

**Alinta Energy Transmission
(Roy Hill) Pty Ltd**

**Electricity Integrated Regional
Licence (EIRL6)**

**2016 Performance Audit
(Independent Assurance)**

January 2017 report

Mr Paul Grey
General Manager Pilbara O&M
Alinta Sales Pty Ltd, trading as Alinta Energy
The Quadrant, 1 William Street
Perth, WA 6000

17 January 2017

Dear Paul

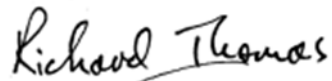
Alinta Energy Transmission (Roy Hill) Pty Ltd Electricity Integrated Regional Licence (EIRL6) – 2016 Performance audit report

We have completed the Electricity Integrated Regional Licence Performance audit for Alinta Energy Transmission (Roy Hill) Pty Ltd for the period 1 October 2013 to 30 September 2016 and are pleased to submit our report to you.

I confirm that this report is an accurate presentation of the findings and conclusions from our audit procedures.

If you have any questions or wish to discuss anything raised in the report, please contact Andrew Baldwin on 0414 924 346 or me on 0411 603 644.

Yours sincerely



Richard Thomas
Partner

Deloitte Risk Advisory Pty Ltd

Contents

1	Independent Auditor’s report	3
2	Executive summary	6
	2.1 Introduction and background	6
	2.2 Observations	6
	2.3 Findings	6
	2.4 AETRH’s response to previous audit recommendations	8
	2.5 Recommendations and action plans	8
	2.6 Scope and objectives	12
	2.7 Approach	12
3	Summary of findings	13
4	Detailed findings, recommendations and action plans	21
	4.1 Electricity Industry Act 2004	22
	4.2 Electricity Licences – Licence Conditions and Obligations	25
	4.3 Electricity Industry Metering Code 2012	28
	4.4 Electricity Industry (Network Quality and Reliability of Supply) Code	54
	Appendix A – Audit Plan	56
	Appendix B – References	57
	Appendix C – Post Audit Implementation Plan	58

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1 Independent Auditor's report

With the approval of the Economic Regulation Authority (the **Authority**) Alinta Energy Transmission (Roy Hill) Pty Ltd (**AETRH**) engaged Deloitte Risk Advisory Pty Ltd (**Deloitte**) to conduct a performance audit of AETRH's compliance with the conditions of its Electricity Integrated Regional Licence (the **Licence**).

Deloitte conducted the performance audit as a reasonable assurance engagement and in accordance with the specific requirements of the Licence and the April 2014 issue of the *Audit and Review Guidelines: Electricity and Gas Licences* issued by the Authority (**Audit Guidelines**).

AETRH's responsibility for compliance with the conditions of the Licence

AETRH is responsible for:

- Ensuring that it has complied in all material respects with the requirements of the Licence
- Establishing and maintaining an effective system of internal control over its systems designed to achieve its compliance with the Licence requirements
- Implementing processes for assessing its compliance requirements and for reporting its level of compliance to the Authority
- Implementing corrective actions for instances of non-compliance (if any).

Deloitte's responsibility

Our responsibility is to express a conclusion in respect of AETRH's compliance with the conditions of the Licence based on our audit procedures. The reasonable assurance engagement has been conducted in accordance with the Audit Guidelines and the Australian Standard on Assurance Engagements (**ASAE**) 3100 *Compliance Engagements* issued by the Australian Auditing and Assurance Standards Board, in order to state whether, in our opinion, based on the procedures performed, AETRH has complied, in all material respects with the conditions of its Licence as outlined in the approved Audit Plan (dated October 2016) for the period 1 October 2013 to 30 September 2016.

ASAE 3100 also requires us to comply with the relevant ethical requirements of the Australian professional accounting bodies.

Our procedures consisted primarily of:

- Utilising the Audit Guidelines and the Electricity Compliance Reporting Manual (**Reporting Manual**) as a guide for development of a risk assessment, and document review to assess controls
- Development of an Audit Plan for approval by the Authority and an associated work program, set out in Appendix A
- Interviews with and representations from relevant AETRH and Alinta Energy staff to gain an understanding of process controls
- Review of documents and walkthrough of processes and controls to assess the overall compliance and effectiveness in accordance with Licence obligations
- Sample testing where relevant for obligations rated as an audit priority 3 and above in the approved Audit Plan.

Limitations of use

This report is intended solely for the information and internal use of AETRH, and is not intended to be and should not be used by any other person or entity. No other person or entity is entitled to rely, in any manner, or for any purpose, on this report.

We understand that a copy of this report will be provided to the Authority for the purpose of reporting on the performance audit for the Licence. We agree that a copy of this report may be provided to the Authority for its information in connection with this purpose but only on the basis that we accept no duty, liability or

responsibility to the Authority in relation to the report. We accept no duty, responsibility or liability to any party, other than AETRH, in connection with the report or this engagement.

Inherent limitations

Our engagement will provide reasonable assurance as defined in ASAE 3100. Reasonable assurance means a high but not absolute level of assurance. Absolute assurance is very rarely attainable as a result of factors such as the following:

- The use of selective testing and testing as at a point of time
- The inherent limitations of internal controls
- The fact that much of the evidence available to us is persuasive rather than conclusive
- The use of judgement in gathering and evaluating evidence and forming conclusions based on that evidence.

Because of the inherent limitations of any compliance procedure, it is possible that fraud, error or non-compliance may occur and not be detected. A reasonable assurance engagement is not designed to detect all instances of non-compliance, as the engagement is not performed continuously throughout the period and the procedures performed in respect of compliance are undertaken on a test basis.

The conclusion expressed in this report has been formed on the above basis. Any projection of the evaluation of the level of compliance to future periods is subject to the risk that the systems may become inadequate because of changes in conditions, or that the degree of compliance with management procedures may deteriorate.

Independence

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

The firm applies Auditing Standard ASQC 1 Quality Control for Firms that Perform Audits and Reviews of Financial Reports and Other Financial Information, Other Assurance Engagements and Related Services Engagements, and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Conclusion

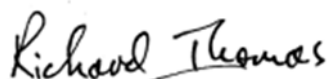
In our opinion, based on the procedures performed, except for the effect of the issues set out in the Basis for qualified conclusion section below, AETRH has complied, in all material respects, with the conditions of its Licence as outlined in the approved Audit Plan (dated October 2016) for the period 1 October 2013 to 30 September 2016.

Basis for qualified conclusion

The following Licence conditions were assessed as non-compliant (rating 2):

Reporting Manual number and Licence condition		Issue
124	<p>Integrated Regional Licence condition 16.1</p> <p>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.</p>	AETRH did not comply with the requirement of clause 5.2.1 of the Reporting Manual to submit a compliance report for the year ending 30 June 2014.
345	<p>Metering Code clause 3.12(4) <i>“Metering installation design requirements”</i></p>	<p>AETRH has not fully complied with the requirements to:</p> <ul style="list-style-type: none"> • Maintain drawings and supporting information, to the standard of good electricity industry practice, detailing the metering installation for maintenance and auditing purposes (<i>obligation 345</i>) • Maintain and administer a metering database containing the required standing data in accordance with Part 4 of the Metering Code (<i>obligations 366, 369 and 370</i>) • Develop an Energy Data Verification Request Form (<i>obligation 411</i>) • Submit to the Authority for its approval under clause 6.2 of the Metering Code: <ul style="list-style-type: none"> • A proposed model service level agreement • A proposed metrology procedure • Proposed mandatory link criteria.
366	<p>Metering Code clause 4.1(1) <i>“The metering database – general”</i></p>	
369	<p>Metering Code clause 4.2(1) <i>“The metering database – the registry”</i></p>	
370	<p>Metering Code clause 4.3(1) <i>“Standing data items”</i></p>	
411	<p>Metering Code clause 5.20(1) <i>“Energy data verification requests”</i></p> <p>Metering Code clause 6.2 <i>“Network operator must establish documents”</i></p>	

DELOITTE TOUCHE TOHMATSU


Richard Thomas

Partner

Perth, January 2017

2 Executive summary

2.1 Introduction and background

The Economic Regulation Authority (the **Authority**) has, under the provisions of the *Electricity Industry Act 2004* (the **Act**), issued to Alinta Energy Transmission (Roy Hill) Pty Ltd (**AETRH**) an Electricity Integrated Regional Licence (EIRL6) (the **Licence**).

Section 13 of the Act requires AETRH to provide the Authority with an audit (the **audit**) conducted by an independent expert acceptable to the Authority not less than once in every 24 month period (or any longer period that the Authority allows). The Authority set the period to be covered by the audit as 1 October 2013 to 30 September 2016.

At the request of AETRH, Deloitte Risk Advisory Pty Ltd (**Deloitte**) has undertaken a reasonable assurance audit of AETRH's compliance with its Licence obligations.

The Licence covers AETRH's generation, transmission, distribution and retail activity in relation to its supply of power to the Roy Hill iron ore mine via a 220kV transmission line from AETRH's Newman Power Station, a 6MW diesel power station at the Roy Hill mine site and 33kV distribution lines operating throughout the Roy Hill mine site. The construction of AETRH's transmission assets, distribution assets and diesel power station was completed on 15 March 2015. AETRH operates as a fully owned subsidiary within the Alinta Group and is supported by the resource and system capabilities of Alinta Energy.

Under short term Power Purchase Agreements between AETRH and BHPB, AETRH also continued to supply power to BHPB during the period up to July 2016. That power was supplied from a designated gas turbine, which was connected to BHPB owned overhead cables through a segregated busbar located in AETRH's 66kV switchyard.

2.2 Observations

In considering AETRH's internal control procedures, structure and environment, its compliance culture and its information systems specifically relevant to those licence obligations subject to audit, we observed that AETRH:

- Has developed procedures and controls designed to help:
 - Facilitate compliance with its Licence obligations
 - Uphold the integrity of its reporting to the Authority and other statutory organisations on matters specific to its Licence obligations
- Maintains a strong records management system and document library, although there is a documentation gap relating to its management of meters
- Has, through Power Purchase Agreements with its customers, addressed those requirements of the Licence and specifically the Metering Code that relate to its day-to-day operations and supply of electricity to customers
- Until the time of this audit, was not fully aware of all of its obligations under the Metering Code, in relation to its role as a network operator.

2.3 Findings

The following tables summarise the assessments made during the audit on AETRH's compliance and the adequacy of controls in place for AETRH to manage its compliance with the relevant obligations or conditions of the Licence:

Table 1 sets out the rating scale defined by the Authority in the Audit Guidelines for the assessment of the level of compliance with the conditions of the Licence. For the highest possible compliance rating to be achieved, AETRH was required to demonstrate it has maintained mature processes and controls, which facilitate compliance with relevant obligations.

Table 1: Compliance and control adequacy rating scale

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

- On a scale of 1 to 4, “1” is the highest compliance rating possible (defined as “Compliant”) with the rating scale moving through to “4”, the lowest rating possible (defined as “Non-compliant – major impact on customers or third parties”)
- On a scale of A to D, “A” is the highest control adequacy rating (defined as “Adequate controls – no improvement needed”) with the rating scale moving through to “D”, the lowest control adequacy rating possible (defined as “No controls evident”).

Table 4 at section 3 of this report provides further detail on the compliance and control adequacy rating scales. The above rating scale is defined by the Audit Guidelines.

Table 2: Summary of findings, by audit priority and compliance rating

Audit Priority	Compliance rating				NR	Total
	1	2	3	4		
Priority 1	-	-	-	-	-	-
Priority 2	-	-	-	-	2	2
Priority 3	4	5	-	-	11	20
Priority 4	33	1	-	-	78	112
Priority 5	11	-	-	-	18	29
Total:	48	6	-	-	109	163

Table 3: Summary of findings, by audit priority and control adequacy

Audit Priority	Control adequacy rating				NP ¹	Total
	A	B	C	D		
Priority 1	-	-	-	-	-	-
Priority 2	-	-	-	-	2	2
Priority 3	-	12	7	1	-	20
Priority 4	1	4	-	-	107	112
Priority 5	-	-	-	-	29	29
Total:	1	16	7	1	138	163

¹ Refers to the obligations for which a control assessment was not required (obligations with an audit priority of 4 or 5 and a compliance rating of 1, or which were not rateable).

Note that, in accordance with the current Audit Guidelines, obligations assessed as being “not applicable” to AETRH’s operations have not been included within this report.

Specific assessments for each Licence obligation are summarised at **Table 4** in the “Summary of findings” section of this report.

Detailed findings, including relevant observations, recommendations and action plans are located in section 4 “Detailed findings, recommendations and action plans” of this report.

2.4 AETRH’s response to previous audit recommendations

Not applicable - as this is the first audit of AETRH’s Licence obligations, there are no previous audit recommendations requiring AETRH’s response.

2.5 Recommendations and action plans

A. Resolved during current audit period

Reporting manual no. & Licence condition ref	Control adequacy	Issue
Obligation 124 A licensee must provide the Authority, in the manner prescribed, any information the Authority requires in connection with its functions under the Electricity Industry Act. <i>Integrated Regional Licence condition 16.1</i>	Adequate controls – no improvement needed (A)	Per clause 5.2.1 of the Reporting Manual, AETRH is required to submit compliance reports for the year ending 30 June to the Authority by 31 August each year. In relation to the year ending 30 June 2014, AETRH did not comply with the requirement to submit a compliance report. We note that as at 30 June 2014, AETRH’s assets were still under construction and AETRH had not yet commenced generating, transmitting, distributing or supplying electricity under the Licence.
	Compliance rating Non-compliant (2)	
Action taken Since August 2015, AETRH has utilised a compliance tracking system to ensure that required reports are prepared and submitted within the required timeframes. Date Resolved: August 2015		Auditor’s comments No further action required.

B. Unresolved at end of current audit period

Reporting manual no. & Licence condition ref	Control adequacy	Issue 1/2016
<p>Obligation 103 A licensee must notify details of the asset management system and any substantial changes to it to the Authority. <i>Electricity Industry Act section 14.1(b)</i></p>	<p>Generally adequate controls – improvement needed (B)</p> <hr/> <p>Compliance rating</p> <p>Compliant (1)</p>	<p>Through discussions with the Manager Asset Management & Engineering and General Manager Pilbara O&M; and consideration of AETRH’s Asset Management Framework and Site Asset Management Plans, we determined that AETRH’s asset management system has further evolved since the Authority was advised of the details of the system at the time of AETRH’s application for its Licence. The key enhancement made during the period subject to this audit relates to the use of the SPM Asset software for supplementing the capabilities of the Ellipse system in AETRH’s approach to assessing and treating risks. Judgement is required to determine whether changes to the asset management system during the audit period are sufficiently substantial as to require specific notification to the Authority in accordance with the requirements of section 14(1) of the Act. AETRH had not specifically considered this requirement and does not have a protocol in place for determining whether the requirement has been triggered. As it may be reasonable to form a view either way, we consider AETRH has not breached the requirements of the Act.</p>
<p>Recommendation 1/2016 AETRH establish a protocol for determining what constitutes a “substantial change” in its asset management system and for duly notifying the Authority when appropriate.</p>	<p>Action Plan 1/2016 AETRH will amend its Management of Change procedure to include a definition of a “substantial change” to the asset management system, requiring management under that procedure and which will acknowledge the requirement to notify the Authority of any such change. Responsible Person: Manager, Asset Management & Engineering Target Date: 31 December 2016</p>	

Reporting manual (obligation) no.	Metering Code clause	Control adequacy	Compliance rating
319	3.1	Generally adequate controls – improvement needed (B)	Not rated
320	3.2(1)	Inadequate controls – significant improvement required (C)	Not rated
326, 327	3.5(1), (2) and (3)	Generally adequate controls – improvement needed (B)	Not rated
331	3.7	Generally adequate controls – improvement needed (B)	Not rated
332	3.8	Generally adequate controls – improvement needed (B)	Compliant (1)
333	3.9(3)	Generally adequate controls – improvement needed (B)	Compliant (1)
336	3.10	Generally adequate controls – improvement needed (B)	Compliant (1)
337	3.11(1)	Generally adequate controls – improvement needed (B)	Not rated
340, 341	3.11A(1) and (2)	Generally adequate controls – improvement needed (B)	Not rated
342 - 344	3.12(1) to (3)	Generally adequate controls – improvement needed (B)	Not rated
345	3.12(4)	Inadequate controls – significant improvement required (C)	Non-compliant (2)
357	3.21(1)	Generally adequate controls – improvement needed (B)	Compliant (1)
366	4.1(1)	Inadequate controls – significant improvement required (C)	Non-compliant (2)
369	4.2(1)	Inadequate controls – significant improvement required (C)	Non-compliant (2)
370	4.3(1)	Inadequate controls – significant improvement required (C)	Non-compliant (2)
411	5.20(1)	Inadequate controls – significant improvement required (C)	Non-compliant (2)
422	5.22(1)	Generally adequate controls – improvement needed (B)	Compliant (1)
434	5.25	No controls evident (D)	Not rated
447	6.1(1)	Inadequate controls – significant improvement required (C)	Not rated
Issue 2/2016 - refer to next page			

Issue 2/2016

AETRH maintains two meters on its electricity transmission and distribution network for measuring and recording energy data relating to electricity transferred to its single customer's delivery points. AETRH's Power Purchase Agreement (**PPA**) with its customer specifies AETRH's obligations for installing, operating and maintaining metering equipment in accordance with *Good Engineering and Operating Practices* and the Metering Code. All energy data from these meters is captured within Alinta Energy's Honeywell Experion system.

