

Electricity Networks
Corporation

(t/a Western Power)

Electricity Distribution
Licence (EDL 1)

Performance Audit Report

November 2014

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Acronym List

Acronym / Reference	Description
AS/NZS 31000:2009	Australian/New Zealand Standard 31000-2009 Risk Management
Audit Guidelines	Authority's Audit and Review Guidelines: Electricity and Gas Licences (April 2014)
Authority	Economic Regulation Authority
B2B	Business to Business
Breach Register	Register of Compliance Contraventions
CBD	Central Business District
Code of Conduct	Code of Conduct for the Supply of Electricity to Small Use Customers 2010 (WA)
Compliance Manual	Electricity Compliance Reporting Manual (Feb 2013)
CT	Current Transformer
CTR	Customer Transfer Request
Compliance Register	Register of Licence Conditions Listing Reporting Type, Risk Rating and Internal Controls for Each Obligation

Acronym / Reference	Description
Customer Transfer Code	Electricity Industry Customer Transfer Code 2004 (WA)
DFIS	Distribution Field Information System
DM	Western Power's document management system
EOPS	Extended Outage Payments Scheme
ETAC	Electricity Transfer Access Contract
HV	High Voltage
IMO	Independent Market Operator
MBS	Metering Business System
Metering Code	Electricity Industry Metering Code 2012 (WA)
NetCIS	Customer Information System
NMI	National Metering Identifier
SALT	Self-Administered Legal Training
SLA	Service Level Agreement
SWIS	South West Interconnected System
TCS	Trouble Call System
UMI	Unique Market Identifier
VT	Voltage Transformer
WAER	Western Australian Electrical Requirements
WADCM	Western Australian Distribution Connection Manual 2013

1. Independent Auditor Report

Introduction

Western Power's distribution licence is subject to a number of obligations contained within the licence itself, the Electricity Industry Act 2004 (the "Act") and regulatory obligations.

Section 13 of the Act requires Western Power to provide the Authority with a performance audit conducted by an independent expert approved by the Authority not less than once every 24 months from the grant of the licence (unless a shorter or longer period is approved by the Authority). The Authority approved Grant Thornton Australia Ltd (Grant Thornton) to conduct the performance audit of Western Power's compliance with the conditions of its Electricity Distribution Licence 1 (EDL1).

An audit plan was developed and approved by the Authority using a risk based approach to focus on key risk areas in accordance with the risk evaluation model, Australian/New Zealand Standard ("AS/NZS") 31000:2009. Grant Thornton has assessed the controls and performance against those standards through a combination of interviews/enquiries, examination of documents and detailed testing.

The audit plan upon which the audit was completed was developed in accordance with the Authority's "Audit and Review Guidelines: Electricity and Gas Licences (April 2014)" ("Audit Guidelines").

Our Responsibility

In accordance with section 11 of the Audit Guidelines, our responsibility is to provide a comprehensive report to Western Power and the Authority that clearly expresses our opinion in respect of the findings of the performance audit.

Our audit was also performed in accordance with ASAE 3000 which provides for the standards on assurance engagements other than audits or review of historical financial information.

Our engagement provides reasonable assurance as defined under paragraph 5 in ASAE 3000. Our approach and methodology was set out in the audit plan reviewed and approved by the Authority on 3 June 2014.

Western Power's Responsibility

Western Power is responsible for designing, implementing and maintaining mechanisms to ensure its compliance with its EDL1 obligations.

Western Power is also responsible for evaluating the effectiveness of those controls implemented within its organisation in achieving and maintaining its compliance requirements.

Further, Western Power is responsible for providing an accurate and complete record of its level of compliance to the Authority.

Limitations of Use

This report has been prepared solely for the management of Western Power for the purposes of its reporting requirements under section 13 of the Act and for no other purpose.

Inherent Limitations

Because of the inherent limitations of any internal control system it is possible that fraud, error or non-compliance with laws and regulations may occur and not be detected.

An audit is not designed to detect all weaknesses in control procedures as it is not performed continuously throughout the period and the tests performed are on a sample basis. Accordingly, readers of this report should not rely on this report to identify all potential instances of non-compliance which may occur.

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

Our audit opinion expressed in this report has been formed on the above basis.

Independence

In performing our engagement, we have complied with the independence requirement of the Australian professional accounting bodies and Audit Guidelines.

Opinion

In our opinion, except for the matters identified in Section 9 – Compliance Obligation Elements which Require Corrective Measures and any effects thereof, we are satisfied that Western Power in all material respects has policies, procedures and systems in place to support compliance with the licence conditions and the integrity of its reporting requirements to the Authority and other statutory organisations for the period 1 July 2012 to 30 June 2014

Grant Thornton Audit Pty Ltd
Chartered Accountants

Michael Hillgrove

Partner

Perth

5th November 2014

2. Executive Summary

Overview

Western Power operates the electricity grid within the South West Interconnected System (“SWIS”) and delivers power to just over 1 million people every day.

Since March 2006, Western Power has held an electricity distribution licence (“EDL1”) granted by the Authority. EDL1 provides Western Power with the legal right to distribute electricity to customers. Since the 2012 Performance Audit, Western Power has undergone a restructure in 2013 to streamline its business. Grant Thornton notes that the restructure did not have a major impact on its control environment.

Section 13 of the Act requires Western Power to provide the Authority with a performance audit conducted by an independent expert acceptable to the Authority no less than once in every 24 month period (or such longer period as the Authority allows).

Objective

The primary objective of this audit was to provide the Authority with an independent assessment of Western Power’s compliance with its licence conditions.

To achieve this objective we evaluated the adequacy and effectiveness of controls implemented by Western Power to fulfil its obligations to comply with the performance and quality standards referred to in its EDL1.

Summary of Actions – Previous Audit Report

Western Power’s last performance audit of compliance with its EDL1 was conducted in 2012. Our review of the status of management actions from the previous audit report identified that 10 licence obligations were resolved before the end of the previous audit period, 14 licence obligations were resolved during the current audit period and 12 licence obligations remained unresolved at the end of the audit period. These observations are further discussed in Section 6 – Review of Status of Management Actions for Previous Audit Report.

Summary of Issues and Recommendations – Current Audit

Table 1: Summary of Findings

Audit Priority	Adequacy of Controls Rating (refer to above). NP = Not Performed: N/A Not Applicable						Compliance Rating			
	N/A	A	B	C	D	NP	1	2	3	4
Audit Priority 1		23	12	2		2	10	16	11	
Audit Priority 2		3				3	3			
Audit Priority 3										
Audit Priority 4		155	8	1		36	152	7	5	
Audit Priority 5		23				13	23			
Not Applicable	8									
Total	8					54				

The above table illustrates the compliance profile of Western Power for the 2014 Performance Audit.

For the audit period 1 July 2012 to 30 June 2014, a total of 39 licence obligations were rated as non-compliant. These obligations are summarised at a high level in Section 12 – “Recommendation Summary” of the report. In addition, these obligations are further discussed in-depth in Section 9 – “Detailed Findings Compliance Elements which Require Corrective Measures” of the report.

Of those 39 non-compliant ratings, 13 related to obligations that were effectively carried forward from the 2012 performance audit. In each case, the cause of the non-compliance was identified through the 2012 performance audit and subsequently corrected part-way through the current audit period. Therefore, the non-compliance audit rating also applies to this current audit period.

As Western Power addressed the causes of the non-compliances by implementing relevant remedial plans during the period 1 July 2012 to 30 June 2014, no further recommendations or action plans are required to address the non-compliances.

Opinion

Please find below an extract from the Independent Auditor Report stating the opinion of the auditor.

“In our opinion, except for the matters identified in Section 9 – Compliance Obligation Elements which Require Corrective Measures and any effects thereof, we are satisfied that Western Power in all material respects has policies, procedures and systems in place to support compliance with the licence conditions and the integrity of its reporting requirements to the Authority and other statutory organisations for the period 1 July 2012 to 30 June 2014.”

Culture of Compliance

In conducting the 2014 Performance Audit, we identified instances of non-compliance by Western Power with its EDL1 obligations, a number of which were self-reported in the 2012/2013 Annual Compliance Report and the 2014 Breach Register. Of the instances that were self-identified, Western Power was noted to proactively investigate and implement remedial actions to mitigate the risk of the breach reoccurring in the future.

For those non-compliances that were revealed during our fieldwork, Western Power was observed to act promptly in conducting investigations to identify the cause of the non-compliance and to develop a solution that could be implemented as soon as practicable.

Throughout our fieldwork we have observed a strong understanding across the business of Western Power's compliance obligations and noted that Western Power is continually working towards improving its compliance culture.

We have noted that Western Power's approach towards compliance has improved since the prior performance audit. Employees are observed to be proactively engaging with the Regulatory Compliance Team to report potential non-compliances or near misses and workshop new solutions to improve its overall compliance. We have observed that compliance with Western Power's licence obligations is not only a matter for specific obligation owners, but is tackled by the business as a whole.

We encourage Western Power to continue to build on its compliance culture with the view to improve its compliance outcome.

3. Scope

The performance audit covered Western Power's Distribution Licence, EDL1, for the 24 month period from 1 July 2012 to 30 June 2014 and examined a total of 288 obligations from the Compliance Manual.

The time period over which the performance audit was conducted was from June 2014 to September 2014 which included planning, fieldwork, reporting and the presentation of results to Western Power's management and the Authority.

The performance audit included:

- A review of the status of management actions pertaining to Western Power's 2012 Performance Audit Report.
- An examination of the breach register maintained by Western Power to determine whether the compliance reports sent to the Authority during the audit period are consistent with the register.
- A review and evaluation of the areas of special interest which have been highlighted by the Authority.

The following areas were identified by the Authority as areas of special interest and Grant Thornton has provided specific commentary within the report in this regard:

- **Western Power's Type 1 Compliance Framework** – The Authority requested a review of the effectiveness of the controls associated with Western Power's Type 1 Compliance Framework. This required an assessment of the controls (preventative and detective), as well as a review of the results of any internal audits of the Framework that have occurred during the audit period.
- **Contractor Management Process** – The Authority required Grant Thornton to review Western Power's contractor management processes to ensure it included adequate controls and monitoring to manage compliance with Western Power's licence obligations. A sample of contract based activities and interview of contractor staff was required to determine compliance.

- **Non-metropolitan site visit** – The Authority required a site visit of a Western Power depot located south of the metropolitan area. The purpose of the visit was to assess the depot’s awareness of internal processes and procedures relevant to Western Power’s licences and assess the depot’s compliance with the processes.

In this regard Grant Thornton visited the Albany depot.

- **Metering Business System** – An assessment of compliance was required of Western Power’s MBS in respect to connections and reconnections. This required a close examination of the actions taken by Western Power to address those problems disclosed in the 2012 audit.

It is important to emphasise that not all obligations in the Compliance Manual were applicable to Western Power and accordingly the audit did not evaluate the performance of Western Power’s compliance with those obligations. In this regards the following licence obligations were determined to be “not applicable” in accordance with the Audit Guidelines.

- Electricity Compliance Reporting Manual 2013 - Obligation 1, 2, 113, 249, 345, 496 and 497.
- Electricity Compliance Reporting Manual 2011- Obligation 298.

The key legislation governing the licensing of distributors of electricity is the Electricity Industry Act 2004. Where applicable, other regulatory requirements that supported the EDL1 conditions were examined. Specifically, the relevant sections of the following codes and regulations were examined as part of this performance audit:

- Code of Conduct for the Supply of Electricity to Small Use Customers 2010 and 2012 (WA);
- Electricity Industry (Obligation to Connect) Regulations 2005 (WA);
- Electricity Industry (Network Quality and Reliability of Supply) Code 2005 (WA);
- Electricity Industry Metering Code 2005 and 2012(WA);
- Electricity Industry Customer Transfer Code 2004 (WA); and
- Electricity Industry (Customer Contracts) Regulations 2005 (WA).

4. Our Approach and Methodology

Risk Identification and Assessment

Grant Thornton analysed each licence compliance element in terms of the inherent risk level, the rated controls and assigned the audit priorities based on the risk level and controls which management exercised over those risks.

Furthermore, we considered and adopted the Authority's Audit Guidelines in conducting the performance audit.

Our fieldwork involved extensive interviews and discussions with the process owner or delegated representative to obtain an understanding of the business environment and organisation structure. Through examination of documents, policies and procedures, we identified key controls. We have undertaken substantive testing to confirm the operational effectiveness of those controls.

The risk assessment rating for each compliance manual reference obligation was reviewed during the fieldwork of the audit and, where applicable, was updated in accordance with the audit findings in this report.

Risk Evaluation

Risk evaluation for Western Power involved Grant Thornton assessing compliance with the requirements of the licence by examining:

- The design effectiveness of the controls through the evaluation of the:
 - Control environment;
 - Information system;
 - Control procedures; and
 - Compliance attitude of management.

- The operating effectiveness of controls throughout the period.
- Tests of operating effectiveness were concerned with how the controls were applied at relevant times during the period under audit, the consistency with which they were applied and by whom or by what means they were applied. The focus was on the systems and effectiveness of processes employed to ensure compliance with the standards, outputs and outcomes required by the licence obligation.

In accordance with the Audit Guidelines, the following compliance rating scale measuring the extent of Western Power’s compliance with the applicable licence obligations was employed.

Performance Audit compliance and controls rating scale			
Adequacy of Controls Rating		Compliance of Controls 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 and third parties
D	No Controls Evident	4	Non-compliant – major impact on customers and third parties

Risk Treatment

If a control risk is identified, which in the Auditor’s professional judgement, left untreated, could cause Western Power to become non-compliant with its obligation under the licence, Grant Thornton has provided recommendations to mitigate the risk to an appropriately low level. The treatment of risks either involves reducing the likelihood of the risk materialising or mitigating the impact of the risk.

5. Audit Team Members and Hours Utilised in the Execution of the Audit

Team Members	Hours
Michael Hillgrove, Engagement Partner	131
Karen Dabbs, Quality Assurance Partner	8
Rudi James, Manager (until 4/7/14)	101
Graeme Morrissey, Supervisor	165
Steve Vu, Consultant	195
Brooke Williams, Consultant	236
Total	836

6. Review of Status of Management Actions for Previous Audit Report

Table of Previous Non Compliances and Audit Recommendations

A. Resolved before the end of the previous audit period

2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Date Resolved	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
75	Non-compliant 2	Nil	May 2012	No
	Electricity Industry (Obligation to Connect) Regulations regulation 6			
	Written evidence of some customers agreeing to be connected to the network outside of the prescribed 20 business days was not retained.			
309	Non-compliant 2	Nil	May 2012	No
	Code of Conduct clause 13.8(1)			

Table of Previous Non Compliances and Audit Recommendations

A. Resolved before the end of the previous audit period

2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Date Resolved	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
	Western Power had kept a record of the total number of connections provided and connections not provided on or before an agreed date, however, testing revealed that the records were inaccurate.			
339	<p>Non-compliant 2</p> <p>Electricity Industry Metering Code clause 3.5(6)</p> <p>There were instances where Synergy was not charged in accordance with the model SLA.</p>	Nil	March 2012	No
386 & 387	Non-compliant 2	Nil	September 2011	No

Table of Previous Non Compliances and Audit Recommendations

A. Resolved before the end of the previous audit period

2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Date Resolved	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
	<p>Electricity Industry Metering Code clause 4.8(4) Electricity Industry Metering Code clause 4.8(5)</p> <ol style="list-style-type: none"> 1. Western Power did not have a formal meter access authority matrix in place for both the metering installation and metering database. 2. Readings Management Team, who primarily validated energy data, had full access rights to the metering installation as the metering software (EMPWin) was installed on their computers. Therefore, personnel within the Team had the capability to 			

Table of Previous Non Compliances and Audit Recommendations

A. Resolved before the end of the previous audit period

2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Date Resolved	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
	reprogram the meters and delete the interval energy data.			
396	<p>Non – Compliant 2</p> <p>Electricity Industry Metering Code clause 5.6(1)</p> <p>There were instances where Western Power did not provide substituted or estimated interval data for a metering point to the current user and the IMO within the prescribed timeframe.</p>	1. Reinforce the requirement to review manual exception reports within the timeframes prescribed by the Metering Code with relevant Finance, Treasury & Risk Team Members.	June 2012	Yes – Grant Thornton has identified further instances of non-compliance in the current audit period. Further action required, for detailed explanation please see licence obligation 412 in the section titled “Detailed Findings – Compliance Elements that Require Corrective Measures”
427	<p>Non-compliant 2</p> <p>Electricity Industry Metering Code clause 5.22(2)</p>	Nil	January 2012	No

Table of Previous Non Compliances and Audit Recommendations

A. Resolved before the end of the previous audit period

2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Date Resolved	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
	Western Power did not use check metering data to validate energy data			
442 & 443	<p>Non-compliant 2</p> <p>Electricity Industry Metering Code clause 5.31(1) Electricity Industry Metering Code clause 5.31(2)</p> <p>In 2009 Western Power verbally agreed with Horizon Power that it would no longer act as a metering data agent for Horizon Power and perform the actions required under this licence obligation. However, this was not agreed in writing until December 2011</p>	Nil	December 2011	No

Table of Previous Non Compliances and Audit Recommendations

A. Resolved before the end of the previous audit period

2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Date Resolved	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
465	<p>Non-compliant 2</p> <p>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 13(2)</p> <p>Average total length of interruptions of supply exceeded the Code requirements. Western Power did not meet the service standard benchmark for SAIDI within the rural long area for the year ending June 2011</p>	Nil	June 2012	No

Table of Previous Non Compliances and Audit Recommendations

B. Resolved during current Audit period

2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Date Resolved	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
63 & 400	Non-compliant 2	1. That Western Power reconfigures MBS to include the last scheduled meter read date or day number history in its response to a retailer who makes a standing data request.	July 2013	No
	Electricity Industry Customer Transfer Code Annex 4 clause A4.1 Electricity Industry Metering Code clause 5.10			
	Western Power did not provide the "last scheduled meter read date or day number" as required.			
235	Non-compliant 2	1. That Western Power provides a report of those disconnections investigated to its Risk and	October 2012	No
	Code of Conduct clause 7.6			

Table of Previous Non Compliances and Audit Recommendations

B. Resolved during current Audit period

2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Date Resolved	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
	Western Power disconnected a customer outside the limitations outlined in Code of Conduct clause 7.6	<p>Compliance Branch.</p> <p>2. That Western Power investigates MBS to determine the cause of those services not having been captured and undertake remedial actions to prevent re-occurrence.</p>		
237	<p>Non-compliant 2</p> <p>Code of Conduct clause 7.7(2)</p> <p>Western Power failed to provide the required notice to a life support equipment customer's supply address.</p>	<p>1. Western Power should test and continue to monitor the effectiveness of its revised planned interruption process and the outcomes of the reviews should be captured.</p>	October 2012	No

Table of Previous Non Compliances and Audit Recommendations

B. Resolved during current Audit period

2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Date Resolved	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
310	Non-compliant 2	That Western Power should: 1. Review MBS functionality to ensure that it accurately calculates and records the reconnection "required by date" in accordance with the Code of Conduct. 2. Re-configure MBS to ensure that the "required by date" is locked.	1. January 2013 2. October 2013	No
	Code of Conduct clause 13.8(2)			
	Review of the monthly exception reports revealed inaccuracies with respect to the total number of reconnections provided and not provided within the prescribed timeframes.			
317	Non-compliant 2	3. Western Power should regularly prepare a report detailing the total number of customers who are	December 2012	No
	Code of Conduct clause 13.14			

Table of Previous Non Compliances and Audit Recommendations

B. Resolved during current Audit period

2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Date Resolved	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
	Western Power had included within the total number of connections to its network, those connections that were not its customers.	connected to its network. The report should be reviewed quarterly for integrity.		
326	<p>Non-compliant 2</p> <p>Code of Conduct clause 14.4(1)</p> <p>There were six instances where Western Power did not acknowledge or respond to a written complaint within the prescribed timeframes.</p>	<ol style="list-style-type: none"> 1. The Corporation examines the feasibility of developing auto-escalation functionality into its NetCIS system that alerts the business of the requirement to respond to a written query or complaint and, if deemed feasible, implement the solution. 2. During the determination of the feasibility for the above 	December 2012	No

Table of Previous Non Compliances and Audit Recommendations

B. Resolved during current Audit period

2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Date Resolved	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
		recommendations, continue with the manual monitoring strategy, focusing on ensuring that a number of staff are across the process and are actively engaged to manage the Corporation's compliance with this obligation.		
347	<p>Non-compliant 2</p> <p>Electricity Industry Metering Code clause 3.11(1)</p> <p>1. Sample-based testing revealed that Western Power was unable to meet the minimum levels of availability of the</p>	<ol style="list-style-type: none"> 1. Review the new COGNOS report to determine and ensure the integrity of the report. 2. For those instances where metering installations are identified to have an availability issue and the matter is within Western Power's control, the 	November 2012	No

Table of Previous Non Compliances and Audit Recommendations

B. Resolved during current Audit period

2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Date Resolved	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
	<p>metering installations on its network for the collection of data as prescribed within the Metering Code.</p> <p>2. Western Power did not have a monitoring mechanism to enable visibility of its performance during the audit period.</p>	Corporation continues to investigate and perform the necessary rectification actions in a timely manner.		
360	<p>Non-compliant 2</p> <p>Electricity Industry Metering Code clause 3.16(3)</p> <p>98% of Western Power's data loggers collated energy data in 15 minute intervals as opposed to the stipulated trading interval of 30 minutes.</p>	1. Western Power should investigate the feasibility of employing the functionality within its data loggers to record energy data at intervals prescribed by the Metering Code, in the event the Minister of Energy does not approve the Corporation's proposed amendments to the	December 2012	No

Table of Previous Non Compliances and Audit Recommendations

B. Resolved during current Audit period

2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Date Resolved	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
		Metering Code.		
361 & 362	<p>Non-compliant 2</p> <p>Electricity Industry Metering Code clause 3.16(5) Electricity Industry Metering Code clause 3.16(6)</p> <p>The metrology procedure and the model SLA did not specify how the network operator is to produce the 'Notional Wholesale Meter' value for the purposes of, and as defined in, the Market Rules. The value was determined by the IMO.</p>	<p>1. In the absence of a ruling from the Minister, Western Power consider stating the required terms in the metrology procedure and establishes how it will be dealt with in the model SLA.</p>	December 2012	No

Table of Previous Non Compliances and Audit Recommendations

B. Resolved during current Audit period

2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Date Resolved	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
363	Non-compliant 2	1. That Western Power incorporates those recommendations under compliance manual reference 360, 361 and 362 to ensure Western Power complies with the prescribed wholesale market metering installation requirements.	December 2012	No
	Electricity Industry Metering Code clause 3.18(1)			
	Western Power was determined to be non-compliant with this licence obligation as a flow on from being non-compliant with obligations 360-362.			
422	Non-compliant 2	1. That Western Power retains evidence of review to substantiate secondary review had been undertaken.	November 2013	No
	Electricity Industry Metering Code clause 5.21(8)			
	1. There were instances where Western Power imposed charges to Synergy for the cancellation of the metering			

Table of Previous Non Compliances and Audit Recommendations

B. Resolved during current Audit period

2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Date Resolved	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
	<p>installation tests, which is not outlined in the Model SLA.</p> <p>2. Western Power did not retain evidence that a secondary review had been conducted for the preparation of invoices.</p>			
426	<p>Non-compliant 2</p> <p>Electricity Industry Metering Code clause 5.22(1)</p> <p>1. Prior to January 2012, Western Power did not validate energy data by conducting a comparison of revenue and check metering data.</p> <p>2. Western Power did not validate data</p>	<p>That Western Power:</p> <p>1. Investigates and establishes nominated maximum values for the remaining meters</p> <p>2. Validates the energy data for the remaining meters against the</p>	<p>1. November 2012</p> <p>2. June 2013</p>	No

Table of Previous Non Compliances and Audit Recommendations

B. Resolved during current Audit period

2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Date Resolved	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
	through a check against a nominated maximum value for 142 meters.	nominated maximum values.		

Table of Previous Non Compliances and Audit Recommendations

C. Unresolved at the end of the Audit period			
2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
41	<p>Non-compliant 2</p> <p>Electricity Industry Customer Transfer Code clause 4.13</p> <p>In some instances, Western Power did not give electronic notice of the transfer and the transfer date to the incoming retailer and previous retailer within the prescribed timeframe.</p>	<p>1. That Western Power continues to investigate the data loading issue between MVRS and MV90 and implements the necessary rectifications.</p>	<p>Yes – although the recommendation has been implemented, Grant Thornton has identified further instances of non-compliance in the current audit period. For detailed explanation please see licence obligation 41 in the section titled “Detailed Findings – Compliance Elements that Require Corrective Measures”</p>
77	<p>Non-compliant 2</p> <p>Electricity Industry (Obligation to Connect) Regulations regulation 8</p>	<p>Nil</p>	<p>Yes –Grant Thornton has identified further instances of non-compliance in the current audit period. For detailed explanation please see licence obligation 77 in the section titled “Detailed Findings – Compliance Elements that Require</p>

Table of Previous Non Compliances and Audit Recommendations

C. Unresolved at the end of the Audit period			
2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
	In some instances, Western Power did not energise premises within the prescribed timeframe.		Corrective Measures”
240	<p>Non-compliant 2</p> <p>Code of Conduct clause 8.2</p> <p>1. There were instances where Western Power was observed not to have reconnected customer’s supply addresses within the prescribed timeframes.</p>	<p>That Western Power should:</p> <ol style="list-style-type: none"> 1. Consider a review of the resource and scheduling to ensure that reconnections can be performed in accordance with the Code of Conduct. 2. Review MBS functionality to ensure 	<p>Yes – although the recommendations have been implemented, Grant Thornton has identified further instances of non-compliance in the current audit period. For detailed explanation please see licence obligation 237 in the section titled “Detailed Findings – Compliance Elements that Require Corrective Measures”</p>

Table of Previous Non Compliances and Audit Recommendations

C. Unresolved at the end of the Audit period			
2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
	2. In some instances, reports detailing reconnections performed outside of the prescribed timeframes were found to be inaccurate. 3. Prior to December 2011, Western Power did not have a process in place for managing urgent reconnections with a retailer and recording these reconnections accurately.	that it accurately calculates and records the reconnection “required by date” in accordance with the Code of Conduct. 3. Re-configure MBS to ensure that the “required by date” is locked.	
297	Non-compliant 2 Code of Conduct clause 12.1(3)	That Western Power: 1. Examines the feasibility of including within its initial voice recognition	Yes – although the recommendations have been implemented, Grant Thornton has identified further instances of non-compliance in the current audit period. For detailed

Table of Previous Non Compliances and Audit Recommendations

C. Unresolved at the end of the Audit period			
2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
	Western Power did not notify customers of their right to have their complaint escalated in instances where their complaint was resolved at first contact.	<p>(IVR) system a complaint filter. Upon selection by the customer of the "complaint" identifier, a pre-recorded message advising the customer of their rights be played prior to the call being answered; and if deemed feasible, implement the solution.</p> <p>2. Alternatively, Western Power trains and instructs its Customer Contact Centre staff to provide advice with respect to the right of escalation when dealing with any complaints.</p>	explanation please see licence obligation 296 in the section titled "Detailed Findings – Compliance Elements that Require Corrective Measures"

Table of Previous Non Compliances and Audit Recommendations

C. Unresolved at the end of the Audit period

2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
312	<p data-bbox="421 791 920 839">Non-compliant 2</p> <p data-bbox="421 855 920 903">Code of Conduct clause 13.10(1)</p> <p data-bbox="421 919 920 1015">Western Power did not capture those complaints resolved at first point of phone contact.</p>	<ol style="list-style-type: none"> <li data-bbox="929 791 1429 1015">1. That Western Power requires its Customer Contact Centre staff to record those complaints resolved during first contact within NetCIS, including the nature of the complaint and the resolution. <li data-bbox="929 1031 1429 1206">2. That the Record Keeping Report processes be reviewed for integrity to ensure that the information required to be captured and reported to the Authority is accurate and complete. 	<p data-bbox="1438 791 2168 1015">Yes – although the recommendations have been implemented, Grant Thornton has identified further instances of non-compliance in the current audit period. For detailed explanation please see licence obligation 315 in the section titled “Detailed Findings – Compliance Elements that Require Corrective Measures”</p>

Table of Previous Non Compliances and Audit Recommendations

C. Unresolved at the end of the Audit period			
2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
318	<p>Non-compliant 2</p> <p>Code of Conduct clause 13.15(1)</p> <p>Western Power's 2010/2011 Record Keeping Report was found to be inaccurate and incomplete as a result of non-compliances detected with obligations 309, 310, 312, 313 and 317.</p>	<p>1. That Western Power considers conducting a review of the implemented controls to determine their adequacy and effectiveness during the preparation of its Record Keeping Report to ensure integrity of information provided to the Authority.</p>	<p>Yes – although the recommendation has been implemented, Grant Thornton has identified further instances of non-compliance in the current audit period. For detailed explanation please see licence obligation 323 in the section titled “Detailed Findings – Compliance Elements that Require Corrective Measures”</p>
366	<p>Non-compliant 2</p> <p>Electricity Industry Metering Code clause 3.21(1)</p> <p>1. Time drift was not being monitored on a monthly basis for all meter types containing internal clocks.</p>	<p>That Western Power:</p> <p>1. Review the time accuracy maintained for all Type 5 meters, and correct the time drift where inaccuracies are identified</p> <p>2. Consider establishing and</p>	<p>Yes – although the recommendations have been implemented, Grant Thornton has identified further instances of non-compliance in the current audit period. For detailed explanation please see licence obligation 378 in the section titled “Detailed Findings – Compliance Elements that Require Corrective Measures”</p>

Table of Previous Non Compliances and Audit Recommendations

C. Unresolved at the end of the Audit period			
2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
	2. There were instances where time accuracy was not maintained as prescribed for Type 5 meters. 3. Prior to December 2011, time drift parameter settings within MV90 had been incorrectly set up.	implementing a monitoring mechanism to prevent time accuracy errors outside the prescribed timeframes in circumstances where a power outage occurs or the back-up battery within the meters is weak/has deteriorated.	
391	Non-compliant 2 Electricity Industry Metering Code clause 5.3	1. That Western Power re-examines the process for obtaining and transferring data and if feasible, implement any potential efficiencies that can be	Yes – although the recommendation has been implemented, Grant Thornton has identified further instances of non-compliance in the current audit period. For detailed explanation please see licence obligation 406 in the section titled “Detailed Findings – Compliance Elements that Require

Table of Previous Non Compliances and Audit Recommendations

C. Unresolved at the end of the Audit period			
2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
	Review of cycle based reports revealed instances where basic data had not been obtained and transferred within the prescribed timeframes.	gained to ensure compliance with this licence obligation.	Corrective Measures”
402	<p>Non-compliant 2</p> <p>Electricity Industry Metering Code clause 5.12(1)</p> <p>In one instance, energy data was not provided within the prescribed timeframe</p>	1. Western Power investigates MBS to determine the cause of the delay in order to ascertain whether the issue is systemic and rectify the issue.	Yes – although the recommendation has been implemented, Grant Thornton has identified further instances of non-compliance in the current audit period. For detailed explanation please see licence obligation 418 in the section titled “Detailed Findings – Compliance Elements that Require Corrective Measures”

Table of Previous Non Compliances and Audit Recommendations

C. Unresolved at the end of the Audit period			
2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
445	<p>Non-compliant 2</p> <p>Electricity Industry Metering Code clause 6.1(1)</p> <ol style="list-style-type: none"> Western Power did not have reporting capabilities across all elements of the model SLA. Due to inaccuracies in recordings for energising a premises or reconnecting after disconnection, reporting of these SLA requirements were not accurate. Western Power did not provide reports to other retailers. 	<p>That Western Power:</p> <ol style="list-style-type: none"> Implement reporting capabilities for the outstanding SLA line elements, remotely collected energy interval data and standing data provision. Provide performance indicator reports to the remaining retailers for the SLA line elements that require reporting. Formally enter into discussions with the remaining retailers whether reporting is required for SLA line elements that can be agreed upon. 	<p>Yes – although the recommendations have been implemented, Grant Thornton has identified further instances of non-compliance in the current audit period. For detailed explanation please see licence obligation 468 in the section titled “Detailed Findings – Compliance Elements that Require Corrective Measures”</p>

Table of Previous Non Compliances and Audit Recommendations

C. Unresolved at the end of the Audit period			
2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
		4. In the event where Western Power is unable to meet its performance under the SLA, engage with affected Code participants and inform them of the actions undertaken, including the proposed strategies to improve performance.	
469	Non-compliant 2 Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 18	Nil	Yes –Grant Thornton has identified further instances of non-compliance in the current audit period. For detailed explanation please see licence obligation 493 in the section titled “Detailed Findings – Compliance Elements that Require Corrective Measures”

Table of Previous Non Compliances and Audit Recommendations

C. Unresolved at the end of the Audit period			
2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
	Western Power failed, in a number of instances, to make payments to customers within the specified timeframe for failure to give notice of a planned interruption.		
470	<p>Non-compliant 2</p> <p>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 19</p> <p>Service standard payments were made outside of the prescribed timeframes in a number of instances.</p>	<ol style="list-style-type: none"> 1. Training of other EOP team members to include interrogative techniques to enable timely and accurate decisions to be made against EOP applications. 2. That the Corporation engages with the relevant Regulator to clarify whether the prescribed timeframe applies to those applications which have been rejected and require further investigation. Based on the 	Yes – although the recommendations have been implemented, Grant Thornton has identified further instances of non-compliance in the current audit period. For detailed explanation please see licence obligation 494 in the section titled “Detailed Findings – Compliance Elements that Require Corrective Measures”

Table of Previous Non Compliances and Audit Recommendations

C. Unresolved at the end of the Audit period

2011 Compliance Manual Reference Number	Compliance Rating/Legislative Obligation/details of issue	Auditors' Recommendation	Further Action Required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable.
		outcome of the discussion develop and implement a process that manages the Corporation's compliance with this obligation.	

