interruption.	2	B	Medium	S						√		Asset Management plan, Customer Service Contracts	Darren Sexton	Customers own diesel powered backup in case of any short interruption
488.	Integrated Regional Licence condition 5.1	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 12(3)	A distributor must take prescribed action in the event of a significant interruption to a small use customer.											NA			Ord Hydro is not a distributor and no new small use customer during the audit period.
489.	Integrated Regional Licence condition 5.1	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 13(2)	A distributor or transmitter must, so far as reasonably practicable, ensure that customers in specified areas do not have average total lengths of interruptions of supply greater than specified durations.	3	A	High	M						√		Reliability Report, Interruption register, customer complaints register, PPAs	Darren Sexton	Check the duration of the interruptions
490.	Integrated Regional Licence condition 5.1	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 13(3)	The average total length of interruptions of supply is to be calculated using the specified method.	2	B	Medium	W						√		Reliability Report, Interruption register, customer complaints register, Guidelines and Standards, PPAs	Darren Sexton	Check compliance with the specified method

491.	Integrated Regional Licence condition 5.1	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 14(8)	A distributor or transmitter must, on request, provide to an affected customer a free copy of an instrument issued by the Minister and of any notice given under section 14(7) of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.	1	C	Low	M							√	Previous requests made by the customers	Darren Sexton	Check evidence of any requests and copies issued to the customers
492.	Integrated Regional Licence condition 5.1	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 15(2)	A distributor or transmitter that agrees with a customer to exclude or modify certain provisions must set out the advantages and disadvantages to the customer of doing so in their agreement.	1	C	Low	M							√	Previous such arrangements, PPAs	Darren Sexton	Check evidence of any such arrangements
493.	Integrated Regional Licence condition 5.1	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 18	A distributor operating a relevant distribution system must, in specified circumstances, make a payment to a customer within a specific timeframe for a failure to give required notice of planned interruption.											NA			Ord Hydro is not a distributor
494.	Integrated Regional Licence condition 5.1	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 19	A distributor operating a relevant distribution system must, in specified circumstances, make a payment to a customer within a specific timeframe if a supply interruption exceeds 12 hours.											NA			Ord Hydro is not a distributor

498.	Integrated Regional Licence condition 5.1	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 23(1)	A distributor or transmitter must take all such steps as are reasonably necessary to monitor the operation of its network to ensure compliance with specified requirements.	2	B	Medium	M							√		SCADA, reliability reports, Power quality reports, meters calibrations records,	Darren Sexton	Verify the compliance with the requirements
499.	Integrated Regional Licence condition 5.1	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 23(2)	A distributor or transmitter must keep records of information regarding its compliance with specific requirements for the period specified.	2	B	Medium	M							√		SCADA, reliability reports, Power quality reports, meters calibrations records,	Darren Sexton	Verify records have been kept in compliance with the requirements during the audit period
500.	Integrated Regional Licence condition 5.1	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 24(3)	A distributor or transmitter must complete a quality investigation requested by a customer in accordance with specified requirements.	1	C	Low	M							√		Any previous requests made by the customer	Darren Sexton	Verify actions if requests are made by the customers
501.	Integrated Regional Licence condition 5.1	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 24(4)	A distributor or transmitter must report the results of an investigation to the customer concerned.	1	C	Low	M							√		Any previous investigation report.	Darren Sexton	Verify evidence of any reports during the audit period

506.	Integrated Regional Licence condition 5.1	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 27(3)	A distributor or transmitter must give a copy of its report about its performance to the Minister and the Authority within the specified period.									Kate Summers	As per Electricity Industry (Network Quality and Reliability of Supply) Amendment Code 2007 - Section 4
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