Although AETRH has demonstrated that it has operated its meters and recorded related energy data to the satisfaction of its customer throughout the period subject to this audit:

1. AETRH has not fully complied with the requirements to:
 - Maintain drawings and supporting information, to the standard of good electricity industry practice, detailing the metering installation for maintenance and auditing purposes (**obligation 345**)
 - Maintain and administer a metering database containing the required standing data in accordance with Part 4 of the Metering Code (**obligations 366, 369 and 370**)
 - Develop an Energy Data Verification Request Form (**obligation 411**).
2. AETRH has not established a clear metering management plan or framework for demonstrating its:
 - Installation and maintenance of meters in accordance with an applicable metrology procedure, the specifications of the National Measurement Institute under the *National Measurements Act*; and the functionality and testing requirements outlined in Part 3 of the Metering Code (**obligations 319, 320, 326, 327, 331 to 333, 336, 337, 340 to 344**)
 - Management of validated energy data (**obligation 422**)
 - Compliance with all applicable agreements, rules, procedures, criteria and processes outlined in Part 6 of the Metering Code (**obligation 447**).

We also note that AETRH has not complied with clause 6.2 of the Metering Code, which requires a network operator to submit a proposed model service level agreement, metrology procedure and mandatory link criteria to the Authority for its approval (clause 6.2 of the Metering Code is not referenced in the Reporting Manual and was not included in the audit plan). We acknowledge that there are no other users of AETRH's transmission and distribution network and no foreseeable prospect of a request to use the network.

Recommendation 2/2016

AETRH:

1. Establish a formal metering database, maintain drawings and supporting information and develop an Energy Data Verification Request Form to ensure its compliance with the requirements of the Metering Code.
2. Prepare a metering management plan (or similar) to:
 - a. Incorporate the requirements of the Metering Code relevant to AETRH's metering operations
 - b. Consolidate and expand on the obligations contained in the PPA.
3. Reach a position on its approach for addressing the technical requirements of clause 6.2 of the Metering Code.

Action Plan 2/2016

AETRH will:

1. Establish a formal metering database, maintain drawings and supporting information and develop an Energy Data Verification Request Form to ensure its compliance with the requirements of the Metering Code.
2. Prepare a metering management plan to incorporate the requirements of the Metering Code relevant to AETRH's metering operations.
3. Reach a position on its approach for addressing the technical requirements of clause 6.2 of the Metering Code.

Responsible Person: General Manager Pilbara O&M

Target Date: 31 March 2017

2.6 Scope and objectives

As described in our engagement letter dated 13 July 2016, we have conducted a reasonable assurance audit in order to state whether, in our opinion, based on our procedures, AETRH has complied, in all material respects, with the conditions of its Licence as outlined in the approved Audit Plan (dated October 2016) during the period 1 October 2013 to 30 September 2016.

Our engagement was conducted in accordance with Australian Standard on Assurance Engagements ASAE 3100 Compliance Engagements, issued by the Australian Auditing and Assurance Standards Board and provides reasonable assurance as defined in ASAE 3100. The procedures we performed are described in more detail in section 2.7 below.

A reasonable assurance engagement in accordance with ASAE 3100 involves performing procedures to obtain evidence about the compliance with the conditions of the Licence. The nature, timing and extent of procedures selected depend on the assurance practitioner's professional judgement, including the assessment of the risks of material misstatement in compliance with the conditions of the Licence. In making those risk assessments; we considered internal controls in relation to compliance with the conditions of the Licence.

ASAE 3100 also requires us to comply with the relevant ethical requirements of the Australian professional accounting bodies.

The Authority has summarised the requirements of the applicable legislation that it expects to be reported upon and included in the scope of this audit in its *September 2014 Electricity Compliance Reporting Manual (Reporting Manual)*.

The Audit Plan approved by the Authority for this audit sets out the Licence conditions confirmed to be included in the scope of the audit, along with the risk assessments and audit priority assigned to each licence obligation. Note that under the current Audit Guidelines, the audit report is not required to include reference to those obligations assessed as "Not Applicable" to AETRH's operations.

2.6.1 Risk assessment revisions

During the audit, we determined that the following obligations were not applicable to AETRH's operations:

- **72 to 77:** The Electricity Industry (Obligation to Connect Code) defines customers as small use customers ("a customer who consumes not more than 160 MWh of electricity per annum"). AETRH is not licenced to supply electricity to small use customers.

2.7 Approach

Our approach for this audit involved the following activities, which were undertaken during the period November to December 2016:

- Utilising the Audit Guidelines and Reporting Manuals (June 2013, May 2014, July 2014 and September 2014 versions) as a guide, development of a risk assessment which involved discussions with key staff and document review to assess controls
- Development of an Audit Plan (see **Appendix A**) for approval by the Authority and an associated work program
- Interviews with relevant site level AETRH staff to gain understanding of process controls (see **Appendix B** for staff involved)
- Review of documents and walkthrough of processes and controls to assess the overall compliance and effectiveness of those processes and controls in accordance with Licence obligations (see **Appendix B** for reference listing)
- Sample testing for obligations assessed as an audit priority 3 (or above) and where there was relevant activity to determine whether transactions complied with the requirements of the obligation
- Reporting of findings to AETRH for review and response.

3 Summary of findings

Table 1 in section 2 above sets out the rating scale defined by the Authority in the Audit Guidelines for the assessment of the level of compliance with the conditions of the Licence. For the highest possible compliance rating to be achieved, AETRH was required to demonstrate it has maintained mature processes and controls, which facilitate compliance with relevant obligations.

The remainder of this report provides:

- A summary of the findings for the compliance obligations (at **Table 4** below)
- Detailed findings, including relevant observations, recommendations and action plans (at **Section 4**).

The risk assessment has been included in this summary to give context to the ratings that have been determined.

Table 4: Compliance Ratings

Refer to Detailed Findings at section 4 and Audit Plan at Appendix A for descriptions of the obligations. Note that detailed findings are not presented for those obligations assessed to be not applicable to AETRH's operations for the period subject to audit - refer to the Audit Plan at Appendix A for further explanation.

#	Obligation reference (condition/clause)	Audit Plan				Adequacy of controls rating					Compliance rating					
		Consequence	Likelihood	Inherent Risk Rating	Control assessment	A	B	C	D	NP	Audit Risk/ Priority	1	2	3	4	NR
12 Electricity Industry Act – Licence Conditions and Obligations																
101	13(1)	Minor	Unlikely	Low	Moderate					✓	Priority 5	✓				
102	14(1)(a)	Minor	Probable	Low	Moderate					✓	Priority 5	✓				
103	14(1)(b)	Moderate	Probable	Medium	Moderate		✓				Priority 4	✓				
104	14(1)(c)	Minor	Unlikely	Low	Moderate					✓	Priority 5	✓				
105	17(1)	Moderate	Probable	Medium	Moderate					✓	Priority 4	✓				
106	31(3)	Minor	Probable	Low	Moderate					✓	Priority 5	✓				
107	41(6)	Moderate	Probable	Medium	Moderate					✓	Priority 4	✓				
110	76	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
112	115(1)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4	✓				
13 Electricity Licences – Licence Conditions and Obligations																
119	12.1 or 24.1	Moderate	Unlikely	Medium	Strong					✓	Priority 4	✓				
120	13.4 or 25.4	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
121	14.2	Moderate	Unlikely	Medium	Moderate					✓	Priority 4	✓				
122	20.5	Moderate	Unlikely	Medium	Moderate					✓	Priority 4	✓				
123	15.1	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
124	16.1	Moderate	Unlikely	Medium	Moderate	✓					Priority 4		✓			
125	17.1 and 17.2	Moderate	Unlikely	Medium	Moderate					✓	Priority 4	✓				
126	18.1	Moderate	Unlikely	Medium	Moderate					✓	Priority 4	✓				
127	Licence condition 29.1	Major	Unlikely	High	Moderate					✓	Priority 2					✓
128	Licence condition 29.3	Major	Unlikely	High	Moderate					✓	Priority 2					✓
15 Electricity Industry Metering Code – Licence Conditions and Obligations																
Part 2 Code objectives and arms-length treatment																
317	2.2(1)(a)	Minor	Unlikely	Low	Moderate					✓	Priority 5					✓
318	2.2(1)(b)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓

#	Obligation reference (condition/clause)	Audit Plan				Adequacy of controls rating					Compliance rating					
		Consequence	Likelihood	Inherent Risk Rating	Control assessment	A	B	C	D	NP	Audit Risk/ Priority	1	2	3	4	NR
Part 3 Meters and metering instalments																
319	3.1	Moderate	Probable	Medium	Weak		✓				Priority 3					✓
320	3.2(1)	Moderate	Probable	Medium	Weak			✓			Priority 3					✓
321	3.3(1)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
322	3.3(3)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
323	3.3A(1)	Moderate	Probable	Medium	Moderate					✓	Priority 4					✓
324	3.3B	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
325	3.3C	Moderate	Probable	Medium	Moderate					✓	Priority 4					✓
326	3.5(1) and (2)	Moderate	Probable	Medium	Weak		✓				Priority 3					✓
327	3.5(3)	Moderate	Probable	Medium	Weak		✓				Priority 3					✓
328	3.5(4)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4	✓				
329	3.5(6)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
330	3.5(9)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
331	3.7	Moderate	Probable	Medium	Weak		✓				Priority 3					✓
332	3.8	Moderate	Probable	Medium	Weak		✓				Priority 3	✓				
333	3.9(3)	Moderate	Probable	Medium	Weak		✓				Priority 3	✓				
334	3.9(7)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
335	3.9(9)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
336	3.10	Moderate	Probable	Medium	Weak		✓				Priority 3	✓				
337	3.11(1)	Moderate	Probable	Medium	Weak		✓				Priority 3					✓
338	3.11(2)	Moderate	Probable	Medium	Moderate					✓	Priority 4					✓
339	3.11(3)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
340	3.11A(1)	Moderate	Probable	Medium	Weak		✓				Priority 3					✓
341	3.11A(2)	Moderate	Probable	Medium	Moderate		✓				Priority 4					✓
342	3.12(1)	Moderate	Probable	Medium	Weak		✓				Priority 3					✓
343	3.12(2)	Moderate	Probable	Medium	Weak		✓				Priority 3					✓
344	3.12(3)	Moderate	Probable	Medium	Weak		✓				Priority 3	✓				

#	Obligation reference (condition/clause)	Audit Plan				Adequacy of controls rating					Compliance rating					
		Consequence	Likelihood	Inherent Risk Rating	Control assessment	A	B	C	D	NP	Audit Risk/ Priority	1	2	3	4	NR
345	3.12(4)	Moderate	Probable	Medium	Weak			✓			Priority 3		✓			
346	3.13(1)	Moderate	Probable	Medium	Moderate					✓	Priority 4	✓				
347	3.13(3)(c)	Moderate	Probable	Medium	Moderate					✓	Priority 4					✓
348	3.13(4)	Moderate	Probable	Medium	Moderate					✓	Priority 4	✓				
349	3.14(3)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
355	3.20(1)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
356	3.20(3)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
357	3.21(1)	Moderate	Unlikely	Medium	Moderate		✓				Priority 4	✓				
358	3.21(2)	Moderate	Probable	Medium	Moderate					✓	Priority 4	✓				
359	3.22	Moderate	Unlikely	Medium	Moderate					✓	Priority 4	✓				
360	3.23(a)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
361	3.23(b)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
364	3.27	Moderate	Unlikely	Medium	Moderate					✓	Priority 4	✓				
365	3.29	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
Part 4 The metering database																
366	4.1(1)	Moderate	Probable	Medium	Weak			✓			Priority 3		✓			
367	4.1(2)	Moderate	Probable	Medium	Moderate					✓	Priority 4	✓				
368	4.1(3)	Moderate	Probable	Medium	Moderate					✓	Priority 4	✓				
369	4.2(1)	Moderate	Probable	Medium	Weak			✓			Priority 3		✓			
370	4.3(1)	Moderate	Probable	Medium	Weak			✓			Priority 3		✓			
371	4.4(1)	Minor	Unlikely	Low	Moderate					✓	Priority 5					✓
372	4.5(1)	Minor	Unlikely	Low	Moderate					✓	Priority 5					✓
373	4.5(2)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
374	4.6(1)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
375	4.6(2)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
376	4.7	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
377	4.8(3)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
378	4.8(3A)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓

#	Obligation reference (condition/clause)	Audit Plan				Adequacy of controls rating					Compliance rating					
		Consequence	Likelihood	Inherent Risk Rating	Control assessment	A	B	C	D	NP	Audit Risk/ Priority	1	2	3	4	NR
379	4.8(4)(a)	Moderate	Probable	Medium	Moderate					✓	Priority 4	✓				
380	4.8(4)(b)	Moderate	Probable	Medium	Moderate					✓	Priority 4	✓				
381	4.8(5)	Moderate	Probable	Medium	Moderate					✓	Priority 4	✓				
382	4.9	Moderate	Probable	Medium	Moderate					✓	Priority 4	✓				
Part 5 Metering services																
383	5.1 (1)	Minor	Unlikely	Low	Moderate					✓	Priority 5					✓
384	5.1(2)	Minor	Unlikely	Low	Moderate					✓	Priority 5					✓
385	5.3	Moderate	Probable	Medium	Moderate					✓	Priority 4	✓				
386	5.4(1)	Minor	Probable	Low	Moderate					✓	Priority 5	✓				
387	5.4(1A)	Moderate	Probable	Medium	Moderate					✓	Priority 4	✓				
388	5.4(2)	Minor	Probable	Low	Moderate					✓	Priority 5					✓
389	5.5(2)	Minor	Unlikely	Low	Moderate					✓	Priority 5					✓
390	5.5(2A)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
391	5.6(1)	Minor	Unlikely	Low	Moderate					✓	Priority 5	✓				
392	5.7	Moderate	Unlikely	Medium	Moderate					✓	Priority 4	✓				
393	5.8	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
394	5.9	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
397	5.12(1)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
398	5.13	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
399	5.14(3)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
400	5.15	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
401	5.16	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
402	5.17(1)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4	✓				
403	5.17A(1)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
404	5.17A(3)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
405	5.18	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
406	5.19(1)	Minor	Unlikely	Low	Moderate					✓	Priority 5					✓

#	Obligation reference (condition/clause)	Audit Plan				Adequacy of controls rating					Compliance rating					
		Consequence	Likelihood	Inherent Risk Rating	Control assessment	A	B	C	D	NP	Audit Risk/ Priority	1	2	3	4	NR
407	5.19(2)	Minor	Unlikely	Low	Moderate					✓	Priority 5					✓
408	5.19(3)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
409	5.19(5)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
410	5.19(6)	Minor	Unlikely	Low	Moderate					✓	Priority 5					✓
411	5.20(1)	Moderate	Probable	Medium	Weak			✓			Priority 3		✓			
412	5.20(2)	Moderate	Probable	Medium	Moderate					✓	Priority 4					✓
413	5.20(4)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
414	5.21(2)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
415	5.21(4)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
416	5.21(5)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
417	5.21(6)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
418	5.21(8)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
419	5.21(9)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
420	5.21(11)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
421	5.21(12)	Moderate	Probable	Medium	Moderate					✓	Priority 4					✓
422	5.22(1)	Moderate	Probable	Medium	Moderate		✓				Priority 4	✓				
423	5.22(2)	Moderate	Probable	Medium	Moderate					✓	Priority 4	✓				
424	5.22(3)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
425	5.22(4)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
426	5.22(5)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
427	5.22(6)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
428	5.23(1)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
429	5.23(3)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
430	5.24(1)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
431	5.24(2)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
432	5.24(3)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
433	5.24(4)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓

#	Obligation reference (condition/clause)	Audit Plan				Adequacy of controls rating					Compliance rating					
		Consequence	Likelihood	Inherent Risk Rating	Control assessment	A	B	C	D	NP	Audit Risk/ Priority	1	2	3	4	NR
434	5.25	Moderate	Probable	Medium	Weak				✓		Priority 3					✓
435	5.27	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
441	5.37(1)(a)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
442	5.37(1)(b)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
443	5.37(1)(b)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
444	5.37(2)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
445	5.37(3)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
446	5.38	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
Part 6 Documentation																
447	6.1(1)	Moderate	Probable	Medium	Weak			✓			Priority 3					✓
448	6.1(2)	Moderate	Probable	Medium	Moderate					✓	Priority 4					✓
449	6.20(4)	Minor	Unlikely	Low	Moderate					✓	Priority 5					✓
450	6.20(5)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
Part 7 Notes and confidential information																
451	7.2(1)	Minor	Probable	Low	Moderate					✓	Priority 5	✓				
452	7.2(2)	Moderate	Probable	Medium	Moderate					✓	Priority 4	✓				
453	7.2(4)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
454	7.2(5)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
455	7.5	Moderate	Probable	Medium	Moderate					✓	Priority 4	✓				
456	7.6(1)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
Part 8 Dispute resolution																
457	8.1(1)	Minor	Unlikely	Low	Moderate					✓	Priority 5					✓
458	8.1(2)	Minor	Unlikely	Low	Moderate					✓	Priority 5					✓
459	8.1(3)	Minor	Unlikely	Low	Moderate					✓	Priority 5					✓
460	8.1(4)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
461	8.3(2)	Minor	Unlikely	Low	Moderate					✓	Priority 5					✓
16 Electricity Industry (Network Quality and Reliability of Supply) Code – Licence Conditions and Obligations																
462	5(1)	Minor	Probable	Low	Moderate					✓	Priority 5	✓				

#	Obligation reference (condition/clause)	Audit Plan				Adequacy of controls rating					Compliance rating					
		Consequence	Likelihood	Inherent Risk Rating	Control assessment	A	B	C	D	NP	Audit Risk/ Priority	1	2	3	4	NR
463	8	Minor	Unlikely	Low	Moderate					✓	Priority 5					✓
464	9	Minor	Probable	Low	Moderate					✓	Priority 5	✓				
465	10(1)	Minor	Probable	Low	Moderate					✓	Priority 5	✓				
466	10(2)	Minor	Probable	Low	Moderate					✓	Priority 5					✓
468	13(2)	Minor	Unlikely	Low	Moderate					✓	Priority 5					✓
469	13(3)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
470	14(8)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4					✓
471	15(2)	Moderate	Probable	Medium	Moderate					✓	Priority 4					✓
477	23(1)	Minor	Probable	Low	Moderate					✓	Priority 5	✓				
478	23(2)	Moderate	Probable	Medium	Moderate					✓	Priority 4	✓				
479	24(3)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4	✓				
480	24(4)	Moderate	Unlikely	Medium	Moderate					✓	Priority 4	✓				

4 Detailed findings, recommendations and action plans

This section has been structured in subsections for the relevant Codes and Regulations against which we assessed AETRH's compliance. The sections are:

- 4.1 Electricity Industry Act 2004
- 4.2 Electricity Licenses - Licence Conditions and Obligations
- 4.3 Electricity Industry Metering Code 2005
- 4.4 Electricity Industry (Network Quality and Reliability of Supply) Code.

Each section contains:

Assessment of compliance and control adequacy – the conclusions from our audit procedures and our assessment of AETRH's compliance with the applicable obligations. These tables include:

- **Findings** – the auditor's understanding of the process and any issues that have been identified during the audit
- **Recommendations** – recommendations for improvement or enhancement of the process or control
- **Action plans** – AETRH's formal response to audit recommendations, providing details of action to be implemented to address the specific issue raised by the audit, assignment of the actions to appropriate staff and corresponding completion dates for the actions.

The compliance and control adequacy ratings have been summarised below for each sub-section.

Controls adequacy rating						Compliance rating					
A	B	C	D	NP	Total	1	2	3	4	NR	Total
<i>4.1 Electricity Industry Act – Licence Conditions and Obligations</i>											
-	1	-	-	8	9	8	-	-	-	1	9
<i>4.2 Electricity Licences – Licence Conditions and Obligations</i>											
1	-	-	-	9	10	5	1	-	-	4	10
<i>4.3 Electricity Industry Metering Code – Licence Conditions and Obligations</i>											
-	15	7	1	108	131	28	5	-	-	98	131
<i>4.4 Electricity Industry (Network Quality and Reliability of Supply) Code – Licence Conditions and Obligations</i>											
-	-	-	-	13	13	7	-	-	-	6	13
1	16	7	1	138	163	48	6	-	-	109	163

4.1 Electricity Industry Act 2004

No.	Obligation under condition	Findings
101	<p>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.</p> <p><i>Electricity Industry Act section 13(1)</i></p>	<p>On 26 July 2016, Deloitte was appointed with the Authority's approval to undertake the first performance audit for the period 1 October 2013 to 30 September 2016. AETRH's arrangements made prior to 1 October 2016 were consistent with the requirements of section 13(1) of the Act.</p>
	<p>Priority: 5 Controls rating: NP Compliance Rating: 1</p>	
102	<p>A licensee must provide for an asset management system.</p> <p><i>Electricity Industry Act section 14(1)(a)</i></p>	<p>We examined correspondence between AETRH and the Authority, which confirmed that:</p> <ul style="list-style-type: none"> The construction of AETRH's assets was completed on 15 March 2015 AETRH had developed an asset management system and had provided an outline of that an asset management system to the Authority on 19 March 2015.
	<p>Priority:5 Controls rating: NP Compliance Rating: 1</p>	
103	<p>A licensee must notify details of the asset management system and any substantial changes to it to the Authority.</p> <p><i>Electricity Industry Act section 14(1)(b)</i></p>	<p>Through discussions with the Manager Asset Management & Engineering and General Manager Pilbara O&M; and consideration of AETRH's Asset Management Framework and Site Asset Management Plans, we determined that AETRH's asset management system has further evolved since the Authority was advised of the details of the system at the time of AETRH's application for its Licence and subsequently on 19 March 2015, at the time AETRH provided an outline of that an asset management system to the Authority. The key enhancement made during the period subject to this audit relates to the use of the SPM Asset software for supplementing the capabilities of the Ellipse system in AETRH's approach to assessing and treating risks.</p> <p>Judgement is required to determine whether changes to the asset management system during the audit period are sufficiently substantial as to require specific notification to the Authority in accordance with the requirements of section 14(1) of the Act. AETRH had not specifically considered this requirement and does not have a protocol in place for determining whether the requirement has been triggered.</p> <p>As it may be reasonable to form a view either way, we consider AETRH has not breached the requirements of the Act.</p>
	<p>Priority:4 Controls rating: B Compliance Rating: 1</p>	
	<p>Recommendation 1/2016</p> <p>AETRH establish a protocol for determining what constitutes a "substantial change" in its asset management system and for duly notifying the Authority when appropriate.</p>	<p>Action Plan 1/2016</p> <p>AETRH will amend its Management of Change procedure to include a definition of a "substantial change" to the asset management system, requiring management under that procedure and which will acknowledge the requirement to notify the Authority of any such change.</p> <p>Responsible Person: Manager, Asset Management & Engineering Target Date: 31 December 2016</p>

No.	Obligation under condition	Findings			
104	<p>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.</p> <p><i>Electricity Industry Act section 14(1)(c)</i></p>	<p>On 26 July 2016, Deloitte was appointed with the Authority's approval to undertake the first review of AETRH's asset management system for the period 1 October 2013 to 30 September 2016. AETRH's arrangements made prior to 1 October 2016 were consistent with the requirements of section 14(1)(c) of the Act.</p>			
	<table border="1"> <tr> <td>Priority:5</td> <td>Controls rating: NP</td> <td>Compliance Rating: 1</td> </tr> </table>	Priority:5	Controls rating: NP	Compliance Rating: 1	
Priority:5	Controls rating: NP	Compliance Rating: 1			
105	<p>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.</p> <p><i>Electricity Industry Act section 17(1)</i></p>	<p>Through examination of AETRH's financial records of licence fee payments processed and the respective invoices issued by the Authority for licence fees payable, we determined that the annual licence fees for 2013, 2014 and 2015 were appropriately paid within one month of the 1 October anniversary date.</p>			
	<table border="1"> <tr> <td>Priority:4</td> <td>Controls rating: NP</td> <td>Compliance Rating: 1</td> </tr> </table>	Priority:4	Controls rating: NP	Compliance Rating: 1	
Priority:4	Controls rating: NP	Compliance Rating: 1			
106	<p>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.</p> <p><i>Electricity Industry Act section 31(3)</i></p>	<p>Through discussion with the General Manager Pilbara O&M and Newman Power Station Plant Manager and examination of AETRH's Emergency Response Plan and the PPA with its customer, we determined that:</p> <ul style="list-style-type: none"> • AETRH maintains emergency response, incident response and business continuity management systems, which support AETRH's commitment to its customer for maintaining continuity of supply and safe and secure operations • AETRH managers are notified (via email distribution group) of significant disruptions as and when they occur. 			
	<table border="1"> <tr> <td>Priority:5</td> <td>Controls rating: NP</td> <td>Compliance Rating: 1</td> </tr> </table>	Priority:5	Controls rating: NP	Compliance Rating: 1	
Priority:5	Controls rating: NP	Compliance Rating: 1			
107	<p>A licensee must pay the costs of taking an interest in land or an easement over land.</p> <p><i>Electricity Industry Act section 41(6)</i></p>	<p>The route of AETRH's transmission line crosses state and private landowner properties, including pastoral leases, freehold tenure, native title claim areas and tenure under the Mining Act 1978.</p> <p>Through discussion with the General Manager Pilbara O&M, examination of documentation supporting AETRH's licence application and easement agreements, and consideration of AETRH's payment arrangements, we determined that AETRH has applied the following processes during the period subject to audit:</p> <ul style="list-style-type: none"> • As part of its licence application process, AETRH identified all relevant land owners and parties with an interest in land on which its transmission assets are located • Where required, easements and agreements were established to facilitate the construction of AETRH's transmission assets on those land holdings • In instances where there is an associated cost to AETRH in those easements and agreements, AETRH pays the due amount in accordance with invoices or contractual terms. 			
	<table border="1"> <tr> <td>Priority:4</td> <td>Controls rating: NP</td> <td>Compliance Rating: 1</td> </tr> </table>	Priority:4	Controls rating: NP	Compliance Rating: 1	
Priority:4	Controls rating: NP	Compliance Rating: 1			

No.	Obligation under condition	Findings			
110	<p>If a designation under section 71(1) of the Electricity Industry Act is in force a licensee must perform the functions of a retailer of last resort and must carry out the supplier of last resort plan if it comes into operation under section 70 of the Electricity Industry Act.</p> <p><i>Electricity Industry Act section 76</i></p>	<p>As the Authority has not yet designated an area under section 68(1) of the Electricity Industry Act, AETRH's compliance with this obligation cannot be rated for the period under audit. The Manager Regulatory Compliance confirmed that the Authority has not consulted with AETRH under section 71 in relation to designating AETRH (the licensee) as a supplier of last resort.</p>			
	<table border="1"> <tr> <td>Priority:4</td> <td>Controls rating: NP</td> <td>Compliance Rating: NR</td> </tr> </table>	Priority:4	Controls rating: NP	Compliance Rating: NR	
Priority:4	Controls rating: NP	Compliance Rating: NR			
112	<p>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.</p> <p><i>Electricity Industry Act section 115(1)</i></p>	<p>Through discussion with the General Manager Pilbara O&M, we determined that AETRH has not engaged in any 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.</p> <p>Access to AETRH's network (relating to the Licence) is governed by AETRH's PPA with its customer. The General Manager Pilbara O&M confirmed that there have been no additional requests for access to the network during the audit period outside of the terms of the existing PPA.</p>			
	<table border="1"> <tr> <td>Priority:4</td> <td>Controls rating: NP</td> <td>Compliance Rating: 1</td> </tr> </table>	Priority:4	Controls rating: NP	Compliance Rating: 1	
Priority:4	Controls rating: NP	Compliance Rating: 1			

4.2 Electricity Licences – Licence Conditions and Obligations

No.	Obligation under condition	Findings
119	<p>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.</p> <p><i>Integrated Regional Licence condition 12.1 or 24.1</i></p>	<p>The Manager Finance (Power Generation) confirmed that:</p> <ul style="list-style-type: none"> To the best of his knowledge, the Alinta Group reporting structure in which the licensee (Alinta Energy Transmission (Roy Hill) Pty Ltd) is a subsidiary, has maintained accounting records that comply with Australian Accounting Standards during the period 1 October 2013 to 30 September 2016 AETRH's financial reporting period is from 1 July to 30 June There are no significant accounting transactions or items that would currently jeopardise AETRH's compliance with accounting standards Alinta Energy's financial statements for the year ending 30 June 2016 were unqualified. <p>Alinta Energy's published financial statements and signed annual audit reports were sighted for the years ending 30 June 2014 and 2015. The financial statements were unqualified.</p>
	<p>Priority:4</p> <p>Controls rating: NP</p> <p>Compliance Rating: 1</p>	
120	<p>A licensee must comply with any individual performance standards prescribed by the Authority.</p> <p><i>Integrated Regional Licence condition 13.4 or 25.4</i></p>	<p>The Manager Regulatory Compliance confirmed that, during the period 1 October 2013 to 30 September 2016, AETRH was not prescribed individual performance standards by the Authority. Therefore, an assessment of AETRH's compliance with this obligation cannot be made for the period subject to audit.</p>
	<p>Priority:4</p> <p>Controls rating: NP</p> <p>Compliance Rating: NR</p>	
121	<p>A licensee must comply, and require its auditor to comply, with the Authority's standard audit guidelines dealing with the performance audit.</p> <p><i>Integrated Regional Licence condition 14.2</i></p>	<p>On 26 July 2016, Deloitte was appointed with the Authority's approval to undertake the first performance audit for the period 1 October 2013 to 30 September 2016. AETRH's arrangements made prior to 1 October 2016 were consistent with the requirements of the Authority's standard audit guidelines.</p>
	<p>Priority:4</p> <p>Controls rating: NP</p> <p>Compliance Rating: 1</p>	
122	<p>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.</p> <p><i>Integrated Regional Licence condition 20.5</i></p>	<p>On 26 July 2016, Deloitte was appointed with the Authority's approval to undertake the first review of AETRH's asset management system for the period 1 October 2013 to 30 September 2016. AETRH's arrangements made prior to 1 October 2016 were consistent with the requirements of the Authority's standard audit guidelines.</p>
	<p>Priority:4</p> <p>Controls rating: NP</p> <p>Compliance Rating: 1</p>	
123	<p>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.</p> <p><i>Integrated Regional Licence condition 15.1</i></p>	<p>The Manager Regulatory Compliance confirmed that, during the period 1 October 2013 to 30 September 2016, AETRH was not under external administration and has not undergone any significant change in circumstances upon which its Licence was granted, which may affect its ability to meet its Licence obligations. Accordingly, there was no obligation to report to the Authority.</p>
	<p>Priority:4</p> <p>Controls rating: NP</p> <p>Compliance Rating: NR</p>	