7. Special Areas of Interest

Initial discussions were held with the Authority and Western Power, and the Authority indicated a desire to place emphasis on the examination of special areas of interest. As such, a greater level of focus and commentary was assigned to these areas:

- **Western Power's Type 1 Compliance Framework** – The Authority has requested a review of the effectiveness of the controls associated with Western Power's Type 1 Compliance Framework. This will require an assessment of the controls (preventative and detective), as well as reviewing the results of any internal audits of the Framework that have occurred during the audit period.
- **Contractor Management Process** – The Authority requires Grant Thornton to review Western Power's contractor management processes to ensure they include adequate controls and monitoring to manage compliance with Western Power's licence obligations. A sample of contract based activities and interview of contractor staff is required to determine compliance
- **Non-metropolitan site visit** – The Authority requires a site visit of a Western Power depot located south of the metropolitan area. The purpose of the visit will be to assess the depot's awareness of internal processes and procedures relevant to Western Power's licences and test for compliance with the processes.
- **Metering Business System** – An assessment of compliance is required of Western Power's MBS in respect to connections and reconnections. This will require a close examination of the actions taken by Western Power to address those problems disclosed in the 2012 audit.

Type 1 Compliance Framework

Western Power developed and implemented a Type 1 Compliance Framework (the “Framework”) in 2012 which was based on the 2010 Electricity Compliance Reporting Manual. Our review of the Framework identified clear articulation as to the purpose and design.

The Framework comprises of a number of control mechanisms which are premised on continuous improvement and sound oversight to mitigate the materialisation of Type 1 non-compliance by Western Power. Each Type 1 obligation has been mapped to an executive team member demonstrating the existence of accountability and responsibility throughout Western Power. We were able to reconcile the Type 1 obligations detailed within the Framework to both the 2012 and 2014 Electricity Compliance Manuals.

The Framework consisted of a number of controls which comprised of:

- Accurate identification of Type 1 licence obligations

This process is prescribed within the “Identify and Update Type 1 Licence Obligations” document which provides for a step by step procedure as to how this activity is to be undertaken.

- Communication and Context of the Type 1 Framework

Training material has been developed to educate and increase the awareness of the Framework to those touch points throughout the business. The delivery of the training is understood to be delivered through different methods which include direct presentation or participation through SALT. The objective of the training is not only to educate Western Power with respect to its obligations under its licences, but also to increase the awareness of its people with respect to the required culture of compliance.

- Controls

Detective Controls

Western Power has implemented an alert process where timely alerts and notification are required to be made through the established reporting protocols. The detective mechanism is varied and involves a number of mechanisms including exception reporting, assurance activities, assessment of the control design and ongoing monitoring.

Preventative Controls

This approach revolves around control design with a view to mitigate the crystallisation of a breach of a Type 1 obligation. Awareness of risk including the cost / benefit of implementing a control is considered during this stage. Preventative controls implemented at Western Power include information, communication, training, work instructions / procedures and automated functions to minimise or mitigate a breach from occurring.

Our review of the controls surrounding the Framework revealed that the understanding of the Framework through Western Power was well established. Interviewees were able to state with a high degree of knowledge the purpose of the Framework and the reason for its existence.

We provide the following commentary with respect to the effectiveness of the Framework with respect to licence obligations 127, 128, 230, 233 and 252:

Western Power was observed to have successfully rolled out the Framework, the discussions with staff who were responsible for carrying out the activities for the aforementioned licence obligations revealed a sound awareness of the Framework and its purpose. Staff were able to demonstrate linkage to the respective Codes and Regulations and provide context as to why these obligations were a priority item. Interviews revealed that staff were also cognisant of the impact of a breach and were able to clearly express the actions required to be undertaken when a breach or near miss was detected.

Through sample based testing and review of Western Power's Breach Register, we were able to confirm that Western Power had identified and self-reported those instances where a breach or a near miss had occurred that they were aware of. Inputs were observed to be made from multiple areas within Western Power and reporting was not limited to licence obligations but included those events where staff had failed to comply with internal controls.

An analysis was performed with respect to the prior audit period and current audit period for clause 7.6 of the Code of Conduct, which revealed that in 2012 Western Power had confirmed 7 disconnections made outside of the prescribed limitations, 2014 observed 1 non-compliant disconnection.

Western Power has implemented a Planned Interruption Procedure which requires a robust process to be carried out during the planning phase of a planned activity. The basis for the focus on the planned interruption activity was the impact on a customer residing at a supply address registered as having life support equipment that might be affected. Our review of the evidence retained by Western Power, sampling of complaints received and service standard payments made did not identify an instance where a life support customer was adversely affected in this regard.

The purpose of examining the planned interruption process was that reliance is placed on the information retained within Western Power's priority restoration register and the data relating to sensitive load customers by the planning team. We performed reconciliation of the supply address of those customer's with life support equipment data supplied by the retailer to Western Power and confirmed that it was accurately reflected within Western Power's systems.

With regards to clause 9.5(3) of the Code of Conduct which requires Western Power to revert a pre-payment meter within the prescribed timeframes as advised under clause 9.5(2) of the Code of Conduct, it is understood that Western Power has not received such a

request and review from the Ninga Mia community where pre-payment meters were located and the life support equipment register did not find any exceptions.

Review of detective controls such as the self-assurance program and internal audits revealed opportunities for continuous improvement and the strengthening of the retention of evidentiary support for planned interruption activities as a result of the potential impact of such activity to those customer 's' supply addresses who have registered as having life support equipment.

Further, review of internal audit reports IA145, AI147, IA151, IA153, IA167 and IA168 noted a gradual decrease in a number of risk rated high (4 reported in IA145 to 0 in IA 167).

Finally, Western Power is required by the Authority to produce a performance audit report conducted by an independent expert at not less than once every 24 months. Review of the Regulatory Compliance Audit and Reporting Timeline noted that Western Power has sufficiently planned and communicated key deliverables for the provision of the report in the required timeframe.

In conclusion, Western Power has developed and implemented a Type 1 Compliance Reporting Framework across the organisation. The existence of a number of detective and preventative controls demonstrates that Western Power has a proactive stance in trying to mitigate the risk of a type 1 obligation breach from occurring. The effectiveness of the framework is evident through the ratings and observations concluded during the fieldwork stage.

Contractor Management Process

The Authority has requested a review of Western Power’s contractor management processes to ensure there are adequate controls and monitoring mechanisms in place to manage compliance with Western Power’s licence obligations.

We understand that Western Power has decided to outsource a number of activities to contractors. These include:

- Service Stream (formally “AMRS”) – Meter readings, de-energise, re-energise and meter exchanges; and
- Theiss and West Coast Energy – Planned Interruptions.

Western Power’s contractors are bound by a contract for service which outlines what activities can and cannot be performed by the contractor. Review of the contract between Western Power and each contractor revealed a detailed outline of the service standards that are required to be met. Further, we noted a link from the work that is to be performed to the relevant licence obligations.

Both Western Power and each contractor have designated contract managers who are responsible for the supervision of the execution of the contract. We also noted that Western Power has key relationship personnel who provide for a key contact point for each contractor.

Monthly meetings are conducted between Western Power and its contractors that facilitate a review of performance and monitoring against the specified service standards. Performance reports are produced to measure the contractors’ performance against their KPI’s. Review of the performance report revealed a nexus between the performance of the contractor against Western Power’s Type 1 licence obligations. This meeting also facilitates discussions of any issues that have arisen and any amendments to the contract that may be required to be made.

In addition, Western Power conducts activities to monitor the performance and quality of the work performed by its contractors. Review of dashboard reports and exception reports revealed Western Power is continually monitoring the performance of its contractors. Further, we note that Western Power conducts field audits of its contractors to ensure that policies and procedures are being followed and the quality of work meets the standards specified in the contract. These audits are performed on a rolling basis and the results are reported directly back to the contractors through monthly meetings conducted.

Further, Western Power provides its contractors with a brief of the works that are required to be performed. Western Power provides training to its contractors to ensure that they are aware of the actions that they can and cannot undertake to ensure compliance with Western power’s licence obligations. Western Power also shares its work instructions and protocols with its contractors to ensure that all work performed is consistent across the business. It was also noted that Western Power has seamlessly integrated its MBS system with Service

Stream's UNIWA system to provide for the timely provision of information between Western Power and its contractors.

In conclusion, Western Power undertakes a number of activities to monitor and manage contractor performance and awareness of Western Power's licence obligations.

Non-metropolitan site visit

A site visit was performed of the Albany depot to facilitate the assessment of the staffs' awareness of internal processes and procedures relevant to Western Power's licences and test for compliance with processes.

The following activities carried out at the depot were identified to be relevant to the performance audit process:

- New connections;
- Re-energisations;
- De-energisations;
- Planned outages;
- Power quality investigations;
- Check meter reads; and
- Meter change and upgrades.

Our walkthrough of processes and enquiries with staff revealed that the Albany depot is responsible for the operational execution of downstream activities. Preparation and distribution of tasks is carried out by other areas within the business.

The primary course for the allocation of the workflow was described as service order based. The depot would receive a daily set of service orders which is allocated from Metering Services for example, who print the service order at the depot's printer. It was identified that the manual process did contain a level of inherent risk, such that a service order may be received at the depot after the field crew have left and this could adversely impact the timeliness of service delivery.

We understand that the training module (SALT) was a key tool used to deliver and assess through online examinations. The training material is understood to include but not limited to Type 1 Compliance Framework and related activities. Staff confirmed that Western Power has been providing training on an annual basis, with interim refreshers and updates where applicable.

Sample based testing of service orders and a review of planned and unplanned interruption activities did not reveal any exceptions. We analysed Western Power's Service Standard Payments register and noted 3 payments having been made to customers within the region for non-notification of a planned interruption.

Our review of the documents retained by the Evidence Retention Team confirmed that the notification task within the planned interruption process had been carried out and that the service standard payment was made to support positive customer relationship management.

The field service crew relied on an electronic tool called a "Tuff Book" which appeared to contain a suite of instructions, policies and procedures. The Tuff Book is understood to be used by field crew and relied upon to contain current information. Currency of information was managed by ensuring each Tuff Book is updated on a regular basis.

We were exposed to the Tuff Book and noted that a large range of information was stored and this provided for direct access to work instructions.

Staff were able to source in a timely manner, key documents from Western Power's intranet. They also offered their high level understanding of Western Power's compliance obligations and the need for reporting of exceptions to their formal leaders. Our discussions revealed a strong level of conversance with the prioritisation process in the event of an unplanned interruption and the activities that would be undertaken to enable the supply of electricity to the effected customers.

At the conclusion of our interviews with depot personnel, we determined that a strong level of compliance awareness was found to exist.

Staff were able to cite with a high degree of confidence, internal policies and procedures and their requirement to adhere to such instructions. Interviewees tabled a number of examples of their experiences during their normal course of work including those aspects which preclude them from undertaking any activity that would prevent them from meeting Western Power's compliance requirements. This topic primarily focused on incident management and resource capacity based on generated workloads.

Metering Business System (MBS)

The 2012 Performance Audit Report identified a number of instances where Western Power was determined to be non-compliant as a result of functionality issues identified within its MBS.

Automated processes such as MVRS and MV90 are used to communicate data in accordance with a number of Codes and Regulations including the Metering Code and the Customer Transfer Code. The 2012 Performance Audit report noted instances where Western Power did not carry out the prescribed activities within the timeframes.

When undertaking root cause analysis for those licence obligations which were deemed to be reliant on the automation within MBS, the 2012 Performance Audit Report noted that Western Power had difficulty identifying the actual cause. This prompted Western Power to interrogate its systems through a process of elimination.

Western Power identified within the Post Audit Implementation Plan that it would perform an upgrade to MBS (referred to as MBS upgrade version 6.6). This upgrade was understood to have been designed to remedy the drivers for the non-compliance detected during the 2012 audit period.

Throughout the 2014 audit period, a closer examination was conducted and the following provides a summary of our observations:

- The MBS upgrade to version 6.6 enabled Western Power to manually read Type 5 meters as a result of an improvement between MVRS and MV90. The upgrade has provided for a more seamless transfer of information and a more robust process around the notifications to be made within the prescribed timeframe. (Licence obligation 41/2012);
- The “required by” date has since been secured and is no longer able to be edited, as a result, the calculation and reporting of the “required by” date has since been addressed. (Licence obligation 63 and 400/2012).
- Western Power continues to experience issues with regard to uploading data from the Personal Digital Assistants (“PDA”) to MBS. We understand some of the causes were the inability of MBS to accept large file sizes from the PDA and general upload issued where the PDA had to be physically connected to the network. The PDA’s were unable to upload data through their wireless capability, thus adversely impacting the timely provision of data.

The 2014 Performance Audit has identified subsequent non-compliances which were a result of MBS not functioning in accordance with technical specifications.

8. Overall Compliance Summary

The performance audit covers Western Power's EDL 1, for the 24 month period 1 July 2012 to 30 June 2014 and tested a total of 288 licence obligations.

Table 2 presents the audit compliance summary for each manual reference obligation.

Key:

Font in black	Refer to 2013 Electricity Compliance Reporting Manual
Font in blue	Refer to 2011 Electricity Compliance Reporting Manual

Table 2 - Compliance Profile Summary Table

Compliance Obligation Reference No.	Licence Reference 2013	Audit Priority applied (Rated 1 – highest to 5 lowest)	Adequacy of Controls Rating (refer to above). NP = Not Performed					Compliance Rating (Refer to above)				
			A	B	C	D	NP	1	2	3	4	
3 3	Electricity Industry Customer Transfer Code clause 3.1(1)(a)	4	✓						✓			
4 4	Electricity Industry Customer Transfer Code clause 3.1(1)(b)	4	✓						✓			
5 5	Electricity Industry Customer Transfer Code clause 3.1(2)	4					✓					
10 10	Electricity Industry Customer Transfer Code clause 3.7(1)	4	✓						✓			
11 11	Electricity Industry Customer Transfer Code clause 3.7(2)	4	✓						✓			

Compliance Obligation Reference No.	Licence Reference 2013	Audit Priority applied (Rated 1 – highest to 5 lowest)	Adequacy of Controls Rating (refer to above). NP = Not Performed					Compliance Rating (Refer to above)			
			A	B	C	D	NP	1	2	3	4
12 12	Electricity Industry Customer Transfer Code clause 3.8(1)	5	✓					✓			
13 13	Electricity Industry Customer Transfer Code clause 3.8(2)(a)	4	✓					✓			
14 14	Electricity Industry Customer Transfer Code clause 3.8(2)(b)	4	✓					✓			
15 15	Electricity Industry Customer Transfer Code clause 3.8(3)	4	✓					✓			
20 20	Electricity Industry Customer Transfer Code clause 3.10(1)	4	✓					✓			
21 21	Electricity Industry Customer Transfer Code clause 3.10(2)	4	✓					✓			
22 22	Electricity Industry Customer Transfer Code clause 4.1	4	✓					✓			
31 31	Electricity Industry Customer Transfer Code clause 4.9(1)	4	✓					✓			
32 32	Electricity Industry Customer Transfer Code clause 4.9(2)	4	✓					✓			
33 33	Electricity Industry Customer Transfer Code clause 4.9(3)	4	✓					✓			
34 34	Electricity Industry Customer Transfer Code clause 4.9(6)	4	✓					✓			
35 35	Electricity Industry Customer Transfer Code clause 4.10(1)	4	✓					✓			

Compliance Obligation Reference No.	Licence Reference 2013	Audit Priority applied (Rated 1 – highest to 5 lowest)	Adequacy of Controls Rating (refer to above). NP = Not Performed					Compliance Rating (Refer to above)			
			A	B	C	D	NP	1	2	3	4
36 36	Electricity Industry Customer Transfer Code clause 4.10(2)	4	✓					✓			
37 37	Electricity Industry Customer Transfer Code clause 4.10(3)	4	✓					✓			
38 38	Electricity Industry Customer Transfer Code clause 4.11(1)	4	✓					✓			
39 39	Electricity Industry Customer Transfer Code clause 4.11(3)	4		✓					✓		
40 40	Electricity Industry Customer Transfer Code clause 4.12(3)	5					✓				
41 41	Electricity Industry Customer Transfer Code clause 4.13	1		✓						✓	
42 42	Electricity Industry Customer Transfer Code clause 4.14	4	✓					✓			
43 43	Electricity Industry Customer Transfer Code clause 4.15	5	✓					✓			
46 46	Electricity Industry Customer Transfer Code clause 5.1(1)	5					✓				
47 47	Electricity Industry Customer Transfer Code clause 5.1(3)	5					✓				
48 48	Electricity Industry Customer Transfer Code clause 5.1(4)	4	✓					✓			
49 49	Electricity Industry Customer Transfer Code clause 6.2	4	✓					✓			
50 50	Electricity Industry Customer Transfer Code clause 6.3(1)	5	✓					✓			

Compliance Obligation Reference No.	Licence Reference 2013	Audit Priority applied (Rated 1 – highest to 5 lowest)	Adequacy of Controls Rating (refer to above). NP = Not Performed					Compliance Rating (Refer to above)			
			A	B	C	D	NP	1	2	3	4
51 51	Electricity Industry Customer Transfer Code clause 6.3(2)	4					✓				
54 54	Electricity Industry Customer Transfer Code clause 6.6	4	✓					✓			
55 55	Electricity Industry Customer Transfer Code clause 7.1(1)	5					✓				
56 56	Electricity Industry Customer Transfer Code clause 7.1(2)	5					✓				
57 57	Electricity Industry Customer Transfer Code clause 7.1(3)	4					✓				
58 58	Electricity Industry Customer Transfer Code clause 7.2(4)	5					✓				
59 59	Electricity Industry Customer Transfer Code clause 7.3(2)	5					✓				
60 60	Electricity Industry Customer Transfer Code Annex 1	4	✓					✓			
61 61	Electricity Industry Customer Transfer Code Annex 2	4	✓					✓			
62 62	Electricity Industry Customer Transfer Code Annex 3	4	✓					✓			
63 63	Electricity Industry Customer Transfer Code Annex 4 clause A4.1	1	✓						✓		
64 64	Electricity Industry Customer Transfer Code Annex 4 clause A4.2	4	✓					✓			
65 65	Electricity Industry Customer Transfer Code Annex 5 clause A5(5)	4	✓					✓			

Compliance Obligation Reference No.	Licence Reference 2013	Audit Priority applied (Rated 1 – highest to 5 lowest)	Adequacy of Controls Rating (refer to above). NP = Not Performed					Compliance Rating (Refer to above)				
			A	B	C	D	NP	1	2	3	4	
66 66	Electricity Industry Customer Transfer Code Annex 5 clause A5(6)	4	✓						✓			
67 67	Electricity Industry Customer Transfer Code Annex 5 clause A5(7)	4	✓						✓			
68 68	Electricity Industry Customer Transfer Code Annex 6 clause A6.2(a)	5	✓						✓			
69 69	Electricity Industry Customer Transfer Code Annex 6 clause A6.2(b)	4	✓						✓			
70 70	Electricity Industry Customer Transfer Code Annex 6 clause A6.6	5	✓						✓			
71 71	Electricity Industry Customer Transfer Code Annex 6 clause A6.7	5	✓						✓			
72 72	Electricity Industry (Obligation to Connect) Regulations regulation 4	2	✓						✓			
73 73	Electricity Industry (Obligation to Connect) Regulations regulation 5(5)	4	✓						✓			
74 74	Electricity Industry (Obligation to Connect) Regulations regulation 5(6)	4	✓						✓			
75 75	Electricity Industry (Obligation to Connect) Regulations regulation 6	1	✓						✓			

Compliance Obligation Reference No.	Licence Reference 2013	Audit Priority applied (Rated 1 – highest to 5 lowest)	Adequacy of Controls Rating (refer to above). NP = Not Performed					Compliance Rating (Refer to above)			
			A	B	C	D	NP	1	2	3	4
76 76	Electricity Industry (Obligation to Connect) Regulations regulation 7(1)	2	✓					✓			
77 77	Electricity Industry (Obligation to Connect) Regulations regulation 8	1		✓						✓	
99 99	Electricity Industry (Customer Contracts) Regulations 2005 regulation 36	4	✓					✓			
101 101	Electricity Industry Act section 13(1)	5	✓					✓			
102 102	Electricity Industry Act section 14(1)(a)	5	✓					✓			
103 103	Electricity Industry Act section 14(1)(b)	4	✓					✓			
104 104	Electricity Industry Act section 14(1)(c)	5	✓					✓			
105 105	Electricity Industry Act section 17(1)	4	✓					✓			
106 106	Electricity Industry Act section 31(3)	5	✓					✓			
107 107	Electricity Industry Act section 41(6)	4	✓					✓			
111 111	Electricity Industry Act section 101	4	✓					✓			
112 112	Electricity Industry Act section 115(1)	4	✓					✓			
119 119	Distribution Licence condition 12.1 Transmission Licence condition 12.1	4	✓					✓			

Compliance Obligation Reference No.	Licence Reference 2013	Audit Priority applied (Rated 1 – highest to 5 lowest)	Adequacy of Controls Rating (refer to above). NP = Not Performed					Compliance Rating (Refer to above)			
			A	B	C	D	NP	1	2	3	4
120 120	Distribution Licence condition 13.4 Transmission Licence condition 13.4	4					✓				
121 121	Distribution Licence condition 14.2 Transmission Licence condition 14.2	4	✓					✓			
122 122	Distribution Transmission Licence condition 15.1 Transmission Licence condition 20.5	4	✓					✓			
123 123	Distribution Licence condition 15.1 Transmission Licence condition 15.1	4					✓				
124 124	Distribution Licence condition 16.1 Transmission Licence condition 16.1	4	✓					✓			
125 125	Distribution Licence condition 17.1 and 17.2 Transmission Licence condition 17.1 and 17.2	4	✓					✓			
126 126	Distribution Licence condition 18.1 Transmission Licence condition 18.1	4	✓					✓			
127 227	Distribution Licence condition 29.1	2	✓					✓			

Compliance Obligation Reference No.	Licence Reference 2013	Audit Priority applied (Rated 1 – highest to 5 lowest)	Adequacy of Controls Rating (refer to above). NP = Not Performed					Compliance Rating (Refer to above)			
			A	B	C	D	NP	1	2	3	4
128 228	Distribution Licence condition 29.3	2					✓				
229 234	Code of Conduct clause 7.5	4	✓					✓			
230 235	Code of Conduct clause 7.6	1	✓							✓	
233 237 (223)	Code of Conduct clause 7.7(3)	1	✓					✓			
234	Code of Conduct clause 7.7(4)	4	✓					✓			
237 240	Code of Conduct clause 8.2	1		✓						✓	
238 243	Code of Conduct clause 9.1(2)	4	✓					✓			
252 249 (239)	Code of Conduct clause 9.5(3)	2					✓				
253	Code of Conduct clause 9.6(3)	4					✓				
257 258	Code of Conduct clause 9.9(2)	4					✓				
279 280	Code of Conduct clause 10.6		✓					✓			
280 281	Code of Conduct clause 10.7(1)	4	✓					✓			
281 282	Code of Conduct clause 10.7(2)	4	✓					✓			
282 283	Code of Conduct clause 10.7(3)	4	✓					✓			
283 284	Code of Conduct clause 10.7(4)	4	✓					✓			
284 285	Code of Conduct clause 10.8(1)	4	✓					✓			
285 286	Code of Conduct clause 10.8(2)	4	✓					✓			
286 287	Code of Conduct clause 10.9	5	✓					✓			

Compliance Obligation Reference No.	Licence Reference 2013	Audit Priority applied (Rated 1 – highest to 5 lowest)	Adequacy of Controls Rating (refer to above). NP = Not Performed					Compliance Rating (Refer to above)			
			A	B	C	D	NP	1	2	3	4
287 288	Code of Conduct clause 10.10(1)	4	✓					✓			
288 289	Code of Conduct clause 10.10(2)	4	✓					✓			
289 290	Code of Conduct clause 10.10(3)	4	✓					✓			
290 291	Code of Conduct clause 10.11(1)	4	✓					✓			
291 292	Code of Conduct clause 10.11(2)	4	✓					✓			
292 293	Code of Conduct clause 10.12(1)	4	✓					✓			
294 295	Code of Conduct clause 12.1(1)	4		✓						✓	
295 296	Code of Conduct clause 12.1(2)	4	✓					✓			
296 297	Code of Conduct clause 12.1(3)	1		✓						✓	
298 299	Code of Conduct clause 12.3	4	✓					✓			
299 300	Code of Conduct clause 12.4	4	✓					✓			
300 301	Code of Conduct clause 13.1(1)	4	✓					✓			
302	Code of Conduct clause 13.1(3)	4	✓						✓		
312 309	Code of Conduct clause 13.8(1)	1	✓					✓			
313 310	Code of Conduct clause 13.8(2)	1	✓						✓		
314 311	Code of Conduct clause 13.9(1)	4	✓					✓			
315 312	Code of Conduct clause 13.10(1)	1		✓					✓		
316 313	Code of Conduct clause 13.10(2)	4	✓						✓		
317 314	Code of Conduct clause 13.11	4	✓					✓			

Compliance Obligation Reference No.	Licence Reference 2013	Audit Priority applied (Rated 1 – highest to 5 lowest)	Adequacy of Controls Rating (refer to above). NP = Not Performed					Compliance Rating (Refer to above)			
			A	B	C	D	NP	1	2	3	4
318 315	Code of Conduct clause 13.12	4	✓					✓			
319 316	Code of Conduct clause 13.13(1)	4					✓				
320	Code of Conduct clause 13.13(2)	4					✓				
321 317	Code of Conduct clause 13.14(1)	1	✓					✓			
323 318	Code of Conduct clause 13.16	1	✓						✓		
324	Code of Conduct clause 13.17(1)	4	✓					✓			
325 319	Code of Conduct clause 13.17(3)	4	✓					✓			
326	Code of Conduct clause 13.18	4	✓					✓			
328 321	Code of Conduct clause 14.1(2)	4	✓					✓			
330 323	Code of Conduct clause 14.2(2)	4	✓					✓			
333 326	Code of Conduct clause 14.4(1)	1	✓						✓		
334 327	Code of Conduct clause 14.4(2)	4					✓				
335	Code of Conduct clause 14.5	4	✓					✓			
337 329	Code of Conduct clause 14.7(2)	4	✓					✓			
338 330	Electricity Industry Metering Code clause 2.2(1)(a)	5					✓				
339 331	Electricity Industry Metering Code clause 2.2(1)(b)	4					✓				
340 332	Electricity Industry Metering Code clause 3.1	4	✓					✓			
341 333	Electricity Industry Metering Code clause 3.2(1)	4	✓					✓			

Compliance Obligation Reference No.	Licence Reference 2013	Audit Priority applied (Rated 1 – highest to 5 lowest)	Adequacy of Controls Rating (refer to above). NP = Not Performed					Compliance Rating (Refer to above)			
			A	B	C	D	NP	1	2	3	4
342 334	Electricity Industry Metering Code clause 3.3(1)	4	✓					✓			
343 335	Electricity Industry Metering Code clause 3.3(3)	4	✓					✓			
344	Electricity Industry Metering Code clause 3.3A(1)	1	✓							✓	
346	Electricity Industry Metering Code clause 3.3C	4	✓					✓			
347 336	Electricity Industry Metering Code clause 3.5(1) and (2)	4	✓					✓			
348 337	Electricity Industry Metering Code clause 3.5(3)	4	✓					✓			
349 338	Electricity Industry Metering Code clause 3.5(4)	4	✓						✓		
350 339	Electricity Industry Metering Code clause 3.5(6)	1	✓					✓			
351 340	Electricity Industry Metering Code clause 3.5(9)	4	✓					✓			
352 341	Electricity Industry Metering Code clause 3.7	4	✓					✓			
353 342	Electricity Industry Metering Code clause 3.8	4	✓					✓			
354 343	Electricity Industry Metering Code clause 3.9(3)	4	✓					✓			
355 344	Electricity Industry Metering Code clause 3.9(7)	4	✓					✓			
356 345	Electricity Industry Metering Code clause 3.9(9)	4					✓				
357 346	Electricity Industry Metering Code clause 3.10	4	✓					✓			

Compliance Obligation Reference No.	Licence Reference 2013	Audit Priority applied (Rated 1 – highest to 5 lowest)	Adequacy of Controls Rating (refer to above). NP = Not Performed					Compliance Rating (Refer to above)			
			A	B	C	D	NP	1	2	3	4
358 347	Electricity Industry Metering Code clause 3.11(1)	1	✓						✓		
359 348	Electricity Industry Metering Code clause 3.11(2)	1		✓					✓		
360 349	Electricity Industry Metering Code clause 3.11(3)	4	✓					✓			
361	Electricity Industry Metering Code clause 3.11A(1)	5	✓					✓			
362	Electricity Industry Metering Code clause 3.11A(2)	4					✓				
363 350	Electricity Industry Metering Code clause 3.12(1)	4	✓					✓			
364 351	Electricity Industry Metering Code clause 3.12(2)	4	✓					✓			
365 352	Electricity Industry Metering Code clause 3.12(3)	4	✓					✓			
366 353	Electricity Industry Metering Code clause 3.12(4)	4	✓					✓			
367 354	Electricity Industry Metering Code clause 3.13(1)	4	✓					✓			
368 355	Electricity Industry Metering Code clause 3.13(3)(c)	4	✓					✓			
369 356	Electricity Industry Metering Code clause 3.13(4)	4	✓					✓			
370 357	Electricity Industry Metering Code clause 3.14(3)	4	✓					✓			
371 358	Electricity Industry Metering Code clause 3.16(1)	4	✓					✓			
372 359	Electricity Industry Metering Code clause 3.16(2)	4	✓					✓			

Compliance Obligation Reference No.	Licence Reference 2013	Audit Priority applied (Rated 1 – highest to 5 lowest)	Adequacy of Controls Rating (refer to above). NP = Not Performed					Compliance Rating (Refer to above)			
			A	B	C	D	NP	1	2	3	4
373 360	Electricity Industry Metering Code clause 3.16(3)	1	✓						✓		
374	Electricity Industry Metering Code clause 3.16(3A)	5	✓					✓			
361	Electricity Industry Metering Code clause 3.16(5)	1	✓						✓		
362	Electricity Industry Metering Code clause 3.16(6)	1	✓						✓		
375 363	Electricity Industry Metering Code clause 3.18(1)	1	✓						✓		
376 364	Electricity Industry Metering Code clause 3.20(1)	4	✓					✓			
377 365	Electricity Industry Metering Code clause 3.20(3)	4					✓				
378 366	Electricity Industry Metering Code clause 3.21(1)	1			✓				✓		
379 367	Electricity Industry Metering Code clause 3.21(2)	4	✓					✓			
380 368	Electricity Industry Metering Code clause 3.22	4	✓					✓			
381 369	Electricity Industry Metering Code clause 3.23(a)	4	✓					✓			
382 370	Electricity Industry Metering Code clause 3.23(b)	4	✓					✓			
383	Electricity Industry Metering Code clause 3.24A(1)	4					✓				
384	Electricity Industry Metering Code clause 3.24B(1)	4					✓				
371	Electricity Industry Metering Code clause 3.25	4	✓					✓			

Compliance Obligation Reference No.	Licence Reference 2013	Audit Priority applied (Rated 1 – highest to 5 lowest)	Adequacy of Controls Rating (refer to above). NP = Not Performed					Compliance Rating (Refer to above)				
			A	B	C	D	NP	1	2	3	4	
386 373	Electricity Industry Metering Code clause 3.29	4		✓						✓		
387 374	Electricity Industry Metering Code clause 4.1(1)	4	✓						✓			
388 375	Electricity Industry Metering Code clause 4.1(2)	4	✓						✓			
389 376	Electricity Industry Metering Code clause 4.1(3)	4		✓						✓		
390 377	Electricity Industry Metering Code clause 4.2(1)	4	✓						✓			
391 378	Electricity Industry Metering Code clause 4.3(1)	4	✓						✓			
392 379	Electricity Industry Metering Code clause 4.4(1)	5	✓						✓			
393 380	Electricity Industry Metering Code clause 4.5(1)	5	✓						✓			
395 382	Electricity Industry Metering Code clause 4.6(1)	4	✓						✓			
396 383	Electricity Industry Metering Code clause 4.6(2)	4	✓						✓			
397 384	Electricity Industry Metering Code clause 4.7	4		✓						✓		
398 385	Electricity Industry Metering Code clause 4.8(3)	4	✓						✓			
399	Electricity Industry Metering Code clause 4.8(3A)	4	✓						✓			
400 386	Electricity Industry Metering Code clause 4.8(4)(a)	1	✓						✓			
401	Electricity Industry Metering Code clause 4.8(4)(b)	4	✓						✓			