No.	Obligation under condition	Findings			
124	<p>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.</p> <p><i>Integrated Regional Licence condition 16.1</i></p>	<p>Per clause 5.2.1 of the Reporting Manual, AETRH is required to submit compliance reports for the year ending 30 June to the Authority by 31 August each year:</p> <ul style="list-style-type: none"> AETRH submitted compliance reports for the years ending 30 June 2015 and 30 June 2016 to the Authority by 31 August each year In relation to the year ending 30 June 2014, AETRH's assets were still under construction and AETRH had not yet commenced generating, transmitting, distributing or supplying electricity under the Licence. However, there remained a requirement for AETRH to submit a compliance report, which AETRH did not meet. <p>Through discussions with the Regulation Wholesale Manager and consideration of AETRH's compliance management activities, we determined that AETRH has the following processes in place to provide the required information to the Authority:</p> <ul style="list-style-type: none"> The Regulation Wholesale Manager is responsible for monitoring compliance with AETRH's Licence obligations, including the timing of submission of required information and reports Since August 2015, AETRH has utilised a compliance tracking system to ensure that required reports are prepared and submitted within the required timeframes. <p>The Manager Regulatory Compliance confirmed that for the period subject to audit, the Authority made ad hoc enquiries but has not required AETRH to formally provide any further information.</p>			
	<table border="1"> <tr> <td>Priority:4</td> <td>Controls rating: A</td> <td>Compliance Rating: 2</td> </tr> </table>	Priority:4	Controls rating: A	Compliance Rating: 2	
Priority:4	Controls rating: A	Compliance Rating: 2			
	<p>Recommendation</p> <p>Not Applicable – this issue was resolved during the audit period.</p>	<p>Action Plan</p> <p>No further action required.</p>			
125	<p>A licensee must publish any information it is directed by the Authority to publish, within the timeframes specified.</p> <p><i>Integrated Regional Licence condition 17.1 and 17.2</i></p>	<p>The Manager Regulatory Compliance confirmed that the Authority did not direct AETRH to publish any information during the period 1 October 2013 to 30 September 2016.</p> <p>We note that under section 28 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005, AETRH is exempt from publishing an annual performance report each year as it is not permitted to contract small use customers under the Licence.</p>			
	<table border="1"> <tr> <td>Priority:4</td> <td>Controls rating: NP</td> <td>Compliance Rating: 1</td> </tr> </table>	Priority:4	Controls rating: NP	Compliance Rating: 1	
Priority:4	Controls rating: NP	Compliance Rating: 1			
126	<p>Unless otherwise specified, all notices must be in writing.</p> <p><i>Integrated Regional Licence condition 18.1</i></p>	<p>The Regulation Wholesale Manager maintains manual and scanned records to evidence formal communications with the Authority, which have been made via post or email.</p>			
	<table border="1"> <tr> <td>Priority:4</td> <td>Controls rating: NP</td> <td>Compliance Rating: 1</td> </tr> </table>	Priority:4	Controls rating: NP	Compliance Rating: 1	
Priority:4	Controls rating: NP	Compliance Rating: 1			
127	<p>A distributor must create and maintain a Priority Restoration Register.</p> <p><i>Integrated Regional Licence condition 29.1</i></p>	<p><i>Obligations 127 and 128</i></p> <p>Schedule 2 – Additional Licence Clauses, clause 3.1 of AETRH's Licence states that AETRH "...is not required to maintain a priority restoration register where the distribution system covered by this licence transports electricity to one customer only".</p>			
	<table border="1"> <tr> <td>Priority:2</td> <td>Controls rating: NP</td> <td>Compliance Rating: NR</td> </tr> </table>	Priority:2	Controls rating: NP	Compliance Rating: NR	
Priority:2	Controls rating: NP	Compliance Rating: NR			

No.	Obligation under condition	Findings	
128	<p>The Priority Restoration Register must comply with any criteria determined by the Minister.</p> <p><i>Integrated Regional Licence condition 29.3</i></p>	<p>As AETRH's distribution system transported electricity to one customer only during the period subject to audit, AETRH was not required to maintain a priority restoration register.</p>	
	Priority:2	Controls rating: NP	Compliance Rating: NR

4.3 Electricity Industry Metering Code 2012

Summary findings

AETRH maintains two meters on its electricity transmission and distribution network for measuring and recording energy data relating to electricity transferred to its single customer's delivery points. AETRH's Power Purchase Agreement (PPA) with its customer specifies AETRH's obligations for installing, operating and maintaining metering equipment in accordance with *Good Engineering and Operating Practices* and the Metering Code. All energy data from these meters is captured within Alinta Energy's Honeywell Experion system.

Although AETRH has demonstrated that it has operated its meters and recorded related energy data to the satisfaction of its customer throughout the period subject to this audit:

1. AETRH has not fully complied with the requirements to:
 - Maintain drawings and supporting information, to the standard of good electricity industry practice, detailing the metering installation for maintenance and auditing purposes (*obligation 345*)
 - Maintain and administer a metering database containing the required standing data in accordance with Part 4 of the Metering Code (*obligations 366, 369 and 370*)
 - Develop an Energy Data Verification Request Form (*obligation 411*).
2. AETRH has not established a clear metering management plan or framework for demonstrating its:
 - Installation and maintenance of meters in accordance with an applicable metrology procedure, the specifications of the National Measurement Institute under the *National Measurements Act*, and the functionality and testing requirements outlined in Part 3 of the Metering Code (*obligations 319, 320, 326, 327, 331 to 333, 336, 337, 340 to 344, 434*)
 - Management of validated energy data (*obligation 422*)
 - Compliance with all applicable agreements, rules, procedures, criteria and processes outlined in Part 6 of the Metering Code (*obligation 447*).

We also note that AETRH has not complied with clause 6.2 of the Metering Code, which requires a network operator to submit a proposed model service level agreement, metrology procedure and mandatory link criteria to the Authority for its approval (clause 6.2 of the Metering Code is not referenced in the Reporting Manual and was not included in the audit plan). We acknowledge that there are no other users of AETRH's transmission and distribution network and no foreseeable prospect of a request to use the network.

The recommendation and action plan below applies to obligations 319, 320, 326, 327, 331 to 333, 336, 337, 345, 340 to 344, 366, 369, 370, 411, 422, 434 and 447.

Recommendation 2/2016

AETRH:

1. Establish a formal metering database, maintain drawings and supporting information and develop an Energy Data Verification Request Form to ensure its compliance with the requirements of the Metering Code.
2. Prepare a metering management plan (or similar) to:
 - c. Incorporate the requirements of the Metering Code relevant to AETRH's metering operations
 - d. Consolidate and expand on the obligations contained in the PPA.
3. Reach a position on its approach for addressing the technical requirements of clause 6.2 of the Metering Code.

Action Plan 2/2016

AETRH will:

1. Establish a formal metering database, maintain drawings and supporting information and develop an Energy Data Verification Request Form to ensure its compliance with the requirements of the Metering Code.
2. Prepare a metering management plan to incorporate the requirements of the Metering Code relevant to AETRH's metering operations.
3. Reach a position on its approach for addressing the technical requirements of clause 6.2 of the Metering Code.

Responsible Person: General Manager Pilbara O&M

Target Date: 31 December 2016

No.	Obligation under condition	Findings
Part 2 Code objectives and arms-length treatment		
317	A network operator must treat all Code participants that are its associates on an arms-length basis. <i>Metering Code clause 2.2(1)(a)</i>	<i>Obligations 317 and 318</i> During the period subject to audit, no other retailers, distributors, generators or users (collectively Code Participants) had access to AETRH's transmission and distribution network.
	Priority: 5 Controls rating: NP Compliance Rating: NR	
318	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. <i>Metering Code clause 2.2(1)(b)</i>	
	Priority: 4 Controls rating: NP Compliance Rating: NR	
Part 3 Meters and metering installations		
319	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. <i>Metering Code clause 3.1</i>	<i>Obligations 319 and 320</i> Through discussion with the General Manager Pilbara O&M and walk through of AETRH's metering arrangements, we determined that: <ul style="list-style-type: none"> Although AETRH has demonstrated that it has maintained its meters to the satisfaction of its customer throughout the period subject to this audit, it has not established a clear metering management plan or framework for demonstrating its compliance with the specifications of the National Measurement Institute under the <i>National Measurements Act</i> AETRH categorises its meters as accumulation meters, however a metering registry has not been maintained to record details of that categorisation (refer to obligation 370) A metrology procedure has not been established for the transmission and distribution network. Accordingly, we are unable to assess AETRH's compliance with clauses 3.1 and 3.2 for the period subject to audit <i>Refer to summary findings, recommendation and action plan at Issue 2/2016 above.</i>
	Priority: 3 Controls rating: B Compliance Rating: NR	
320	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. <i>Metering Code clause 3.2(1)</i>	
	Priority: 3 Controls rating: C Compliance Rating: NR	
321	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. <i>Metering Code clause 3.3(1)</i>	Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that although AETRH's meters collect interval data, AETRH categorises its meters as accumulation meters rather than interval meters.
	Priority: 4 Controls rating: NP Compliance Rating: NR	

No.	Obligation under condition	Findings
322	<p>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.</p> <p><i>Metering Code clause 3.3(3)</i></p>	<p>Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that AETRH's meters operate within internal communications systems and are not required to comply with telecommunications regulations.</p> <p><i>Obligations 323 to 325</i></p> <p>AETRH's electricity supply arrangements provide only for electricity to be transferred out of the network at the point of connection to the Roy Hill mine site. Accordingly, no bi-directional electricity flows have occurred at AETRH's metering points during the period subject to audit.</p>
	<p>Priority: 4</p> <p>Controls rating: NP</p> <p>Compliance Rating: NR</p>	
323	<p>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.</p> <p><i>Metering Code clause 3.3A(1)</i></p>	
	<p>Priority: 4</p> <p>Controls rating: NP</p> <p>Compliance Rating: NR</p>	
324	<p>A user who is aware of bi-directional flows at a metering point which was not previously subject to a bi-directional electricity flows or any changes in a customer's or user's circumstances in a metering point which will result in bi-directional electricity flows must notify the network operator within 2 business days.</p> <p><i>Metering Code clause 3.3B</i></p>	
	<p>Priority: 4</p> <p>Controls rating: NP</p> <p>Compliance Rating: NR</p>	
325	<p>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.</p> <p><i>Metering Code clause 3.3C</i></p>	
	<p>Priority: 4</p> <p>Controls rating: NP</p> <p>Compliance Rating: NR</p>	

No.	Obligation under condition	Findings
326	<p>A network operator must ensure that there is a metering installation at every connection point on its network which is not a Type 7 connection point. Unless it is a Type 7 metering installation, the metering installation must meet the functionality requirements prescribed.</p> <p><i>Metering Code clause 3.5(1) and (2)</i></p>	<p><i>Obligations 326 and 327</i></p> <p>Through discussion with the General Manager Pilbara O&M and walk through of AETRH's metering arrangements, we determined that:</p> <ul style="list-style-type: none"> • AETRH maintains meters for the two relevant connection points within its network • AETRH's meters are designed to meet the functionality requirements for type 1 meters • Although AETRH has demonstrated that it has installed and maintained its meters to the satisfaction of its customer throughout the period subject to this audit, it has not established a clear metering management plan or framework for demonstrating its compliance with all requirements outlined in Part 3 of the Metering Code. Accordingly, we are unable to assess AETRH's compliance with clause 3.5 for the period subject to audit.
	<p>Priority: 3</p> <p>Controls rating: B</p> <p>Compliance Rating: NR</p>	
327	<p>A network operator must, unless otherwise agreed, for each metering installation on its network, on and from the time of its connection to the network, provide, install, operate and, subject to subclause 3.7(5), maintain the metering installation in the manner prescribed.</p> <p><i>Metering Code clause 3.5(3)</i></p>	<p><i>Refer to summary findings, recommendation and action plan at Issue 2/2016 above.</i></p>
	<p>Priority: 3</p> <p>Controls rating: B</p> <p>Compliance Rating: NR</p>	
328	<p>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.</p> <p><i>Metering Code clause 3.5(4)</i></p>	<p>Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that AETRH's meters are located as close as practicable to the connection points within its network, being at the Roy Hill mine site switchyard.</p>
	<p>Priority: 4</p> <p>Controls rating: NP</p> <p>Compliance Rating: 1</p>	
329	<p>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.</p> <p><i>Metering Code clause 3.5(6)</i></p>	<p>Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that:</p> <ul style="list-style-type: none"> • AETRH's PPA with its customer does not provide for AETRH to impose a charge for providing, installing, operating or maintaining its meters • AETRH has not imposed such a charge during the period subject to audit.
	<p>Priority: 4</p> <p>Controls rating: NP</p> <p>Compliance Rating: NR</p>	
330	<p>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.</p> <p><i>Metering Code clause 3.5(9)</i></p>	<p>Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that AETRH has not identified any of its meters to be non-compliant with the Metering Code.</p>
	<p>Priority: 4</p> <p>Controls rating: NP</p> <p>Compliance Rating: NR</p>	

No.	Obligation under condition	Findings	
331	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. <i>Metering Code clause 3.7</i>	Through discussion with the General Manager Pilbara O&M and walk through of AETRH's metering arrangements, we determined that: <ul style="list-style-type: none"> AETRH's meters are currently not supported by equipment which is connected to a telecommunications network However, in the event of such equipment being installed, AETRH has not established a clear metering management plan or framework for ensuring its compliance with the Metering Code and applicable State and Commonwealth enactments. 	
	Priority: 3	Controls rating: B	Compliance Rating: NR
332	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. <i>Metering Code clause 3.8</i>	<i>Obligations 331, 332 and 333</i> Through discussion with the General Manager Pilbara O&M and walk through of AETRH's metering arrangements, we determined that: <ul style="list-style-type: none"> AETRH's meters have been secured through physical and logical means to prevent and/or detect unauthorised access AETRH's meters are designed to meet the accuracy requirements for type 1 meters Although AETRH has demonstrated that it has installed and maintained its meters to the satisfaction of its customer throughout the period subject to this audit, it has not established a clear metering management plan or framework for demonstrating its compliance with all requirements outlined in Part 3 of the Metering Code. 	
	Priority: 3	Controls rating: B	Compliance Rating: 1
333	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. <i>Metering Code clause 3.9(3)</i>		
	Priority: 3	Controls rating: B	Compliance Rating: 1
334	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 Type 3 metering installation for active energy only. <i>Metering Code clause 3.9(7)</i>	During the period subject to audit, AETRH did not have any customers with annual consumption below 750MWh. Accordingly, AETRH had no obligations under clause 3.9(7) of the Metering Code for the period subject to audit.	
	Priority: 4	Controls rating: NP	Compliance Rating: NR
335	If compensation is carried out within the meter then the resultant metering system error must be as close as practicable to zero. <i>Metering Code clause 3.9(9)</i>	Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that no such compensation has been carried out within AETRH's meters during the period subject to audit.	
	Priority: 4	Controls rating: NP	Compliance Rating: NR

No.	Obligation under condition	Findings
336	<p>A network operator must ensure that any programmable settings within any of its metering installations, data loggers or peripheral devices, that may affect the resolution of displayed or stored data, meet the relevant requirements specified in the applicable metrology procedure and comply with any applicable specifications or guidelines specified by the National Measurement Institute under the National Measurement Act.</p> <p><i>Metering Code clause 3.10</i></p>	<p>Through discussion with the General Manager Pilbara O&M and walk through of AETRH's metering arrangements, we determined that:</p> <ul style="list-style-type: none"> • AETRH's meters are designed to meet the specifications of the National Measurement Institute under the <i>National Measurement Act</i> • A metrology procedure has not been established for AETRH's transmission and distribution network • Although AETRH has demonstrated that it has installed and maintained its meters to the satisfaction of its customer throughout the period subject to this audit, it has not established a clear metering management plan or framework for demonstrating its compliance with the specifications of the National Measurement Institute under the <i>National Measurements Act</i>.
	<p>Priority: 3</p> <p>Controls rating: B</p> <p>Compliance Rating: 1</p>	<p><i>Refer to summary findings, recommendation and action plan at Issue 2/2016 above.</i></p>
337	<p>A network operator must ensure that a metering installation on its network is operating consistently with good electricity industry practice to measure and record data, and to permit collection of data within the time specified in the applicable service level agreement, for at least the percentages of the year specified.</p> <p><i>Metering Code clause 3.11(1)</i></p>	<p>Through discussion with the General Manager Pilbara O&M and walk through of AETRH's metering arrangements, we determined that although AETRH has demonstrated that it has maintained and operated its meters to the satisfaction of its customer throughout the period subject to this audit, it has not established a clear metering management plan or framework for demonstrating its compliance with all requirements outlined in Part 3 of the Metering Code. Accordingly, we are unable to assess AETRH's compliance with clause 3.11 for the period subject to audit.</p>
	<p>Priority: 3</p> <p>Controls rating: B</p> <p>Compliance Rating: NR</p>	<p><i>Refer to summary findings, recommendation and action plan at Issue 2/2016 above.</i></p>
338	<p>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.</p> <p><i>Metering Code clause 3.11(2)</i></p>	<p>The General Manager Pilbara O&M confirmed that AETRH had not made repairs to its meters during the period subject to audit.</p>
	<p>Priority: 4</p> <p>Controls rating: NP</p> <p>Compliance Rating: NR</p>	
339	<p>A Code participant who becomes aware of an outage or malfunction of a metering installation must advise the network operator as soon as practicable.</p> <p><i>Metering Code clause 3.11(3)</i></p>	<p>AETRH has not accessed any other network for the purpose of its Licence throughout the period subject to this audit. Accordingly it has not acted as a Code participant in relation to another network and this obligation is not relevant to this audit.</p>
	<p>Priority: 4</p> <p>Controls rating: NP</p> <p>Compliance Rating: NR</p>	

No.	Obligation under condition	Findings
340	A network operator must ensure that the meters on its network are systematically sampled and tested for accuracy in accordance with AS 1284.13. <i>Metering Code clause 3.11A(1)</i>	<p><i>Obligations 340 to 344</i></p> <p>Through discussion with the General Manager Pilbara O&M and walk through of AETRH's metering arrangements, we determined that:</p> <ul style="list-style-type: none"> • During the period subject to audit, none of AETRH's meters were tested for accuracy or deemed to have failed under AS 1284.13. AS 1284.13 does not explicitly prescribe a testing frequency that would have required AETRH's meters to have been tested since their installation in March 2015. Accordingly, we are unable to assess AETRH's compliance with clause 3.11A for the period subject to audit • Isolation facilities are provided to facilitate testing and calibration of the meters • Although AETRH has demonstrated that it has installed, maintained and operated its meters to the satisfaction of its customer throughout the period subject to this audit, it has not established a clear metering management plan or framework for demonstrating its compliance with the Metering Code and specifications of the National Measurement Institute under the <i>National Measurements Act</i> • A metrology procedure has not been established for the transmission and distribution network. <p>Accordingly, we are unable to assess AETRH's compliance with clause 3.12(1) and (2) for the period subject to audit.</p> <p><i>Refer to summary findings, recommendation and action plan at Issue 2/2016 above.</i></p>
	Priority: 3 Controls rating: B Compliance Rating: NR	
341	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. <i>Metering Code clause 3.11A(2)</i>	
	Priority: 4 Controls rating: B Compliance Rating: NR	
342	A network operator must ensure that each metering installation complies with, at least, the prescribed design requirements. <i>Metering Code clause 3.12(1)</i>	
	Priority: 3 Controls rating: B Compliance Rating: NR	
343	A network operator must ensure that instrument transformers in its metering installations comply with the relevant requirements of any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act and any requirements specified in the applicable metrology procedure. <i>Metering Code clause 3.12(2)</i>	
	Priority: 3 Controls rating: B Compliance Rating: NR	
344	A network operator must provide isolation facilities, to the standard of good electricity industry practice, to facilitate testing and calibration of the metering installation. <i>Metering Code clause 3.12(3)</i>	
	Priority: 3 Controls rating: B Compliance Rating: 1	
345	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. <i>Metering Code clause 3.12(4)</i>	<p>AETRH has not maintained sufficient drawings and supporting information, detailing the metering installation for auditing purposes.</p> <p><i>Refer to summary findings, recommendation and action plan at Issue 2/2016 above.</i></p>
	Priority: 3 Controls rating: C Compliance Rating: 2	

No.	Obligation under condition	Findings
346	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. <i>Metering Code clause 3.13(1)</i>	Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that AETRH uses parallel check meters for each of its metering installations, which are Type 1 metering installations.
	Priority: 4	
347	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. <i>Metering Code clause 3.13(3)(c)</i>	Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that AETRH does not use partial check meters.
	Priority: 4	
348	A check metering installation for a metering point must comply with the prescribed requirements. <i>Metering Code clause 3.13(4)</i>	Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that AETRH's parallel check meters measure the same load conditions and have the same error level as the relevant revenue meters and are not used for any other purpose, in accordance with the requirements of clause 3.13(4)(b) of the Metering Code.
	Priority: 4	
349	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. <i>Metering Code clause 3.14(3)</i>	Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that at the time of commissioning, AETRH's metering installations were designed in compliance with the accuracy requirements of the Metering Code. Accordingly, clause 3.14(3) is not relevant to AETRH's circumstances.
	Priority: 4	
355	A network operator must, if reasonably requested by a Code participant, provide enhanced technology features in a metering installation. <i>Metering Code clause 3.20(1)</i>	The General Manager Pilbara O&M confirmed that AETRH has not been requested by a Code participant to provide enhanced technology features in a metering installation.
	Priority: 4	
356	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. <i>Metering Code clause 3.20(3)</i>	Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that: <ul style="list-style-type: none"> AETRH's PPA with its customer does not provide for AETRH to impose a charge for providing, installing, operating or maintaining its meters AETRH has not imposed such a charge during the period subject to audit.
	Priority: 4	

No.	Obligation under condition	Findings
357	Meters containing an internal real time clock must maintain time accuracy as prescribed. Time drift must be measured over a period of 1 month. <i>Metering Code clause 3.21(1)</i>	Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that: <ul style="list-style-type: none"> • AETRH's meters contain an internal real time clock • Although AETRH's operation and maintenance of its meters is designed to maintain the prescribed time accuracy of their internal real time clock in accordance with its obligations under its customer PPA, AETRH has not established a clear metering management plan or framework for demonstrating its compliance with the Metering Code.
	Priority: 4	Controls rating: B
		Compliance Rating: 1
358	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. <i>Metering Code clause 3.21(2)</i>	Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that AETRH's on-site facilities and systems appropriately provide for interval energy data to be stored.
	Priority: 4	Controls rating: NP
		Compliance Rating: 1
359	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. <i>Metering Code clause 3.22</i>	Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that during the period subject to audit AETRH held the required licence for using and accessing the metering software associated with its meters.
	Priority: 4	Controls rating: NP
		Compliance Rating: 1
360	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. <i>Metering Code clause 3.23(a)</i>	<i>Obligations 360 and 361</i> Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that during the period subject to audit, AETRH did not provide signals from the meter for a user's purposes.
	Priority: 4	Controls rating: NP
		Compliance Rating: NR
361	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. <i>Metering Code clause 3.23(b)</i>	
	Priority: 4	Controls rating: NP
		Compliance Rating: NR

No.	Obligation under condition	Findings
364	<p>A person must not install a metering installation on a network unless the person is the network operator or a registered metering installation provider for the network operator doing the type of work authorised by its registration.</p> <p><i>Metering Code clause 3.27</i></p>	The General Manager Pilbara O&M confirmed that the meters installed on AETRH's transmission network at the time of the network's construction were installed by AETRH, as the network operator.
	<p>Priority: 4</p> <p>Controls rating: NP</p> <p>Compliance Rating: 1</p>	
365	<p>A network operator must publish a list of registered metering installation providers, including the prescribed details, and at least annually, update the list.</p> <p><i>Metering Code clause 3.29</i></p>	As AETRH has not installed any new meters since the time of the network's construction, there was no requirement to register a metering installation provider or publish an associated list.
	<p>Priority: 4</p> <p>Controls rating: NP</p> <p>Compliance Rating: NR</p>	
Part 4 The metering database		
366	<p>A network operator must establish, maintain and administer a metering database containing, for each metering point on its network, standing data and energy data.</p> <p><i>Metering Code clause 4.1(1)</i></p>	<p>AETRH has not maintained and administered a metering database containing the required standing data in accordance with Part 4 of the Metering Code.</p> <p>We observed that energy data from each of AETRH's meters is captured within AETRH's Honeywell Experion system.</p> <p><i>Refer to summary findings, recommendation and action plan at Issue 2/2016 above.</i></p>
	<p>Priority: 3</p> <p>Controls rating: C</p> <p>Compliance Rating: 2</p>	
367	<p>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.</p> <p><i>Metering Code clause 4.1(2)</i></p>	Through discussion with the General Manager Pilbara O&M and Ellipse Team Leader, consideration of AETRH's metering arrangements and examination of Alinta Energy's IT Security Policy and password policy system parameters, we determined that AETRH's Honeywell Experion system is appropriately secured through physical and logical means to prevent and/or detect unauthorised access.
	<p>Priority: 4</p> <p>Controls rating: NP</p> <p>Compliance Rating: 1</p>	
368	<p>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.</p> <p><i>Metering Code clause 4.1(3)</i></p>	Through discussion with the General Manager Pilbara O&M and Ellipse Team Leader; and examination of Alinta Energy's System back-up protocol, we determined that AETRH has established appropriate capabilities to restore the Honeywell Experion system within two business days to ensure energy data will continue to be captured.
	<p>Priority: 4</p> <p>Controls rating: NP</p> <p>Compliance Rating: 1</p>	

No.	Obligation under condition	Findings
369	A network operator must ensure that its registry complies with the Code and the prescribed clause of the market rules. <i>Metering Code clause 4.2(1)</i>	<p><i>Obligations 369 and 370</i></p> <p>We observed that AETRHH had maintained many of the components of the information required by clause 4.3 of the Metering Code, however:</p> <ul style="list-style-type: none"> • That information is not held in a central registry • AETRHH has not maintained and administered a metering database containing all of the required registry and standing data in accordance with Part 4 of the Metering Code. <p><i>Refer to summary findings, recommendation and action plan at Issue 2/2016 above.</i></p>
	Priority: 3 Controls rating: C Compliance Rating: 2	
370	The standing data for a metering point must comprise at least the items specified. <i>Metering Code clause 4.3(1)</i>	<p><i>Obligations 371 to 373</i></p> <p>AETRHH has not accessed any other network for the purpose of its Licence throughout the period subject to this audit. Accordingly it has not acted as a Code participant in relation to another network and this obligation is not relevant to this audit.</p>
	Priority: 3 Controls rating: C Compliance Rating: 2	
371	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. <i>Metering Code clause 4.4(1)</i>	<p><i>Obligations 371 to 373</i></p> <p>AETRHH has not accessed any other network for the purpose of its Licence throughout the period subject to this audit. Accordingly it has not acted as a Code participant in relation to another network and this obligation is not relevant to this audit.</p>
	Priority: 5 Controls rating: NP Compliance Rating: NR	
372	A Code participant must not knowingly permit the registry to be materially inaccurate. <i>Metering Code clause 4.5(1)</i>	<p><i>Obligations 371 to 373</i></p> <p>AETRHH has not accessed any other network for the purpose of its Licence throughout the period subject to this audit. Accordingly it has not acted as a Code participant in relation to another network and this obligation is not relevant to this audit.</p>
	Priority: 5 Controls rating: NP Compliance Rating: NR	
373	Subject to subclause 5.19(6), if a Code participant, other than a network operator, becomes aware of a change to, or an inaccuracy in, an item of standing data in the registry, then it must notify the network operator and provide details of the change or inaccuracy within the timeframes prescribed. <i>Metering Code clause 4.5(2)</i>	<p><i>Obligations 371 to 373</i></p> <p>AETRHH has not accessed any other network for the purpose of its Licence throughout the period subject to this audit. Accordingly it has not acted as a Code participant in relation to another network and this obligation is not relevant to this audit.</p>
	Priority: 4 Controls rating: NP Compliance Rating: NR	

No.	Obligation under condition	Findings			
374	<p>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.</p> <p><i>Metering Code clause 4.6(1)</i></p> <table border="1" data-bbox="248 405 1070 453"> <tr> <td data-bbox="248 405 506 453">Priority: 4</td> <td data-bbox="512 405 770 453">Controls rating: NP</td> <td data-bbox="777 405 1070 453">Compliance Rating: NR</td> </tr> </table>	Priority: 4	Controls rating: NP	Compliance Rating: NR	<p><i>Obligations 374 to 376</i></p> <p>During the period subject to audit, AETRH did not maintain a metering registry and there was no opportunity for a Code participant to have visibility of items of standing data recorded by AETRH.</p>
Priority: 4	Controls rating: NP	Compliance Rating: NR			
375	<p>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.</p> <p><i>Metering Code clause 4.6(2)</i></p> <table border="1" data-bbox="248 699 1070 746"> <tr> <td data-bbox="248 699 506 746">Priority: 4</td> <td data-bbox="512 699 770 746">Controls rating: NP</td> <td data-bbox="777 699 1070 746">Compliance Rating: NR</td> </tr> </table>	Priority: 4	Controls rating: NP	Compliance Rating: NR	
Priority: 4	Controls rating: NP	Compliance Rating: NR			
376	<p>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.</p> <p><i>Metering Code clause 4.7</i></p> <table border="1" data-bbox="248 932 1070 979"> <tr> <td data-bbox="248 932 506 979">Priority: 4</td> <td data-bbox="512 932 770 979">Controls rating: NP</td> <td data-bbox="777 932 1070 979">Compliance Rating: NR</td> </tr> </table>	Priority: 4	Controls rating: NP	Compliance Rating: NR	
Priority: 4	Controls rating: NP	Compliance Rating: NR			
377	<p>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.</p> <p><i>Metering Code clause 4.8(3)</i></p> <table border="1" data-bbox="248 1165 1070 1212"> <tr> <td data-bbox="248 1165 506 1212">Priority: 4</td> <td data-bbox="512 1165 770 1212">Controls rating: NP</td> <td data-bbox="777 1165 1070 1212">Compliance Rating: NR</td> </tr> </table>	Priority: 4	Controls rating: NP	Compliance Rating: NR	<p><i>Obligations 377 and 378</i></p> <p>During the period subject to audit, no other retailers or generators had access to AETRH's transmission and distribution network.</p>
Priority: 4	Controls rating: NP	Compliance Rating: NR			
378	<p>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.</p> <p><i>Metering Code clause 4.8(3A)</i></p> <table border="1" data-bbox="248 1426 1070 1474"> <tr> <td data-bbox="248 1426 506 1474">Priority: 4</td> <td data-bbox="512 1426 770 1474">Controls rating: NP</td> <td data-bbox="777 1426 1070 1474">Compliance Rating: NR</td> </tr> </table>	Priority: 4	Controls rating: NP	Compliance Rating: NR	
Priority: 4	Controls rating: NP	Compliance Rating: NR			

No.	Obligation under condition	Findings	
379	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. <i>Metering Code clause 4.8(4)(a)</i>	<p><i>Obligations 379 to 381</i></p> <p>Through discussion with the General Manager Pilbara O&M and Ellipse Team Leader, consideration of AETRH's metering arrangements and examination of Alinta Energy's IT Security Policy and password policy system parameters, we determined that AETRH has appropriate methods in place to ensure that relevant data held in its meters and Honeywell Experion system and is appropriately secured through physical and logical means to prevent and/or detect unauthorised access.</p>	
	Priority: 4		Controls rating: NP
380	A network operator must have devices and methods in place that ensure and ensure that the data held in its metering database is secured from unauthorised local or remote access using the methods prescribed. <i>Metering Code clause 4.8(4)(b)</i>		
	Priority: 4		Controls rating: NP
381	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. <i>Metering Code clause 4.8(5)</i>		
	Priority: 4	Controls rating: NP	Compliance Rating: 1
382	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. <i>Metering Code clause 4.9</i>	<p>Through discussion with the General Manager Pilbara O&M and Ellipse Team Leader; and consideration of AETRH's metering arrangements, we determined that AETRH's Honeywell Experion system is designed to ensure that relevant energy data is retained in a readily accessible format for at least 13 months and once archived, indefinitely (i.e. in excess of five years and 11 months) in a format that is accessible within a reasonable period of time.</p>	
	Priority: 4		Controls rating: NP

No.	Obligation under condition	Findings
Part 5 Metering services		
383	<p>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.</p> <p><i>Metering Code clause 5.1 (1)</i></p>	<p><i>Obligations 383 and 384</i></p> <p>During the period subject to audit, no other retailers, distributors, generators or users (collectively Code Participants) had access to AETRH's transmission and distribution network, or an opportunity to obtain a metering service. Therefore clause 5.1 of the Metering Code did not apply to AETRH's circumstances during the period subject to audit.</p>
	<p>Priority: 5</p> <p>Controls rating: NP</p> <p>Compliance Rating: NR</p>	
384	<p>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.</p> <p><i>Metering Code clause 5.1(2)</i></p>	
	<p>Priority: 5</p> <p>Controls rating: NP</p> <p>Compliance Rating: NR</p>	
385	<p>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).</p> <p><i>Metering Code clause 5.3</i></p>	<p><i>Obligations 385 to 387</i></p> <p>Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that:</p> <ul style="list-style-type: none"> • Energy data collected from meters is immediately transferred to AETRH's Honeywell Experion system • Actual meter readings are undertaken on a continuous basis and in 30 minute intervals • AETRH's use of check meters accommodates the required energy data validation processes • Meter readings are only performed by appointed AETRH personnel.
	<p>Priority: 4</p> <p>Controls rating: NP</p> <p>Compliance Rating: 1</p>	
386	<p>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.</p> <p><i>Metering Code clause 5.4(1)</i></p>	
	<p>Priority: 5</p> <p>Controls rating: NP</p> <p>Compliance Rating: 1</p>	
387	<p>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.</p> <p><i>Metering Code clause 5.4(1A)</i></p>	
	<p>Priority: 4</p> <p>Controls rating: NP</p> <p>Compliance Rating: 1</p>	