Compliance Obligation Reference No.	Licence Reference 2013	Audit Priority applied (Rated 1 – highest to 5 lowest)	Adequacy of Controls Rating (refer to above). NP = Not Performed					Compliance Rating (Refer to above)			
			A	B	C	D	NP	1	2	3	4
402 387	Electricity Industry Metering Code clause 4.8(5)	1	✓					✓			
403 388	Electricity Industry Metering Code clause 4.9	4	✓					✓			
404 389	Electricity Industry Metering Code clause 5.1 (1)	5	✓					✓			
405 390	Electricity Industry Metering Code clause 5.1(2)	5	✓					✓			
406 391	Electricity Industry Metering Code clause 5.3	1			✓					✓	
407 392	Electricity Industry Metering Code clause 5.4(1)	1		✓						✓	
408	Electricity Industry Metering Code clause 5.4(1A)	4	✓					✓			
410	Electricity Industry Metering Code clause 5.5(2)	4	✓					✓			
411 394	Electricity Industry Metering Code clause 5.5(2A)	4	✓					✓			
412 396	Electricity Industry Metering Code clause 5.6(1)	1		✓					✓		
413 397	Electricity Industry Metering Code clause 5.7	4	✓					✓			
414 398	Electricity Industry Metering Code clause 5.8	4	✓					✓			
415 399	Electricity Industry Metering Code clause 5.9	4	✓					✓			
416 400	Electricity Industry Metering Code clause 5.10	1	✓						✓		
417 401	Electricity Industry Metering Code clause 5.11	4	✓					✓			

Compliance Obligation Reference No.	Licence Reference 2013	Audit Priority applied (Rated 1 – highest to 5 lowest)	Adequacy of Controls Rating (refer to above). NP = Not Performed					Compliance Rating (Refer to above)			
			A	B	C	D	NP	1	2	3	4
418 402	Electricity Industry Metering Code clause 5.12(1)	1		✓						✓	
419 403	Electricity Industry Metering Code clause 5.13	4	✓					✓			
420 404	Electricity Industry Metering Code clause 5.14(3)	4	✓					✓			
421 405	Electricity Industry Metering Code clause 5.15	4	✓					✓			
424	Electricity Industry Metering Code clause 5.17A(1)	4	✓					✓			
425	Electricity Industry Metering Code clause 5.17A(3)	4			✓					✓	
430 413	Electricity Industry Metering Code clause 5.19(5)	4	✓					✓			
432 415	Electricity Industry Metering Code clause 5.20(1)	4	✓					✓			
433 416	Electricity Industry Metering Code clause 5.20(2)	4	✓					✓			
434 417	Electricity Industry Metering Code clause 5.20(4)	4		✓						✓	
435 418	Electricity Industry Metering Code clause 5.21(2)	4	✓					✓			
436 419	Electricity Industry Metering Code clause 5.21(4)	4		✓						✓	
439 422	Electricity Industry Metering Code clause 5.21(8)	1	✓					✓			
440 423	Electricity Industry Metering Code clause 5.21(9)	4	✓					✓			
441 424	Electricity Industry Metering Code clause 5.21(11)	4	✓					✓			

Compliance Obligation Reference No.	Licence Reference 2013	Audit Priority applied (Rated 1 – highest to 5 lowest)	Adequacy of Controls Rating (refer to above). NP = Not Performed					Compliance Rating (Refer to above)			
			A	B	C	D	NP	1	2	3	4
442 425	Electricity Industry Metering Code clause 5.21(12)	4	✓					✓			
443 426	Electricity Industry Metering Code clause 5.22(1)	1	✓							✓	
444 427	Electricity Industry Metering Code clause 5.22(2)	1	✓					✓			
445 428	Electricity Industry Metering Code clause 5.22(3)	4	✓					✓			
446 429	Electricity Industry Metering Code clause 5.22(4)	4	✓					✓			
447 430	Electricity Industry Metering Code clause 5.22(5)	4	✓					✓			
448 431	Electricity Industry Metering Code clause 5.22(6)	4	✓					✓			
449 432	Electricity Industry Metering Code clause 5.23(1)	4	✓					✓			
450 433	Electricity Industry Metering Code clause 5.23(3)	4	✓					✓			
451 434	Electricity Industry Metering Code clause 5.24(1)	4	✓					✓			
452 435	Electricity Industry Metering Code clause 5.24(2)	4	✓					✓			
453 436	Electricity Industry Metering Code clause 5.24(3)	4	✓					✓			
454 437	Electricity Industry Metering Code clause 5.24(4)	4	✓					✓			
455 438	Electricity Industry Metering Code clause 5.25	4	✓					✓			
457 440	Electricity Industry Metering Code clause 5.29	4						✓			

Compliance Obligation Reference No.	Licence Reference 2013	Audit Priority applied (Rated 1 – highest to 5 lowest)	Adequacy of Controls Rating (refer to above). NP = Not Performed					Compliance Rating (Refer to above)			
			A	B	C	D	NP	1	2	3	4
458 441	Electricity Industry Metering Code clause 5.30(1)	4					✓				
459 442	Electricity Industry Metering Code clause 5.31(1)	1					✓				
460 443	Electricity Industry Metering Code clause 5.31(2)	1					✓				
461 444	Electricity Industry Metering Code clause 5.34(2)	4					✓				
462	Electricity Industry Metering Code clause 5.37(1)(a)	4					✓				
463	Electricity Industry Metering Code clause 5.37(1)(b)	4					✓				
464	Electricity Industry Metering Code clause 5.37(1)(b)	4					✓				
465	Electricity Industry Metering Code clause 5.37(2)	4					✓				
466	Electricity Industry Metering Code clause 5.37(3)	4					✓				
467	Electricity Industry Metering Code clause 5.38	4					✓				
468 445	Electricity Industry Metering Code clause 6.1(1)	1		✓						✓	
470 447	Electricity Industry Metering Code clause 6.20(4)	5					✓				
471	Electricity Industry Metering Code clause 6.20(5)	4					✓				
472 448	Electricity Industry Metering Code clause 7.2(1)	5	✓					✓			
473 449	Electricity Industry Metering Code clause 7.2(2)	4					✓				

Compliance Obligation Reference No.	Licence Reference 2013	Audit Priority applied (Rated 1 – highest to 5 lowest)	Adequacy of Controls Rating (refer to above). NP = Not Performed					Compliance Rating (Refer to above)			
			A	B	C	D	NP	1	2	3	4
478 454	Electricity Industry Metering Code clause 8.1(1)	5					✓				
479 455	Electricity Industry Metering Code clause 8.1(2)	5					✓				
480 456	Electricity Industry Metering Code clause 8.1(3)	5					✓				
481 457	Electricity Industry Metering Code clause 8.1(4)	4					✓				
482 458	Electricity Industry Metering Code clause 8.3(2)	5					✓				
483 459	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 5(1)	5	✓					✓			
484 460	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 8	5	✓					✓			
485 461	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 9	4	✓					✓			
486 462	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 10(1)	5	✓					✓			
487 463	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 10(2)	5	✓					✓			
488 464	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 12(3)	4		✓						✓	
489 465	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 13(2)	1	✓					✓			

Compliance Obligation Reference No.	Licence Reference 2013	Audit Priority applied (Rated 1 – highest to 5 lowest)	Adequacy of Controls Rating (refer to above). NP = Not Performed					Compliance Rating (Refer to above)				
			A	B	C	D	NP	1	2	3	4	
490 466	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 13(3)	4	✓						✓			
491 467	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 14(8)	4					✓					
492 468	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 15(2)	4					✓					
493 469	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 18	1		✓						✓		
494 470	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 19	1		✓						✓		
495 471	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 21(1)	4	✓						✓			
498 474	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 23(1)	5	✓						✓			
499 475	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 23(2)	4	✓						✓			
500 476	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 24(3)	4					✓					
501 477	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 24(4)	4					✓					

Compliance Obligation Reference No.	Licence Reference 2013	Audit Priority applied (Rated 1 – highest to 5 lowest)	Adequacy of Controls Rating (refer to above). NP = Not Performed					Compliance Rating (Refer to above)				
			A	B	C	D	NP	1	2	3	4	
502 478	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 25(2)	4	✓						✓			
503 479	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 25(3)	4	✓						✓			
504 480	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 26	4	✓						✓			
505 481	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 27(1)	4	✓						✓			
506 482	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 27(3)	4	✓						✓			
511 487	Electricity Industry Act section 61 and 65	4						✓				
512 488	Electricity Industry Act section 62, 64 and 65	4						✓				
513 489	Electricity Industry Act section 65	4						✓				
514 490	Electricity Industry Act section 11	4	✓						✓			
515 491	Electricity Industry Act section 11	4						✓				

9. Detailed Findings – Compliance Elements which Require Corrective Measures

No	Obligation	Description	Compliance Rating		Observation
			2014	2011	
39	Electricity Industry Customer Transfer Code clause 4.11(3)	A network operator and the retailer must take certain action if the contestable customer's meter is not read on the nominated transfer date.	B	2	<p>Sample-based testing did not identify any instances where Western Power did not work with incoming retailers to negotiate a new nominated transfer date. However, enquires with the Finance, Treasury and Risk Team and review of Western Power's 2014 Breach Register revealed that Western Power had not negotiated a new transfer date with the incoming retailer, specifically, for those instances where Type 5 meters were not read on the nominated transfer date.</p> <p>Based on our enquires and review of relevant documentation we determine that Western Power was not compliant with this licence obligation.</p>
Cause			Recommendation		
The time frame allowed for the completion of service orders for the manual reading of Type 5 meters did not provide for a timeframe that facilitated meters to be read on the nominated transfer date.			1. Implement a solution that facilitates the timely completion of service orders for manually read Type 5 meters on the nominated transfer date.		

No	Obligation	Description	Compliance Rating		Observation
2014 2011 41 41	Electricity Industry Customer Transfer Code clause 4.13	A network operator must within two business days after the transfer date give an electronic notice of the transfer and the transfer date to the incoming retailer, the previous retailer and, if applicable, the independent market operator.	B	3	Sample-based testing of 35 CTRs revealed three instances where Western Power did not give an electronic notice of the transfer and the transfer date to the incoming retailer and previous retailer within the prescribed timeframe. Based on sample-based testing, we have concluded that Western Power was not compliant with this licence obligation.
Cause			Recommendation		
Western Power did not negotiate a new transfer date in accordance with clause 4.11(3), therefore the original timeframe for providing notice of the transfer to the incoming retailer was not amended. Transfers were not completed on the nominated date due to: <ul style="list-style-type: none"> • the communications unit within some Type 1-4 meters being faulty and investigations performed extended the time period in which a request was closed; and • Type 5 meters failing to read as a result of a manual interrogation. 			2. Where Western Power is unable to perform a transfer on the nominated transfer date, negotiate with the incoming retailer to determine a new nominated transfer date in accordance with 4.11(3) of the Transfer Code.		

No	Obligation	Description	Compliance Rating		Observation
			2014	2011	
63	Electricity Industry Customer Transfer Code Annex 4 clause A4.1	A network operator must provide certain information, if available, to a retailer who submits a request for standing data.	A	2	<p>A walkthrough of the process and discussions with the Finance, Treasury and Risk Team revealed that, prior to the implementation of the MBS upgrade in July 2013, Western Power did not provide last accumulated read dates to the retailer.</p> <p>Sample-based testing and review of the revised standing data request form and the information post the MBS upgrade did not reveal any exceptions.</p> <p>Notwithstanding that Western Power has since remedied the cause of the failure to provide a retailer with the last accumulated read date, Western Power was non-compliant within the audit period.</p>
Cause			Recommendation		
Western Power's Web Portal system was not designed to provide the last accumulated read date.			Nil		

No 2014 2011	Obligation	Description	Compliance Rating		Observation
77 77	Electricity Industry (Obligation to Connect) Regulations regulation 8	A distributor that is obliged to energise premises must do so within a defined timetable.	B	3	<p>Whilst our sample-based testing did not identify any exceptions with respect to the energising of premises, a review of the new connections compliance report and discussions with the Customer Connections Team revealed that there were instances where Western Power did not energise premises within the timeframe specified under regulation 8.2 of the Code.</p> <p>There were approximately 584 out of 53,527 energisation service orders for the 2012-2014 audit period that were not completed within the timeframes prescribed.</p> <p>Based on our enquires and review of relevant documentation we determine that Western Power was not compliant with this licence obligation.</p>
Cause			Recommendation		
<ol style="list-style-type: none"> 1. Technical issues identified with the new connection that caused delays in the completion of the service order. 2. Resourcing constraints due to prioritisation of emergency and fault work. 			<ol style="list-style-type: none"> 3. Where technical and capacity issues are identified, negotiate with the customer a revised date and mutually agree to that date in accordance with regulation 8.2. 		

No 2014 2011	Obligation	Description	Compliance Rating		Observation
230 235	Code of Conduct clause 7.6	A retailer or distributor must comply with the limitations specified in clause 7.6 when arranging for disconnection or disconnecting a customer's supply address.	A	3	<p>Sample-based testing of disconnection service orders completed within the audit period did not reveal any instances where Western Power had disconnected a customer outside the limitations detailed under clause 7.6.</p> <p>However, review of a notification made to the Authority by Western Power identified that Western Power did report a wrongful disconnection during the audit period. Specifically, a disconnection service order was carried out whilst the customer had a complaint in respect of bill-related information. The customer had raised a complaint with the Energy Ombudsman which Western Power and the retailer were not aware of.</p> <p>A review of the <i>Code of Conduct for the Supply of Electricity to Small Use Customers 2014</i> (“Code of Conduct”) noted a revision with respect to clause 7.6. The revision provides that where a distributor has been made aware of a complaint, then it must not perform a disconnection in the detailed circumstances.</p> <p>Notwithstanding that the 2014 revision to the Code of Conduct appears to have remedied the cause of the compliance failure, based on our enquires and review of relevant documentation we conclude that Western Power was non-compliant with this licence obligation within the audit period.</p>

No	Obligation	Description	Compliance Rating	Observation
2014 2011				
Cause			Recommendation	
Western Power was not aware of an outstanding complaint by a customer before a disconnection service order was carried out.			Nil	

No 2014 2011	Obligation	Description	Compliance Rating		Observation
237 240	Code of Conduct clause 8.2	A distributor must reconnect the customer's supply address upon the request of a retailer within the timeframes specified in subclause 8.2(2).	B	3	<p>Whilst sample-based testing did not reveal any exceptions, our review of Western Power's 2013 Annual Compliance Report and the 2014 Breach Register identified that Western Power had reported instances where reconnections were not performed within the timeframes prescribed.</p> <p>Based on review of relevant documentation we conclude that Western Power was not compliant with this licence obligation.</p>
Cause			Recommendation		
<ol style="list-style-type: none"> 1. Site access restrictions. 2. Resource constraints restricted the ability for Western Power to undertake the reconnection related activity within the prescribed timeframes. 3. Safety concerns 			<ol style="list-style-type: none"> 4. Implement a solution that would enable Western Power to comply with the timeframes specified in sub clause 8.2(2) of the Code of Conduct. 		

No	Obligation	Description	Compliance Rating		Observation
294 295	Code of Conduct clause 12.1(1)	A retailer and distributor must develop, maintain and implement an internal process for handling complaints and resolving disputes.	B	3	<p>Discussions with the Complaints & Resolution Team revealed that Western Power has developed an internal process for handling complaints and resolving disputes.</p> <p>However, review of Western Power's 2014 Breach Register revealed that on 30 June 2014, a Customer Service Centre staff member failed to record a complaint in Western Power's customer management system in circumstances where the customer expressed dissatisfaction in relation to a complaint that had previously been closed by Western Power.</p> <p>Based on our enquires and review of the 2014 Breach Register, we determine that Western Power was non-compliant with this licence obligation.</p>
Cause			Recommendation		
A Customer Service Centre staff member did not adhere to Western Power's complaints handling procedure.			5. Reinforce to Customer Service Centre staff the importance of recording complaints in accordance with the complaints handling procedure.		

No 2014 2011	Obligation	Description	Compliance Rating		Observation
296 297	Code of Conduct clause 12.1(3)	A retailer or a distributor must advise the customer in accordance with subclause 12.1(3).	B	3	<p>Whilst our sample-based testing did not reveal any exceptions, our enquires with the Complaints and Resolution Team revealed that Western Power did not record customer dissatisfaction calls that were resolved at first contact as a complaint, prior to the implementation of the management action from the 2012 Performance Audit in January 2013.</p> <p>Further, discussion with the Customer Service Centre Team also revealed that during the audit period Western Power had identified instances where its call centre operators were not correctly distinguishing an enquiry from a complaint in accordance with the Complaints Handling Process.</p> <p>As a result, the respective customers were not notified of their rights to have their complaint escalated in accordance with the Code of Conduct.</p> <p>Based on our enquires and sample-based testing, we determine that Western Power was not compliant with this licence obligation.</p>

No	Obligation	Description	Compliance Rating	Observation
2014 2011				
Cause			Recommendation	
Improper classification of customer complaints by Customer Service Centre staff.			<ol style="list-style-type: none"> 6. Provide a more focussed training program that would enable Western Power's Customer Service Centre staff to differentiate a complaint from an enquiry. Further, strengthen the monitoring process around first contacts to ensure that a correct classification of that contact is made. 7. Reinforce the requirement to Customer Service Centre staff of Western Power's obligations to advise customers who articulate dissatisfaction of their right of escalation under subclause 12.1(3)(a). 	

No	Obligation	Description	Compliance Rating		Observation
302	Code of Conduct clause 13.1(3)	For the purposes of subclause 13.1(1), a distributor must keep the information specified in subclause 13.1(3).	A	2	Discussions with various Western Power personnel, as well as a review of records of information specified within sub clause 13.1(3), revealed that Western Power had a process and methodology in place to facilitate its compliance with this obligation. However, as a result of the non-compliances identified for licence obligations 294, 296, 315 and 316, we have concluded that Western Power did not retain accurate nor complete records as required under clause 13.1(3) of the Code of Conduct.
Cause			Recommendation		
Licence obligation 315 – Western Power was not accurately recording complaints			8. Refer to Licence Obligations 294 and 296.		

No	Obligation	Description	Compliance Rating		Observation
313 310	Code of Conduct clause 13.8(2)	A distributor must keep a record of the total number of reconnections provided (other than those specified in subclause 13.8(2)(a)) and the total number of those reconnections not provided within the prescribed timeframe.	A	2	<p>Discussions with the Commercial Services Team and review of Western Power’s 2013 Compliance Report revealed that prior to 30 October 2012 Western Power was not accurately recording the total number of reconnections provided, and the total number of reconnections not provided, within the prescribed timeframe.</p> <p>Western Power remedied the cause of this non-compliance in October 2012 by developing an IT solution that bypassed any amendments made to the “required by” date in MBS. Further, in October 2013, the “required by” date was locked as part of an upgrade to MBS. Sample-based testing and reconciliation of the 2013 Record Keeping Report and raw data post the implementation of the IT solution and MBS upgrade did not reveal any exceptions.</p> <p>Notwithstanding that Western Power has since remedied the cause of the failure to accurately record the total number of reconnections provided, and the total number of reconnections not provided, within the specified timeframe, Western Power was non-compliant within the audit period.</p>
Cause			Recommendation		
1. MBS did not have the functionality to restrict amendments to the reconnection “required by” date.			Nil.		

No	Obligation	Description	Compliance Rating		Observation
2014 2011					
315 312	Code of Conduct clause 13.10(1)	A distributor must keep a record of the complaints information specified in subclause 13.10(1).	B	2	<p>Enquires with the Complaints and Resolution Team revealed that Western Power personnel did not record customer complaints that were resolved at first contact prior to the implementation of the management action from the 2012 Performance Audit in January 2013.</p> <p>Further, enquires with the Customer Service Team revealed that, within the audit period, there were instances where customer dissatisfaction had been expressed, but a complaint had not been recorded.</p> <p>Based on our enquires we determine that Western Power was not compliant with this licence obligation</p>
Cause			Recommendation		
Improper classification of customer complaints by Customer Service Centre staff.			9. Refer to Licence Obligations 294 and 296.		

No	Obligation	Description	Compliance Rating		Observation
316 313	Code of Conduct clause 13.10(2)	A distributor must keep a record of the details of each customer complaint referred to in subclause 13.10(1).	A	2	<p>Discussions with the Complaints and Resolution Team revealed that Western Power has a process and methodology in place to facilitate the record keeping of information in accordance with 13.10(1) of the Code of Conduct.</p> <p>Sample-based testing did not reveal any instances where the details of a complaint had not been recorded in accordance with the Code of Conduct.</p> <p>However, as a result of observations in respect of licence obligations 294, 296 and 315, we have concluded that Western Power did not retain accurate and complete records as required under this clause.</p>
Cause			Recommendation		
Licence obligation 315 – Western Power was not accurately recording complaints.			10. Refer to Licence Obligations 294 and 296.		

No 2014 2011	Obligation	Description	Compliance Rating		Observation
323 318	Code of Conduct clause 13.16	A distributor must prepare a report in respect of each reporting year setting out the information in the records specified in subclause 13.16	A	2	<p>Discussions with the Customer Services Team, as well as a review of the annual report prepared by Western Power, confirmed that Western Power has a process and methodology in place to facilitate compliance with this obligation.</p> <p>However, as a result of our observations in respect of licence obligations 294, 296, 302, 315 and 316, it was determined that elements of information provided in the report were inaccurate or incomplete.</p> <p>Based on our enquires, review of relevant documentation and our observations we determine that Western Power was not compliant with this licence obligation.</p>
Cause			Recommendation		
Licence Obligation 315 – Western Power was not accurately recording complaints			11. Refer to Licence Obligations 294 and 296		

No	Obligation	Description	Compliance Rating		Observation
<p>2014</p> <p>2011</p> <p>333</p> <p>326</p>	Code of Conduct clause 14.4(1)	Upon receipt of a written query or complaint by a customer, a distributor must acknowledge the query or complaint within 10 business days and respond to the query or complaint by addressing the matters raised within 20 business days.	A	2	<p>Whilst our sample-based testing did not reveal any exceptions, discussions with the Complaints and Resolution Team revealed that there was one instance where Western Power had failed to acknowledge a customer complaint within the prescribed timeframe.</p> <p>Walkthrough of the remedial action implemented by Western Power in October 2013 identified that an automatic acknowledgement functionality on the “Poles in Paddocks” email address has been implemented, facilitating compliance with this obligation.</p> <p>Notwithstanding that Western Power has since remedied the cause of the failure to acknowledge a complaint within the timeframes prescribed, Western Power was non-compliant within the audit period.</p>
Cause			Recommendation		
<p>The customer had sent their complaint to an email address (polesinpaddocks@westernpower.com.au) which is not normally used for the receipt of complaints by Western Power. Upon review of the email, it was determined to be a complaint and forwarded to the Complaints and Resolution Team for response. This particular email address did not have an automatic acknowledgement functionality.</p>			<p>Nil.</p>		

No 2014 2011	Obligation	Description	Compliance Rating		Observation
344	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.	A	3	<p>Sample-based testing did not reveal any instances where bi-directional electricity flows were occurring at metering points that did not have the appropriate metering installation in place.</p> <p>However, discussions with the Meter Installations Team revealed that there were instances during the audit period where bi-directional electricity flows occurred at metering points where metering installations were not capable of separately measuring bi-directional flows.</p> <p>Western Power was observed to have since replaced those meters with meters that are capable of measuring and recording bi-directional flow. A review of the application process for the connection of PV generators revealed that locations identified as bi-directional flows will no longer be commissioned without the correct metering installations.</p> <p>Notwithstanding that Western Power has since remedied the cause of the failure to ensure that bi-directional electricity flows do not occur at a metering point not capable of measuring such flow, Western Power was non-compliant within the audit period.</p>

No	Obligation	Description	Compliance Rating	Observation
2014 2011				
Cause			Recommendation	
Western Power permitted the installation of PV generation units without the correct metering installation being in place.			Nil	

No	Obligation	Description	Compliance Rating		Observation
349 338	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	A	2	<p>Review of Western Power’s 2014 Breach Register revealed an instance where a metering point for a High Voltage (“HV”) revenue metering installation was not located as close as practicable to the connection point.</p> <p>Discussions with the Metering Services Team revealed that Western Power was in the process of coordinating the installation of a replacement HV unit, which is required to be specifically designed and manufactured for the site.</p> <p>Based on our enquiries and review of relevant documentation, we determine that Western Power was not compliant with this licence obligation.</p>
Cause				Recommendation	
A temporary low voltage (“LV”) meter was installed to measure the load consumption on a customer’s site as the HV revenue meter was damaged due to an electrical fault.				12. Complete the installation of the replacement HV unit and remove the temporary LV meter.	

No	Obligation	Description	Compliance Rating		Observation
358 347	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.	A	2	<p>Discussions with the Field Operations Team revealed that as at 30 June 2013 98.7% of metering installations were operating consistently with good electricity industry practice to measure, record and permit a timely collection of data in line with the SLA.</p> <p>Western Power's performance was observed to be below the 99% benchmark as detailed within the Metering Code.</p> <p>Western Power since developed a COGNOS report to enable the monitoring of meter installations on its network. The COGNOS report provides visibility over an interval meter's ability to function in accordance with requirements. This report provides for a detective mechanism that identifies those instances where remedial action is required to be undertaken.</p> <p>A review of the COGNOS report for the period 1 July 2013 to 31 May 2014 revealed that Western Power had exceeded the required benchmark of 99% for that period.</p> <p>Notwithstanding that Western Power has since remedied the cause of the failure to ensure a metering installation is operating consistently in line with the percentages outlined in the Metering Code, Western Power was non-compliant within the audit period.</p>

No	Obligation	Description	Compliance Rating	Observation
Cause			Recommendation	
		<ol style="list-style-type: none"> 1. Remote location of metering installations 2. Adverse weather conditions 3. Limited availability of communication coverage 	Nil.	

No	Obligation	Description	Compliance Rating		Observation
359 348	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 (SLA).	B	2	<p>Sample-based testing of 35 service orders noted the existence of requests for the repair of metering installations. Sixteen instances were detected where the repairs of the meters were not performed within the timeframe agreed within the SLA.</p> <p>Based on sample-based testing performed, we determine that Western Power was not compliant with this licence obligation.</p>
Cause			Recommendation		
<ol style="list-style-type: none"> 1. Limited availability of resources 2. Geographical spread of customers 3. Site access restrictions 4. Safety concerns 			<ol style="list-style-type: none"> 13. Implement a solution that would enable Western Power to comply with the applicable SLA. 		

No	Obligation	Description	Compliance Rating		Observation
373 360	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.	A	2	<p>Discussions with the Metering Services Team, and a review of the technical specifications of Type 1 – 5 meters confirmed that the meters installed by Western Power were manufactured to collate data in sub-multiples of a trading interval which was not in accordance with 3.16(3) of the Code, at the beginning of the audit period.</p> <p>With the amendment of the Metering Code in December 2012 permitting the collation of energy data in the manner prescribed above, no instances of non-compliance have since been identified.</p> <p>Notwithstanding that the amendments were made to the Metering Code within the audit period, Western Power was non-compliant with this obligation prior to the changes taking effect on 7 December 2012.</p>
Cause			Recommendation		
<p>Prior to the amendment of the Metering Code in December 2012, meters installed by Western Power collated information in sub-multiples of a trading interval, which was not permitted under the Metering Code at the time.</p>			<p>Nil.</p>		

No	Obligation	Description	Compliance Rating		Observation
361 & 362	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.	A	2	<p>Discussions with Metering Services and review of the Model SLA and the Metrology Procedure revealed neither document addressed the requirements outlined in clause 3.16(4) of the Metering Code 2005.</p> <p>Specifically, clause 3.16(4) required the Metrology Procedure to specify how Western Power is to produce the “Notional Wholesale Meter” value for the purposes of, and as defined in, the market rules.</p> <p>Further, our enquires with the Metering Services Team revealed that the “Notional Wholesale Meter” value has always been determined by the Independent Market Operator and not the network operator.</p> <p>Review of the Metering Code 2012 noted that these two obligations have since been removed.</p> <p>Notwithstanding that the amendments were made to the Metering Code within the audit period, Western Power was non-compliant with this obligation prior to the changes taking effect on 7 December 2012.</p>
	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.			
Cause			Recommendation		
Prior to the amendments made to the Metering Code 2005 the responsibility for determining the “Notional Wholesale Meter” value did not lie with Western Power.			Nil.		

No 2014 2011	Obligation	Description	Compliance Rating		Observation
375 363	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.	A	2	<p>Discussions with the Metering Services Team revealed meters installed by Western Power were configured to collate energy data in sub-multiples of a trading interval which did not comply with the prescribed wholesale market metering installation requirements as required under clause 3.16 of the Metering Code.</p> <p>With the amendment of the Metering Code in December 2012 permitting the collation of energy data in the manner prescribed above, no instances of non-compliance have since been identified.</p> <p>Notwithstanding that the amendments were made to the Metering Code within the audit period, Western Power was non-compliant with this obligation prior to the changes taking effect on 7 December 2012.</p>

No	Obligation	Description	Compliance Rating	Observation
Cause			Recommendation	
<p>Prior to the amendment of the Metering Code in December 2012, meters installed by Western Power collated information in sub-multiples of a trading interval, which was not permitted under the Metering Code at the time.</p>			<p>Nil.</p>	

No 2014 2011	Obligation	Description	Compliance Rating		Observation
378 366	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.	C	2	<p>Discussions with the Finance, Treasury and Risk Team revealed that Western Power has mechanisms in place to monitor time drift over a period of 1 month. However, sample-based testing revealed 5 out of 35 instances within the audit period where meters with an internal time clock were unable to maintain time accuracy as prescribed.</p> <p>The maintenance of time drift is managed by MV90, which has allocated servers. MV90 utilises the system clock to measure and report on time drift over the month. The time accuracy for Type 1 – 5 meters are contingent on the MV90 and MVRS servers maintaining time within the timeframes prescribed.</p> <p>Review of the Time Drift Compliance Report identified approximately 60% of the relevant meters were not compliant, specifically in July and August 2013.</p> <p>In June 2014, Western Power completed an infrastructure upgrade that mitigated the risk of servers altering a time source on relocation or upgrade. Further, Western Power conducted a review of test plans to verify of accuracy of time details.</p> <p>Based on discussions held, sample-based testing performed and a review of relevant documentation, we determine that Western Power was not compliant with this licence obligation during the audit period.</p>

No 2014 2011	Obligation	Description	Compliance Rating	Observation
Cause			Recommendation	
Following the relocation of Western Power’s MV90 server to the Head Office, a time synchronisation issue caused the time accuracy of some meters to be affected. Western Power’s testing following the relocation of the MV90 server was not sufficient to detect the non-compliance.			14. Continue to monitor time accuracy as prescribed and correct the time drift in meters where inaccuracies are identified	

No	Obligation	Description	Compliance Rating		Observation
2014					
2011					
386 373	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.	B	2	Discussions with the Meter Installations Team and review of the list published by Western Power noted that it did not include the type of work the registered metering installation provider is authorised to carry out. Based on our discussions held and review of the published list on the Western Power website, we determined that Western Power was not compliant with this licence obligation.
Cause			Recommendation		
Oversight by the preparer of the list.			15. That the published list be reviewed and amended to ensure its content addresses the Metering Code requirement to include the type of work the registered metering installation provider is authorised to carry out.		

No	Obligation	Description	Compliance Rating		Observation
389 376	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.	B	2	<p>Discussions held with the Information and Communication Technology team as well as a review of Western Power’s Disaster Recovery Plan (“DRP”) revealed that a plan is in place to address a potential failure of its primary metering database in the event of a disaster.</p> <p>Walkthrough of the DRP indicated that there is a backup server which will be activated as soon as a failure of the primary server is recognised. This server is updated simultaneously to ensure that the provision of data to Code participants is as accurate and up to date as possible.</p> <p>Further, there are queuing applications in place to record information whilst the main metering database is undergoing repairs in order to prevent data loss attributable to a failure.</p> <p>Review of the Disaster Recovery Validation Test Summary revealed that a test of the disaster recovery system conducted in March 2014 identified that the MBS back- up failed to activate. Therefore, in the event a disaster occurs, we are not satisfied that MBS could be rebuilt, and energy data provided to Code participants, within the timeframes prescribed by clause 4.1(3) of the Metering Code.</p> <p>Based on our enquiries and review of relevant documentation, we determine that Western Power was not compliant with this licence obligation.</p>

No	Obligation	Description	Compliance Rating	Observation
Cause			Recommendation	
		During an annual test, the MBS component of the disaster recovery system did not activate.		16. Undertake an upgrade to the MBS component of the disaster recovery system and conduct testing to ensure it is capable of meeting the requirements specified in the Metering Code.

No	Obligation	Description	Compliance Rating		Observation
397 384	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.	B	2	Discussions with the Finance, Treasury and Risk Team and review of the exception report for the 2013/14 period revealed 108 instances out of 997,375 within the period where Western Power did not give notice of changes to standing data as required under clause 4.7 of the Metering Code. Based on our enquires and review of relevant documentation we determine that Western Power was not compliant with this licence obligation.
Cause			Recommendation		
Manual data entry errors made within MBS caused delays in the provision of metering data within the prescribed timeframe.			17. Reinforce to relevant staff the importance of entering data correctly within MBS to mitigate the risk of future data entry errors.		

No	Obligation	Description	Compliance Rating		Observation
406 391	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).	C	3	Discussions with the Finance, Treasury and Risk Team revealed that there were instances where energy data was not obtained and transferred within the 2 day time frame as required under the Metering Code. Sample-based testing of 35 meter read routes identified 7 instances where transfers of energy data were made outside the prescribed timeframe. Based on discussions held and sample-based testing performed, we determine that Western Power was not compliant with this licence obligation.
Cause			Recommendation		
<ol style="list-style-type: none"> 1. Delays in receiving energy data from field officers' hand-held units. 2. Meter reads not being carried out in accordance with the scheduled read plan. 			<ol style="list-style-type: none"> 18. Reinforce the scheduled meter read plan and requirement to undertake meter reads and send energy data in accordance with the Metering Code. 		