No.	Obligation under condition	Findings				
388	<p>A user must, when reasonably requested by a network operator, assist the network operator to comply with the network operator's obligation under subclause 5.4(1).</p> <p><i>Metering Code clause 5.4(2)</i></p>	AETRH has not accessed any other network for the purpose of its Licence throughout the period subject to this audit. Accordingly it has not acted as a user in relation to another network and this obligation is not relevant to this audit.				
	<table border="1"> <tr> <td>Priority: 5</td> <td>Controls rating: NP</td> <td>Compliance Rating: NR</td> </tr> </table>	Priority: 5	Controls rating: NP	Compliance Rating: NR		
Priority: 5	Controls rating: NP	Compliance Rating: NR				
389	<p>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.</p> <p><i>Metering Code clause 5.5(2)</i></p>	<p><i>Obligations 389 and 390</i></p> <p>Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that:</p> <ul style="list-style-type: none"> AETRH's PPA with its customer does not provide for AETRH to impose a charge for providing energy data or standing data on request AETRH has not imposed such a charge during the period subject to audit. 				
	<table border="1"> <tr> <td>Priority: 5</td> <td>Controls rating: NP</td> <td>Compliance Rating: NR</td> </tr> </table>	Priority: 5	Controls rating: NP	Compliance Rating: NR		
Priority: 5	Controls rating: NP	Compliance Rating: NR				
390	<p>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.</p> <p><i>Metering Code clause 5.5(2A)</i></p>					
	<table border="1"> <tr> <td>Priority: 4</td> <td>Controls rating: NP</td> <td>Compliance Rating: NR</td> </tr> </table>	Priority: 4	Controls rating: NP	Compliance Rating: NR		
Priority: 4	Controls rating: NP	Compliance Rating: NR				
391	<p>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).</p> <p><i>Metering Code clause 5.6(1)</i></p>	<p><i>Obligations 391 and 392</i></p> <p>Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that:</p> <ul style="list-style-type: none"> Energy data, including validated, substituted or estimated data is provided to AETRH's customer in accordance with the PPA As AETRH's network is not part of the wholesale electricity market, AETRH is not required to provide data to the IMO During the period subject to audit, no other users had access to AETRH's transmission and distribution network. 				
	<table border="1"> <tr> <td>Priority: 5</td> <td>Controls rating: NP</td> <td>Compliance Rating: 1</td> </tr> </table>	Priority: 5	Controls rating: NP	Compliance Rating: 1		
Priority: 5	Controls rating: NP	Compliance Rating: 1				
392	<p>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.</p> <p><i>Metering Code clause 5.7</i></p>					
	<table border="1"> <tr> <td>Priority: 4</td> <td>Controls rating: NP</td> <td>Compliance Rating: 1</td> </tr> </table>	Priority: 4	Controls rating: NP	Compliance Rating: 1		
Priority: 4	Controls rating: NP	Compliance Rating: 1				

No.	Obligation under condition	Findings					
393	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. <i>Metering Code clause 5.8</i>	<p><i>Obligations 393, 394, 397 to 400</i></p> <p>Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that:</p> <ul style="list-style-type: none"> Any related metering information (including dates for the purpose of invoicing) is required to be provided to AETRH's customer in accordance with the PPA During the period subject to audit, no other users had access to AETRH's transmission and distribution network No requests for energy data, standing data or bulk standing data have been received by AETRH during the period subject to audit As AETRH's network is not part of the wholesale electricity market, AETRH is not required to provide data to the IMO. 					
	Priority: 4			Controls rating: NP	Compliance Rating: NR		
394	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. <i>Metering Code clause 5.9</i>			<p><i>Obligations 393, 394, 397 to 400</i></p> <p>Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that:</p> <ul style="list-style-type: none"> Any related metering information (including dates for the purpose of invoicing) is required to be provided to AETRH's customer in accordance with the PPA During the period subject to audit, no other users had access to AETRH's transmission and distribution network No requests for energy data, standing data or bulk standing data have been received by AETRH during the period subject to audit As AETRH's network is not part of the wholesale electricity market, AETRH is not required to provide data to the IMO. 			
	Priority: 4					Controls rating: NP	Compliance Rating: NR
397	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 a network operator must provide a user with a complete set of energy data for the a metering point within the timeframes prescribed. <i>Metering Code clause 5.12(1)</i>					<p><i>Obligations 393, 394, 397 to 400</i></p> <p>Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that:</p> <ul style="list-style-type: none"> Any related metering information (including dates for the purpose of invoicing) is required to be provided to AETRH's customer in accordance with the PPA During the period subject to audit, no other users had access to AETRH's transmission and distribution network No requests for energy data, standing data or bulk standing data have been received by AETRH during the period subject to audit As AETRH's network is not part of the wholesale electricity market, AETRH is not required to provide data to the IMO. 	
	Priority: 4						
398	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. <i>Metering Code clause 5.13</i>	<p><i>Obligations 393, 394, 397 to 400</i></p> <p>Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that:</p> <ul style="list-style-type: none"> Any related metering information (including dates for the purpose of invoicing) is required to be provided to AETRH's customer in accordance with the PPA During the period subject to audit, no other users had access to AETRH's transmission and distribution network No requests for energy data, standing data or bulk standing data have been received by AETRH during the period subject to audit As AETRH's network is not part of the wholesale electricity market, AETRH is not required to provide data to the IMO. 					
	Priority: 4						
399	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. <i>Metering Code clause 5.14(3)</i>			<p><i>Obligations 393, 394, 397 to 400</i></p> <p>Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that:</p> <ul style="list-style-type: none"> Any related metering information (including dates for the purpose of invoicing) is required to be provided to AETRH's customer in accordance with the PPA During the period subject to audit, no other users had access to AETRH's transmission and distribution network No requests for energy data, standing data or bulk standing data have been received by AETRH during the period subject to audit As AETRH's network is not part of the wholesale electricity market, AETRH is not required to provide data to the IMO. 			
	Priority: 4						
400	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. <i>Metering Code clause 5.15</i>					<p><i>Obligations 393, 394, 397 to 400</i></p> <p>Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that:</p> <ul style="list-style-type: none"> Any related metering information (including dates for the purpose of invoicing) is required to be provided to AETRH's customer in accordance with the PPA During the period subject to audit, no other users had access to AETRH's transmission and distribution network No requests for energy data, standing data or bulk standing data have been received by AETRH during the period subject to audit As AETRH's network is not part of the wholesale electricity market, AETRH is not required to provide data to the IMO. 	
	Priority: 4						

No.	Obligation under condition	Findings
401	<p>If a user collects or receives energy data from a metering installation then the user must provide the network operator with the energy data (in accordance with the communication rules) within the timeframes prescribed.</p> <p><i>Metering Code clause 5.16</i></p>	AETRH has not accessed any other network for the purpose of its Licence throughout the period subject to this audit. Accordingly it has not acted as a user in relation to another network and this obligation is not relevant to this audit.
	<p>Priority: 4 Controls rating: NP Compliance Rating: NR</p>	
402	<p>A user must provide standing data and validated, and where necessary substituted or estimated, energy data to the user's customer to which that information relates where the user is required by an enactment or an agreement to do so for billing purposes or for the purpose of providing metering services to the customer.</p> <p><i>Metering Code clause 5.17(1)</i></p>	Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that standing data and validated energy data is provided to AETRH's customer in accordance with the PPA, for the purpose of invoicing.
	<p>Priority: 4 Controls rating: NP Compliance Rating: 1</p>	
403	<p>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).</p> <p><i>Metering Code clause 5.17A(1)</i></p>	<p><i>Obligations 403 and 404</i></p> <p>The General Manager Pilbara O&M confirmed that during the period subject to audit, AETRH did not receive any direction from its customer to provide data for a metering point from its metering database.</p>
	<p>Priority: 4 Controls rating: NP Compliance Rating: NR</p>	
404	<p>A network operator must comply with a direction under subclause 5.17A(1) within the timeframes prescribed.</p> <p><i>Metering Code clause 5.17A(3)</i></p>	
	<p>Priority: 4 Controls rating: NP Compliance Rating: NR</p>	
405	<p>If a user collects or receives information regarding a change in the energisation status of a metering point then the user must provide the network operator with the prescribed information, including the stated attributes, within the timeframes prescribed.</p> <p><i>Metering Code clause 5.18</i></p>	AETRH has not accessed any other network for the purpose of its Licence throughout the period subject to this audit. Accordingly it has not acted as a user in relation to another network and this obligation is not relevant to this audit.
	<p>Priority: 4 Controls rating: NP Compliance Rating: NR</p>	

No.	Obligation under condition	Findings	
406	A user must, when requested by the network operator acting in accordance with good electricity industry practice, use reasonable endeavours to collect information from customers, if any, that assists the network operator in meeting its obligations described in the Code and elsewhere, and provide that information to the network operator. <i>Metering Code clause 5.19(1)</i>	<p><i>Obligations 406 to 408</i></p> <p>AETRH has not accessed any other network for the purpose of its Licence throughout the period subject to this audit. Accordingly it has not acted as a user in relation to another network and this obligation is not relevant to this audit.</p>	
	Priority: 5		Controls rating: NP
407	A user must, to the extent that it is able, collect and maintain a record of the prescribed information in relation to the site of each connection point with which the user is associated. <i>Metering Code clause 5.19(2)</i>		
	Priority: 5		Controls rating: NP
408	Subject to subclauses 5.19(3A) and 5.19(6), the user must within 1 business day after becoming aware of any change in an attribute described in subclause 5.19(2), notify the network operator of the change. <i>Metering Code clause 5.19(3)</i>		
	Priority: 4	Controls rating: NP	Compliance Rating: NR
409	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. <i>Metering Code clause 5.19(5)</i>	<p>In relation to AETRH's transmission and distribution network, during the period subject to audit:</p> <ul style="list-style-type: none"> • AETRH operated as both the network operator and retailer • No other users had access to AETRH's network. <p>Accordingly, AETRH had no obligations under clause 5.19(5) of the Metering Code for the period subject to audit.</p>	
	Priority: 4		Controls rating: NP
410	The user must use reasonable endeavours to ensure that it does not notify the network operator of a change in an attribute described in subclause 5.19(2) that results from the provision of standing data by the network operator to the user. <i>Metering Code clause 5.19(6)</i>	<p>AETRH has not accessed any other network for the purpose of its Licence throughout the period subject to this audit. Accordingly it has not acted as a user in relation to another network and this obligation is not relevant to this audit.</p>	
	Priority: 5		Controls rating: NP
411	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. <i>Metering Code clause 5.20(1)</i>		
	Priority: 3		Controls rating: C

No.	Obligation under condition	Findings
412	An Energy Data Verification Request Form must require a Code participant to provide the information prescribed. <i>Metering Code clause 5.20(2)</i>	AETRH has not developed an Energy Data Verification Request Form. We note that the General Manager Pilbara O&M confirmed that during the period subject to audit, AETRH did not receive any request for verification of energy data.
	Priority: 4	Controls rating: NP Compliance Rating: NR
413	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. <i>Metering Code clause 5.20(4)</i>	The General Manager Pilbara O&M confirmed that during the period subject to audit, AETRH did not receive any request for verification of energy data.
	Priority: 4	Controls rating: NP Compliance Rating: NR
414	A network operator must comply with any reasonable request under subclause 5.21(1) <i>Metering Code clause 5.21(2)</i>	<i>Obligations 414 and 415</i> The General Manager Pilbara O&M confirmed that during the period subject to audit, AETRH did not receive any request for a test or audit of the accuracy of a metering installation, the energy data from the metering installation and/or the standing data from the metering installation.
	Priority: 4	Controls rating: NP Compliance Rating: NR
415	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. <i>Metering Code clause 5.21(4)</i>	
	Priority: 4	Controls rating: NP Compliance Rating: NR
416	A Code participant must not request a test or audit under subclause 5.21(1) unless the Code participant is a user and the test or audit relates to a time or times at which the user was the current user or the Code participant is the IMO. <i>Metering Code clause 5.21(5)</i>	<i>Obligations 416 and 417</i> AETRH has not accessed any other network for the purpose of its Licence throughout the period subject to this audit. Accordingly it has not acted as a user in relation to another network and this obligation is not relevant to this audit.
	Priority: 4	Controls rating: NP Compliance Rating: NR
417	A Code participant must not make a request under subclause 5.21(1) that is inconsistent with any access arrangement or agreement. <i>Metering Code clause 5.21(6)</i>	
	Priority: 4	Controls rating: NP Compliance Rating: NR

No.	Obligation under condition	Findings
418	<p>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.</p> <p><i>Metering Code clause 5.21(8)</i></p>	<p><i>Obligations 418 to 421</i></p> <p>Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that:</p> <ul style="list-style-type: none"> AETRH's PPA with its customer does not provide for AETRH to impose a charge for undertaking a test of metering installations and/or or auditing of information from the meters associated with the metering installations AETRH has not imposed such a charge during the period subject to audit. <p>The General Manager Pilbara O&M confirmed that during the period subject to audit, AETRH did not receive any request for a test or audit of the accuracy of a metering installation, the energy data from the metering installation and/or the standing data from the metering installation.</p>
	<p>Priority: 4</p> <p>Controls rating: NP</p> <p>Compliance Rating: NR</p>	
419	<p>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.</p> <p><i>Metering Code clause 5.21(9)</i></p>	
	<p>Priority: 4</p> <p>Controls rating: NP</p> <p>Compliance Rating: NR</p>	
420	<p>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.</p> <p><i>Metering Code clause 5.21(11)</i></p>	
	<p>Priority: 4</p> <p>Controls rating: NP</p> <p>Compliance Rating: NR</p>	
421	<p>The original stored error correction data in a meter must not be altered except during accuracy testing and calibration of a metering installation.</p> <p><i>Metering Code clause 5.21(12)</i></p>	
	<p>Priority: 4</p> <p>Controls rating: NP</p> <p>Compliance Rating: NR</p>	
422	<p>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.</p> <p><i>Metering Code clause 5.22(1)</i></p>	<p>Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that:</p> <ul style="list-style-type: none"> AETRH uses parallel check meters for each of its metering installations, which are Type 1 metering installations Although AETRH applies energy data validation process in accordance with its obligations under its customer PPA, AETRH has not established a clear metering management plan or framework for demonstrating its compliance with the prescribed rules and procedures set out in Appendix 3 of the Metering Code. <p><i>Refer to summary findings, recommendation and action plan at Issue 2/2016 above.</i></p>
	<p>Priority: 4</p> <p>Controls rating: B</p> <p>Compliance Rating: 1</p>	

No.	Obligation under condition	Findings
423	<p>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.</p> <p><i>Metering Code clause 5.22(2)</i></p>	<p>Through discussion with the General Manager Pilbara O&M and consideration of AETRH's metering arrangements, we determined that:</p> <ul style="list-style-type: none"> AETRH uses parallel check meters for each of its metering installations, which are Type 1 metering installations AETRH's parallel check metering arrangements meet the requirements of clause 3.13(4)(b) of the Metering Code.
	<p>Priority: 4</p> <p>Controls rating: NP</p> <p>Compliance Rating: 1</p>	
424	<p>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.</p> <p><i>Metering Code clause 5.22(3)</i></p>	<p>The General Manager Pilbara O&M confirmed that during the period subject to audit, there were no instances in which substitute values were required to be prepared due to a check meter not being available or energy data not being recoverable from a metering installation within the time required.</p>
	<p>Priority: 4</p> <p>Controls rating: NP</p> <p>Compliance Rating: NR</p>	
425	<p>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.</p> <p><i>Metering Code clause 5.22(4)</i></p>	<p>The General Manager Pilbara O&M confirmed that during the period subject to audit, there were no instances in which it detected a loss of energy data or incorrect energy data from a metering installation.</p>
	<p>Priority: 4</p> <p>Controls rating: NP</p> <p>Compliance Rating: NR</p>	
426	<p>Substitution or estimation of energy data is required when energy data is missing, unavailable or corrupted, including in the circumstances described in this subclause.</p> <p><i>Metering Code clause 5.22(5)</i></p>	<p><i>Obligations 426 to 429</i></p> <p>The General Manager Pilbara O&M confirmed that during the period subject to audit, there were no instances in which substitution or estimation of energy data was required due to energy data being missing, unavailable or corrupted.</p>
	<p>Priority: 4</p> <p>Controls rating: NP</p> <p>Compliance Rating: NR</p>	
427	<p>A network operator must review all validation failures before undertaking any substitution.</p> <p><i>Metering Code clause 5.22(6)</i></p>	
	<p>Priority: 4</p> <p>Controls rating: NP</p> <p>Compliance Rating: NR</p>	
428	<p>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.</p> <p><i>Metering Code clause 5.23(1)</i></p>	
	<p>Priority: 4</p> <p>Controls rating: NP</p> <p>Compliance Rating: NR</p>	