No	Obligation	Description	Compliance Rating		Observation
407 392	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.	B	3	<p>Whilst our sample-based testing did not reveal any exceptions, discussions with the Field Operations Team revealed instances where Western Power was unable to undertake a meter reading that provided for an actual value that passed its validation process as defined in Appendix 2 of the Metering Code.</p> <p>During the 2013/14 financial year, approximately 9,977 customers out of 1,060,588 customers were affected of which 2,731 meters could not be read due to site access restrictions.</p> <p>Based on discussions held and sample-based testing performed, we determine that Western Power was not compliant with this licence obligation.</p>
Cause			Recommendation		
<ol style="list-style-type: none"> Inability to access a number of meters on Western Power's network. Inability to complete the scheduled meter reads in accordance with the planned timeframes due to resourcing constraints. 			<ol style="list-style-type: none"> Where a meter cannot be read due to access restrictions, liaise with the retailer to assist Western Power in gaining access to the customer's meter. Implement a solution that would enable Western Power to comply with sub clause 5.4(1) of the Metering Code. 		

No	Obligation	Description	Compliance Rating		Observation
2014 2011 412 396	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).	B	2	<p>Discussions with the Finance, Treasury and Risk Team and review of a sample of daily validation reports revealed that Western Power did not provide validated, and where necessary, substituted or estimated energy data for a metering point to the user within the timeframes prescribed by the Metering Code.</p> <p>Walkthrough of the process to validate data revealed that where necessary MBS will provide substituted or estimated data for a metering point. However, where MBS is unable to substitute or estimate data for a metering point, an exception is flagged, which requires manual intervention before the data is provided to the user and the IMO. Further, enquires revealed that this process was not always completed within the timeframes prescribed in subclause 5.6(1).</p>
Cause			Recommendation		
1. Manual review of the exception reports caused delays in the provision of metering data within the prescribed timeframe.			21. Reinforce the requirement to review manual exception reports within the timeframes prescribed by the Metering Code with relevant Finance, Treasury & Risk Team Members.		

No	Obligation	Description	Compliance Rating		Observation
			2014	2011	
416 400	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.	A	2	<p>Walkthrough of the process for the provision of standing data and discussions with the Finance, Treasury and Risk Team revealed that prior to the implementation of the MBS upgrade in July 2013, Western Power did not provide the last accumulated read dates to the retailer.</p> <p>The upgrade has since improved the automated functionality and facilitated the provision of the required data. A review of a sample of data requests and the information post the MBS upgrade did not reveal any exceptions.</p> <p>Notwithstanding that Western Power has since remedied the cause of the failure to provide a retailer with the last accumulated read date, Western Power was non-compliant within the audit period.</p>
Cause			Recommendation		
Western Power's Web Portal system was not designed to provide the last accumulated read date.			Nil		

No	Obligation	Description	Compliance Rating		Observation
418 402	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.	B	3	<p>Sample-based testing of 35 meter data requests revealed six instances during the audit period where Western Power failed to provide users with energy data within the two days required by the Metering Code.</p> <p>Walkthrough of the process revealed that Western Power had relied on a manual process to respond to the request from a user.</p> <p>Discussion with the Finance, Treasury and Risk Team revealed that as at 30 June 2014, Western Power had commenced automating the process to prevent data from being delivered outside the time frames specified.</p> <p>As the implementation of the automated process was yet to be completed at the conclusion of the audit period, its effectiveness could not be determined.</p> <p>Based on our discussions held, a walkthrough of the process and sample-based testing performed, we determine that Western Power was not compliant with this licence obligation.</p>
Cause			Recommendation		
Manual review of user requests caused delays in the provision of metering data within the prescribed timeframe.			22. Complete the implementation of the automated process of responding to users' requests.		

No	Obligation	Description	Compliance Rating		Observation
			2014	2011	
425	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.	C	3	<p>Sample-based testing revealed 3 out of 10 instances where Western Power did not comply with a direction provided by a person if (and to the extent that) a customer associated with a metering point gives a direction to do so, as required under subclause 5.17A(1) within the timeframes prescribed.</p> <p>Discussions with the Finance, Treasury and Risk Team noted that the Energy Data Authorisation Access System (“EDAAS”) is utilised to report and monitor responsiveness in relation to compliance requirements. Users of EDAAS count the direction date at the point of entry (time 0). The Metering Code requires that responsiveness be determined from the date of receipt of the direction.</p> <p>Based on discussions held and sample-based testing performed we determine that Western Power was not compliant with this licence obligation.</p>
Cause			Recommendation		
EDAAS does not have the ability to record the direction date and, therefore, the ability to accurately count the responsiveness timeframe. A time gap between date of receipt of the direction and date of entry into EDAAS has demonstrated an incorrect responsiveness by Western Power. Time 0 should be the date of receipt of request as opposed to the date of entry into EDAAS.			<p>23. Build into the EDAAS the ability to enter the date of receipt as the start date rather than the date the request is manually inputted into the system.</p> <p>24. Alternatively, develop a web-based solution to enable the provision of data to be automated.</p>		

No 2014 2011	Obligation	Description	Compliance Rating		Observation
434 417	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.	B	3	<p>Discussions with the Finance, Treasury and Risk Team and review of Western Power's 2014 Breach Register revealed that Western Power did not provide verified energy data within the timeframes prescribed for 135 meter reads out of 19,031 meter reads that were undertaken in the 2013/2014 period.</p> <p>Further, enquires revealed that a meter data verification request is received from Code participants through the Metering Service Web Portal. The request is then manually checked and, if an investigation is required, a field officer will attend the site to perform a manual reading of the meter.</p> <p>Sample-based testing did not reveal any exceptions where meter data verification requests were responded to outside the prescribed timeframe.</p> <p>Based on our enquires and review of documentation we determine that Western Power was not compliant with this licence obligation.</p>

No	Obligation	Description	Compliance Rating	Observation
2014 2011				
Cause			Recommendation	
1. Where meters were removed or relocated and an investigation was subsequently required, there were delays in the provision of verified energy data 2. The remote location of meters in non-metropolitan areas 3. Limited availability of resources			25. Maintain a record of the location of meters once they have been removed. 26. Implement a solution that would enable Western Power to be compliant with the timeframes prescribed in the Metering Code.	

No	Obligation	Description	Compliance Rating		Observation
436 419	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 (SLA).	B	3	<p>Sample-based testing revealed four instances during the audit period where Western Power failed to complete its testing requirement within the seven day time frame specified within the SLA.</p> <p>Review of the test request forms and the testing carried out indicated that testing procedures were performed in accordance with the metrology procedures.</p> <p>Based on sample-based testing performed and review of relevant documentation, we determine that Western Power was not compliant with this licence obligation.</p>
Cause			Recommendation		
<ol style="list-style-type: none"> Western Power was unable to access the metering installations in question Limited availability of resources 			<ol style="list-style-type: none"> Implement a solution that would enable Western Power to address its compliance requirements as detailed under the applicable SLA. 		

No	Obligation	Description	Compliance Rating		Observation
2014 2011 443 426	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.	A	3	<p>Sample-based testing did not reveal any instances during the audit period where energy data had not been validated in accordance with the prescribed rules and procedures as set out in Appendix 2 of the Metering Code. However, enquires with the Finance, Treasury and Risk Team identified instances where energy data was not validated, due to the inability to calculate the maximum value.</p> <p>Western Power has since implemented an archive functionality by identifying archive files of metering installations which included the required maximum value as specified by the Metering Code.</p> <p>Notwithstanding that Western Power has since remedied the cause of the failure to validate energy data in accordance with the Metering Code, Western Power was non-compliant within the audit period.</p>
Cause			Recommendation		
<ol style="list-style-type: none"> Western Power revealed that there was insufficient information for metering installations to establish and calculate a maximum value. Safety regulations prevented Field Service Officers from accessing transformer chambers to obtain relevant data. 			Nil.		

No	Obligation	Description	Compliance Rating		Observation
468 445	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.	B	3	As a result of Western Power's failure to meet the requirements of the SLA in line with clauses 3.11 (2) and 5.21 (4) of the Metering Code (Licence Obligations 359 and 436), Western Power was unable to demonstrate compliance with clause 6.1(1) of the Metering Code.
Cause			Recommendation		
For specific causes, refer to licence obligations 359 and 436.			28. Refer to Licence Obligations 359 and 436.		

No 2014 2011	Obligation	Description	Compliance Rating		Observation
488 464	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.	B	3	<p>Enquires with the Network Planning and Standards Team revealed that Western Power did not meet the prescribed standard as defined under the <i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005</i>.</p> <p>Review of Western Power's 2014 Breach Register noted a recent identification of 106,474 customers who have experienced interruptions longer than 12 hours during the period April 2006 to 30 June 2014. A further 24,958 customers during the same period had experienced supply interruptions greater than the number prescribed under the Code.</p> <p>Review of the <i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005</i> noted that its calculation of permissible interruptions does not exclude adverse weather related events. Our enquiries revealed that Western Power is unable to remedy the cause of such interruptions to facilitate its compliance with this clause.</p> <p>It is understood that the service standard benchmarks in Western Power's Access Arrangement, permit the calculation of significant interruptions to exclude adverse weather related events.</p> <p>Based on discussions held and a review of relevant documentation we determine that Western Power was not compliant with this licence obligation.</p>

No	Obligation	Description	Compliance Rating	Observation
2014 2011				
Cause			Recommendation	
1. Adverse weather conditions that cause lengthy outages. 2. Planned maintenance works where alternative arrangements are not available/possible.			29. Engage with the Public Utilities Office (“PUO”) to amend the <i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005</i> to align with the service standard benchmarks in the Access Arrangement by way of seeking the exclusion of adverse weather events from the statistical count of significant interruptions to small use customers.	

No	Obligation	Description	Compliance Rating		Observation
2014					
2011					
493 469	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.	B	2	<p>Whilst sample-based testing did not note any exceptions, enquires with the Service Quality Notification Team and review of the service standard payments for planned outages report revealed eight instances within the audit period where customers did not receive payments within the prescribed timeframes.</p> <p>Based on discussions held and review of relevant documentation we determine that Western Power was not compliant with this licence obligation.</p>
Cause			Recommendation		
<ol style="list-style-type: none"> The handling code was not entered at time of processing payment. Payments processed over the weekend were not approved by a senior employee for the Monday payment run. 			<ol style="list-style-type: none"> Implement a supervisory review to ensure that the handling code is correctly applied and transactions prepared over a non-business day are approved for payment, to facilitate timely provision of service standard payments. 		

No	Obligation	Description	Compliance Rating		Observation
2014					
2011					
494 470	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.	B	2	<p>Whilst sample-based testing did not reveal any exceptions, a review of the service standard payment report for extended outages and discussions with the Customer Services Centre Team noted that Western Power identified that it had not paid two customers their entitlement within the prescribed timeframe.</p> <p>Based on discussions held and review of relevant documentation we determine that Western Power was not compliant with this licence obligation.</p>
Cause			Recommendation		
<ol style="list-style-type: none"> 1. Large volume of claims to process in major storm events 2. IT server failed to validate cheques 			<ol style="list-style-type: none"> 31. Implement a solution that would facilitate for increased work flow as a result of an adverse weather event. 32. Implement a monitoring mechanism whereby reconciliation is performed to ensure that the payment run aligns with payment entitlements. 		

10. Detailed Findings – Compliance Elements which Do Not Require Further Action

No	Obligation	Description	Compliance Rating		Observation
2013 2012 3 3	Electricity Industry Customer Transfer Code clause 3.1(1)(a)	A network operator must publish a request for standing data form which must comply with Annex 1 of the Electricity Industry Customer Transfer Code.	A	1	<p>Review of the Metering Service Web Portal noted the existence of a standing data form. Observation of the process revealed that the fields to be completed on the form were in-line with Annex 1 of the Customer Transfer Code.</p> <p>Based on our observations we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>
4 4	Electricity Industry Customer Transfer Code clause 3.1(1)(b)	A network operator must publish a request for historical data form which must comply with Annex 2 of the Electricity Industry Customer Transfer Code.	A	1	<p>Review of the Metering Service Web Portal noted the existence of the published request for historical data form. Observation of the process revealed that the form aligned with Annex 2 of the Industry Customer Transfer Code.</p> <p>Based on our review we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating		Observation
10 10	Electricity Industry Customer Transfer Code clause 3.7(1)	A network operator must, subject to clause 3.7(3) of the Electricity Industry Customer Transfer Code, electronically notify a retailer if its data request is not valid.	A	1	<p>Discussions with the Area Manager Revenue and the Readings Management Team Leader, accompanied by the review of MBS and sample testing performed revealed that if a retailer sends a data request it is automatically rejected if it is not valid.</p> <p>Further, we walked-through an example of a data request on the Metering Service Web Portal that did not contain valid data. Edits on the portal resulted in an automated notification to the retailer that the request is not valid.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating		Observation
11 11	Electricity Industry Customer Transfer Code clause 3.7(2)	A network operator must comply with clause 3.7(1) of the Electricity Industry Customer Transfer Code within defined timeframes depending on the number of standing or historical data requests that the retailer submits.	A	1	<p>Discussion with the Area Manager Revenue and the Readings Management Team Leader revealed that this process is an automated functionality within MBS. Non-compliance is identified in the system and an automated response is ensured within the defined timeframes.</p> <p>We sampled data requests that were not valid. The samples did not reveal any instances where standing or historical data was not provided to the retailer within the defined timeframe.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating		Observation
12 12	Electricity Industry Customer Transfer Code clause 3.8(1)	A network operator must use all reasonable endeavours to provide to the retailer the requested data under a valid data request.	A	1	<p>Discussion with the Area Manager Revenue and the Readings Management Team Leader revealed that the MBS' automated functionality combined with manual monitoring and response controls act to ensure a retailer's data request is responded to fully.</p> <p>Our sampling of data requests revealed that the processes and controls were successful in providing the requested data in all cases observed.</p> <p>Explanations received on the MBS functionality and response controls demonstrated that Western Power has used all reasonable endeavours to provide the retailer the requested data under a valid data request.</p> <p>Through our audit procedures, we have concluded that Western Power has adequate and effective controls in place to support compliance with this obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating		Observation
13 13	Electricity Industry Customer Transfer Code clause 3.8(2)(a)	A network operator must provide the requested data under a valid data request electronically in a format in accordance with the communication rules if they have been approved or otherwise in accordance with the metering Code.	A	1	<p>Discussion with the Area Manager Revenue and the Readings Management Team Leader revealed that data requests are processed through the MBS system and, as such, responses are electronic, in a format in accordance with the Communication Rules.</p> <p>We reviewed the Communication Rules and viewed a sample of electronic data requests. Each request was observed to be in a format that was electronic and in a format that was in accordance with the Communication Rules.</p> <p>Through our discussions and review of the electronic data request format, we have concluded that Western Power has adequate and effective controls in place to support compliance with this obligation.</p>
14 14	Electricity Industry Customer Transfer Code clause 3.8(2)(b)	A network operator must provide the requested data under a valid data request in accordance with a specified timetable.	A	1	<p>Our discussions and review of the data request process revealed that MBS is designed to respond to a valid data request within the timetables as described in clause 3.8(2)(b).</p> <p>Sample based testing revealed that, in all instances, the requested data was provided in accordance with those timetables.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliant with this manual reference obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating		Observation
15 15	Electricity Industry Customer Transfer Code clause 3.8(3)	A network operator must electronically notify the retailer of the most likely exit points to which a data request relates, up to a maximum of 10, if a retailer submits a data request under clause 3.4 and the network operator has not allocated a UMI for the exit point and it is unable to determine a single exit point to which the data request relates.	A	1	<p>Discussion with the Area Manager Revenue and the Readings Management Team Leader revealed that MBS has been coded to automatically provide the retailer up to 10 exit points on receipt of a data request.</p> <p>We viewed the entry of a NMI (or UMI) request on the Metering Service Web Portal and confirmed that up to 10 exit points are electronically provided.</p> <p>Based on our discussions and review of the Metering Web Portal, we have concluded that Western Power has adequate and effective controls in place to support compliant with this manual reference obligation.</p>
20 20	Electricity Industry Customer Transfer Code clause 3.10(1)	A network operator must not charge for the provision of standing data.	A	1	<p>Discussions with the Finance, Treasury and Risk Team revealed that MBS is automatically configured to not charge for the provision of standing data.</p> <p>Sample based testing of standing data requests revealed that the customer was not charged for the provision of standing data.</p> <p>Based on our discussions and sample based testing we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating		Observation
21 21	Electricity Industry Customer Transfer Code clause 3.10(2)	A network operator must not charge more for historical consumption data than the defined amounts.	A	1	<p>Discussions with the Finance, Treasury and Risk Team revealed that Western Power charges for the provision of historical consumption data in accordance with the prescribed amounts.</p> <p>Review of the model SLA revealed that Western Power charges retailers \$49.50 for an historical consumption request for a period between 13-24 months. Western Power does not charge retailers for the provision of historical consumption data between 0-12 months.</p> <p>Sample based testing of historical consumption requests confirmed that Western Power charged in accordance with the model SLA.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>
22 22	Electricity Industry Customer Transfer Code clause 4.1	A network operator must publish a customer transfer request form which must comply with Annex 3 of the Electricity Industry Customer Transfer Code.	A	1	<p>We reviewed the CTR form made available on the Metering Service Web Portal and noted that the form aligns fully with Annex 3 of the Customer Transfer Code.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating		Observation
31 31	Electricity Industry Customer Transfer Code clause 4.9(1)	A network operator must object to a customer transfer request in certain circumstances as set out in clause 4.9(1) of the Electricity Industry Customer Transfer Code.	A	1	<p>Discussion with the Area Manager Revenue and the Readings Management Team Leader revealed that MBS has automated functionality to reject transfer requests that do not meet the definition of clause 4.9(1) of the Customer Transfer Code.</p> <p>Our review of a sample of such requests demonstrated that each request was appropriately rejected by MBS.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>
32 32	Electricity Industry Customer Transfer Code clause 4.9(2)	A network operator must not object to a customer transfer request otherwise than in accordance with clause 4.9(1) of the Electricity Industry Customer Transfer Code.	A	1	<p>Enquires with the Area Manager Revenue and the Readings Management Team Leader revealed that MBS has been designed to only object to CTRs in the circumstances outlined in clause 4.9(1) of the Customer Transfer Code.</p> <p>Sample based testing of CTRs that were objected to by MBS confirmed that objected requests were in accordance with the Customer Transfer Code.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating		Observation
33 33	Electricity Industry Customer Transfer Code clause 4.9(3)	A network operator that objects to a customer transfer request must give an electronic notice detailing specified information to a retailer within the timeframe prescribed.	A	1	<p>Discussion with the Metering Branch revealed that MBS automatically sends electronic notification to the retailer if a CTR has been objected to.</p> <p>Sample based testing of CTRs that were objected to by MBS revealed that the retailer was sent the specified information within the timeframe prescribed.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>
34 34	Electricity Industry Customer Transfer Code clause 4.9(6)	A network operator and retailer must agree to a revised nominated transfer date in certain circumstances.	A	1	<p>Discussions with the Metering Branch revealed that Western Power engages with the retailer to revise a nominated transfer date in certain circumstances. Further, the agreed upon transfer date is facilitated by email communication between the retailer, Account Manager and Meter Analysts.</p> <p>Review of email correspondence and walkthrough of process determined that Western Power and the retailer had agreed to a revised transfer date.</p> <p>Based on our discussions and review of documentation we have concluded that Western Power has adequate and effective controls in place to support compliance with this manual reference obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating		Observation
35 35	Electricity Industry Customer Transfer Code clause 4.10(1)	A network operator must take certain action in accordance with a defined timetable following the receipt of a valid customer transfer request, subject to clauses 4.10(2) and 4.10(3) of the Electricity Industry Customer Transfer Code and using all reasonable endeavours to affect the transfer.	A	1	<p>Enquires with the Metering Branch revealed that Web Services Metering Portal and MBS has built in functionality to electronically notify the retailer of the nominated transfer date within the prescribed timeframe upon submission of a valid customer transfer request.</p> <p>Further, walkthrough of the process revealed that secondary validation checks occur to ensure that the correct transfer date has been entered by the system.</p> <p>Based on our enquires and walkthrough of the process we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation</p>

No 2013 2012	Obligation	Description	Compliance Rating		Observation
36 36	Electricity Industry Customer Transfer Code clause 4.10(2)	A network operator must take certain action if it considers that it is unlikely to be able to meet its obligations under clause 4.10(1) of the Electricity Industry Customer Transfer Code within the defined timetable.	A	1	<p>Discussion with the Metering Services Team revealed that where Western Power is unable to meet its obligation within the specified timeframe, electronic notification of a new nominated date was provided to the retailer within the prescribed timeframe.</p> <p>Walkthrough of the customer request transfer process revealed that Type 1-4 meters can be read remotely commencing at midnight the night before the transfer date. Further, Type 5 meters are required to be read manually which is conducted the day after the transfer date.</p> <p>Based on discussions and walkthrough of the process we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation</p>

No 2013 2012	Obligation	Description	Compliance Rating		Observation
37 37	Electricity Industry Customer Transfer Code clause 4.10(3)	In certain circumstances a network operator must electronically notify the retailer of the most likely exit points to which a customer transfer request relates, up to a maximum of 10, if the network operator has not allocated the exit point a UMI and it is unable to determine a single exit point to which the customer transfer request relates, within the specified timeframe.	A	1	<p>Enquires with the Metering Services Team revealed that all exit points on the Western Power network have been assigned an UMI/NMI automatically through a function within MBS.</p> <p>Sample based testing of exit points confirmed that each exit point was allocated an UMI/NMI and there were no identifiable instances for a CTR where an exit point did not have an UMI/NMI assigned.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating		Observation
38 38	Electricity Industry Customer Transfer Code clause 4.11(1)	A transfer may only occur on a day the contestable customer's meter is actually read.	A	1	<p>Discussions with the Metering Team revealed that Western Power has systems and processes in place to ensure that transfer occurs on the day the contestable customer's meter is actually read.</p> <p>Walkthrough of the CTR process revealed that once Western Power receives a valid transfer request, the request is entered into the transfer calendar which will prompt MBS to schedule a meter read on the day of the nominated transfer date.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
42 42	Electricity Industry Customer Transfer Code clause 4.14	A network operator must, following a transfer, do all that is necessary to ensure that charges up to the transfer time are paid by or charged to the previous retailer and charges from the transfer time are paid by or charged to the incoming retailer.	A	1	<p>Walkthrough of the customer transfer process revealed that MBS has the functionality to automatically separate the meter reading data obtained according to the previous and incoming retailer based on the time of transfer.</p> <p>Sample based testing confirmed that meter reading and billing information was separated into incoming and previous retailer at the time of the transfer.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating		Observation
43 43	Electricity Industry Customer Transfer Code clause 4.15	In the case of a transfer to reverse an erroneous transfer, a network operator and all affected retailers (and the independent market operator if applicable) must act in good faith to ensure that the rights and obligations of the affected contestable customer are as they would have been had the erroneous transfer not occurred.	A	1	<p>Walkthrough of the customer transfer process and review of Western Power's Build Pack revealed that an erroneous transfer will be reverted to its original state by issuing a notification with a specific change reason code of '1025' within the XML file sent to all affected parties.</p> <p>Review of a sample of requests that were determined to be erroneous confirmed that Western Power will revert the transfer and return it to its original state acting in good faith.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
48 48	Electricity Industry Customer Transfer Code clause 5.1(4)	A network operator and a retailer must comply with approved communication rules.	A	1	<p>Discussion with Metering Services revealed that the Communication Rules were approved by the Authority in February 2006. Western Power has since translated the Communication Rules into its Build Pack which is part of the automated functionality contained within MBS.</p> <p>A desktop review of the Build Pack confirmed the nexus between it and the Communication Rules which provides for the foundation by which data is communicated between Western Power and retailers.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating		Observation
49 49	Electricity Industry Customer Transfer Code clause 6.2	A licensee's notice in relation to a data request or customer transfer request must identify the exit point to which it relates.	A	1	<p>Discussions with the Finance, Treasury and Risk Team revealed that Western Power has processes in place to support compliance with this licence obligation.</p> <p>Review of data requests and CTRs provided revealed that the request identified the exit point to which it relates through a NMI/UMI number. All meters on Western Power's network are allocated a NMI. We did not identify any instances where this did not occur.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating		Observation
50 50	Electricity Industry Customer Transfer Code clause 6.3(1)	A network operator must use its reasonable endeavours to ensure that a retailer can give it a notice by post, facsimile or electronic communication and notify the retailer of a telephone number for voice communication.	A	1	<p>Discussions with the Finance, Treasury and Risk Team revealed that Western Power has processes in place to support compliance with this licence obligation.</p> <p>Review of Western Power's website confirmed that it has made available its contact details to ensure that the retailer can give notice by post, facsimile or electronic communication.</p> <p>Further, Western Power has provided a telephone number for voice communication on its website.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating		Observation
54 54	Electricity Industry Customer Transfer Code clause 6.6	A network operator or a retailer must send required electronic communications to the applicable electronic communication address, in accordance with Annex 6.	A	1	<p>Discussions with the Finance, Treasury and Risk Team revealed that the market allocates a market code to any market participant on its inception. This market code utilised in communication with Code Participants as the electronic communication address.</p> <p>Any changes that are required to be made to a Code Participants electronic communication address is required to go through the Wholesale Electricity Market Rules. Western Power has provided that it has not sought a change to its market code within the audit period.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating		Observation
60 60	Electricity Industry Customer Transfer Code Annex 1	A network operator's request for standing data form must require a retailer to provide certain information.	A	1	<p>Discussions with the Finance, Treasury and Risk Team revealed that Western Power's request for standing data form requires a retailer to provide the relevant information in accordance with Annex 1.</p> <p>Review of the Metering Services Web Portal and MBS transcripts confirmed that the standing data form requires the retailer to provide the prescribed information.</p> <p>Further, if the prescribed information is not provided the request is determined to be invalid and the request is rejected.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating		Observation
61 61	Electricity Industry Customer Transfer Code Annex 2	A network operator's request for historical consumption data form must require a retailer to provide certain information.	A	1	<p>Discussions with the Finance, Treasury and Risk Team revealed that the historical consumption data form requires the retailer to provide the specified information.</p> <p>Review of the Western Power Web Portal and the MBS transcripts revealed, where the required information was not provided the request would be invalid and prompt the retailer to provide the correct information.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
62 62	Electricity Industry Customer Transfer Code Annex 3	A network operator's customer transfer request form must require a retailer to provide certain information.	A	1	<p>Discussions with the Finance, Treasury and Risk Team revealed that the transfer request form requires the retailer to provide information in accordance with the Code.</p> <p>Walkthrough of the CTR process in Western Power's Web Portal revealed that, if the specified information was not provided the request would be invalid and prompt the retailer to re-enter the correct information.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating		Observation
64 64	Electricity Industry Customer Transfer Code Annex 4 clause A4.2	A network operator must provide certain metering data, if available, in a prescribed manner to a retailer who submits a request for historical consumption data.	A	1	<p>Discussions with the Finance, Treasury and Risk Team revealed that metering data is provided in the prescribed manner to the retailer who submits the request.</p> <p>Further, we noted that Western Power is able to provide historical data for a period greater than 12 months for contestable customers.</p> <p>Review of the transcript of historical consumption requests from MBS revealed that the data provided was dependant on the capabilities of the exit point.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating		Observation
65 65	Electricity Industry Customer Transfer Code Annex 5 clause A5(5)	A network operator must respond to a request from a retailer for a UMI and checksum for an exit point within one business day of receiving a retailer's request.	A	1	<p>Discussions with the Finance, Treasury and Risk Team revealed that the NMI discovery process is automated within MBS to return a result as soon as possible.</p> <p>Walkthrough of the NMI discovery process and review of MBS transcripts confirmed that Western Power responds to requests from the retailer for a UMI and checksum for an exit point within the prescribed timeframe.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
66 66	Electricity Industry Customer Transfer Code Annex 5 clause A5(6)	A network operator must provide the most likely matches to the retailer, up to a maximum of 99, if a request does not return a single UMI and checksum.	A	1	<p>Discussions with the Finance, Treasury and Risk Team revealed that Western Power has processes in place to support compliance with this licence obligation.</p> <p>Walkthrough of the NMI discovery process revealed that Western Powers Web Portal is configured to provide a maximum of 99 likely matches if the request does not return a single UMI and checksum.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating		Observation
67 67	Electricity Industry Customer Transfer Code Annex 5 clause A5(7)	A network operator must, unless otherwise advised by the retailer, provide the UMI and checksum for the relevant exit point if a request returns a single UMI and checksum.	A	1	<p>Discussions with Western Power and walkthrough of the NMI discovery process revealed that, if the retailer provides the UMI and checksum for a specific exit point, the request returns the details of a single UMI and check sum.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
68 68	Electricity Industry Customer Transfer Code Annex 6 clause A6.2(a)	A network operator and a retailer must use reasonable endeavours to ensure that its information system on which electronic communications are made is operational 24 hours a day and 7 days a week.	A	1	<p>Discussions with the Finance, Treasury and Risk Team provided that its electronic communication system is made available on a 24/7 basis using reasonable endeavours.</p> <p>Review of the IT Disaster Recovery Plan for MBS revealed that there is process in place to recover MBS in a timely manner in the event of a system outage.</p> <p>Further, we noted that the IT department perform backups of MBS and the Web Portal on a regular basis.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating		Observation
69 69	Electricity Industry Customer Transfer Code Annex 6 clause A6.2(b)	A network operator and a retailer must establish a mechanism to generate an automated response message for each electronic communication (other than an automated response message) received at the electronic communication address.	A	1	<p>Discussions with the Finance, Treasury and Risk Team revealed that MBS has built in functionality to generate an automated response message for each electronic communication received at the electronic communication address.</p> <p>Walkthrough of a number of different types of requests confirmed that Western Power has established a mechanism to generate an automated response.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating		Observation
70 70	Electricity Industry Customer Transfer Code Annex 6 clause A6.6	The originator of an electronic communication must identify itself in the communication.	A	1	<p>Discussions with the Finance, Treasury and Risk Team revealed that each electronic communication identifies the recipient and receiver by a market code.</p> <p>Each Market Participant is provided with a market code on their inception to identify the user on all electronic communication.</p> <p>Further, we note that all email communication from Western Power includes an email signature which details the name of the employee, their role and relevant telephone numbers.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating		Observation
71 71	Electricity Industry Customer Transfer Code Annex 6 clause A6.7	The originator of an electronic communication must use reasonable endeavours to adopt a consistent data format for information over time, to facilitate any automated processing of the information by the addressee.	A	1	<p>Discussions with the Finance, Treasury and Risk Team revealed that MBS is built in accordance with the Build Pack. The Build Pack is defined by the Customer Transfer Code Communication Rules and Metering Code Communication Rules and facilitates how Western Power communicates with other Code Participants.</p> <p>Our review of MBS transcripts over the audit period confirmed that the XML files were in a consistent data format.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
72 72	Electricity Industry (Obligation to Connect) Regulations regulation 4	A distributor must attach or connect premises to a distribution system if a retailer or customer takes certain action and the circumstances in regulation 5(1) of the Electricity Industry (Obligation to Connect) Regulations exist.	A	1	<p>Discussions with staff revealed that Western Power attaches or connects a premise to a distribution system if a retailer or customer takes certain action and the circumstances in regulation 5(1) of the Regulations exist.</p> <p>Sample based testing did not reveal any instances where Western Power did not connect a premise to its distribution system where circumstances under the Code were met.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
73 73	Electricity Industry (Obligation to Connect) Regulations regulation 5(5)	A distributor that is obliged to attach or connect premises to the distribution system under regulation 4 of the Electricity Industry (Obligation to Connect) Regulations must extend the distribution system to a suitable connection point.	A	1	<p>Our enquiries with the Connections Team revealed the existence of a process to facilitate the connection of premises as a result of an obligation that may arise under regulation 4.</p> <p>A customer is able to make application and this is reviewed to ascertain whether there is an obligation upon Western Power to extend its distribution system to a suitable connection point. If this obligation is confirmed, then Western Power engages its Design Team to map out the required piece of work.</p> <p>Sample based testing did not reveal any exception in this regard.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
74 74	Electricity Industry (Obligation to Connect) Regulations regulation 5(6)	The capacity and standard of an extension must be adequate for the supply required and in accordance with accepted good industry practice as it would be applied by a prudent distributor.	A	1	<p>Walkthrough of the design and specification process for enabling the extension of the distribution network to a suitable connection point revealed that consideration is given to good industry practice.</p> <p>Observation was made on Western Power's data system (DFIS) which provides for information relating to work carried out on connection points confirmed that extensions had been carried out where necessary.</p> <p>Discussion with the Connections Team also revealed that customers' requirements were considered when determining the capacity and standard when extending the network.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
75 75	Electricity Industry (Obligation to Connect) Regulations regulation 6	A distributor that is obliged to attach or connect premises to the distribution system under regulation 4 of the Electricity Industry (Obligation to Connect) Regulations must do so within a defined timeframe.	A	1	<p>Discussions with Western Power staff revealed the existence of processes and systems to connect a customer within the specified timeframe.</p> <p>Sample based testing identified an instance where Western Power had not connected a premise within the 20 business day prescribed time frame. However, Western Power had obtained written confirmation from the customer of an agreed date.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
76 76	Electricity Industry (Obligation to Connect) Regulations regulation 7(1)	A distributor must energise premises in certain prescribed circumstances.	A	1	<p>Discussion with Western Power revealed that it does not energise a premise without the receipt of a completion advice from an electrical contractor as written law does not permit energisation without this document.</p> <p>Sample based testing revealed that a completion notice had been sought prior to the energisation request being completed and the energisation took place.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliances Rating		
99 99	Electricity Industry (Customer Contracts) Regulations 2005 regulation 36	The licensee must determine, from time to time, the default supplier for each connection point that connects to a distribution system operated by the licensee.	A	1	<p>Desktop review of data maintained within MBS confirmed that Western Power keeps a record of the default supplier for each connection point.</p> <p>Each NMI which is connected to Western Power's distribution system requires a default supplier to be identified in its data characteristics. This enables the identification of a supplier for each connection point on its distribution system.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		
101 101	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.	A	1	<p>Discussions with the Regulatory Compliance Manager demonstrated the existence of processes to ensure that a performance audit was conducted within the specified time period.</p> <p>A review of the date by which the 2012 Performance Audit was submitted and the notice of acceptance from the Authority appointing an independent audit expert for the subsequent performance audit revealed that Western Power had provided for a performance audit in the relevant 24 month time frame.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
102 102	Electricity Industry Act section 14(1)(a)	A licensee must provide for an asset management system.	A	1	<p>Discussions with the Regulatory Compliance Manager demonstrated that there are processes to ensure that Western Power has appropriately provided for an asset management system.</p> <p>Reviews of the April 2014 Budget vs. Actual figures indicated that there were amounts allocated and expensed for the maintenance and servicing of the asset management system in place.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		
103 103	Electricity Industry Act section 14(1)(b)	A licensee must notify details of the asset management system and any substantial changes to it to the Authority.	A	1	<p>Discussions with the Regulatory Compliance Manager revealed that there is a process in place to ensure that Western Power communicates all substantial changes to its asset management system to the Authority.</p> <p>During the audit period, there were two instances in which substantial changes had been made to the asset management system. Correspondence between Western Power and the Authority regarding these substantial changes was sighted, indicating that Western Power had complied with its obligation to communicate any substantial changes.</p>
104 104	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.	A	1	<p>Discussions with the Regulatory Compliance Manager revealed the existence of processes to ensure that a review of the asset management system is conducted in the specified time period.</p> <p>A review of the date by which the 2012 review report was submitted and the notice of acceptance from the Authority appointing an independent audit expert for the subsequent review revealed that Western Power had provided for a asset management review in the relevant 24 month time frame.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		
105 105	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.	A	1	<p>Discussions with the Regulatory Compliance Manager revealed that there was a process in place to ensure that the prescribed licence fee was paid to the Authority in the time frame specified by the Act.</p> <p>Western Power tabled both the invoices as proof of payment for the 2013 and 2014 licence fees which confirmed that payments were made in accordance with the time period specified.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		
106 106	Electricity Industry Act section 31(3)	A licensee must take reasonable steps to minimise the extent or duration of any interruption, suspension or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause.	A	1	<p>Discussions with the Network Operations Centre and review of the emergency prioritisation protocols confirmed that Western Power has implemented a process to remedy interruption to supply due to an accident, emergency, potential danger or other unavoidable cause.</p> <p>Walkthrough of response procedures revealed that, if Western Power believes it is in the interest of public safety that an interruption of supply of electricity is required, Western Power has a number of strategies to minimise the extent of the interruption. This includes re-routing of supply, emergency response vehicles, emergency crew and alternative sources of electricity such as emergency generators.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		
107 107	Electricity Industry Act section 41(6)	A licensee must pay the costs of taking an interest in land or an easement over land.	A	1	<p>Discussions with the Property and Fleet Manager revealed that Western Power takes an interest in an easement over land using its power under Section 45 of the Energy Operators (Powers) Act 1979. In these cases, this requires a valuation of the land to be performed. Western Power will then compensate the land owner accordingly.</p> <p>Other manners in which Western Power takes an interest in land are described as follows.</p> <p>Freehold purchases – transaction between Western Power and the seller of land that requires an official agreement. In these cases, Western Power pays an amount for the land as established within the agreement.</p> <p>Leases – represent standard commercial leases where the lessor is compensated for the set time in which Western Power utilises the land.</p> <p>Crown reserves – an order is received from the Department of Lands whereby Western Power is granted temporary access to the use of land. No official transfer of the land occurs and therefore no compensation is required.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		
111 111	Electricity Industry Act section 101	A retail, distribution or integrated regional licensee must not supply electricity to small use customers unless the licensee is a member of an approved scheme and is bound by and compliant with any decision or direction of the electricity ombudsman under the approved scheme.	A	1	<p>As a requirement to supply electricity to small use customers, Western Power is required to ensure that as a licensee, membership is obtained from an approved scheme, bound by and compliant with any decision or direction of the electricity ombudsman under the approved scheme.</p> <p>Discussions with the Regulatory Compliance Manager and a review of the Energy Ombudsman Western Australia Annual report provided evidence that Western Power is a member of an approved scheme and is therefore compliant with its obligation.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		
112 112	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.	A	1	<p>Discussions with the Access Solutions Team revealed that Western Power had not engaged in conduct for the purpose of hindering or prohibiting access by any person to services in accordance with the Act.</p> <p>Further, enquires with the staff revealed that Western Power has not received any complaints in relation to conduct that prohibits or hinders access to its distribution network.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		
119 119	Distribution Licence condition 12.1	A licensee and any related body corporate must maintain accounting records that comply with the Australian Accounting Standards Board Standards or equivalent International Accounting Standards.	A	1	<p>Western Power undertakes an audit of its financial records to ensure that records are maintained in compliance with Australian and International Accounting Standards on an annual basis.</p> <p>Walkthroughs with the head of accounting and finance provided the 2013 audit report was evidence that Western Power's financial records were in compliance with the relevant standards.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
121 121	Distribution Licence condition 14.2	A licensee must comply, and require its auditor to comply, with the Authority's standard audit guidelines dealing with the performance audit	A	1	<p>Review of a letter provided during discussions with the Regulatory Compliance Manager, regarding the Authority's approval of the audit plan for the 2014 Performance Audit by the Authority indicated that Western Power is compliant with its obligation to ensure that auditors assigned for the 2014 Performance Audit meet the guidelines prescribed by the Authority.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		
122 122	Distribution Transmission Licence condition 15.1	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.	A	1	<p>Review of a letter provided during discussions with the Regulatory Compliance Manager regarding the Authority's approval of the Audit Plan for the 2014 Asset Management System Review indicated that Western Power is compliant with its obligation to ensure that auditors assigned for the 2014 Asset Management System Review meet the guidelines prescribed by the Authority.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
124 124	Distribution Licence condition 16.1	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.	A	1	<p>A review of the Regulatory Compliance Calendar and Register of Correspondence with the Authority obtained during discussions with the Regulatory Compliance Manager revealed that Western Power has mechanisms in place to ensure that all information requested by the Authority is delivered in the manner prescribed and within the time frame specified.</p> <p>The results of sample based testing revealed that for samples selected, Western Power had provided the Authority with requested information in the manner prescribed and within the time frame specified. All formal communications between the two entities were conducted in writing.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support</p>
125 125	Distribution Licence condition 17.1 and 17.2	A licensee must publish any information it is directed by the Authority to publish, within the timeframes specified.	A	1	<p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support</p>