No.	Obligation under condition	Findings			
429	<p>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.</p> <p><i>Metering Code clause 5.23(3)</i></p>				
	<table border="1"> <tr> <td>Priority: 4</td> <td>Controls rating: NP</td> <td>Compliance Rating: NR</td> </tr> </table>	Priority: 4	Controls rating: NP	Compliance Rating: NR	
Priority: 4	Controls rating: NP	Compliance Rating: NR			
430	<p>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.</p> <p><i>Metering Code clause 5.24(1)</i></p>	<p><i>Obligations 430 to 434</i></p> <p>The General Manager Pilbara O&M confirmed that during the period subject to audit, there were no instances in which:</p> <ul style="list-style-type: none"> • A better quality actual or deemed actual value became available • Substitution or estimation of energy data was required • A Code participant requested an estimated or substituted value to be replaced. 			
	<table border="1"> <tr> <td>Priority: 4</td> <td>Controls rating: NP</td> <td>Compliance Rating: NR</td> </tr> </table>	Priority: 4	Controls rating: NP	Compliance Rating: NR	
Priority: 4	Controls rating: NP	Compliance Rating: NR			
431	<p>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.</p> <p><i>Metering Code clause 5.24(2)</i></p>				
	<table border="1"> <tr> <td>Priority: 4</td> <td>Controls rating: NP</td> <td>Compliance Rating: NR</td> </tr> </table>	Priority: 4	Controls rating: NP	Compliance Rating: NR	
Priority: 4	Controls rating: NP	Compliance Rating: NR			
432	<p>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.</p> <p><i>Metering Code clause 5.24(3)</i></p>				
	<table border="1"> <tr> <td>Priority: 4</td> <td>Controls rating: NP</td> <td>Compliance Rating: NR</td> </tr> </table>	Priority: 4	Controls rating: NP	Compliance Rating: NR	
Priority: 4	Controls rating: NP	Compliance Rating: NR			
433	<p>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.</p> <p><i>Metering Code clause 5.24(4)</i></p>				
	<table border="1"> <tr> <td>Priority: 4</td> <td>Controls rating: NP</td> <td>Compliance Rating: NR</td> </tr> </table>	Priority: 4	Controls rating: NP	Compliance Rating: NR	
Priority: 4	Controls rating: NP	Compliance Rating: NR			

No.	Obligation under condition	Findings
434	<p>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.</p> <p><i>Metering Code clause 5.25</i></p>	<p><i>Refer to description above for obligations 430 to 434</i></p> <p>AETRH has not yet established a metrology procedure.</p>
	<p>Priority: 3 Controls rating: D Compliance Rating: NR</p>	
435	<p>Upon request from a network operator, the current user for a connection point must provide the network operator with customer attribute information that it reasonably believes are missing or incorrect within the timeframes prescribed.</p> <p><i>Metering Code clause 5.27</i></p>	<p>AETRH has not accessed any other network for the purpose of its Licence throughout the period subject to this audit. Accordingly it has not acted as a user in relation to another network and this obligation is not relevant to this audit.</p>
	<p>Priority: 4 Controls rating: NP Compliance Rating: NR</p>	
441	<p>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.</p> <p><i>Metering Code clause 5.37(1)(a)</i></p>	<p><i>Obligations 441 to 446</i></p> <p>During the period subject to audit, the requirements of Division 5.5 of the Metering Code were not relevant to AETRH's network operations as AETRH did not have any small use customers connected to its network and it was not contracted to provide metering services at one or more connection points on its network.</p> <p>Accordingly, AETRH had no obligations under clauses 5.37 and 5.38 of the Metering Code for the period subject to audit.</p>
	<p>Priority: 4 Controls rating: NP Compliance Rating: NR</p>	
442	<p>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).</p> <p><i>Metering Code clause 5.37(1)(b)</i></p>	
	<p>Priority: 4 Controls rating: NP Compliance Rating: NR</p>	
443	<p>A network operator must publish the report described in subclause 5.37(1) within 3 months after the year ends.</p> <p><i>Metering Code clause 5.37(1)(b)</i></p>	
	<p>Priority: 4 Controls rating: NP Compliance Rating: NR</p>	
444	<p>The report prepared by the network operator must include the information prescribed.</p> <p><i>Metering Code clause 5.37(2)</i></p>	
	<p>Priority: 4 Controls rating: NP Compliance Rating: NR</p>	

No.	Obligation under condition	Findings
445	For each relevant metering service, the information in subclause 5.37(2) must be reported separately for the specified classes of connection point. <i>Metering Code clause 5.37(3)</i>	<i>Refer to description above for obligations 441 to 446</i>
	Priority: 4 Controls rating: NP Compliance Rating: NR	
446	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). <i>Metering Code clause 5.38</i>	
	Priority: 4 Controls rating: NP Compliance Rating: NR	
Part 6 Documentation		
447	A network operator must, in relation to its network, comply with the agreements, rules, procedures, criteria and processes prescribed. <i>Metering Code clause 6.1(1)</i>	AETRH has not complied with clause 6.2 of the Metering Code, which requires a network operator to submit a proposed model service level agreement, metrology procedure and mandatory link criteria to the Authority for its approval. However, we note that as there are no other users of AETRH's transmission and distribution network and no foreseeable prospect of a request to use the network, AETRH's circumstances have not triggered the intent of the Metering Code for such documents to be prepared for the purpose of another user. However, AETRH has not established a clear metering management plan or framework for demonstrating its compliance with all applicable agreements, rules, procedures, criteria and processes outlined in Part 6 of the Metering Code.
	Priority: 3 Controls rating: C Compliance Rating: NR	
448	A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed. <i>Metering Code clause 6.1(2)</i>	AETRH has not accessed any other network for the purpose of its Licence throughout the period subject to this audit. Accordingly it has not acted as a user in relation to another network and this obligation is not relevant to this audit.
	Priority: 4 Controls rating: NP Compliance Rating: NR	
449	A network operator must amend any document in accordance with the Authority's final findings. <i>Metering Code clause 6.20(4)</i>	<i>Obligations 449 and 450</i> During the period subject to audit, AETRH had not submitted a proposed model service level agreement, metrology procedure or mandatory link criteria to the Authority for its approval.
	Priority: 5 Controls rating: NP Compliance Rating: NR	
450	The network operator must publish any document that has been amended under subclause 6.20(4). <i>Metering Code clause 6.20(5)</i>	
	Priority: 4 Controls rating: NP Compliance Rating: NR	

No.	Obligation under condition	Findings
Part 7 Notes and confidential information		
451	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. <i>Metering Code clause 7.2(1)</i>	Through discussions with the Wholesale Regulation Manager and consideration of AETRH's business practices, we determined that AETRH maintains electronic, facsimile and voice communication channels commensurate with the expectations of a major business.
	Priority: 5	Controls rating: NP Compliance Rating: 1
452	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. <i>Metering Code clause 7.2(2)</i>	AETRH had notified its customer of its contact details prior to the issue of the Licence. The Wholesale Regulation Manager confirmed that AETRH has not made any changes to its contact details during the period subject to audit.
	Priority: 4	Controls rating: NP Compliance Rating: 1
453	If requested by a network operator with whom it has entered into an access contract, the Code participant must notify its contact details to a network operator within 3 business days after the request. <i>Metering Code clause 7.2(4)</i>	<i>Obligations 453 and 454</i> AETRH has not accessed any other network for the purpose of its Licence throughout the period subject to this audit. Accordingly it has not acted as a Code participant in relation to another network and this obligation is not relevant to this audit.
	Priority: 4	Controls rating: NP Compliance Rating: NR
454	A Code participant must notify any affected network operator of any change to the contact details it notified to the network operator under subclause 7.2(4) at least 3 business days before the change takes effect. <i>Metering Code clause 7.2(5)</i>	
	Priority: 4	Controls rating: NP Compliance Rating: NR
455	A Code participant must subject to subclauses 5.17A and 7.6 not disclose, or permit the disclosure of, confidential information provided to it under or in connection with the Code and may only use or reproduce confidential information for the purpose for which it was disclosed or another purpose contemplated by the Code. <i>Metering Code clause 7.5</i>	<i>Obligations 455 and 456</i> Through discussions with the General Manager Pilbara O&M; and examination of AETRH's PPA, we determined that: <ul style="list-style-type: none"> AETRH is aware of its confidentiality requirements in its capacity as a network operator AETRH's PPA (which governs AETRH's obligations as a network operator) with its customer contains detailed provisions on the management of confidential information During the period subject to audit, AETRH was not required under a provision in the Metering Code to disclose confidential information.
	Priority: 4	Controls rating: NP Compliance Rating: 1
456	A Code participant must disclose or permit the disclosure of confidential information that is required to be disclosed by the Code. <i>Metering Code clause 7.6(1)</i>	
	Priority: 4	Controls rating: NP Compliance Rating: NR

No.	Obligation under condition	Findings			
Part 8 Dispute resolution					
457	<p>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.</p> <p><i>Metering Code clause 8.1(1)</i></p>	<p><i>Obligations 457 to 461</i></p> <p>For the purposes of the Metering Code, ‘disputes’ refers to metering disputes between AETRH as a code participant and as a network operator, another retailer, another generator, another network operator, a user or the IMO.</p> <p>Through discussions with the General Manager Pilbara O&M; and examination of AETRH’s customer PPAs, we determined that:</p> <ul style="list-style-type: none"> • No disputes occurred during the period subject to audit • AETRH, in its role as a network operator, is governed by the provisions of its customer PPA when settling disputes. 			
	<table border="1"> <tr> <td>Priority: 5</td> <td>Controls rating: NP</td> <td>Compliance Rating: NR</td> </tr> </table>		Priority: 5	Controls rating: NP	Compliance Rating: NR
Priority: 5	Controls rating: NP		Compliance Rating: NR		
458	<p>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.</p> <p><i>Metering Code clause 8.1(2)</i></p>				
	<table border="1"> <tr> <td>Priority: 5</td> <td>Controls rating: NP</td> <td>Compliance Rating: NR</td> </tr> </table>		Priority: 5	Controls rating: NP	Compliance Rating: NR
Priority: 5	Controls rating: NP	Compliance Rating: NR			
459	<p>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.</p> <p><i>Metering Code clause 8.1(3)</i></p>				
	<table border="1"> <tr> <td>Priority: 5</td> <td>Controls rating: NP</td> <td>Compliance Rating: NR</td> </tr> </table>	Priority: 5	Controls rating: NP	Compliance Rating: NR	
Priority: 5	Controls rating: NP	Compliance Rating: NR			
460	<p>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.</p> <p><i>Metering Code clause 8.1(4)</i></p>				
	<table border="1"> <tr> <td>Priority: 4</td> <td>Controls rating: NP</td> <td>Compliance Rating: NR</td> </tr> </table>	Priority: 4	Controls rating: NP	Compliance Rating: NR	
Priority: 4	Controls rating: NP	Compliance Rating: NR			
461	<p>The disputing parties must at all times conduct themselves in a manner which is directed towards achieving the objective in subclause 8.3(1).</p> <p><i>Metering Code clause 8.3(2)</i></p>				
	<table border="1"> <tr> <td>Priority: 5</td> <td>Controls rating: NP</td> <td>Compliance Rating: NR</td> </tr> </table>	Priority: 5	Controls rating: NP	Compliance Rating: NR	
Priority: 5	Controls rating: NP	Compliance Rating: NR			

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

No.	Obligation under condition	Findings
462	A distributor or transmitter must, as far as reasonably practicable, ensure that electricity supply to a customer's electrical installations complies with prescribed standards. <i>Network Quality and Reliability of Supply Code clause 5(1)</i>	<p><i>Obligations 462 to 469</i></p> <p>Through discussion with the General Manager Pilbara O&M; consideration of AETRH's transmission and distribution network operations and the relevant items of its customer PPA, we determined that during the period subject to audit:</p> <ul style="list-style-type: none"> AETRH's customer PPA prescribes: <ul style="list-style-type: none"> Power system specifications Voltage fluctuation, harmonic and reliability requirements Obligations upon AETRH for managing interruptions, including recognising interruptions, communicating with the customer, restoration in conjunction with the customer As far as reasonably practicable, AETRH had ensured that electricity supply to its customer's electrical installations complied with the prescribed standards AETRH maintained formal records of correspondence with the customer in relation to requests for data relating to the quality of supply There were no occasions in which AETRH was required to disconnect the supply of electricity to its customer's electrical installations As far as reasonably practicable and in accordance with the PPA with its customer, AETRH had ensured that the supply of electricity to its customer was maintained and the occurrence and duration of interruptions was kept to a minimum There were no instances in which an alternate supply of electricity was viable in the event of AETRH's customer being affected by a proposed interruption AETRH's customer PPA addresses the requirements of clause 13 of the Network Quality and Reliability of Supply Code in relation to the duration of interruptions.
	Priority:5 Controls rating: NP Compliance Rating: 1	
463	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. <i>Network Quality and Reliability of Supply Code clause 8</i>	
	Priority:5 Controls rating: NP Compliance Rating: NR	
464	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. <i>Network Quality and Reliability of Supply Code clause 9</i>	
	Priority:5 Controls rating: NP Compliance Rating: 1	
465	A distributor or transmitter must, so far as reasonably practicable, reduce the effect of any interruption on a customer. <i>Network Quality and Reliability of Supply Code clause 10(1)</i>	
	Priority:5 Controls rating: NP Compliance Rating: 1	
466	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. <i>Network Quality and Reliability of Supply Code clause 10(2)</i>	
	Priority:5 Controls rating: NP Compliance Rating: NR	
468	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. <i>Network Quality and Reliability of Supply Code clause 13(2)</i>	
	Priority:5 Controls rating: NP Compliance Rating: NR	

No.	Obligation under condition	Findings
469	The average total length of interruptions of supply is to be calculated using the specified method. <i>Network Quality and Reliability of Supply Code clause 13(3)</i>	<i>Refer to description above for obligations 462 to 469</i>
	Priority:4 Controls rating: NP Compliance Rating: NR	
470	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. <i>Network Quality and Reliability of Supply Code clause 14(8)</i>	During the period subject to audit, the Minister had not issued an instrument in relation to the Network Quality and Reliability of Supply Code, nor had any notice been given under section 14(7) of the Network Quality and Reliability of Supply Code.
	Priority:4 Controls rating: NP Compliance Rating: NR	
471	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. <i>Network Quality and Reliability of Supply Code clause 15(2)</i>	Through discussion with the General Manager Pilbara O&M; and consideration of AETRH's operations and its customer PPA, we determined that: <ul style="list-style-type: none"> • AETRH's PPA with its customer sets out provisions related to quality and reliability standards • During the period subject to audit, no new customer agreements had been established.
	Priority:4 Controls rating: NP Compliance Rating: NR	
477	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. <i>Network Quality and Reliability of Supply Code clause 23(1)</i>	Through discussion with the General Manager Pilbara O&M; and consideration of AETRH's transmission and distribution network operations and its customer PPA, we determined that during the period subject to audit, as far as reasonably practicable, AETRH had monitored its network operations to ensure compliance with the requirements of its customer PPA and any additional requirement prescribed by the Network Quality and Reliability of Supply Code.
	Priority: 5 Controls rating: NP Compliance Rating: 1	
478	A distributor or transmitter must keep records of information regarding its compliance with specific requirements for the period specified. <i>Network Quality and Reliability of Supply Code clause 23(2)</i>	Through discussions with the General Manager Pilbara O&M and Wholesale Regulation Manager; and consideration of AETRH's business practices, we determined that AETRH uses the SharePoint system to maintain formal records of information regarding its network quality and reliability performance.
	Priority: 4 Controls rating: NP Compliance Rating: 1	
479	A distributor or transmitter must complete a quality investigation requested by a customer in accordance with specified requirements. <i>Network Quality and Reliability of Supply Code clause 24(3)</i>	<i>Obligations 479 and 480</i> The General Manager Pilbara O&M confirmed that during the period subject to audit, its customer had requested AETRH to complete quality investigations and AETRH provided information relating to the result of the investigations performed, within 20 working days of request and in accordance with the requirements of the customer's PPA.
	Priority: 4 Controls rating: NP Compliance Rating: 1	
480	A distributor or transmitter must report the results of an investigation to the customer concerned. <i>Network Quality and Reliability of Supply Code clause 24(4)</i>	
	Priority: 4 Controls rating: NP Compliance Rating: 1	

Appendix A – Audit Plan

**Alinta Energy Transmission
(Roy Hill) Pty Ltd
Electricity Integrated Regional Licence
(EIRL6)
2016 Performance Audit**

Audit Plan

October 2016

Contents

1	Introduction	1
	Overview	1
	Objective	1
	Scope	1
	Responsibility	4
2	Approach	5
	Risk assessment	5
	Systems analysis/walkthrough	6
	Testing/review	7
	Reporting	8
3	General information	9
	Key Alinta contacts	9
	Deloitte staff	9
	Timing	9
	Appendix 1 – Risk assessment key	10
	Appendix 2 – Risk assessment	12

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1 Introduction

Overview

The Economic Regulation Authority (**the Authority**) has under the provisions of the Electricity Industry Act 2004 (**Electricity Act**), issued to Alinta Energy Transmission (Roy Hill) Pty Ltd (**Alinta**) an Electricity Integrated Regional Licence (**the Licence**). The Licence relates to Alinta's electricity generation, transmission, distribution and retail operations.