	Feb 2013	Feb 2013	Compliance Rating		
126 126	Distribution Licence condition 18.1	Unless otherwise specified, all notices must be in writing.	A	1	compliance with this licence obligation.

	Feb 2013	Feb 2013	Compliance Rating		Consequence
127 <i>227</i>	Distribution Licence condition 29.1	A distributor must create and maintain a Priority Restoration Register.	A	1	<p>Discussions with the Network Operations Team revealed that there are processes in place that restore electricity to the network as quickly as possible.</p> <p>We noted that Western Power could identify those customers who were on life support or had a sensitive load flag attached to their NMI. We confirmed that Western Power reconciles its Life Support Register on a daily basis with the register of the retailer. Western Power's process indicated that their restoration priority will vary in each situation. However, the priority for Western Power is public safety, then the restoration of its sensitive load customers.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Consequence
229 234	Code of Conduct clause 7.5	A distributor who disconnects a customer's supply address for emergency reasons must provide a 24-hour emergency line and use its best endeavours to restore supply as soon as possible.	A	1	<p>Western Power makes available a 24 hour emergency line to its customers, 13 13 51. Walkthrough with NOC and SOC of Western Power's TCS confirmed an emergency management plan that provides for actions in the event of an emergency. Walkthrough of a sample of emergency incidences attended by Western Power revealed that it has a triage process in place to identify and restore supply as soon as possible.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Consequence
233 237	Code of Conduct clause 7.7(3)	Where a distributor has been informed by a retailer under subclause 7.7(1)(c) or by a relevant government agency that a person residing at a customer's supply address requires life support equipment, or of a change of details notified to the retailer under subclause 7.7(2), the distributor must comply with subclause 7.7(3).	A	1	<p>Discussions with the Network Operations Team revealed that it has processes in place to facilitate compliance with clause 7.7(3) where it has been informed by a retailer or by a government agency that a person residing at a customer's supply address requires life support equipment or a change of details has been notified.</p> <p>Further, enquires revealed that all customers must submit an application for life support through their retailer.</p> <p>Walkthrough of the life support register maintenance process revealed that it is an automated function. Emails are sent to Western Power by the retailer on a daily basis to notify Western Power of any changes to its life support register. These changes are then automatically reconciled within the TCS system. Western Power's Metering Database has the functionality to "talk" to TCS and identify what premises have life support customers. This functionality prohibits any disconnection service orders to be completed whilst the premises is occupied by life support residents.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Consequence
234	Code of Conduct clause 7.7(4)	Where the distributor has already provided notice of a planned interruption under the Network Quality and Reliability of Supply Code 2005 that will affect a supply address and has been informed by a retailer under subclause 7.7(1)(c) or by a relevant government agency that a person residing at a customer's supply address requires life support equipment, the distributor must use best endeavours to contact that customer prior to the planned interruption.	A	1	<p>Enquires with the Service Quality Notification Team revealed that Western Power has dedicated a staff member for notifying life support customers of planned interruptions. Review of the planned interruption report confirmed that Western Power has provided life support customers with at least 3 business days written notice of the planned interruption and obtained verbal acknowledgement from the customer where practicable.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Consequence
238 243	Code of Conduct clause 9.1(2)	A distributor may only operate a pre-payment meter and a retailer may only offer a pre-payment meter service in an area that has been declared by the Minister by notice published in the <i>Government Gazette</i> .	A	1	<p>Review of the location of pre-payment meters through the pre-payment meter register confirmed that Western Power has only installed such meters at the Ninga Mia community.</p> <p>This locality is the only area that has been declared by the Minister by notice published in the <i>Government Gazette</i>. We understand that the area was gazetted in June 2010 and no further amendments have been made in this regard.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
279 280	Code of Conduct clause 10.6	Upon request and at no charge, a distributor must provide a customer with the information specified in subclause 10.6.	A	1	<p>Discussions with Western Power personnel revealed that customers can obtain the information specified in sub clause 10.6 of the Code of Conduct at no charge.</p> <p>Review of Western Power's website identified that the distribution standards, metering arrangement information. Code of Conduct and Customer Service Charter can be obtained by a customer at no charge.</p> <p>In the situation where a customer calls the Call Centre, the representative will refer the customer to its website, and is able to provide a direct link.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Consequence
280 281	Code of Conduct clause 10.7(1)	Upon request, a distributor must provide a customer with their consumption data.	A	1	<p>Discussions with the Metering Services and Customer Assist Teams confirmed that Western Power has a process in place to ensure that customers are provided with their consumption data on request.</p> <p>Walkthrough of the process revealed that a customer requests their consumption data through the Customer Assist Team who then sends a work order to the Metering Service Team through NetCIS. The Metering Team then extracts the historical consumption data for the customer and communicates it to the customer via a formal letter.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
281 282	Code of Conduct clause 10.7(2)	If a customer requests their consumption data under subclause 10.7(1), the distributor must provide the information at no charge in the circumstances specified in subclause 10.7(2).	A	1	<p>Discussion with the Customer Assist and Metering Services Teams revealed that Western Power has a process in place to ensure that it provides the customer's consumption data at no charge in the circumstances specified in sub clause 10.7(2).</p> <p>Sample based testing did not reveal any instances where a small use customer was charged for the provision of historical consumption data.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Consequence
282 283	Code of Conduct clause 10.7(3)	A distributor must provide a customer with the requested consumption data within 10 business days of the receipt of the request, or, if payment is required (and requested by the distributor within two (2) business days of the request), within 10 business days of receipt of payment of the distributor's reasonable charge for providing the consumption data.	A	1	<p>Discussions with the Customer Assist and Metering Services Team revealed that Western Power has a process in place for the provision of consumption data within the prescribed timeframe.</p> <p>Walkthrough of the request process and sample based testing did not reveal any instances where Western Power did not provide the customer their consumption data within the prescribed timeframe.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
283 284	Code of Conduct clause 10.7(4)	A distributor must keep a customer's consumption data for seven (7) years.	A	1	<p>Discussions with the Information Knowledge Management Team revealed that consumption data has been stored within MBS and NetCIS for at least 7 years. Western Power provided that MBS has kept consumption data since its inception.</p> <p>Further, staff provided that the only way data can be removed from the system is through authorisation from the data owner. No requests of this nature have been made within the audit period.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Consequence
284 285	Code of Conduct clause 10.8(1)	Upon request, a distributor must inform a customer how the customer can obtain information on distribution standards and metering arrangements prescribed under the specified Acts or adopted by the distributor that are relevant to the customer.	A	1	<p>Discussions with the Customer Assist Team personnel revealed that Call Centre staff have the ability and knowledge to inform customers how to obtain information on distribution standards and metering arrangements.</p> <p>Walkthrough of this process confirmed that Call Centre staff refer customers to Western Power's website where the requested information can be obtained.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
285 286	Code of Conduct clause 10.8(2)	A distributor must publish information on distribution standards and metering arrangements on the distributor's website.	A	1	<p>Discussions with the Complex Metering and Laboratory Team Leader revealed that there is a process in place to publish the required information on Western Power's website. The information on distribution standards and metering arrangements is contained in the WADCM. Further, enquires revealed that the WADCM is updated and reviewed for currency on a regular basis.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Consequence
286 287	Code of Conduct clause 10.9	To the extent practicable, a retailer and distributor must ensure that any written information that must be given to a customer by the retailer or distributor or its electricity marketing agent under the Code of Conduct is expressed in clear, simple, and concise language and is in a format that makes it easy to understand.	A	1	<p>Discussions with the Customer Assist Team revealed that all material is reviewed to ensure it meets prescribed requirements before it is made available to the public.</p> <p>Review of information given to customers confirmed it is in a manner that is expressed in clear, simple and concise language and a format that makes it easy to understand.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
287 288	Code of Conduct clause 10.10(1)	Upon request, a retailer and a distributor must tell a customer how the customer can obtain a copy of the Code of Conduct.	A	1	<p>Discussions with the Customer Assist Branch revealed that Call Centre staff are made aware of how a customer can obtain a copy of the Code of Conduct.</p> <p>Walkthrough of the request process at reception confirmed that staff were aware of where a customer can obtain a copy of the Code of Conduct.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Consequence
288 289	Code of Conduct clause 10.10(2)	A retailer and distributor must make electronic copies of the Code of Conduct available, at no charge, on their websites.	A	1	<p>Review of Western Power’s website confirmed that we could download a copy of the Code of Conduct at no charge.</p> <p>Further, Call Centre personnel have the ability to email a copy of the Code of Conduct to a customer at no charge.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
289 290	Code of Conduct clause 10.10(3)	A retailer and a distributor must make a copy of the Code of Conduct available for inspection, at no charge, at their respective offices.	A	1	<p>Enquires with reception at Head Office, Metering Services Branch and Jandakot Office revealed that Western Power had copies of the Code of Conduct available at no charge.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Consequence
290 291	Code of Conduct clause 10.11(1)	Upon request and at no charge, a retailer and a distributor must make available to a residential customer services that assist the residential customer in interpreting information provided by the retailer or distributor (including independent multi-lingual and TTY services, and large print copies).	A	1	<p>Discussions with the Customer Assist Team revealed that Western Power has processes in place to make available to residential customers services including independent multi-lingual, TTY services and large print copies.</p> <p>Review of documentation provided to customers revealed the inclusion of phone numbers that direct customers to interpreting services.</p> <p>Further, examination of the invoices received by the interpretation service provider confirmed that Western Power bears the cost of this service and does not pass the cost onto its customers.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Consequence
291 292	Code of Conduct clause 10.11(2)	A retailer and, where appropriate, a distributor, must include in relation to residential customers the telephone number for their TTY services and for independent multi-lingual services, as well as the National Interpreter Symbol with the words “Interpreter Services”, on the bill and bill-related information, reminder notices and disconnection warnings.	A	1	<p>Discussions with the Customer Assist Team revealed that all bill and bill related information include the telephone number for Western Power’s TTY services and independent multi-lingual services as well as the National Interpreter Symbol.</p> <p>Sample based testing of bill and bill related information did not revealed any instances where this information was not provided.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
292 293	Code of Conduct clause 10.12(1)	Upon request and at no charge, a distributor must advise a customer of the availability of different types of meters, as well as their suitability to the customer’s supply address, purpose, costs, and installation, operation and maintenance procedures.	A	1	<p>Discussion with the Complex Metering and Laboratory Team Leader provided that the required information can be located on Western Power’s website, in the Customer Charter, by telephone or by email, at no charge. Further, enquires with the Call Centre staff revealed that customers are not charged for the information prescribed by the Code of Conduct.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Consequence
295 296	Code of Conduct clause 12.1(2)	The complaints handling process under subclause 12.1(1) must comply with the requirements specified in subclauses 12.1(2)(a), (b) and (c) and be made available at no cost.	A	1	<p>Review of the complaints handling documentation revealed that the Western Power has complied with the requirements specified in sub clause 12.1(2)(a), (b) and (c). Further, we could obtain the complaints handling process on Western Power’s website at no cost and where a customer does not have internet access a copy of the complaints handling process would be posted at no charge.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
298 299	Code of Conduct clause 12.3	Upon request and at no charge, a retailer, distributor and electricity marketing agent must give a customer information that will assist the customer in utilising the respective complaints handling processes.	A	1	<p>Discussions with the Customer Assist Team revealed that Call Centre personnel were well conversant in the complaints handling process and if more information was required they would transfer the call to Western Power’s dedicated Complaints and Resolution Team.</p> <p>Further, review of Western Power’s website revealed that the information surrounding the complaints handling process was made available to customers.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Consequence
299 300	Code of Conduct clause 12.4	When a retailer, distributor or electricity marketing agent receives a complaint that does not relate to its functions, it must advise the customer of the entity that it reasonably considers to be the appropriate entity to deal with the complaint (if known).	A	1	<p>Discussions with the Complaints & Resolution Team Leader revealed that team members are advised to refer any complaint that does not relate to their functions to the appropriate area within Western Power to deal with the complaint.</p> <p>Review of the process between Western Power and retailers confirmed that a call would be transferred to the appropriate entity if it did not relate to Western Power's functions.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
300 301	Code of Conduct clause 13.1(1)	Unless expressly provided otherwise, a retailer, distributor or electricity marketing agent must keep a record or other information as required to be kept by the Code of Conduct for at least two (2) years from the last date on which the information was recorded.	A	1	<p>Discussions held with Western Power revealed that it utilises a number of systems such as NetCIS and MBS which stores information in accordance with the requirements of clause 13.1 of the Code of Conduct. It is understood that both systems do not have an automatic archive functionality and the data is available on request.</p> <p>Further the results of sample based testing confirmed that records were kept for at least two years from the last date on which the information was recorded.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Consequence
312 309	Code of Conduct clause 13.8(1)	A distributor must keep a record of the total number of connections provided and connections not provided on or before the agreed date.	A	1	<p>Discussions held with staff revealed that Western Power has a process and methodology in place to facilitate record keeping in accordance with clause 13.8(1) of the Code of Conduct.</p> <p>Reconciliation between the 2013 Record Keeping Report, New Connection Compliance Report and raw data provided did not reveal any variances that indicated the records kept are not accurate.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
314 311	Code of Conduct clause 13.9(1)	A distributor must keep a record of the street lights information specified in subclause 13.9(1).	A	1	<p>Discussions held with Western Power as well as a review of the street light maintenance data for the audit period revealed that it has a process and methodology in place to facilitate the maintenance of records in accordance with clause 13.9(1) of the Code of Conduct.</p> <p>Western Power was observed to maintain street light information within its MBS, TCS and Asset Management System. Western Power utilises COGNOS as its reporting mechanism to collate its record keeping report.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Consequence
317 314	Code of Conduct clause 13.11	A distributor must keep a record of the payments made under subclauses 14.4 and 14.5.	A	1	<p>Discussions held with the Commercial Services Team Leader revealed that Western Power utilises the Register of Reimbursements made to retailers to ensure that it maintains records of amounts owed to retailers in respect to payments specified under sub clauses 14.4 and 14.5.</p> <p>Further, sample based testing was performed which reconciled amounts listed within the register to extracts from the Ellipse Accounting System which verified payment of amounts owed. The results of testing indicated that the information within the register was both complete and accurate.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
318 315	Code of Conduct clause 13.12	A distributor must keep a record of the call centre performance indicators specified in subclause 13.12.	A	1	<p>Discussions held with personnel revealed that Western Power has a process and methodology in place to facilitate the maintenance of records in accordance with clause 13.12 of the Code of Conduct.</p> <p>Review of the Call Centre statistics and raw data provided revealed that Western Power has accurately kept a record of call centre performance indicators as specified in sub clause 13.12.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Consequence
321 317	Code of Conduct clause 13.14(1)	A distributor must keep a record of the total number of exit points of customers who are connected to its network.	A	1	<p>Discussions held with staff and review for the exit point data extracted from MBS revealed that Western Power has a process and methodology in place to facilitate the capture of the total number of exit points of customers who are connected to its network.</p> <p>Grant Thornton understands that Western Power maintains a record of exit points on the SWIS (“South West Interconnected System”), NWIS (“North West Interconnected System”) and NINT. Upon reporting this figure in its Record Keeping Report, Western Power has developed guidelines that specifically exclude those Horizon Power customers on the NWIS and NINT.</p> <p>Re-performance of the calculation of the exit point statistic confirmed the accuracy of the figures reported in the Record Keeping Report.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
324	Code of Conduct clause 13.17(1)	The annual retailer and distributor reports specified in subclauses 13.15 and 13.16 are to be published no later than the following October 1.	A	1	<p>Review of the date which the 2013 Annual Retailer Report was published as well as correspondence between Western Power, the Authority and the Minister regarding the dates which these reports were delivered, indicated that Western Power has fulfilled its obligation to publish the report by the October 1 deadline and deliver the report to</p>

	Feb 2013	Feb 2013	Compliance Rating		Consequence
325 319	Code of Conduct clause 13.17(3)	A copy of each report must be given to the Minister and the Authority not less than seven (7) days before it is published.			both the Minister and the Authority seven days prior to the date the report was published. Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.

	Feb 2013	Feb 2013	Compliance Rating		Consequence
326	Code of Conduct clause 13.18	A retailer and distributor must provide the information in the records in subclause 13.15 and 13.16, as applicable, to the Authority in a format acceptable to the Authority not later than the following September 23.	A	1	<p>Discussions with the Regulatory Compliance Manager and the Senior Process and Governance Analyst indicated that there are several procedures and processes in place to ensure that information specified within the Code of Conduct is provided to the Authority no later than the following September 23.</p> <p>Reviews were performed of reconciliation documents which included Information Checklist and Annual Record Keeping Report Data List which were utilised as tools to ensure the completeness of the information as specified by the legislation.</p> <p>Sample testing was also performed which tested the accuracy of the raw data from which the final figures were compiled. No errors were identified as a result of testing performed.</p> <p>In addition, a review of correspondence between Western Power and the Authority provided evidence that the template used to compile the final report was received from the Authority and that the final report was received from Western Power within the time period specified.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Consequence
328 321	Code of Conduct clause 14.1(2)	Subject to clause 14.6, a distributor must compensate a retailer for the payment if a retailer is liable to and makes a payment due to an act or omission of the distributor.	A	1	Discussions with the Commercial Services Team Leader revealed that Western Power has a process in place to compensate the retailer in the event that Western Power has not performed a reconnection or disconnection within the prescribed timeframe. Sample based testing revealed that payments had been verified and made to the retailer on receipt of a claim invoice.
330 323	Code of Conduct clause 14.2(2)	Subject to clause 14.6, a distributor must compensate a retailer for the payment if a retailer is liable to and makes a payment under subclause 14.2(1) due to an act or omission of the distributor.			Further, enquires noted that where the claim had not been verified and paid, Western Power would communicate the reasons for the outcome to the retailer. Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.

	Feb 2013	Feb 2013	Compliance Rating		Consequence
335	Code of Conduct clause 14.5	Subject to subclause 14.6, if a distributor disconnects a customer's supply address other than as authorised by this Code or otherwise by law, or as authorised by a retailer, then the distributor must pay the customer \$100 for each day that the customer was wrongfully disconnected.	A	1	<p>Discussion with the Commercial Services Team Leader noted that Western Power utilises the Register of Reimbursements made to retailers in order to maintain and keep a record of payments which have or are required to be made in line with clause 14.5 of the Code.</p> <p>Once wrongful disconnections have been identified by the Metering team, details are sent to the Commercial Services team so that actions can be undertaken to organise payment and update records accordingly.</p> <p>Furthermore, sample based testing revealed that all payments in relation to wrongful disconnections which were the fault of the retailer, were paid in accordance with the Code of Conduct.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Consequence
337 329	Code of Conduct clause 14.7(2)	A distributor who is required to make a compensation payment for failing to satisfy a service standard under clauses 14.4 or 14.5 must do so in the manner specified in subclause 14.7(2).	A	1	<p>Discussions with Western Power personnel as well as a review of the Wrongful Disconnections and Customer Misread Reimbursements Documents revealed that Western Power had appropriate procedures in place to facilitate the payment of customers in accordance with the manner specified in sub clause 14.7(2) of the Code of Conduct.</p> <p>Further, review of the Service Standard Payment Report for complaints that were not acknowledged or responded to within the timeframes prescribed confirmed Western Power has processes and systems in place for making a compensation payment when required.</p> <p>Sample based testing did not reveal any instances where Western Power failed to make compensation payments outside the manner specified under the Code.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
340 332	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.	A	1	<p>Discussion with the Complex Metering & Laboratory Team Leader revealed that Western Power has a process in place to ensure that its meters meet the requirements specified in the metrology procedure and guidelines under the National Measurement Act.</p> <p>Meters are initially tested during the tender evaluation process with the supplier over a test period of up to four weeks. Western Power utilise the Revenue Meter Technical Specification and Meter Tender Specification documents during this phase which align to the metrology procedure and National Measurement Act standards. Enquires revealed that Western Power was not required to undertake any testing as no new meters had been tendered for in the period under review.</p> <p>Although there has been no update in regards to the type of meters purchased during the current period; batch testing is conducted on all meters which are purchased in accordance with the Meter Management Plan and Compliance Testing Plan.</p> <p>As disclosed in the 2009 Performance Audit Report, Grant Thornton understands that there were approximately 320,000 non-compliant direct connect meters on the network. In order to resolve this issue an action plan was developed by Western Power and approved by the Office of Energy Safety, to replace the non-compliant meters by 1st December 2015. Given that the process is observed to be ongoing and the completion date falls outside the scope period of the audit, no further investigation was undertaken by Grant Thornton in respect to this matter.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
341 333	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.	A	1	<p>Discussion with the Complex Metering & Laboratory Team Leader revealed that all meters are tested at the tender evaluation phase with the supplier to ensure that they comply with the requirements under sub clause 3.2(1)(a)(b) of the Metering Code. The Metering Team utilise the Western Australia Electricity Market Metrology Procedure for all metering installations.</p> <p>Further, the Meter Tender Specifications and the Revenue Meters Technical Specifications documents set the required standards for suppliers in the tender evaluation process. Observation of meter types within the Western Power metering laboratory confirmed that the various meters installed by Western Power display, or permit access to a display, of the measurements specified by the Metering Code through the use of dials, a cyclometer or an illuminated display panel.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
342 334	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.	A	1	<p>Discussions with the Complex Metering & Laboratory Team Leader revealed that Western Power has processes in place to ensure its compliance with this obligation.</p> <p>Review of the different meter types within the laboratory revealed that all interval meters have an 'infra-red' interface which allows interval data to be downloaded.</p> <p>Further, enquires revealed that of the five types of interval meters installed by Western Power, Type 1 – 4 meters have the specifications for modems to be installed alongside the meters which allow data to be downloaded remotely through MV90 via a communication link. Unlike Type 1-4 meters, Type 5 meters do not have these same capabilities and therefore data has to be accessed and downloaded via the 'infra-red' interface on site.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
343 335	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.	A	1	<p>Discussions with the Complex Metering & Laboratory Team Leader revealed that all Type 1-4 meters are required to have a corresponding modem device installed which allows data to be downloaded remotely through MV90. All modem devices utilised by Western Power are provided by modem supplier Maxon.</p> <p>Review of the Certificate of Conformance held by Western Power indicates that the Maxon brand of modems are in compliance with relevant telecommunications regulations, to allow interval energy data to be downloaded in the manner prescribed.</p> <p>Sample based testing revealed that of all the Type 1-4 meters tested, all meters had a corresponding mobile telephone number attached allowing the data to be accessed remotely through the modem device installed.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
346	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.	A	1	<p>Discussion with the Complex Metering & Laboratory Team Leader revealed that Western Power has a process in place to ensure that all users who have systems which require bi-directional electricity flows to be measured have meters installed which have the capabilities to record such information. Furthermore, the information recorded by these meters is in accordance with clause 3.3C of the Metering Code.</p> <p>Review of the meter fact sheets revealed that EM1000 and U3330 meters installed by Western Power have the capability to record the net production of bi-directional electricity flows for each specific user.</p> <p>In addition, the results of sample based testing also revealed that all users who required meters which measured bi-directional electricity flows in accordance with the Metering Code had the relevant meters installed or reconfigured to do so.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
347 336	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.	A	1	<p>Discussions with Metering Services revealed that Western Power sources meters through a tender process. Within the tender documents, the specifications are detailed and the potential supplier must demonstrate that the proposed meters meet the specifications as prescribed. Western Power exposes the proposed meters to quality testing to determine whether the meters do in fact meet its requirements. Upon identification of the preferred supplier, Western Power continues to source its meters in accordance with the procurement contract.</p> <p>Western Power is advised of a completed meter installation from the customer's electrical contractor. A NMI is then generated and attached to the meter installation to facilitate identification of the connection point. Observation of sample data maintained in MBS confirmed the existence of a metering installation on the network aside from Type 7 connection points.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
348 337	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.	A	1	<p>Review of Section 11 of the Western Australian Distribution Connections Manual (located on Western Power’s website), High Voltage Transmission Metering Project Work Process and the Model SLA outlined the relevant processes and procedures Western Power has in place to ensure that metering installations were provided for, installed, operated and maintained as per the ‘WAER’ and Metering Code in the manner prescribed.</p> <p>Further, discussions held with the Complex Metering & Laboratory Team Leader revealed that Western Power has a platform in place for faulty/non-faulty meters to be identified, operated, repaired and maintained via a customer complaint process and Meter Management Plan.</p> <p>Sample based testing was also performed to ensure that all repairs, installations and maintenance of meters were performed in line with the manner prescribed by the Metering Code. The results of sample based testing did not highlight any issues which would indicate a failure in the operation of controls and processes in place.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
350 339	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.	A	1	<p>Discussions held with the Billing and Metering Compliance Officer revealed the existence of processes and mechanisms to ensure that it only imposes charges for the services provided per clause 3.5(6) of the Metering Code in accordance with the Model SLA.</p> <p>Sample based testing did not reveal any instances where a customer was charged outside of the requirements imposed by the agreement.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
351 340	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.	A	1	<p>Discussions with the Metering Services Team revealed that there are processes in place to ensure Western Power advises affected parties of the non-compliant metering installation and arrange for the non-compliance to be corrected as soon as practicable.</p> <p>Sample-based testing did not identify any instances where Western Power had failed to advise the affected parties of a non-compliant metering installation.</p> <p>Review of the Model SLA provided that meter installation repairs must be performed within a 5 day time frame for metro customers and 10 days for country customers.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
352 341	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.	A	1	<p>Discussions with the Complex Metering & Laboratory Team Leader revealed that all Type 1-4 meters are required to be installed with a corresponding modem device which allows data to be downloaded remotely through MV90. All modem devices utilised by Western Power are provided by modem supplier Maxon.</p> <p>Review of the Certificate of Conformance held by Western Power indicated that the Maxon brand of modems utilised are in compliance with applicable State and Commonwealth enactments. The modems access the telecommunication network through a National Telecommunication provider which demonstrates compatibility as required.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
353 342	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.	A	1	<p>Discussions with Complex Metering & Laboratory Team Leader revealed that all meters installed by Western Power are fitted with a security seal as part of their design. The security seal not only hinders access to the meter but allows unauthorised access to be detected. Security seals for each meter type were observed whilst touring the testing laboratory.</p> <p>In the event that the seal has been compromised, tampering of a meter is reported to Western Power after being identified by the customer, field officers, retailers, or Service Stream (metering contractors).</p> <p>After identification has occurred, Western Power immediately replaces the damaged meter and undertakes an investigation with the Customer Inspection Revenue Protection Team to determine the cause of the compromised security seal. The results on the investigation are passed on to the Energy Ombudsman where remedial action is sought if tampering is considered intentional.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
354 343	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.	A	1	<p>Discussions with the Complex Metering & Laboratory Team Leader revealed that batch testing is performed once an order of meters is received to ensure that all meters meet the requirements specified as per the Metering Code. If one meter fails the prescribed requirements then the whole batch of meters purchased is returned to ensure accuracy.</p> <p>Prior to this, once a new type of meter is tendered for, testing occurs during the tender evaluation phase to ensure that all meters installed by Western Power meet the specified accuracy requirements. In addition, subsequent to meters being installed meters are tested in accordance with the Metering Management Plant to ensure accuracy of the meters is maintained.</p> <p>Further, we note that Western Power utilises the Western Australian Distributions Connection Manual, which references the Australian Standards and ensures that each meter installation is in compliance with the Table 3 in Appendix of the Code.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
355 344	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.	A	1	<p>Discussions with the Complex Metering & Laboratory Team Leader indicated that where High Voltage customers have the requirements and annual consumption as specified by clause 3.9(7) of the Metering Code, there are controls in place to ensure that meters installed meet the relevant accuracy requirements of a Type 3 Meter.</p> <p>As per Table 3 of Appendix 1 of the Metering Code, the accuracy requirement for CT/VT meters installed for Type 3 meters is 0.5. Review of the Metering Technical Requirements Manual and Specifications of all High Voltage Meters installed by Western Power, revealed all meters have 0.5 accuracy reading and therefore meet the accuracy requirements of Type 3 meters as required by the Metering Code. In addition to this, testing is performed on meters during the tender evaluation phase prior to being approved for use, as well as in accordance with the Metering Management Plan to ensure that accuracy of the meters is maintained after installation has occurred.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
357 346	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.	A	1	<p>Discussions held with the Complex Metering & Laboratory Team Leader revealed that all meters installed by Western Power are approved in accordance with the National Measurement Institute section M6 and Australian standards.</p> <p>Testing of meters in accordance with the standards are performed during testing undertaken during the 'tender evaluation' phase to ensure that all programmable functions in relation to the resolution of displayed or stored data are in accordance with any prescribed requirements under the Western Australian Metrology Procedure and Metering Code.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
360 349	Electricity Industry Metering Code clause 3.11(3)	A Code participant who becomes aware of an outage or malfunction of a metering installation must advise the network operator as soon as practicable.	A	1	<p>Discussions held with the Metering Branch revealed that Western Power has B2B systems and Metering Web Portal which enables Code Participants to communicate an outage or malfunction of a metering installation to the network operator via the service order process defined in the SWIS Communication Rules and the associated Build Pack as soon as practicable.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
361	Electricity Industry Metering Code clause 3.11A(1)	A network operator must ensure that the meters on its network are systematically sampled and tested for accuracy in accordance with AS 1284.13.	A	1	<p>Discussions held with Western Power revealed that the Metering Management Plan was developed to systematically sample and test meters installed on its network for accuracy in accordance with AS 1284.13.</p> <p>After reviewing the document on Western Power's website it was noted that the Metering Management Plan provides details on its system to ensure that meters register within the margin of error referred to in section 41 (3) of the Electricity Act 1945 and that the plan complies with the requirements of the Australian Standard.</p> <p>Further, review of the In-Service Testing Summary provided by Western Power confirmed that meters on its network are systematically sampled and tested for accuracy in accordance with AS 1284.13</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
363 350	Electricity Industry Metering Code clause 3.12(1)	A network operator must ensure that each metering installation complies with at least the prescribed design requirements.	A	1	<p>Discussions with the Complex Metering and Laboratory Team Leader revealed that Western Power has policies and procedures in place to ensure that all metering installations conducted by Western Power are in compliance with clause 3.21(1) of the Metering Code.</p> <p>For all installations which take place, whether relating to high or low voltage metering installations, both the Western Australian Distribution Connection Manual and High Voltage Design Technical Requirements act as a guide for performing installations in accordance with the design requirements prescribed by the Metering Code. In addition, all installations of meters for high voltage users must be reviewed and approved by the Complex Metering and Laboratory Team to further ensure compliance.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
364 351	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.	A	1	<p>Discussions with the Complex Metering and Laboratory Team Leader revealed that Western Power utilises the Western Australian Distributions Connections Manual, the Western Australian Electricity Requirements and High Voltage Commissioning Sheet to ensure that all installations of CT/VT (instrument) transformers are performed in accordance with the relevant requirements of the Metrology Procedure and Australian Standard.</p> <p>Furthermore, where instrument transformers are installed for high voltage meter installations, completion advices must be completed and approved by Western Power to ensure that there is compliance with the requirements of the Metering Code.</p> <p>Sample based testing revealed that for high voltage installations which occurred during the audit period, installations were accompanied by a completion advice which reconciled to the information within MBS.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
365 352	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.	A	1	<p>Discussions held with the Complex Metering and Laboratory Team Leader revealed that Western Power utilises the Western Australian Electrical Requirements Manual, the Western Australian Distribution Connections Manual and High Voltage Transmission and Generation Metering Guidelines in metering design considerations to ensure that isolation facilities are provided in accordance with the Australian Standard.</p> <p>Review of metering specifications and designs for both low and high voltage metering installations, identified that Western Power provides isolation facilities in the form of an SPD and Fuse Isolations Switches respectively.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
366 353	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.	A	1	<p>Discussions with the Complex Metering and Laboratory Team Leader revealed that drawings in relation to metering installation arrangements, as depicted within the Western Australian Distributions Connection Manual and High Voltage Transmission and Generation Metering Guidelines are maintained within the Western Power Corporate Filing System (DM) for maintenance and auditing purposes.</p> <p>Reviews of drawings obtained from Metering Services were reconciled to drawings included within the documents mentioned above with no variations noted.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
367 354	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.	A	1	<p>Discussions held with the Complex Metering and Laboratory Team Leader revealed that full check meters are installed where all Type 1 and Type 2 metering installations are required for high voltage users.</p> <p>Western Power utilises the High Voltage Transmission and Generation Metering Guidelines to ensure that check meters are installed in accordance with the metrology procedure and Australian Standard. Furthermore, all metering installations for high voltage services must be approved by the Head of Metering on a project basis.</p> <p>Sample testing of high voltage meter installations during the period revealed that all installations tested had both a revenue and check meter installed in accordance with the prescribed requirements.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
368 355	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.	A	1	<p>Discussions held with the Complex Metering and Laboratory Team Leader revealed that full check meters are installed for Type 2 metering services, However, in the event that a partial check meter is installed, Western Power will utilise the High Voltage Transmission and Generation Metering Types and the High Voltage Technical Requirements documents to ensure that they are installed in line with 'good electricity industry practice'.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
369 356	Electricity Industry Metering Code clause 3.13(4)	A check metering installation for a metering point must comply with the prescribed requirements.	A	1	<p>Discussions held with the Complex Metering and Laboratory Team Leader revealed that for all instances where revenue and check meters are installed for Type 1 and 2 meters, the same model of meters are used. This helps to ensure that both meters meet the prescribed requirements of the Metering Code.</p> <p>All meter types installed for use, are tested during the 'tender evaluation phase' with Western Power utilising the Metering Technical Requirement documents to further ensure compliance with the Metering Code</p> <p>Sample based testing was performed which indicated that for high voltage installations which were tested during the year, both revenue and check meters installed were the same model which complied with the Metering Code.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
370 357	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.	A	1	<p>Discussions held with the Complex Metering and Laboratory Team Leader revealed that there were no instances during the period where metering installations using metering class CTs and VTs required to be adjusted to ensure accuracy requirements specified within Table 3 in Appendix 1 of the Metering Code prior to installation. Western Power provided that all meter models used for installation were tested during the tender evaluation stage to ensure that all prescribed accuracy requirements were met.</p> <p>Furthermore, meters are tested subsequent to installation in accordance with the Metering Management Plan to ensure the accuracy requirements are maintained in line with the Metering Code.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
371 358	Electricity Industry Metering Code clause 3.16(1)	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.	A	1	<p>Discussions held with the Complex Metering and Laboratory Team Leader revealed that meters utilised for Type 1 – 5 metering installations are tested during the tender evaluation phase to ensure that all meters installed have the facilities and functionality requirements prescribed by the Metering Code.</p> <p>Review of specifications of meter models installed for Type 1 – 5 metering installations revealed that the facilities and functionality requirements were met and that testing of meters installed was performed in accordance with the Metering Management Plan to ensure that meters were still operating effectively.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
372 359	Electricity Industry Metering Code clause 3.16(2)	The network operator must ensure that a Type 1 metering installation to Type 4 metering installation on the network includes a communications link.	A	1	<p>Discussions held with the Complex Metering and Laboratory Team revealed that for all Type 1-4 metering installations, a completion advice which records the 'remote mobile phone number' assigned to all communications link devices is forwarded to the Metering Services Team so information can be recorded within the MBS system.</p> <p>Subsequent to the installation of such meters, data is extracted using the communications link on a regular basis through the MV90 system which allows Western Power to further monitor any instances where communication links for such metering installations are not operational.</p> <p>Sample based testing revealed that for all Type 1-4 metering installations tested, mobile phone numbers were included within the MBS system, indicating that communication link devices had been installed.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
374	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.	A	1	<p>Discussions held with Western Power personnel and review of the Metering Technical Specifications document revealed that metering installations collated data in sub multiples of the trading interval.</p> <p>Further enquires and sample based testing indicated that where Western Power has provided energy data to a Code participant, energy data was aggregated into the trading intervals specified by the Metering Code.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
376 364	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.	A	1	<p>Discussions held with the Complex Metering and Laboratory Team revealed the existence of processes to ensure that requests made by Code participants to provide enhanced technology in metering installations are adhered to.</p> <p>Requests made for enhanced technology features such as signal outputs, bi-directional recording facilities and communications links are received through MBS from retailers after requests have been made by customers. MBS will generate a service order which the metering data centre team will only close off once a completion advice form is received. Completion advice forms are sent through by Metering officers once a service order requests has been attended to.</p> <p>Sample based testing revealed that in instances where such requests had been made, Western Power ensured that the enhanced technology features requested for a metering installation had been provided.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
379 367	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.	A	1	<p>Discussions with the Complex Metering and Laboratory Team and a review of the Revenue Meters Technical Specifications Guide revealed that data loggers utilised by Western Power have the ability to store information for the prescribed timeframes. Where meters with communication links have been installed, data is stored for at least 35 days and where meters with no communication links have been installed, data is stored for at least 200 days which is in line with the requirements of the Metering Code.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
380 368	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.	A	1	<p>Discussions with the Complex Metering and Laboratory Team revealed that all meters purchased are accompanied by the relevant software and licenses for Western Power to utilise the enhanced technology features of the meters. This allows the metering team to program the devices installed and set parameters based on the needs of the individual users.</p> <p>Western Power is responsible for determining who is provided access to its metering software to ensure only authorised personnel have access to program and set parameters within metering installations. Those who are granted access however are only granted 'read only' access to further ensure the security of the information.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
381 369	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.	A	1	<p>Discussions with the Complex Metering and Laboratory Team revealed that all meters are installed with electronic buffers and relays to ensure that any attempt to damage the meter maliciously or accidentally through the signals provided will not result in damage to the meter. This is verified through testing performed at the tender evaluation process for all meters utilised by Western Power.</p> <p>Enquiries indicated that there had been no instances within the audit period where accidental or malicious damage had occurred to the meter through the tampering of devices attached to metering signals.</p> <p>For all instances where requests are made for signals to be provided, it was noted that upon installation, the crew member undertaking the installation will provide the user with the relevant specification details to enable compliance with clause 3.23(c).</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
382 370	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(c) of the Code.	A	1	<p>Discussions with Western Power personnel revealed that all meters are installed with electronic buffers and relays to ensure that any attempt to damage the meter maliciously or accidentally through the signals provided will not result in damage to the meter. This is verified through testing performed at the tender evaluation process for all meters utilised by Western Power.</p> <p>Enquiries indicated that there had been no instances within the audit period where accidental or malicious damage had occurred to the meter through the tampering of devices attached to metering signals.</p> <p>For all instances where requests are made for signals to be provided., it was noted that upon installation, the crew member undertaking the installation will provide the user with the relevant specification details to enable compliance with clause 3.23(c).</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
371	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.	A	1	<p>Discussions with Western Power personnel revealed that it had operated and maintained those pre-payment meters on its network like any other metering installation.</p> <p>The Electricity Industry Metering Code 2005 was revised and has since been replaced with the Electricity Industry Metering Code 2012. Review of the 2012 Code noted the removal of clauses 3.24 and 3.25, thus there is no ongoing obligation in this regard.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
387 374	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.	A	1	<p>Walkthrough of the data maintained in MBS with Meter Services confirmed the existence of a data base that, for each metering point on its network, contained:</p> <ul style="list-style-type: none"> • a registry containing standing data for a metering point; and • energy data for the metering point being either accumulated or interval energy data, for the respective meter installations. <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
388 375	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.	A	1	<p>Discussions held with the Complex Metering and Laboratory Team Leader revealed that there are security measures in place to restrict access to the metering database from unauthorised users.</p> <p>In order to obtain access to the metering database, requests must be made using an MBS application form which must be approved by the head of Metering Services. Access will only be approved where considered absolutely necessary. Western Power has developed a password authority level matrix on its metering database and implemented a signature authority list for MBS to ensure approval to the metering database is only provided by the appropriate personnel.</p> <p>Furthermore, passwords are changed on a regular basis and MBS prevents access to the system if they have failed to log in after three attempts. Unauthorised access can be detected where the system is accessed by someone not listed on the password authority level matrix.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
390 377	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.	A	1	<p>Based on a walkthrough of the data maintained in MBS with Metering Services and review of 8.3.1 of the Market Rules, we determined that the registry within MBS contained at a minimum the required information.</p> <p>It is understood that MBS has been designed to record and report automatically the required information to Market Participants.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
391 378	Electricity Industry Metering Code clause 4.3(1)	The standing data for a metering point must comprise at least the items specified.	A	1	<p>Walkthrough of MBS and review of sampled data confirmed the existence of the items specified under table 2 for standing data for a metering point.</p> <p>Discussions with Western Power also revealed that MBS is configured to capture the Metering Code requirements. It is understood that MBS has undergone a number of upgrades, however, the standing data composition continues to reflect the designated source of standing data that is required to be contained in the registry.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
392 379	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.	A	1	<p>Discussions with the Finance, Treasury and Risk Team revealed that Western Power has systems and processes in place to determine the most appropriate way to resolve a discrepancy between the energy data held in a metering installation and data held in the metering database.</p> <p>Western Power resolves any discrepancy raised by a Code participant through a B2B process. Metering Services will investigate the discrepancy through field enquires and system interrogation.</p> <p>Walkthrough of the process revealed that Western Power engages with the Code participant to resolve the discrepancy.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
393 380	Electricity Industry Metering Code clause 4.5(1)	A Code participant must not knowingly permit the registry to be materially inaccurate.	A	1	<p>Discussions with the Finance, Treasury and Risk Team revealed that Western Power run exception and health check reports on a daily basis within MBS and any discrepancies found are investigated.</p> <p>Further, we noted that MBS has built-in security controls that do not permit registry access to unauthorised users. MBS also has a built-in audit trail functionality to track any amendments made to the registry.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
395 382	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..	A	1	<p>Discussions with the Finance, Treasury and Risk Team revealed that when Western Power is notified of a change to or inaccuracy in an item of standing data by a Code participant then Western Power will update MBS to reflect this change.</p> <p>Walkthrough of the process demonstrated that Western Power receives a service order from the retailer on behalf of the customer to update standing data. The service order would then be validated and updated within MBS.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
396 383	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.	A	1	<p>Discussions with the Finance, Treasury and Risk Team revealed that Western Power receives a service order from the retailer on behalf of the customer to update standing data. The service order is then validated and updated within MBS. Where validation results in an exception the Basic Meter Team will investigate and in some instances field officers may be required to visit the site.</p> <p>Review of communication between to the retailer and Western Power confirmed investigations were carried out to the standard of good electricity practice and MBS was updated as a result of the investigation.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
398 385	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.	A	1	<p>Discussion with the Complex Metering and Laboratory Team Leader revealed that Western Power has processes in place to allow retailers and generators remote access to energy data.</p> <p>Requests for such access are made to Western Power using service orders which are received through MBS. Once orders are received, the necessary actions will be undertaken to ensure that 'read only' access; which is restricted by a specific username and password, is provided to the user making the request. Metering personnel will seek clarification from the Accounts Manager to ensure that the user requesting access has the rights to such access.</p> <p>Sample based testing confirmed that Western Power only provides 'read-only' access to its metering points for users that have a current access contract with Western Power.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
399	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.	A	1	<p>Discussions with Western Power revealed that there are processes and systems in place that allow a retailer or generator to have access to data held in its metering points and its associated connection points.</p> <p>We note that retailers and generators utilise the Metering Web Portal to have access to Western Power’s metering database.</p> <p>Further, we understand that Western Power utilises a B2B gateway with Synergy which allows MBS to talk directly to Synergy’s Billing System.</p> <p>Review of the access control matrix for both the gateway and Web Portal revealed that all retailers and generators only have “read only” access.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
400 386	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	A	1	<p>Discussions with Western Power staff revealed that there are processes in place to ensure that energy data held in its metering installation is secured from unauthorised local access or remote access, by electronic password and electronic security controls which are sufficient to the standard of good electricity practice.</p> <p>Review of the authorisation matrix confirmed that an electronic password is required to access the metering software and every time the meter is probed.</p> <p>Further, we noted that each meter is protected by a seal and outer casing that protects the meter from unauthorised access.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
401	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.	A	1	<p>Discussions held with the Complex Metering and Laboratory Team Leader revealed that Western Power has security measures in place to restrict access to the metering database from unauthorised users.</p> <p>In order to obtain access to the metering database, requests are made using an MBS application form which is to be approved by the Head of Metering Services. Access will only be approved where considered absolutely necessary. Western Power has developed a password authority level matrix on its metering database and implemented a signature authority list for MBS to ensure approval to the metering database is only provided by the appropriate personnel.</p> <p>Furthermore, passwords are changed on a regular basis and MBS prevents access to the system if they have failed to log in after three attempts. Unauthorised access can be detected where the system is accessed by someone not listed on the password authority level matrix.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
402 387	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.	A	1	<p>Discussions with Western Power personnel revealed that there are processes in place to ensure that electronic passwords and other electronic security controls are only issued to the specified authorised personnel and keeps its record of electronic security controls secure from unauthorised access.</p> <p>Western Power personnel are required to be issued with a network login and given access by IT personnel to the Metering Database. Further, it is to be noted that MBS requires passwords to be changed on a regular basis and the system will lock the user after three failed logon attempts.</p> <p>Review of the electronic password matrix for Western Power's metering installation and database revealed that only authorised personnel have access to these systems.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
403 388	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.	A	1	<p>Discussion with Western Power personnel revealed that energy data is recorded within MBS and retained for an infinite period. It is understood that all data maintained within MBS is readily accessible and has been available since the creation of the system.</p> <p>MBS does not have an archive function and, therefore, the retention of data exceeds the prescribed time limits. Sample based testing confirmed the existence of energy data in a readily accessible format for at least 7 years which is longer than the 5 years and 11 months prescribed under clause 4.9(b).</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
404 389	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.	A	1	<p>Discussions with the Commercial Services Team Leader revealed that Western Power is currently negotiating a SLA with Synergy. Review of monthly B2B meeting minutes revealed that negotiation of the SLA is facilitated through these meetings. This process demonstrates that Western Power uses all reasonable endeavours to accommodate another Code participant's requirement to obtain a metering service and requirements in connection with the negotiation of a SLA.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
405 390	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.	A	1	<p>Discussions with the Commercial Services Team Leader revealed B2B meetings occur on a monthly basis with Synergy to negotiate terms on the draft SLA. Further, Western Power engages external legal consultants to review the changes in the SLA that had been negotiated with Synergy.</p> <p>Review of the draft SLA and B2B meeting minutes demonstrated that Western Power has negotiated its terms in good faith.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
408	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.	A	1	<p>Discussions with Metering Services revealed that whilst customers have contacted Western Power and provided a meter reading, these reading are not used in any form.</p> <p>Meter readings will only be accepted from those who have been appropriately trained in and possess the suitable skills to conduct a meter read in accordance with good electricity practice.</p> <p>It is understood that only meter readings provided by approved and appropriately trained meter readers are accepted for regional locations.</p> <p>Our enquiries made with contractors re-affirmed that only those who have been appropriately trained and assessed as competent in the reading of meters are permitted to do so.</p> <p>Only those meter reads as provided by approved meter readers is utilised and deemed to be an actual value where it passes validation.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
410	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.	A	1	<p>Discussions with the Finance, Treasury and Risk Team revealed that Western Power does not charge for the provision of standing data or historical consumption data requests relating to period of 0 – 12 months. Whereas, a fee of \$49.50 ex GST is charged for the provision of historical consumption data relating to a period between 13 – 24 months.</p> <p>Sample based testing revealed that Western Power is applying charges in accordance with the applicable model SLA.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
411 394	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.	A	1	<p>Discussions with the Finance, Treasury and Risk Team revealed that Western Power does not impose a charge for the provision of standing data and energy data if another enactment prohibits it.</p> <p>Sample based testing revealed that Western Power only imposes charges in accordance with its model SLA.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
413 397	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.	A	1	<p>Discussions with Western Power and walkthrough of the replacement data process identified that, in the event replacement energy data is inserted into MBS, this data is made available to the market (the user for the metering point and the IMO) on the same day.</p> <p>The timeliness by which this activity is undertaken is noted to exceed the minimum 2 business day requirement.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
414 398	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.	A	1	<p>Discussions with the Complex Metering & Laboratory Team Leader revealed Western Power provides information to the user through various avenues to enable users to comply with obligations in the time frame specified by the Metering Code.</p> <p>The number of avenues includes B2B transactions, Metering Services Web Portal, Western Power Contact Call Centre Communications, Direct Response via email and telephone. Furthermore, regular B2B meetings are held with the retailer as a forum to discuss any areas of concern in relation to compliance with the Metering Code.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
415 399	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.	A	1	<p>Discussions with Western Power and walkthrough of the processes employed to provide or obtain standing data revealed the existence of an automated process within MBS.</p> <p>Sample based testing confirmed that Western Power did provide users standing data in accordance with any enactment. Western Power also has mechanisms in place to supply general information at no charge as required under clause 10.6 of the Code of Conduct.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
417 401	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.	A	1	<p>Walkthrough of the mechanisms by which Western Power provides an incoming retailer with a copy of the standing data for each metering point associated with the connection point within the 2 business days.</p> <p>The provision of standing data to incoming retailers is facilitated through the MBS in accordance with the established Standing Data Procedure. Sample based testing of standing data updates provided after a transfer has occurred did not reveal any exceptions.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
419 403	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.	A	1	<p>Discussions with Western Power personnel revealed that there are processes in place to provide the current user with a complete set of standing data for a metering point and advise whether there was a communication link within the timeframes prescribed.</p> <p>Sample based testing and review of the communication rules confirmed that Western Power provides a user with a full set of standing data within the timeframes specified by the Metering Code.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
420 404	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.	A	1	<p>Discussions with the Customer Relations Manager revealed that there were processes in place to ensure that bulk standing data requests were attended to in the time frame specified within the Communication Rules.</p> <p>Walkthroughs of the request process found that Western Power receives all requests for bulk standing data through MBS or directly through a web portal. The Customer Relations Manager then validates the request before contacting IT to compile the information. It will then be manually delivered to the requesting user given the size of the information will prohibit it from being sent through the avenues requested.</p> <p>Sample based testing revealed that those requests made during the period were made in line with the time frames specified within the Communication Rules.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
421 405	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.	A	1	<p>Discussions with the Finance, Treasury and Risk Team revealed that Western Power has processes in place to support compliance with this licence obligation.</p> <p>Review of NEM12 and NEM13 files sent to the IMO revealed that the files include the date of the meter reading in accordance with the requirements specified.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
424	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).	A	1	<p>Discussions with the Finance, Treasury and Risk Team revealed that Western Power has systems and processes in place to provide data from its metering database to a third party customer if it has been given the direction to do so that complies with subclause 5.17A(2).</p> <p>Western Power receives email notification from the third party with a consent form attached that is then entered into the EDAAS system. Once the consent data and information has been entered the requested information is provided to the third party.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
430 413	Electricity Industry Metering Code clause 5.19(5)	A network operator must give notice to a user, or (if there is a different current user) the current user, acknowledging receipt of any customer, site or address attributes from the user within the timeframes prescribed.	A	1	<p>Discussions with Western Power personnel revealed that there are processes in place to ensure that a notice is given to a user, acknowledging receipt of a customer and the site or address attributes from the user within the timeframes prescribed.</p> <p>We noted that notifications are provided to users through an automated functionality within MBS. Walkthrough of the process confirmed that Western Power gave notice to a user acknowledging the receipt of customer attributes or site address within 1 business day after receiving the information and address attributes from the user within 15 business days after receiving the information.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
432 415	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.	A	1	Walkthrough of the data verification process and review of the Energy Data Verification Request Form revealed that the form has been developed in accordance with the Communication Rules. Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.
433 416	Electricity Industry Metering Code clause 5.20(2)	An Energy Data Verification Request Form must require a Code participant to provide the information prescribed.	A	1	Review of the Energy Data Verification Request Form and walkthrough of the data verification process revealed that the form requires the Code participant to provide the prescribed information. Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.

	Feb 2013	Feb 2013	Compliance Rating		Observation
435 418	Electricity Industry Metering Code clause 5.21(2)	A network operator must comply with any reasonable request under subclause 5.21(1).	A	1	<p>Discussions with the Complex Metering and Laboratory Team Leader revealed that Western Power has procedures in place to ensure that it complies with test requests made by Code participants under sub clause 5.21(1).</p> <p>Western Power receives requests made by Code participants through service orders created by retailers through the MBS system. Once service orders are received, the metering team will undertake the necessary steps to carry out testing.</p> <p>Once testing is complete, a 'Test Request' form which details the results of testing is sent to the Commercial Services Team Leader who updates MBS to reflect that testing has been performed and close the service order.</p> <p>Review of the Generic Meter Performance Test Sheet, which outlines the policies and procedures for testing meters, revealed that testing was performed in accordance with the Metrology Procedure.</p> <p>Sample based testing revealed that testing performed on metering installations made by Code participants was performed in accordance with the SLA.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
439 422	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.	A	1	<p>Discussions with Western Power staff revealed that there are processes in place to ensure a charge is not imposed for the testing of a metering installation or audit in accordance with the applicable SLA.</p> <p>Sample based testing confirmed that a charge was not imposed for test or audit of a meter that was not compliant with the Model SLA. Walkthrough of the billing process revealed a number of checks are undertaken to ensure the user is only imposed a charge in accordance with the SLA.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
440 423	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.	A	1	<p>Review of the Model SLA revealed the existence of a clause that no charge is to be imposed if the test or audit results in a non-compliance with the Metering Code.</p> <p>Sample based testing of meter tests that had been conducted during the audit period revealed that where a meter was deemed to be non-compliant no fee was charged.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
441 424	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.	A	1	<p>Discussions with the Complex Metering and Laboratory Team Leader revealed in cases where tests have revealed that the accuracy of the metering installation does not meet the requirements of the Metering Code, Western Power will utilise the Notification of Affected parties for Non-Compliant Metering Installations document to ensure that all relevant affected parties are notified.</p> <p>Western Power receives requests for the testing of metering installations made by customers via service orders created by retailers through MBS. Once service orders are received, the metering team will undertake the necessary steps to carry out testing.</p> <p>On the completion of a ‘Test Request’ form which details the results of testing, it is sent to the Commercial Services Team Leader so MBS can be updated accordingly. When MBS is updated, this will advise the retailers of the possible non-compliance as well as the actions which will be undertaken to rectify the problem. The retailers are responsible for notifying the respective customer.</p> <p>Where meters are found to be non-compliant, Western Power will replace the metering installation as per the SLA.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
442 425	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.	A	1	<p>Discussions held with the Complex Metering and Laboratory Team Leader revealed that no amendments are made to original stored error correction data within a meter.</p> <p>Furthermore, no meters are calibrated during testing to ensure that a true test of a meter is performed. This is in line with the information outlined within the Generic Meter Performance Test Sheet which details the policies and procedures for testing meters.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
444 427	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.	A	1	<p>Discussions with staff revealed that check metering data, where available, is used to validate energy data where check metering data has been appropriately adjusted for differences in metering installation accuracy in accordance with sub clause 3.13.</p> <p>Sample based testing and review of daily validation reports confirmed that Western Power validates energy data against check metering data in accordance with sub clause 5.22(2).</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
445 428	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.	A	1	<p>Discussions with the Finance, Treasury and Risk Team revealed that Western Power has the processes and systems in place to prepare substitute values using methods contained in Appendix 3.</p> <p>Walkthrough of MBS functionality revealed that the substitution methods outlined in Appendix 3 were built into the system. Sample based testing confirmed that where check meters are not available or energy data cannot be recovered then Western Power prepare substitute values using a method contained in Appendix 3.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
446 429	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.	A	1	<p>Walkthrough of the data validation process revealed that MBS compares basic meter read data to historical data and if the comparison results in an abnormality then it is identified within an exception report.</p> <p>For interval data, MV90 has built in functionality to identify exceptions in interval data. This exception will then be flagged for further investigation by an Analyst.</p> <p>Sample based testing confirmed that Code participants were found to be notified within 24 hours after the detection.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
447 430	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.	A	1	<p>Walkthrough of the substitution process revealed that MBS has built in functionality that allows for the estimation or substitution of energy data in the circumstances described in this sub clause.</p> <p>Further, Western Power runs an exception report daily to identify where energy data is missing, unavailable or corrupt. Review of the exception report confirmed that substitution or estimation of energy data is required in the circumstance described.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
448 431	Electricity Industry Metering Code clause 5.22(6)	A network operator must review all validation failures before undertaking any substitution.	A	1	<p>Walkthrough of the validation process revealed that for basic meters, MBS, and for interval data, MV90 has a built in functionality that will flag where meter reads are outside the desired tolerance. This will then require an Analyst to review the failure and undertake the appropriate substitution.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
449 432	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.	A	1	<p>Walkthrough of the substitution process revealed where there are instances of a communication failure with a meter and there is no possibility of determining an actual value for a metering point, then Western Power designates an estimated or substituted value to be a deemed actual value for the metering point.</p> <p>Review of MBS and NEM files confirmed that Western Power determines estimated or substituted energy data to be the actual value of the metering point where there is no possibility of identifying an actual value for a metering installation.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
450 433	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.	A	1	<p>Discussions with Western Power staff revealed that there are processes in place that provide for repairs to be undertake or replacement to be made to metering equipment where a deemed actual value has been designated for a metering point. Further, the deemed actual value assigned is a substituted or estimated value in accordance with sub clause 5.24(3) and 5.24(4).</p> <p>Sample based testing confirmed that when a deemed actual value was designated the metering equipment was replaced.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
451 434	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.	A	1	<p>Discussions with the Finance, Treasury and Risk Team revealed that an actual read can be replaced with a better quality actual read in the event a Field Officer incorrectly takes a reading of a basic meter. In the case of an interval meter, an actual read is replaced with a deemed actual value when the actual read is determined to be inaccurate.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
452 435	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.	A	1	<p>Discussions with the Finance, Treasury and Risk Team revealed that MBS will automatically detect errors in deemed actual reads through an exception report. These reads are then investigated by an analyst and replaced with a better quality deemed actual value.</p> <p>Review of MBS confirmed that Western Power replaces the first value with the second value in doing so, consistent with good electricity industry practice.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
453 436	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.	A	1	<p>Discussions with Western Power personnel revealed that MBS has the functionality to identify exceptions. This exception report requires human intervention and where the Analyst determines that there is a better quality actual, deemed, estimated or substituted value available will replace the first value with the second value.</p> <p>Sample based testing of meter reads where the read is determined to be erroneous confirmed that Western Power will use a better quality deemed actual value, estimate of substitute to replace the first estimated or substituted value.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
454 437	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.	A	1	<p>Discussions with the Finance, Treasury and Risk Team revealed that a Code participant may request the replacement of estimated or substituted data through email. The readings are then investigated and a decision made as to either accept or reject the request to replace the estimated or substituted reading.</p> <p>Further, we understand that Western Power participates in B2B meeting with the retailer regarding any areas of concern. This is also a forum where requests for the replacement of data may be made.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
455 438	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.	A	1	<p>Review of the Australian Energy Market Operator Metrology Procedures and MBS specifications revealed that Western Power undertakes validation and exception reporting activities on a daily basis to ensure any transformation or processing of data preserves its accuracy in accordance with the metrology procedure.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
472 448	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.	A	1	<p>Discussions with the Commercial Services Team Leader revealed that Western Power makes contact information available through its website. Review of the company website, identified that details are provided to Code participants which allow communication via, post, e-mail (electronically), facsimile and telephone.</p> <p>Further Code participants are able to communicate electronically with Western Power through the Metering Service Centre Web Portal and B2B gateway.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
483 459	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.	A	1	<p>Walkthroughs were conducted with the Systems Analyst Team of the procedures and processes to ensure that electricity supply provided to customers electrical installations comply with the prescribed standards.</p> <p>As prescribed by the Code, Western Power is to ensure that disturbances or distortions are not in excess of limits allocated on a customer basis. All limit allocations are assigned in accordance with the Code. To ensure that disturbances and distortions are kept at a minimum, devices known as Ametek Recorders as well as ION are employed throughout the network, enabling any excess distortions to be identified and the remedied by the Systems Analyst Team.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
484 460	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.	A	1	<p>Discussions with the Network Operations Team revealed that Western Power has processes and systems in place to disconnect the supply of electricity to installations or property in the specified circumstances, unless it is in the interest of the customer to maintain supply.</p> <p>Review of emergency management procedures confirmed that Western Power will disconnect supply in the event an emergency has been identified and has processes in place to isolate and disconnect the installation or property.</p> <p>Further, enquires revealed that Western Power has protection switches on its network that prevent the network from overload.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
485 461	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.	A	1	<p>Discussions with the Network Operations Team revealed that Western Power has processes and procedures in place to ensure that the supply of electricity is maintained and the occurrence and duration of interruption is kept to a minimum.</p> <p>Further, we understand that Western Power has emergency management plans and fault processing procedures in place to isolate an incident as soon as practicable to ensure that electricity is restored to customers as a priority.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
486 462	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.	A	1	<p>Discussions with the Network Operations Centre and walkthrough of the priority restoration process we understand that Western Power has identified a number of work practices that enable it to reduce the effect of any interruption on a customer.</p> <p>A review or a sample of interruptions was performed and it was observed that Western Power had deployed within a timely manner, responses to unplanned interruptions such as field crews and emergency response crews. The purpose of which was to attend to the danger presented and restore supply as soon as it was safe and practicable. Due consideration was also demonstrated to have been given to those customers identified as sensitive loads or registered as having life support equipment at their supply address.</p> <p>Walkthrough of the planned interruption process and related activity noted that further consideration had been given to re-routing the source of supply of electricity to minimise the extent of the interruption (through its switching capability). Western Power identified that, in the instance where planned or unplanned work would cause a significant interruption, alternative means of supply of electricity would be mobilised (emergency generator response).</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
487 463	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.	A	1	<p>Discussions held with the Network Operations Centre and depot staff revealed that Western Power has in place work instructions that prohibit the conduct of planned interruptions where it has identified that the forecasted temperature meets or exceeds the identified range.</p> <p>Walkthrough of the Planned Interruption Process confirmed the existence of the aforementioned instruction. Review of a sample of DNARs identified consideration had also been given to the anticipated length of planned interruption.</p> <p>Enquiries revealed that Western Power does have the capability to provide an alternative means of electricity to those customers who were affected by a planned interruption. Examples were sighted where Western Power is able to switch the source of supply of electricity through its automated switching program (a recent addition to Western Power capabilities). Western Power is also able to utilise its own generators or source generators from contractors and can be used to provide an alternative means of electricity to its customers.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
489 465	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.	A	1	<p>Review of the length of interruption data provided by Western Power revealed that it had exceeded the average total length of interruptions of supply as specified by the Code across the following areas:</p> <ul style="list-style-type: none"> • Perth CBD; • Urban area's other than Perth CBD; and • Any other area of the State. <p>Further, the Network Quality Team indicated that Western Power did not meet the service standard benchmarks outlined in the Access Arrangement (2012-2017) for the service average interruption duration index ("SAIDI") for rural long. Our review of the Access Arrangements noted the permitted length of interruptions to be greater than those prescribed within the Code and that the Access Arrangement has been approved by the Authority.</p> <p>Grant Thornton understands that Western Power engaged with the PUO on 27 March 2013 to request an amendment to the <i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005</i>.</p> <p>Western Power provided that the standard was not met due to unforeseen weather events and planned interruptions to its network. Grant Thornton understands that these events are outside Western Power's control.</p> <p>Based on audit procedures performed we have concluded that Western Power has undertaken the necessary actions that 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.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
490 466	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.	A	1	<p>Discussions with staff revealed that Western Power utilise an automated database to calculate the average total length of interruptions of supply.</p> <p>Further, review of the rules within the database that determine the calculation was determined to be in accordance with the specified method.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
495 471	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 21(1)	A distributor operating a relevant distribution system must provide eligible customers with information about applying for payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.	A	1	<p>Discussions with Western Power staff revealed that the Customer Service Team is able to provide customers with the information required under section 21 of the Code.</p> <p>Further, review of Western Power's website revealed that customers are able to source the information about applying for payments for the failure to meet the requirements under section 18 and 19 of the Code.</p> <p>Review of service standard payments made within the audit period revealed that application forms had been completed by customers and payments made.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
498 474	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.	A	1	<p>Discussions with the Network Performance Monitoring and Benchmarking Team revealed that Western Power has processes in place to monitor its network to ensure compliance with Electricity Industry (Network Quality and Reliability of Supply) Code 2005.</p> <p>Review of the data obtained from the system is used to produce Western Power's Annual Reliability and Quality Report which facilitated Western Power's compliance with the reporting requirement under section 27 of the Electricity Industry Code.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
499 475	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.	A	1	<p>Discussions with the Network Operations Branch revealed that Western Power has processes in place to retain data in regards to compliance for at least five years.</p> <p>Western Power utilises a system called "PI Historian" to keep records for up to a five year period.</p> <p>Sample based testing confirmed that information in regards to compliance had been retained for at least five years.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
502 478	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 25(2)	A distributor or transmitter must make available, at no cost, a copy of a document setting out its complaint handling processes to a small customer who makes a complaint to the distributor or transmitter or who asks to be given such information.	A	1	<p>Discussions with the Complaints & Resolution Team Leader revealed that the complaints handling process can be located in the Customer Charter on Western Power's website. Further, if a customer does not have access to the internet a copy of the Customer Charter is sent out to the customer at no charge.</p> <p>Review of Western Power's website and the Customer Charter confirmed that a copy of its complaints handling process is made available to a small customer who makes a complaint to the network operator at no cost.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
503 479	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 25(3)	A document setting out a distributor's or transmitter's complaint handling process must contain the specified information.	A	1	<p>Discussions with the Complaints & Resolution Team Leader revealed that Western Power's Customer Charter and complaints handling process contains the specified information. Further, Western Power provides the specified information as a paragraph in a formal document to the customer as a final response communication.</p> <p>Review of the Customer Charter confirmed that the specified information is included in line with the Code.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

	Feb 2013	Feb 2013	Compliance Rating		Observation
504 480	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 26	A distributor or transmitter must arrange for an independent audit and report on its systems for monitoring, and its compliance with specific requirements. This is to be carried out in respect of the operation of such systems during each year ending on 30 June.	A	1	Discussions with the Regulatory Compliance Manager as well as reviews conducted on the 2013 Annual Report and Audit Report verified that Western Power has controls in place which are both designed and operating effectively to ensure that an independent audit and report on its systems for monitoring is arranged for the time period specified by the Code.
505 481	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 27(1)	A distributor or transmitter must prepare and publish a report about its performance in accordance with specified requirements.	A	1	Discussions with the Regulatory Compliance Manager confirmed that Western Power had prepared and published a report compiled of all information specified by the Code by no later than October 1 st . A review of the Information Checklist utilised which ensured the completeness of the information as well as the date which the 2013 Annual Report was published indicated that Western Power was in compliance with the requirements of its licence obligation.

	Feb 2013	Feb 2013	Compliance Rating		Observation
506 482	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.	A	1	<p>Review of correspondence between Western Power, the Minister and the Authority and walkthroughs with staff indicated that Western Power has fulfilled its obligation to deliver the reports to the parties mentioned, seven days prior to the report being published as specified by the Code.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>
514 490	Electricity Industry Act section 11	The licensee will operate and maintain a trouble call fault management system.	A	1	<p>Discussions with Network Quality Team revealed that Western Power operates and maintains a trouble call fault management system.</p> <p>Further, we understand that the TCS system is supported by five servers, of which three are located in Western Power's East Perth Control Centre and two at Head Office. In the event of an emergency at the East Perth Control Centre, Western Power can ensure TCS continues to operate at Head Office.</p> <p>Based on our audit procedures we have concluded that Western Power has adequate and effective controls in place to support compliance with this licence obligation.</p>

11. Detailed Findings – Compliance Elements which are Non-Rateable

No 2013 2012	Obligation	Description	Compliance Rating	Observation
5 5	Electricity Industry Customer Transfer Code clause 3.1(2)	If a network operator publishes an amended data request form it must comply with Annex 1 or Annex 2 of the Electricity Industry Customer Transfer Code, as applicable.	NP	<p>Discussion with the Area Manager Revenue and the Readings Management Team Leader, accompanied by observation of the current published data request forms revealed that the current forms are in-line with Annex 1 and 2 of the Customer Transfer Code. Any amendments would require the review and approval of management and the Compliance Teams who would ensure that the new forms are in-line with the Annexes.</p> <p>Through inquiry, it was noted that Western Power did not amend its data request form within the audit period.</p> <p>In the absence of audit activity within the audit period, we determined that we could not provide a compliance rating for this licence obligation.</p>
40 40	Electricity Industry Customer Transfer Code clause 4.12(3)	The parties to an access contract must negotiate in good faith any necessary amendments to the access contract arising from certain circumstances.	NP	<p>Discussions with the Access Solutions Team revealed that Western Power has processes in place to negotiate in good faith any necessary amendments to the access contract. Further, no amendments to any access contracts have been required to be made within the audit period.</p> <p>In the absence of audit activity within the audit period, we determined that we could not provide a compliance rating for this licence obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating	Observation
46 46	Electricity Industry Customer Transfer Code clause 5.1(1)	A network operator must submit communication rules to the Authority within six months after the commencement of the Electricity Industry Customer Transfer Code.	NP	<p>Review of the Authority's website and Communication rules revealed that Western Power had published the document after the Authority's approval on the 16 December 2005 in accordance with the Customer Transfer Code.</p> <p>In the absence of activity within the audit period, we are unable to rate the compliance of this licence obligation.</p>
47 47	Electricity Industry Customer Transfer Code clause 5.1(3)	A network operator must take certain action before submitting the communication rules to the Authority.	NP	<p>Discussion with Metering Services revealed that there have been no amendments made to the Communication Rules during the audit period which required a submission to be made to the Authority.</p> <p>As a result of an absence of such activity the requirement under clause 5.1(3) of the Customer Transfer Code has not materialised. In the absence of such activity we are unable to determine the compliance to process in this regard.</p>

No 2013 2012	Obligation	Description	Compliance Rating	Observation
51 51	Electricity Industry Customer Transfer Code clause 6.3(2)	A network operator must notify each retailer of its initial contact details, and any amended contact details at least three business days before the change takes effect.	NP	<p>Discussions with Account Managers revealed that if Western Power was required to change its contact details it would notify each retailer in a timely manner.</p> <p>We noted that Western Power would update its website and send an email communication to each retailer in the event it amended its contact details.</p> <p>Further, enquires revealed that Western Power has not amended its contact detail within the audit period.</p> <p>As a result of an absence of such activity the requirement under clause 6.3(2) of the Customer Transfer Code has not materialised. In the absence of such activity we are unable to determine the compliance to process in this regard.</p>

No 2013 2012	Obligation	Description	Compliance Rating	Observation
55 55	Electricity Industry Customer Transfer Code clause 7.1(1)	For a dispute in respect of a matter under or in connection with the Electricity Industry Customer Transfer Code, any disputing party must meet within five business days of a request from another disputing party and attempt to resolve the dispute by negotiations in good faith.	NP	<p>Discussions with the Account Managers revealed that Western Power has a process in place that addresses the dispute management process in accordance with the Customer Transfer Code.</p> <p>Further, we noted revealed that there is a framework in place whereby the Account Managers will address an issue before it escalates into a dispute. This process includes the Account Managers from the Customer Solutions branch being in continuous contact with the retailers and regular B2B meetings.</p>
56 56	Electricity Industry Customer Transfer Code clause 7.1(2)	If the negotiations in 7.1(1) of the Electricity Industry Customer Transfer Code do not resolve the dispute within 10 days after the first meeting, the dispute must be referred to the senior executive officer of each disputing party who must attempt to resolve the dispute by negotiations in good faith.	NP	<p>Discussions and review of the process document revealed that Western Power has processes in place to support compliance with this obligation. However, enquires revealed that during the audit period there had not been any disputes in regards to the Customer Transfer Code.</p> <p>In the absence of audit activity we are unable to determine the compliance with these licence obligations.</p>

No 2013 2012	Obligation	Description	Compliance Rating	Observation
57	Electricity Industry Customer Transfer Code clause 7.1(3)	If the dispute is resolved, the disputing parties must prepare a written and signed record of the resolution and adhere to the resolution.	NP	
58	Electricity Industry Customer Transfer Code clause 7.2(4)	A disputing party that refers a dispute to the Authority must give notice to the Authority of the nature of the dispute, including specified details.	NP	
59	Electricity Industry Customer Transfer Code clause 7.3(2)	A disputing party must at all times conduct itself in a manner which is directed towards achieving the objectives in clause 7.3(1) of the Electricity Industry Customer Transfer Code.	NP	

No 2013 2012	Obligation	Description	Compliance Rating	Observation
120 120	Distribution Licence condition 13.4 Transmission Licence condition 13.4	A licensee must comply with any individual performance standards prescribed by the Authority.	NP	Discussions with the Regulatory Compliance Manager revealed that the Authority has not prescribed any individual performance standards for Western Power. In the absence of activity within the audit period we are unable to rate the compliance of this licence obligation.
123 123	Distribution Licence condition 15.1 Transmission Licence condition 15.1	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.	NP	Discussions with the Regulatory Compliance Manager as well as a review of the 2013 Financial Statements and Auditors Report did not indicate that Western Power has an issue in regards to its ability to continue as a going concern entity. Therefore no report to the Authority is required as per the licence obligation. In the absence of activity within the audit period we are unable to rate the compliance of this licence obligation.
128 228	Distribution Licence condition 29.3	The Priority Restoration Register must comply with any criteria determined by the Minister.	NP	Discussion with staff revealed that the Minister has not given a direction to Western Power to develop a Priority Restoration Register. In the absence of activity within the audit period we are unable to rate the compliance of this licence obligation

No 2013 2012	Obligation	Description	Compliance Rating	Observation
252 249	Code of Conduct clause 9.5(3)	If a retailer requests a distributor to revert a pre-payment meter under subclause 9.5(2), the distributor must revert the pre-payment meter within the time frames specified in subclause 9.5(3).	NP	<p>Discussions with staff revealed that Western Power has processes in place to revert a pre-payment meter, if a retailer requests, within the time frames prescribed.</p> <p>Further, our enquires revealed that there had not been any requests received from the retailer requesting that a pre-payment meter be reverted.</p> <p>In the absence of activity within the audit period we are unable to rate the compliance of the obligation.</p>
253	Code of Conduct clause 9.6(3)	If a retailer requests a distributor to revert a pre-payment meter, the distributor must revert the pre-payment meter within the time frames specified	NP	<p>Discussions with the Metering Team revealed that there has not been a request from the retailer within the audit period to revert a pre-payment meter.</p> <p>In the absence of activity within the audit period we are unable to determine compliance with this licence obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating	Observation
257 258	Code of Conduct clause 9.9(2)	If requested by a retailer, a distributor must check or test a pre-payment meter.	NP	<p>Discussions with Metering Services revealed that it has not received a request from the retailer to check or test a pre-payment meter. We understand that if meter checks or test was requested, they would be carried out in accordance with existing work instructions used to test or check any other meter on its network.</p> <p>In the absence of activity during the audit period, we are unable to determine compliance against this licence obligation.</p>
319 316	Code of Conduct clause 13.13(1)	A distributor must keep a record of the information related to pre-payment meter customer complaints specified in subclause 13.13(1).	NP	<p>Discussions with the Complaints & Resolution Team Leader revealed that there had not been any complaints related to pre-payment meters within the audit period.</p> <p>Review of the monthly pre-payment meter extracts from NetCIS confirmed that Western Power has not received any complaints in relation to pre-payment meters.</p>
320	Code of Conduct clause 13.13(2)	A distributor must keep a record of the details of each pre-payment meter customer's complaint referred to in subclause 13.13(1).	NP	<p>Due to the absence of audit activity we are unable to rate the compliance of this obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating	Observation
334 327	Code of Conduct clause 14.4(2)	Subject to clause 14.6, a distributor must pay the customer \$20 where the distributor has failed to acknowledge or respond to a written query or complaint within the timeframes prescribed in subclause 14.4(1).	NP	<p>Discussions with the Complaints & Resolution Team Leader revealed that Western Power will pay the customer \$50 if it has failed to acknowledge or respond to a written query or complaint within the timeframes prescribed.</p> <p>Western Power requires a customer to complete a SLA claim form to receive a payment. Review of the SLA claims document revealed that Western Power has not received a SLA claim form where it has failed to acknowledge or respond to a written query or complaint in the timeframes specified.</p> <p>Due to the absence of audit activity within the audit period we are unable to rate this licence condition.</p>
338 330	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.	NP	<p>Enquiries made with the Customer Relations Manager and a review of the Corporation Structure as recorded on the ASIC website indicates that Western Power does have an associate.</p> <p>In order to ensure compliance with the Metering Code, Western Power</p>

No 2013 2012	Obligation	Description	Compliance Rating	Observation
339 331	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.	NP	<p>refrains from engaging in any business related transactions with any of the associates under the Corporate Structure.</p> <p>In the event that Western Power was to engage in a business related transaction. It was noted that the Legal, Commercial and Procurement teams would conduct a review to ensure that all such transactions are performed on an arm's length basis. This is confirmed by the fact every transaction which passes through the commercial team goes through both commercial and legal sign off. Given the absence of activity in regards to the obligation it is deemed to be non-rateable.</p>
356 345	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.	NP	<p>Discussions with Western Power personnel revealed that compensation is only carried out when meters are installed subsequent to electricity passing through active transformers. This is on the basis that once electricity passes through the transformers the voltage reading is reduced.</p> <p>Given that Western Power ensures that all high voltage meter installations are carried out as 'close as practicable to zero', prior to any electricity passing through any such transformers, there are no instances where compensation is undertaken by Western Power. Therefore, this obligation is considered to be non-rateable.</p>

No 2013 2012	Obligation	Description	Compliance Rating	Observation
362	Electricity Industry Metering Code clause 3.11A(2)	Subject to clause 3.11A(3), if a “population” of meters is deemed to have failed under AS 1284.13, the network operator must ensure that all the meters that make up the population are removed and replaced with new meters within 3 years of the testing of the population.	NP	<p>Walkthrough of the sampling and testing process employed by Western Power of meters on its network revealed the existence of a systematic process which aligned to AS 1284.13.</p> <p>Western Power was able to explain the nexus and methodology used to sample and test meters. Observations were made linking the Standard to the testing process.</p> <p>During the audit period, there were no instances where a population of meters were identified as having failed the Standard and required removal and replacement with new meters.</p> <p>As disclosed in the 2009 Performance Audit Report, Grant Thornton understands that there were approximately 320,000 non-compliant direct connect meters on the network. In order to resolve this issue an action plan was developed by Western Power and approved by the Office of Energy Safety, to replace the non-compliant meters by 1st December 2015. Given that the process is observed to be ongoing and the completion date falls outside the scope period of the audit, no further investigation was undertaken by Grant Thornton in respect to this matter.</p> <p>In the absence of activity with regard to clause 3.11A(2) of the Metering Code, we have determined that we could not rate this compliance manual reference obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating	Observation
377 365	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.	NP	<p>Discussion with the Metering Services and review of the applicable SLA revealed that Western Power does not charge Code participants for the provision of metering installations with enhanced technology features.</p> <p>Whilst Western Power has demonstrated that it has the ability and processes to invoice a Code participant, it is understood not to have done so with respect to this licence obligation.</p> <p>In the absence of activity within the audit period we are unable to rate Western Power's compliance in this regard.</p>

No 2013 2012	Obligation	Description	Compliance Rating	Observation
383	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	NP	<p>Discussions with the Complex Metering & Laboratory Team Leader revealed that there have been no retailer requests for Western Power to install a pre-payment meter.</p> <p>However, in the event, that a request is made, it was noted that Western Power will first ensure that a notice has been provided by the Minister in the Government Gazette to ensure that pre-payment meters are approved for installation in the specified area requested and that like all other meters utilised by Western Power, meters will be tested in the tender evaluation stage to ensure the meter meets the specification and performance requirements of the Code. This process demonstrates that a pre-payment meter would be sufficient to enable the retailer to comply with its obligations under the Code of Conduct.</p> <p>In the absence of activity within the audit period we are unable to determine the compliance to process in this regard.</p>

No 2013 2012	Obligation	Description	Compliance Rating	Observation
384	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.	NP	<p>Discussions with Western Power revealed that it has not received a request to replace a pre-payment meter with a non-prepayment meter from a retailer.</p> <p>If such a request was received, Western Power provided that it would be attended to as part of the business as usual which meter exchange is covered by the SLA.</p> <p>In the absence of activity with regard to clause 3.24B(1) of the Metering Code, we have determined that we could not rate this compliance manual reference obligation.</p>
457 440	Electricity Industry Metering Code clause 5.29	If a network operator makes an election under subclause 5.28 in respect of a network, then, (unless the election is terminated under the meter data agency agreement) the parties must undertake the activities prescribed, as applicable.	NP	<p>Discussions with Metering Services revealed that Western Power has not entered into a metering data agency agreement during the audit period therefore an election under clause 5.28 of the Metering Code.</p> <p>Western Power personnel also provided that it did not undertake any activities prescribed under this licence obligation.</p> <p>In the absence of activity with regard to clause 5.29 of the Metering Code, we have determined that we could not rate this compliance manual reference obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating	Observation
458 441	Electricity Industry Metering Code clause 5.30(1)	If a network operator makes an election under subclause 5.28 in relation to the network, then the parties must enter into an agreement in relation to the network, which must deal with at least the matters prescribed.	NP	<p>Discussions with Metering Services revealed that Western Power has not made an election under clause 5.28 during the audit period. Western Power does not have a requirement to enter into a metering data agency agreement in relation to the network.</p> <p>In the absence of activity with regard to clause 5.30(1) of the Metering Code, we have determined that we could not rate this compliance manual reference obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating	Observation
459 442	Electricity Industry Metering Code clause 5.31(1)	If a network operator makes an election under subclause 5.28 in relation to a network, the electricity networks corporation must assess the compliance of each metering installation in the network with this Code and notify the electing network operator of each non-compliant metering installation.	NP	<p>Discussions with Metering Services revealed that Western Power does not act as a metering data agent for any other Code participant. We understand that Western Power and Horizon had put an agreement in writing in December 2011 where Western Power would no longer assess the compliance of each metering installation in the Horizon Network as required by clause 5.31(1) of the Metering Code.</p> <p>We understand that Western Power submitted a proposal to the Office of Energy in 2010 to amend the Metering Code. At the end of the 2012 audit period Western Power was awaiting the outcome of this proposal.</p> <p>Review of the 2012 Metering Code revealed that Western Power was unsuccessful in amending the Metering Code to restrict the application of Division 5.4 limiting Electricity Networks Corporation (“Western Power”) to only be obligated to be a metering data agent for another network operator if the network operator’s network is located within the boundaries of the SWIS.</p> <p>As Western Power no longer acts as a metering agent for any user we are able to rate the compliance of this licence obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating	Observation
460 443	Electricity Industry Metering Code clause 5.31(2)	For each non-compliant metering installation notified under subclause 5.31(1)(b), the electing network operator may, by notice to the electricity networks corporation, require the electricity networks corporation to upgrade a non-compliant metering installation, in which case the electricity networks corporation must undertake the upgrade in accordance with the metering data agency agreement and good electricity industry practice.	NP	<p>Discussions with Western Power revealed that it does not act as a metering data agent for any other Code participant. We understand that Western Power and Horizon had put an agreement in writing in December 2011 where Western Power would no longer upgrade non-compliant meters on the Horizon Network as required by clause 5.31(2) of the Metering Code.</p> <p>We understand that Western Power submitted a proposal to the Office of Energy in 2010 to amend the Metering Code. At the end of the 2012 audit period Western Power was awaiting the outcome of this proposal.</p> <p>Review of the 2012 Metering Code revealed that Western Power was unsuccessful in amending the Metering Code to restrict the application of Division 5.4 limiting Electricity Networks Corporation (“Western Power”) to only be obligated to be a metering data agent for another network operator if the network operator’s network is located within the boundaries of the SWIS.</p> <p>As Western Power no longer acts as a metering agent for any user we are able to rate the compliance of this licence obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating	Observation
461 444	Electricity Industry Metering Code clause 5.34(2)	Except to the extent that the metering data agency agreement provides otherwise, the costs which may be recovered by the electricity networks corporation under subclause 5.34(1) must not exceed the amounts prescribed.	NP	<p>Discussions with Metering Services revealed that Western Power has not entered into an arrangement under clause 5.28 and therefore, a meter data agency agreement does not exist.</p> <p>It is understood that Western Power was not a meter data agency during the audit period.</p> <p>In the absence of activity with regard to clause 5.34(1) of the Metering Code, we have determined that we could not rate this compliance manual reference obligation.</p>
462	Electricity Industry Metering Code clause 5.37(1)(a)	A network operator must for the year ending on each 30 June, prepare a report setting out the information listed in subclause 5.37(2) for each metering service it was requested during the year to provide or scheduled during the year to carry out.	NP	<p>Discussion with the Project Coordinator revealed that there is a process in place to collate data on a daily basis to complete the report.</p> <p>As this is a new requirement within the 2012 Metering Code the first report is required to be published for the reporting period ending 30 June 2014 by September 2014. Therefore, as at the end of the audit period this report had yet to be published. Therefore, we are unable to rate the compliance in regards to this licence obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating	Observation
463	Electricity Industry Metering Code clause 5.37(1)(b)	A network operator must provide a copy of the report described in subclause 5.37(1)(a) to the Minister and the Authority not less than 5 business days before it is published under subclause 5.37(3).	NP	<p>Discussion with the Project Coordinator revealed that there is a process in place to provide a copy of the report to the Minister and the Authority not less than 5 business days before it is published under sub clause 5.37(3).</p> <p>As this is a new requirement within the 2012 Metering Code the first report is required to be published for the reporting period ending 30 June 2014 by September 2014. Therefore, as at the end of the audit period this report had yet to be published. Therefore, we are unable to rate the compliance in regards to this licence obligation.</p>
464	Electricity Industry Metering Code clause 5.37(1)(b)	A network operator must publish the report described in subclause 5.37(1) within 3 months after the year ends.	NP	<p>Discussion with the Project Coordinator revealed that there is a process in ensure the report is published within three months of year end.</p> <p>As this is a new requirement within the 2012 Metering Code the first report is required to be published for the reporting period ending 30 June 2014 by September 2014. Therefore, as at the end of the audit period this report had yet to be published. Therefore, we are unable to rate the compliance in regards to this licence obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating	Observation
465	Electricity Industry Metering Code clause 5.37(2)	The report prepared by the network operator must include the information prescribed.	NP	<p>Discussion with the Project Coordinator revealed that there is a process in place to collate data as prescribed by the Code.</p> <p>As this is a new requirement within the 2012 Metering Code the first report is required to be published for the reporting period ending 30 June 2014 by September 2014. Therefore, as at the end of the audit period this report had yet to be published. Therefore, we are unable to rate the compliance in regards to this licence obligation.</p>
466	Electricity Industry Metering Code clause 5.37(3)	For each relevant metering service, the information in subclause 5.37(2) must be reported separately for the specified classes of connection point.	NP	<p>Discussion with the Project Coordinator revealed that there is a process in place to ensure that the data within the report is separately classified into classes of connection point.</p> <p>As this is a new requirement within the 2012 Metering Code the first report is required to be published for the reporting period ending 30 June 2014 by September 2014. Therefore, as at the end of the audit period this report had yet to be published. Therefore, we are unable to rate the compliance in regards to this licence obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating	Observation
467	Electricity Industry Metering Code clause 5.38	A 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)	NP	<p>Discussion with the Project Coordinator revealed that there is a process in place to ensure that data is retained in a format that is easily assessable within a reasonable period of time for at least 7 years.</p> <p>As this is a new requirement within the 2012 Metering Code the first report is required to be published for the reporting period ending 30 June 2014 by September 2014. Therefore, as at the end of the audit period this report had yet to be published. Therefore, we are unable to rate the compliance in regards to this licence obligation.</p>
470 447	Electricity Industry Metering Code clause 6.20(4)	A network operator must amend any document in accordance with the Authority's final findings.	NP	<p>Discussions with Western Power personnel and review of the Authority's website revealed that Western Power did not receive any advice from the Authority to amend any of the listed documents under Code.</p> <p>In the absence of activity within the audit period we are unable to rate the compliance in regard to this licence obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating	Observation
471	Electricity Industry Metering Code clause 6.20(5)	The network operator must publish any document that has been amended under subclause 6.20(4).	NP	<p>Discussions with Western Power personnel revealed that there are processes in place to publish any document that has been amended under the subclause 6.20(4).</p> <p>Review of the Authority's website revealed that Western Power did not receive a direction to amend any document in accordance with clause 6.20(4) and therefore, was not required to publish any document.</p> <p>In the absence of activity within the audit period, we are unable to rate the compliance of this licence obligation.</p>
473 449	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.	NP	<p>Discussions with the Metering Services Manager revealed that Western Power has not changed its initial contact details or any of its contact details within the audit period.</p> <p>We were able to perform a walkthrough of the notification process if a change to its contact details was to occur.</p> <p>Notwithstanding the existence of a methodology for a notification to be provided to Code participants in the event of a change of initial contact details, in the absence of activity during the audit period, we are unable to rate process compliance in this regard.</p>

No 2013 2012	Obligation	Description	Compliance Rating	Observation
478 454	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.	NP	<p>Discussions with the Account Managers revealed that Western Power has a process in place that addresses the dispute management process in accordance with the Metering Code.</p> <p>Further, we noted that there is a framework in place whereby the Account Managers will address an issue before it escalates into a dispute. This process includes the Account Managers from the Customer Solutions branch being in continuous contact with the retailers and regular B2B meetings.</p>
479 455	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.	NP	<p>Enquires revealed that during the audit period there had not been any disputes in regards to the Metering Code.</p> <p>In the absence of audit activity we are unable to determine the compliance with these licence obligations.</p>

No 2013 2012	Obligation	Description	Compliance Rating	Observation
480 456	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.	NP	
481 457	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.	NP	

No 2013 2012	Obligation	Description	Compliance Rating	Observation
482 458	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).	NP	
491 467	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.	NP	<p>Discussions with staff revealed that Western Power did not apply for an exemption or replacement of a provision under section 14(7) of the Code during the audit period. As a result, there has not been an instrument issued by the Minister.</p> <p>In the absence of activity within the audit period, we are unable to rate the compliance of this licence obligation.</p>
492 468	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.	NP	<p>Discussions with staff revealed that Western Power did not enter into any agreements that required an exclusion or modification of certain provisions with a customer under Part 2 of the Code.</p> <p>In the absence of activity within the audit period we are unable to rate the compliance of this licence obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating	Observation
500 476	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.	NP	<p>Walkthrough of the Power Quality / TVI Complaint Handling Process, and review of monthly internal SLA monitoring tools confirmed the existence of a mechanism by which quality investigations are completed. Notwithstanding the absence of a written request from a customer, Western Power presented a prioritisation handling methodology in the event of a receipt of a written request, to ensure that the investigation is carried out within the prescribed timeframe.</p> <p>In the absence of a written request to investigate power quality by a customer, we are not able to conclude on the effectiveness of Western Power's processes in this regard.</p>

No 2013 2012	Obligation	Description	Compliance Rating	Observation
501 477	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.	NP	<p>Discussions with Network Quality and Reliability revealed that the customer would be advised of the outcome of the investigation including where appropriate, the scope of further work. Where reports have been provided, it has been in a verbal form and later recorded against the customer account via NetCIS. If the customer was unable to be contacted, then the investigation outcomes would continue to be captured on NetCIS in the event that the customer contacts the call centre.</p> <p>In the absence of a written request to investigate power quality by a customer, there is an absence of a nexus which requires Western Power to report the outcome of an investigation, which it has voluntarily done so, to the requesting customer. Therefore we are not able to conclude on the effectiveness of Western Power's processes in this regard.</p>
511 487	Electricity Industry Act section 61 and 65	The licensee must submit to the Coordinator a draft extension and expansion policy within the specified timeframe.	NP	<p>Discussions with staff revealed that on 23 August 2007, the Coordinator notified Western Power that the extension and expansion policy has been repealed. It is understood that the Coordinator has not requested for a draft extension and expansion policy during the audit period.</p> <p>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating	Observation
512 488	Electricity Industry Act section 62, 64 and 65	The licensee must comply with a direction given by the Coordinator in relation to a draft extension and expansion policy or an amendment to an extension and expansion policy.	NP	<p>Discussions with personnel revealed that on 23 August 2007, the Coordinator notified Western Power that the extension and expansion policy has been repealed. It is understood that the Coordinator has not provided a direction in relation to a draft extension and expansion or an amendment to an extension and expansion policy during the audit period.</p> <p>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>
513 489	Electricity Industry Act section 65	The licensee must implement arrangements set out in an approved extension and expansion policy.	NP	<p>Discussions with staff revealed that on 23 August 2007, the Coordinator notified Western Power that the extension and expansion policy has been revealed. It is also understood the Coordinator has not required Western Power to produce a replacement draft extension and expansion policy.</p> <p>In the absence of activity with regard to this obligation, we have determined that we could not rate this compliance manual reference obligation.</p>

No 2013 2012	Obligation	Description	Compliance Rating	Observation
515 491	Electricity Industry Act section 11	The licensee must provide prior notification to the Authority if it intends to outsource its trouble call fault management system.	NP	Discussions with the Network Quality Team revealed that Western Power does not intend to outsource its TCS system. In the absence of activity within the audit period we are unable to rate the compliance of the obligation.

12. Recommendation Summary

Table of Current Audit Non Compliance and Recommendations			
A. Resolved during the current audit period			
Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue)	Date Resolved and Management Action Taken	Audit Comments
63	A2	Western Power implemented an upgrade to its Metering Business System (“MBS”) in July 2013. A review of the revised standing data request form and the information post the MBS upgrade did not reveal any exceptions.	No further action required
	Electricity Industry Customer Transfer Code Annex 4 clause A4.1		
230	Western Power did not provide the last accumulated read dates to the retailer as required under this obligation because its Web Portal System was not designed with the capability to do so.	A review of the <i>Code of Conduct for the Supply of Electricity to Small Use Customers 2014</i> noted a revision with respect to clause 7.6 to clarify that	No further action required
	A3 Code of Conduct clause 7.6		

Table of Current Audit Non Compliance and Recommendations

A. Resolved during the current audit period

Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue)	Date Resolved and Management Action Taken	Audit Comments
	Review of a notification made by Western Power to the Authority identified that Western Power wrongfully disconnected a customer's supply address in October 2012 when the customer had an unresolved complaint with the Ombudsman that Western Power was not aware of.	where a distributor has been made aware of a complaint, then it must not perform a disconnection in the detailed circumstances.	
313	A2 Code of Conduct clause 13.8(2)	Western Power remedied the cause of this non-compliance in October 2012 by developing an IT solution that bypassed any amendments	No further action required

Table of Current Audit Non Compliance and Recommendations

A. Resolved during the current audit period

Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue)	Date Resolved and Management Action Taken	Audit Comments
	Discussions and review of Western Power's 2013 Compliance Report revealed that prior to 30 October 2012 Western Power was not accurately recording the total number of reconnections provided, and the total number of reconnections not provided, within the prescribed timeframe.	made to the "required by" date in MBS. Further, in October 2013, the "required by" date was locked as part of an upgrade to MBS. Sample-based testing and reconciliation of the 2013 Record Keeping Report and raw data post the implementation of the IT solution and MBS upgrade did not reveal any exceptions.	
333	A2 Code of Conduct clause 14.4(1)	Western Power implemented an automatic acknowledgement function on the "Poles in Paddocks" email address in October 2013.	No further action required

Table of Current Audit Non Compliance and Recommendations

A. Resolved during the current audit period

Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue)	Date Resolved and Management Action Taken	Audit Comments
	Discussions revealed an instance where Western Power failed to acknowledge a written complaint within the prescribed timeframe, as the complaint was sent to the “Poles in Paddocks” email address which did not have an automatic acknowledgement functionality.	Sample based testing performed after October 2013 did not reveal any exceptions	
344	<p>A3</p> <p>Electricity Industry Metering Code clause 3.3A(1)</p> <p>Discussions revealed some instances during the audit period where bi-directional electricity flow occurred at metering points where the metering installation was not capable of separately measuring bi-directional flow.</p>	Western Power was observed to have since replaced the non-compliant meters with meters that are capable of measuring bi-directional flow. Further, Western Power implemented a new process in July 2013 to ensure that locations identified as bi-directional flows will no longer be commissioned without evidence of a correct metering installation.	No further action required

Table of Current Audit Non Compliance and Recommendations

A. Resolved during the current audit period

Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue)	Date Resolved and Management Action Taken	Audit Comments
358	A2 Electricity Industry Metering Code clause 3.11(1)	Western Power developed a COGNOS report in July 2013 which provides visibility over an interval meters' ability to function in accordance with requirements specified in the Metering Code. Review of the COGNOS report for July 2013 - 31 May 2014 revealed that Western Power exceeded the 99% benchmark for that period.	No further action required
	Discussions revealed that as at June 2013, 98.7% of Western Power's metering installations were operating consistently with good industry practice to measure, record and permit the timely collection of data, against the benchmark of 99% required under the Metering Code.		
373	A2 Electricity Industry Metering Code clause 3.16(3)	The Metering Code was amended in December 2012 to permit the collation of energy data in sub-multiples of a trading interval, which aligns with the technical specifications of the meters	No further action required

Table of Current Audit Non Compliance and Recommendations			
A. Resolved during the current audit period			
Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue)	Date Resolved and Management Action Taken	Audit Comments
	Meters installed by Western Power were manufactured to collate energy data in sub-multiples of a trading interval, which was not in accordance with clause 3.16(3) of the Metering Code.	installed by Western Power.	
361(2012) & 362(2012)	A2 Electricity Industry Metering Code clause 3.16(5) Electricity Industry Metering Code clause 3.16(6)	The Metering Code was amended in December 2012 and these two obligations were removed	No further action required

Table of Current Audit Non Compliance and Recommendations

A. Resolved during the current audit period

Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue)	Date Resolved and Management Action Taken	Audit Comments
	Discussions and review of the Model SLA and the Metrology Procedure revealed neither document addressed how Western Power is to produce the “Notional Wholesale Meter” value for the purposes of, and as defined in, the market rules.		
375	<p>A2</p> <p>Electricity Industry Metering Code clause 3.18(1)</p> <p>Meters installed by Western Power were manufactured to collate energy data in sub-multiples of a trading interval, which did not comply with the wholesale market metering installation requirements under 3.16 of the Code.</p>	The Metering Code was amended in December 2012 to permit the installation of meters which collate energy data in sub-multiples of a trading interval, which aligns with the technical specifications of the meters installed by Western Power.	No further action required

Table of Current Audit Non Compliance and Recommendations

A. Resolved during the current audit period

Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue)	Date Resolved and Management Action Taken	Audit Comments
416	A2 Electricity Industry Metering Code clause 5.10	Western Power upgraded MBS in July 2013 to facilitate the provision of the required data. A review of a sample of data requests and the information post the MBS upgrade did not reveal any exceptions.	No further action required
	Western Power's Web Portal system was not designed to provide the last accumulated read dates to the retailer as required under clause 5.10 of the Metering Code.		
443	A3 Electricity Industry Metering Code clause 5.22(1)	In July 2013 Western Power obtained archived metering installation files and re-performed calculations to obtain the maximum value for the affected metering installations in order to	No further action required

Table of Current Audit Non Compliance and Recommendations

A. Resolved during the current audit period

Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue)	Date Resolved and Management Action Taken	Audit Comments
	Discussions revealed instances where Western Power did not validate energy data in accordance with Appendix 2 of the Metering Code as it was unable to calculate the maximum value due to not having sufficient information.	validate the energy data. Sample based testing performed post July 2013 did not reveal any exceptions.	

Table of Current Audit Non Compliance and Recommendations

B. Unresolved at end of current audit period

Reference (No/Year) Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue	Auditors' Recommendation	Management Action taken by end of Audit Period
01/2014 39	B2 Electricity Industry Customer Transfer Code clause 4.11(3)	1. Implement a solution that facilitates the timely completion of service orders for manually read Type 5 meters on the nominated transfer date.	
	Discussions and review of Western Power's 2014 Breach Register revealed that Western Power had not negotiated a new transfer date with the incoming retailer, specifically, for those instances where Type 5 meters were not read on the nominated transfer date.		
02/2014 41	B3 Electricity Industry Customer Transfer Code clause 4.13	2. Where Western Power is unable to perform a transfer on the nominated transfer date, negotiate with the incoming retailer to determine a new nominated transfer date in	

Table of Current Audit Non Compliance and Recommendations

B. Unresolved at end of current audit period

Reference (No/Year) Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue	Auditors' Recommendation	Management Action taken by end of Audit Period
	Sample-based testing of 35 CTRs revealed three instances where Western Power did not give an electronic notice of the transfer and the transfer date to the incoming retailer and previous retailer within the prescribed timeframe. One instance was due to a faulty communications unit within the meter and the other two instances involved Type 5 meters that failed to read due to manual interrogation.	accordance with 4.11(3) of the Transfer Code.	
03/2014 77	B3 Electricity Industry (Obligation to Connect) Regulations regulation 8	3. Where technical and capacity issues are identified, negotiate with the customer a revised date and mutually agree to that date in accordance with regulation 8.2.	

Table of Current Audit Non Compliance and Recommendations

B. Unresolved at end of current audit period

Reference (No/Year) Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue)	Auditors' Recommendation	Management Action taken by end of Audit Period
	Review of Western Power's new connections compliance report revealed that it did not energise premises within the prescribed timeframes on approximately 584 out of 53,527 occasions during the audit period due to technical issues, resourcing constraints and safety concerns.		
04/2014 237	B3 Code of Conduct clause 8.2	4. Implement a solution that would enable Western Power to comply with the timeframes specified in sub clause 8.2(2) of	

Table of Current Audit Non Compliance and Recommendations			
B. Unresolved at end of current audit period			
Reference (No/Year) Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue	Auditors' Recommendation	Management Action taken by end of Audit Period
	Review of Western Power's 2013 Annual Compliance Report and the 2014 Breach Register revealed that it did not reconnect the customer's supply address within the specified timeframe due to site access restrictions and resourcing constraints.	the Code of Conduct.	
05/2014 294	B3 Code of Conduct clause 12.1(1)	5. Reinforce to Customer Service Centre staff the importance of recording complaints in accordance with the complaints handling	

Table of Current Audit Non Compliance and Recommendations

B. Unresolved at end of current audit period

Reference (No/Year) Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue	Auditors' Recommendation	Management Action taken by end of Audit Period
	Review of Western Power's 2014 Breach Register revealed that on 30 June 2014, a Customer Service Centre staff member failed to record a complaint in Western Power's customer management system in circumstances where the customer expressed dissatisfaction in relation to a complaint that had previously been closed by Western Power.	procedure.	
06/2014 296	B3 Code of Conduct clause 12.1(3)	6. Provide a more focussed training program that would enable Western Power's Customer Service Centre staff to	

Table of Current Audit Non Compliance and Recommendations

B. Unresolved at end of current audit period

Reference (No/Year) Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue	Auditors' Recommendation	Management Action taken by end of Audit Period
	Discussions revealed instances where Western Power did not notify customers of their right to have their complaint escalated. This was a result of Western Power not recording customer complaints that were resolved at first instance and Customer Service Centre staff improperly classifying complaints.	differentiate a complaint from an enquiry. Further, strengthen the monitoring process around first contacts to ensure that a correct classification of that contact is made. 7. Reinforce the requirement to Customer Service Centre staff of Western Power's obligations to advise customers who articulate dissatisfaction of their right of escalation under subclause 12.1(3)(a).	
07/2014 302	A2 Code of Conduct clause 13.1(3)	8. Refer to Licence Obligations 294 and 296.	

Table of Current Audit Non Compliance and Recommendations

B. Unresolved at end of current audit period

Reference (No/Year) Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue)	Auditors' Recommendation	Management Action taken by end of Audit Period
	Due to the non-compliances identified for licence obligations 294, 296, 315 and 316, it was determined that Western Power did not retain the information specified under this clause.		
08/204 315	B2 Code of Conduct clause 13.10(1) Western Power did not record customer complaints that were resolved on first contact. Further, there were instances where customer dissatisfaction had been expressed but a complaint had not been recorded.	9. Refer to Licence Obligations 294 and 296.	
09/2014	A2	10. Refer to Licence Obligations 294 and 296.	

Table of Current Audit Non Compliance and Recommendations

B. Unresolved at end of current audit period

Reference (No/Year) Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue	Auditors' Recommendation	Management Action taken by end of Audit Period
316	Code of Conduct clause 13.10(2) Due to the non-compliance detected under licence obligation 294, 296 and 315, it was determined that Western Power did not retain accurate nor complete records of the details of each customer complaint, as required.		
10/2014 323	A2 Code of Conduct clause 13.16 Due to the non-compliances detected under licence obligations 294, 296, 302, 315 and 316, it was determined that Western Power was non-compliant with this licence obligation.	11. Refer to Licence Obligations 294 and 296.	

Table of Current Audit Non Compliance and Recommendations			
B. Unresolved at end of current audit period			
Reference (No/Year) Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue	Auditors' Recommendation	Management Action taken by end of Audit Period
11/2014 349	A2	12. Complete the installation of the replacement HV unit and remove the temporary LV meter.	
	Electricity Industry Metering Code clause 3.5(4) Review of Western Power's 2014 Breach Register revealed an instance where a metering point for a HV revenue metering installation was not located as close as practicable to the connection point. Grant Thornton notes that this is an isolated incident and testing performed did not identify any exceptions.		
12/2014 359	B2	13. Implement a solution that would enable Western Power to comply with the applicable SLA.	
	Electricity Industry Metering Code clause 3.11(2)		

Table of Current Audit Non Compliance and Recommendations

B. Unresolved at end of current audit period

Reference (No/Year) Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue)	Auditors' Recommendation	Management Action taken by end of Audit Period
	Sample-based testing identified 16 instances where the repairs of meters were not performed within the prescribed timeframe agreed within the SLA due to either resourcing constraints, the geographical spread of customers, site access restrictions or safety concerns.		
13/2014 378	C2 Electricity Industry Metering Code clause 3.21(1)	14. Continue to monitor time accuracy as prescribed and correct the time drift in meters where inaccuracies are identified.	

Table of Current Audit Non Compliance and Recommendations			
B. Unresolved at end of current audit period			
Reference (No/Year) Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue	Auditors' Recommendation	Management Action taken by end of Audit Period
	The relocation of Western Power's MV90 server to the Head Office caused a time synchronisation issue with the internal clock. This adversely impacted the calculation of time drift and the maintenance of time accuracy of approximately 60% of Type 1 – 5 meter installations which were reliant on both the MV90 and MVRS servers maintaining time as prescribed.		
14/2014 386	B2 Electricity Industry Metering Code clause 3.29 Western Power did not include the type of work the registered metering installation provider was authorised to carry out.	15. That the published list be reviewed and amended to ensure its content addresses the Metering Code requirement to include the type of work the registered metering installation provider is authorised to carry out.	

Table of Current Audit Non Compliance and Recommendations			
B. Unresolved at end of current audit period			
Reference (No/Year) Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue	Auditors' Recommendation	Management Action taken by end of Audit Period
15/2014 389	B2	16. Undertake an upgrade to the MBS component of the disaster recovery system and conduct testing to ensure it is capable of meeting the requirements specified in the Metering Code.	
	Electricity Industry Metering Code clause 4.1(3)		
	Review of the Disaster Recovery Validation Test Summary revealed that the test of the disaster recovery system conducted in March 2014 identified that the MBS back- up failed to activate. Therefore, in the event a disaster occurs, we are not satisfied that MBS could be re-built, and energy data provided to Code participants, within the timeframes prescribed by clause 4.1(3) of the Metering Code.		
16/2014	B2	17. Reinforce to relevant staff the importance	

Table of Current Audit Non Compliance and Recommendations

B. Unresolved at end of current audit period

Reference (No/Year) Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue	Auditors' Recommendation	Management Action taken by end of Audit Period
397	Electricity Industry Metering Code clause 4.7 Discussions and review of the exception report for the 2013/14 period revealed 108 instances out of 997,375 within the period where Western Power did not give notice of changes to standing data as required under clause 4.7 of the Metering Code.	of entering data correctly within MBS to mitigate the risk of future data entry errors.	
17/2014 406	C3 Electricity Industry Metering Code clause 5.3	18. Reinforce the scheduled meter read plan and requirement to undertake meter reads and send energy data in accordance with the	

Table of Current Audit Non Compliance and Recommendations

B. Unresolved at end of current audit period

Reference (No/Year) Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue	Auditors' Recommendation	Management Action taken by end of Audit Period
	Sample-based testing of 35 meter reads revealed seven instances where Western Power did not obtain and transfer energy data into its metering database within the prescribed timeframe. This was caused by delays in receiving data from hand-held units and meter reads not being carried out in accordance with the scheduled read plan.	Metering Code.	
18/2014 407	B3 Electricity Industry Metering Code clause 5.4(1)	19. Where a meter cannot be read due to access restrictions, liaise with the retailer to assist Western Power in gaining access to the customer's meter.	

Table of Current Audit Non Compliance and Recommendations

B. Unresolved at end of current audit period

Reference (No/Year) Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue	Auditors' Recommendation	Management Action taken by end of Audit Period
	Western Power was unable to conduct meter readings that provided for an actual value that passed its validation process as defined in Appendix 2 of the Metering Code due to site access restrictions and resourcing constraints. It is understood that approximately 9,977 customers out of 1,060,588 customers were affected during the 2013/14 financial year, of which 2,731 were due to site access restrictions.	20. Implement a solution that would enable Western Power to comply with sub clause 5.4(1) of the Metering Code.	
19/2014 412	B2 Electricity Industry Metering Code clause 5.6(1)	21. Reinforce the requirement to review manual exception reports within the timeframes prescribed by the Metering Code with relevant Finance, Treasury & Risk Team	

Table of Current Audit Non Compliance and Recommendations			
B. Unresolved at end of current audit period			
Reference (No/Year) Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue)	Auditors' Recommendation	Management Action taken by end of Audit Period
	Discussions and review of a sample of daily validation reports revealed that Western Power did not provide validated, and where necessary, substituted or estimated energy data for a metering point to the user within the timeframes prescribed by the Metering Code. This was due to the need to manually review exception reports, which caused delays in the provision of data.	Members.	
20/2014 418	B3 Electricity Industry Metering Code clause 5.12(1)	22. Complete the automation of the process of responding to users' requests.	

Table of Current Audit Non Compliance and Recommendations

B. Unresolved at end of current audit period

Reference (No/Year) Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue	Auditors' Recommendation	Management Action taken by end of Audit Period
	Sample-based testing of 35 meter data requests revealed 6 instances during the audit period where Western Power failed to provide users with energy data within the prescribed timeframe, with delays being caused by reliance on a manual process to respond to users' requests. As at 30 June 2014, Western Power had commenced, but had not yet completed, automating this process.		
21/2014 425	C3 Electricity Industry Metering Code clause 5.17A(3)	23. Build into the Energy Data Authorisation Access System ("EDAAS") the ability to enter a date of receipt as the start date rather than the date the request is manually	

Table of Current Audit Non Compliance and Recommendations			
B. Unresolved at end of current audit period			
Reference (No/Year) Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue	Auditors' Recommendation	Management Action taken by end of Audit Period
	Sample-based testing revealed 3 out of 10 instances where Western Power did not comply with a direction provided within the prescribed timeframe because Western Power's Energy Data Authorisation Access System ("EDAAS") did not have the ability to record the date the direction was received, but only the date the direction was manually inputted into EDAAS. Therefore, time 0 was incorrectly recorded as the date of entry into EDAAS as opposed to the date of receipt.	inputted into the system. 24. Alternatively, develop a web-based solution to enable to provision of data to be automated.	
22/2014 434	B3 Electricity Industry Metering Code clause 5.20(4)	25. Maintain a record of the location of meters once they have been removed. 26. Implement a solution that would enable Western Power to be compliant with the	

Table of Current Audit Non Compliance and Recommendations

B. Unresolved at end of current audit period

Reference (No/Year) Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue)	Auditors' Recommendation	Management Action taken by end of Audit Period
	Discussions with the Finance, Treasury and Risk Team and review of Western Power's 2014 Breach Register revealed that Western Power did not provide verified energy data within the timeframes prescribed for 135 meter reads out of 19,031 meter reads that were undertaken in the 2013/2014 period	timeframes prescribed in the Metering Code.	
23/2014 436	B3 Electricity Industry Metering Code clause 5.21(4)	27. Implement a solution that would enable Western Power to address its compliance requirements as detailed under the applicable SLA.	

Table of Current Audit Non Compliance and Recommendations

B. Unresolved at end of current audit period

Reference (No/Year) Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue	Auditors' Recommendation	Management Action taken by end of Audit Period
	Sample-based testing revealed 4 instances during the audit period where Western Power did not complete testing within the prescribed timeframe because Western Power was unable to access the metering installations in question.		
24/2014 468	B3 Electricity Industry Metering Code clause 6.1(1) Western Power was non-compliant with this licence obligation as a result of the non-compliances identified for licence obligations 359 and 436.	28. Refer to Licence Obligations 359 and 436.	

Table of Current Audit Non Compliance and Recommendations

B. Unresolved at end of current audit period

Reference (No/Year) Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue	Auditors' Recommendation	Management Action taken by end of Audit Period
25/2014 488	B3	29. Engage with the Public Utilities Office ("PUO") to amend the <i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005</i> to align with the service standard benchmarks in the Access Arrangement by way of seeking the exclusion of adverse weather events from the statistical count of significant interruptions to small use customers.	
	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 12(3)		
27/2014 493	B2	30. Implement a supervisory review to ensure that the handling code is correctly applied and transactions prepared over a non-business day are approved for payment, to	
	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 18		

Table of Current Audit Non Compliance and Recommendations			
B. Unresolved at end of current audit period			
Reference (No/Year) Compliance Manual Reference	Compliance rating / Legislative Obligation / details of the issue	Auditors' Recommendation	Management Action taken by end of Audit Period
	Review of Western Power's Service Standard Payments for Planned Outages Report revealed 8 instances during the audit period where it did not pay customers a service standard payment within the prescribed timeframe.	facilitate timely payment of service standard payments.	
28/2014 494	<p>B2</p> <p>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 19</p> <p>Review of the Service Standards Payment for Extended Outages Report revealed instances within the audit period where Western Power did not pay extended outage payments within the prescribed timeframe.</p>	<p>31. Implement a solution that would facilitate for increased work flow as a result of an adverse weather event.</p> <p>32. Implement a monitoring mechanism whereby reconciliation is performed to ensure that the payment run aligns with payment entitlements.</p>	

Appendix 1 – Audit Evidence – Documents Examined

Documents Examined
DM# 7001191 Register of Synergy Reimbursement
DM#12089840 Western Power and Synergy B2B Steering Group Minutes – Apr 2014
DM#12089902 Email from HSF Re Synergy SLA review
DM#12089903 Metering SLA HSF Comments
DM#12097697 Financial Accounts Report
Meter Tests conducted for 2012-2014
DM#11882807 DR Validation 29-30 March 2014
DM#12068203 MBS Application DR Design
DM#12075548 P1 & P2 Incidents
Western Power DR Plan – MBS Components Only
DM#2443824 Customer Transfer Code Communication Rules Report

Documents Examined
DM#8855631 Ninga Mia Prepayment Meters – Government Gazette
DM#12090881 Location report Prepayment Meters
DM#8575903 Meter Test Process
DM# 10710730 Amendments to the SWIS Communication Rules
DM#12105052 Energisation Report
DM#12105052 Installation Repair Report
DM#12108052 Meter Investigation Report
WA Distribution Connections Manual – Chapter 11 Metering
Metering Services Generic SLA with WA Retailers
Standard Electricity Prices Charges Brochure MSF
DM#5041217 R&D Gating EDM1 MK6E HV CT Meter Class Evaluation Report
DM#12113356 SO 125699085 Email
DM#12113359 SO 126886480 Email
DM#12113371 SO 134654254 Email
DM#12113352 SO101686000 Email
DM#12113354 SO106828978 Email
DM#12113356 SO 125699085 Email
DM#3958468 Meter Technical Specifications
DM8117564 Revenue Meters Technical Specifications
DM#12118941 Samples of Type 1-4

Documents Examined
DM#12119152 Type 1 NMI 8002013343
DM#12119165 Type 2 NMI 8001019784
DM#12119175 Type 3 NMI 8001000207
DM#12119186 Type 4 NMI 8001178314
DM#12113425 SO90147182 Email
DM#12113431 SO 118464134 Email
DM#12113433 SO 118965897 Email
DM#12113435 SO129514132 Email
DM#7560244 Metering Technical Requirements – High Voltage Metering
DM#12114231 Email
DM#12114241 Email
DM#12114248 Email
DM#12114261 Email
DM#9260167 In Service Compliance Test Results
DM#9503722 In Service Compliance Test Results
DM#9800163 In Service Compliance Test Results
DM#11061411 In Service Compliance Test Results
DM#11162412 In Service Compliance Test Results
DM#10103686 L&G Modems Certificate of Compliance

Documents Examined
DM#6718579 Procedure Meter and Service Apparatus Interference
DM#8572290 Password Authority Level Matrix Metering Installation
DM#8600731 Password Authority Level Matrix on Metering Database
Technical Rules Final WE360551V5
DM#12114577 MBS Functionality
DM#8990788 L&G EM5300 Meter Codes
DM#12114740 Program Files
DM#12114864 Program Files
Metering Services Metering Management Plan
DM#9034279 In-Service Compliance – Metering Report
DM#12114970 HV Commissioning Report 8002048504
DM#12114983 HV Commissioning Report 8002073940
DM#12115001 HV Commissioning Report 8002163927
WAER 2014
DM#1199017 Inspection System Plan
DM#12122567 Sample DM Screen
DM#12122575 Sample TIMSWEB Screen
DM#12116330 Metering Installation Type 1-2
DM#12120920 NMI8002016519
DM#12120955 NMI8002016510
DM#12120963 NMI8002016571

Documents Examined
DM#3184562 R&D Pamphlet Meters
DM#3825365 R&D Pamphlet Meters
DM#8000985 Metering Communication Equipment Installation Procedure
DM#9540497 R&D Pamphlet Meters
DM#10645770 SWMS Communication Equipment Installation
DM#12115164 COMMS Service Order & MCA
DM#12115185 COMMS Service Order & MCA
DM#12115198 COMMS Service Order & MCA
DM#12115229 COMMS Service Order & MCA
DM#12115308 COMMS Service Order & MCA
DM#8904575 Western Power L&G Meters Data Storage
DM#12104804 MBS Database Access Personnel Register
DM#12102483 Metering Installation Software Access – Personnel Register
DM#12115681 Prepayment Meter Compliance to Small Use Customer Code
DM#12115771 Read Only Password
DM#12119426 B2B Service Order MDV
Breach Register 1/7/12-31/5/14
DM#9626868 Ellipse Payment Data for SSP Reconciliation
DM#9249968 Quality Service Standard Payments Spreadsheet
DM#9272900 Customer Service Payments Spreadsheet

Documents Examined
DM#10751383 Cross Meter Investigation
DM#11849399 Metering Wrongful Disconnections
DM#10984655 Misread Reimbursements Spreadsheet
DM#10163500 Retailer Reimbursement Procedure
Synergy Extended Metering Services – May 2014
Invoice for Synergy May 2014 & May 2012
Synergy Extended Metering Services – August 2012
2013 Customer Transfer Data
Read Day SD80010228342
DM#9508545 Time Accuracy Compliance Report
DM#10105844 Maintaining Meter Time Accuracy
DM#9505787 Time Accuracy Compliance Procedure
DM#11803957 Opportunity Management Self-Assessment
DM#8622799 Customer Relations MC Dispute Process
DM#8622799 Customer Relations CTC Dispute Process
Actuals replaced by Actuals (Intervals)
Data Substitution and Estimation
Substitution Methods – July 12-May 14
Validation Samples

Documents Examined
DM#10878808 IDM Process Max Value
DM#9296727 IDM Process MBS Reading Exceptions
Max Value Reports
DM#2249451 FS Section Basic readings
DM#2238533 FS Section Interval Readings
DM#2498518 FS Section Meter Reading Exceptions
DM#9504583 Basic Data Management Handbook
DM#10907657 IDM Process Interval Zero Check Report
DM#10878769 IDM Process Gaps Report Email
DM#11863264 IDM Process SCADA and Revenue vs Check Recon
DM#8447124 Interval Data Management Process
Substitution Samples
List of 3 rd Party Requests 2013-2014
DM#12140857 Calculation of the Avgas total length of interruption
Complaints Handling Process
DM#12145672 IT SC Request for Bulk SDN
DM#12145014 Synergy Bulk Standing Data Request
DM#9895743 ETAC Contract Preparation and Execution Check
EOPS Payment Sheet July 2012-June2014

Documents Examined
DM#8575903 Meter Test process
Fact Sheet – How to Read Meter
Offered Calls Profile Inch Fir Calls – Sample Dates
DM#9279619 Customer Service Centre Reporting
DM#121601190 Disconnection Volumes
DM#12149960 Reconnection List
Complaints Data 2012-2014
DM#10335049 CRL Spreadsheet
Interval Meters without One Month Consecutive Actuals
Record Keeping Report 2011-2012 & 2012-2013
DM#8550558 Standard Operating Procedure Obligation to Connect
DM#8550285 O2C Admin Process from Aug 2011
DM#12164207 New Connections List
List of Planned Outages
SSP Planned Outage July 2012 to June 2014
Breach Register 2013-2014
DM#9725122 IDM Probe Route Check List
DM#9670255 O2C Letter
Type 5 Manual Read Meter Routes
Extended Metering Services Synergy Sept 2013

Documents Examined
Extended Metering Services Synergy July 2013
Extended Metering Services Synergy June 2013
DM#1196351 Under Frequency Load Shedding
DM#8482502 Prioritizing Network Restoration Guidance
DM#2081872 Unplanned Switching Program
DM#1531050 Manual Program Load Shedding
DM#1530872 Restoration of Feeders and Recloses
DM#10206435 MBS 6.6 Project Status Report
DM#10287377 Functional Test Required Appointment Date Field Locked
PMD Request List
June 2013 CBPR
June 2013 CBPR
ETIC Completion Notices
Manual Completion Notices
DM#12151229 Theiss June 2014 Minutes
DM#12186801 WCE June 2014 Minutes
Amended Proposed Revisions to the Access Arrangement
DM#11121719 Reliability Compliance – July 2013
DM#12144509 Meter Population Report – June 2014
DM#12152634 Metering Services Annual compliance Stats
DM#12160344 Reliability Compliance – May 2014

Documents Examined
DM#9942758 Max Estimates Project Plan
DM#11440738 Annual Meter Reading Request
DM#11440753 Final Notice Of Obligation to Apply for Annual Meter Reading Request
DM#12159724 Annual Read Obligation Performance Reporting
DM#9981710 Procedure for Complaints
PROD 9382 Basic Readings expected vs Loaded
DM5383606 Retailer Credit Management
DM#8970907 De-Energisation Authorisation Number Work Instruction
DM#9439047 Life Support Equipment
DM#9439680 Type 1 De-en Compliance Training
DM#9964754 Work Instructions for De-En Breach Reports
DM#10072276 Compliance Failure Presentation
DM#10607298 Managing a Manual De-en Process
DM#10657429 Training Notes for Processing De-en SO RequestsDM#6315351 De-en and Re-en Technical Procedure
DM#6531739 Metering SO Requirements for Field Ops
DM#8650306 Requirements for WR3788
DM#9501761 Re-en Compliance
DM#11775447 Service Stream

Appendix 2 – Audit Evidence – Personnel who Assisted in the Audit

Positions of Western Power Personnel	Area
Senior Asset Strategy Engineer	Network Planning and Standards
Interval Data Coordinator	Finance, Treasury & Risk
Senior Process & Governance Analyst	Customer Service
Customer Connections Services Manager	Customer Service
Network Control Manager	Network Operations
Project Manager	Project Delivery Process Performance
Readings Management Team Leader	Metering Branch
Commercial Services Team Leader	Field Operations
BT Onsite Operations Manager	Customer Service Centre
Quality & Compliance Officer	Network Operations
Project Coordinator	Field Operations
Customer Service Resource Coordinator	Customer Service
Customer Relations Manager	Customer Service
Complaints & Resolution Team Leader	Customer Service
Regulatory Compliance Manager	Regulation & Investment Management
Reading Operations Team Leader	Field Operations
Customer Service Centre Team Leader	Customer Service
Senior Customer Relations Consultant	Customer Service

Positions of Western Power Personnel	Area
Billing And Metering Compliance Officer	Finance, Treasury & Risk
Business Analyst	Customer Service
Service Quality Notification Team Leader	Customer Service
Contract Field Operations Manager	Field Operations
Metering Services Manager	Field Operations
Customer Service Centre Manager	Customer Service
Category & Contracts Team Leader	Group Commercial
Complex Metering & Laboratory Team Leader	Field Operations
Principal Planning Engineer	Network Planning and Standards
Meter Installations Team Leader	Field Operations
Access Solutions Manager	Customer Service
Network Analysis Team Leader	Network Planning & Standards
Area Manager Revenue	Metering Branch
Senior Compliance Specialist	Regulation & Investment Management
Area Manager Regional South East	Field Operations
State Manager Service Stream	Service Stream
Development Manager	Network Operations
Financial Accounting Manager	Finance, Treasury & Risk
Reading Operations Team Leader	Metering Services
Strategic Network Planning Team Leader	Strategic Network Development
Field Services Coordinator	Metro North
Senior Information Consultant	Information Management
Field Services Coordinator	Regional South East
Lineworker	Regional South East
Field Services Coordinator (Acting)	Regional South East
Technical Networks Officer (Acting)	Regional South East
Customer Service Officer	Customer Service Centre
Metro North Manager	Metro North
Economic Regulation Manager	Economic Regulation
Engineering Team Leader	Plant Performance