Section 13 of the Electricity Act requires Alinta to provide to the Authority a performance audit (**the audit**) conducted by an independent expert acceptable to the Authority not less than once in every 24 month period. With the Authority's approval, Deloitte Risk Advisory Pty Ltd (**Deloitte**) has been appointed to conduct the audit for the period 1 October 2013 to 30 September 2016.

The Licence covers Alinta's generation, transmission, distribution and retail activity in relation to its supply of power to the Roy Hill iron ore mine via a 220kV transmission line from Alinta Energy's Newman power station and a 6MW diesel power station at the Roy Hill mine site.

The audit will be conducted in accordance with the April 2014 issue of the *Audit and Review Guidelines: Electricity and Gas Licences* (**Audit Guidelines**). In accordance with the Audit Guidelines this document represents the Audit Plan (**the Plan**) that is to be agreed upon by Deloitte and Alinta and presented to the Authority for approval.

Objective

The performance audit is defined as an examination of the measures taken by Alinta to meet the performance criteria specified in its Licence.

The audit is designed to provide reasonable assurance regarding the assessment of appropriateness, effectiveness and efficiency associated with Alinta's compliance with its Licence. The audit will specifically consider the following:

- *Process compliance* - the effectiveness of systems and procedures in place throughout the audit period, including assessing the adequacy of internal controls
- *Outcome compliance* - the actual performance against standards prescribed in the Licence throughout the audit period
- *Output compliance* - the existence of the output from systems and procedures throughout the audit period (that is, proper records exist to provide assurance that procedures are being consistently followed and controls are being maintained)
- *Integrity of performance* - the completeness and accuracy of the performance reporting to the Authority
- *Compliance with any individual licence conditions* - the requirements imposed on Alinta by the Authority or specific issues for follow-up that are advised by the Authority.

Scope

The Authority provides guidance on those aspects of the Licence and Alinta's performance criteria, which it expects to be reported upon and included in the scope of the performance audit in its *Electricity Compliance Reporting Manual* (**Reporting Manual**).

The audit applies the singular audit priority assessment approach to identify all applicable licence obligations. Each of the compliance requirements identified in the Reporting Manual have been evaluated for applicability to Alinta's operations and used as the basis for determining the performance criteria to be considered for the audit. In line with the Licence authorisations in Schedule 1, in-scope obligations relate to any combination of the following Licence areas; Generation, Transmission, Distribution and Retail.

The audit period is from 1 October 2013 to 30 September 2016.

During the period subject to audit, the Reporting Manual has undergone three revisions. The four versions of the Reporting Manual are applicable to the periods outlined below:

Reporting Manual version	Relevance of revision to Licence
June 2013	This version of the Reporting Manual was current at the commencement of the audit period.
May 2014	The May 2014 version of the Reporting Manual was primarily published to reflect administrative adjustments to reference distribution and transmission licences in two obligations. As none of the changes between the two versions have an impact on Alinta's licence obligations, this audit will not specifically reference the obligations listed in May 2014 version.
July 2014	The July 2014 version of the Reporting Manual was primarily published to accommodate changes to the <i>Code of Conduct for the Supply of Electricity to Small Use Customers (Code of Conduct)</i> , which took effect from 1 July 2014. Note that Alinta currently does not have any obligations under the Code of Conduct as the Licence specifically excludes Alinta from supplying electricity to small use customers.
September 2014	The September 2014 version was primarily published to expand on obligation 236 into an additional obligation (236A) relating to life support equipment at a customer's supply address. Again, this obligation does not apply to Alinta's operations. The current version of the Reporting Manual is the primary reference for this audit, particularly for the obligation numbering.

Table 1 below outlines the in-scope compliance requirements that apply to Alinta's operations during the period subject to audit. A total of 172 obligations are applicable to Alinta's operations. Where necessary, further explanation is provided to describe the extent of application of those obligations. Note that due to Alinta's current operating arrangements, a number of those obligations are not likely to be triggered during the period subject to audit. In such instances, the obligation remains applicable to the scope of this audit, with the audit report to identify and describe instances where an obligation cannot be assessed and rated.

The assessment is made against the current (September 2014) Reporting Manual.

Table 1 – Application of legislative elements to Alinta’s operations

Legislative element	Application to Alinta’s operations
Type 1 reporting obligations for all licence types	<p>Two of the nine Type 1 obligations are applicable to Alinta’s operations.</p> <p>The remaining seven Type 1 obligations are not applicable to Alinta’s current operations as they relate to the Code of Conduct, which is designed to address standards of conduct in the supply and marketing of electricity to small use customers. The Licence specifically excludes Alinta from supplying to small use customers.</p>
Electricity Industry Customer Transfer Code	<p>The 71 obligations under the Customer Transfer Code are designed to address requirements of network operators and retailers in the event of customers transferring between retailers.</p> <p>None of the 71 obligations are applicable to Alinta for the audit period for the following reasons:</p> <ul style="list-style-type: none"> • The Licence excludes Alinta from supplying to small use customers • Alinta is the only retailer selling electricity through the relevant distribution and transmission system • Alinta does not have access to another network for the purpose of supplying any new contestable customers.
Electricity Industry (Obligation to Connect) Regulations	All six obligations are applicable to Alinta’s operations.
Electricity Industry (Customer Contracts) Regulations	None of the 23 obligations are applicable to Alinta’s operations as the Licence specifically excludes Alinta from supplying to small use customers.
Electricity Industry Act	<p>Nine of the 13 obligations are applicable to Alinta’s operations.</p> <p>The remaining four obligations are not applicable as the Licence specifically excludes Alinta from supplying to small use customers.</p>
Electricity Licences – Licence Conditions and Obligations	<p>10 of the 15 obligations are applicable to Alinta’s operations.</p> <p>The remaining five obligations are not applicable as the Licence specifically excludes Alinta from supplying to small use customers.</p>
Code of Conduct	None of the obligations are applicable to Alinta for the audit period as the Licence excludes Alinta from supplying to small use customers.
Electricity Industry Metering Code	<p>134 of the 145 obligations are applicable to Alinta’s operations.</p> <p>The remaining obligations are not applicable to Alinta’s operations due to their application to:</p> <ul style="list-style-type: none"> • Operations within the South West Interconnected System, which is not applicable to Alinta’s licenced areas • The Electricity Generation and Retail Corporation (Synergy) or Electricity Networks Corporation (Western Power) only • Small use customers (in relation to pre-payment meters). The Licence excludes Alinta from supplying to small use customers.
Electricity Industry (Network Quality and Reliability of Supply) Code	<p>13 of the 23 obligations are applicable to Alinta’s operations.</p> <p>The remaining 10 obligations are not applicable as the Licence specifically excludes Alinta from supplying to small use customers.</p>

Responsibility

Alinta's responsibility for compliance with the conditions of the Licence

Alinta is responsible for:

- Ensuring that it has complied in all material respects with the requirements of the Licence as specified by the Audit Guidelines
- Establishing and maintaining an effective system of internal control over its systems designed to achieve its compliance with the Licence requirements and the Audit Guidelines
- Implementing processes for assessing its compliance requirements and for reporting its level of compliance to the Authority
- Implementing corrective actions for instances of non-compliance.

Deloitte's responsibility

Our responsibility is to express a conclusion on Alinta's compliance with the conditions of the Licence based on our procedures. The reasonable assurance audit will be performed in accordance with the Audit Guidelines and the Australian Standard on Assurance Engagements (ASAE) 3100 *Compliance Engagements* issued by the Australian Auditing and Assurance Standards Board, in order to state whether, in our opinion, based on the procedures performed, Alinta has complied, in all material respects with the conditions of its Licence as specified in the Audit Guidelines for the period 1 October 2013 to 30 September 2016.

Limitations of use

The resulting report is intended solely for the information and internal use of Alinta, and is not intended to be and should not be used by any other person or entity. No other person or entity is entitled to rely, in any manner, or for any purpose, on this report. We do not accept or assume responsibility to anyone other than Alinta for our work, for this report, or for any reliance which may be placed on this report by any party other than Alinta.

We understand that a copy of the report will be provided to the Authority for the purpose of reporting on the performance audit for Alinta's Licence. We agree that a copy of the report may be provided to the Authority for its information in connection with this purpose but, as will be made clear in the report, only on the basis that we accept no duty, liability or responsibility to the Authority in relation to the report. We accept no duty, responsibility or liability to any party, other than Alinta, in connection with the report or this engagement.

Inherent limitations

Our engagement will provide reasonable assurance as defined in ASAE 3100. Reasonable assurance means a high but not absolute level of assurance. Absolute assurance is very rarely attainable as a result of factors such as the following:

- The use of selective testing and testing as at a point of time
- The inherent limitations of internal control
- The fact that much of the evidence available to us is persuasive rather than conclusive
- The use of judgement in gathering and evaluating evidence and forming conclusions based on that evidence.

We cannot, in practice, examine every activity and procedure, nor can we be a substitute for management's responsibility to maintain adequate controls over all levels of operations and their responsibility to prevent and detect irregularities, including fraud. Accordingly, readers of our report should not rely on the report to identify all potential instances of non-compliance which may occur. Our report will contain a statement of responsibility that will draw attention to management's responsibility for establishing and maintaining an effective control structure.

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

Independence

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

2 Approach

The audit will be conducted in three distinct phases, being a risk assessment, system analysis/walkthrough and testing and review. From the audit results, a report will be produced to outline findings, overall compliance assessments, overall control adequacy assessments and recommendations for improvement in line with the Audit Guidelines. Each step of the audit is discussed in detail below.

Risk assessment

The audit will focus on identifying or assessing those activities and management control systems to be examined and the matters subject to audit. Therefore, the purpose of conducting the risk assessment as a preliminary phase enables the auditor to focus on pertinent/high risk areas of Alinta's licence obligations. The risk assessment gives specific consideration to changes to Alinta's systems and processes and any matters of significance raised by the Authority and/or Alinta. The level of risk and materiality of the process determine the level of audit required i.e. the greater the materiality and the higher the risk, the more audit effort to be applied.

The first step of the risk assessment is the rating of the potential consequences of Alinta not complying with its licence obligations, in the absence of mitigating controls. As the Reporting Manual is prescriptive in its criteria for classifying the consequences of non-compliance (refer to **Appendix 1-1**) the risk assessment applies the Reporting Manual's classifications for each obligation subject to audit. Reference is also made to the consequence rating descriptions listed at Table 15 of the Audit Guidelines (refer to **Appendix 1-2**), providing the risk assessment with context to ensure the appropriate consequence rating is applied to each obligation subject to audit.

Once the consequence has been determined, the likelihood of Alinta not complying with its obligations is assessed using the likelihood rating listed at Table 16 of the Audit Guidelines (refer to **Appendix 1-3**). The assessment of likelihood is based on the expected frequency of Alinta's non-compliance with the relevant licence obligation over a period of time.

Table 2 below (sourced from Table 17 of the Audit Guidelines) outlines the combination of consequence and likelihood ratings to determine the level of inherent risk associated with each individual obligation.

Table 2: Inherent risk rating

Likelihood	Consequence		
	Minor	Moderate	Major
Likely	Medium	High	High
Probable	Low	Medium	High
Unlikely	Low	Medium	High

Once the level of inherent risk has been determined, the adequacy of existing controls is assessed in order to determine the level of control risk. Controls are assessed and prioritised as weak, moderate or strong dependant on their suitability to mitigate the risks identified. The control adequacy ratings used by this risk assessment are aligned to the ratings listed at Table 19 of the Audit Guidelines (refer to **Appendix 1-4**).

Once inherent risks and control risks are established, the audit priority can then be determined using the matrix listed at Table 20 of the Audit Guidelines (refer to **Table 3** below). Essentially, the higher the level of risk the more substantive testing is required.

Table 3: Assessment of Audit Priority

Inherent Risk	Adequacy of existing controls		
	Weak	Moderate	Strong
High	Audit priority 1	Audit priority 2	
Medium	Audit priority 3	Audit priority 4	
Low	Audit priority 5		

The following table outlines the audit requirement for each level of audit priority. Testing can range from extensive substantive testing around the controls and activities of particular processes to confirming the existence of controls through discussions with relevant staff.

Table 4: Audit Priority Table

Priority rating and resulting audit procedures	
Rating	Audit requirement
Audit Priority 1	<ul style="list-style-type: none"> • Controls testing and extensive substantive testing of activities and/or transactions • Follow-up and if necessary, re-test matters previously reported.
Audit Priority 2	<ul style="list-style-type: none"> • Controls testing and moderate substantive testing of activities and/or transactions • Follow-up and if necessary, re-test matters previously reported.
Audit Priority 3	<ul style="list-style-type: none"> • Limited controls testing (moderate sample size). Only substantively test transactions if further control weakness found • Follow-up of matters previously reported.
Audit Priority 4	<ul style="list-style-type: none"> • Confirmation of existing controls via observation and walk through testing • Follow-up of matters previously reported.
Audit Priority 5	<ul style="list-style-type: none"> • Confirmation of existing controls via observation, discussions with key staff and/or reliance on key references (“desktop review”).

The risk assessment has been discussed with stakeholders to gain their input as to the appropriateness and factual accuracy of risk and control ratings and associated explanations. The key sources considered in reaching our preliminary assessment of the risk and control ratings were based on:

- Our understanding of Alinta’s operations, the WA electricity industry and related regulatory environment
- Consideration of annual compliance reports
- Any other factors that may have an effect on the level of risk or strength of controls.

At this stage, the risk assessment can only be a preliminary assessment based on reading of documentation and interviews by the auditors. It is possible that the ratings and risk assessment comments may be revised as we conduct our work and new evidence comes to light. Accordingly the risk assessment for the performance audit is a preliminary draft, not a final report, and no reliance should be placed on its findings. It is however an invaluable tool for focussing the audit effort.

The performance audit risk assessment is attached at **Appendix 2**.

Systems analysis/walkthrough

The systems analysis required will be determined utilising the audit priority scale outlined above. Once the priority level has been defined the testing component will take place by way of interviewing key operational and administrative staff who will outline information that displays compliance with the Licence requirements. Note that for obligations assessed as having an audit priority of three or lower, a specific assessment on the adequacy of Alinta’s controls will be performed.

In performing our analysis/walkthrough of Alinta's systems and processes, we will consider the following:

- The control environment: Alinta's management philosophy and operating style, organisational structure, assignment of authority and responsibilities, the use of internal audit, the use of information technology and the skills and experience of key staff members
- Information systems: the appropriateness of Alinta's information systems (in particular, those relating to network management & control and metering services) to record the information needed to comply with the licence, the accuracy of data, the security of data and documentation describing the information system
- Control procedures: the presence of systems and procedures to ensure compliance with the licence, effectiveness of Alinta's internal control structure to detect and correct non-compliance. Specific consideration will be given to and significant changes in relevant systems and procedures implemented during the period subject to audit
- Compliance attitude: action taken by Alinta in response to any previous audit recommendations. Consideration will be given to the timing of action taken during the period subject to audit and whether the action has a permanent impact on Alinta's level of compliance
- Outcome compliance: actual performance against standards prescribed in the licence throughout the audit period.

Where required, an observation of processes, procedures and operations and review of key documents will occur to assist in the determination of Alinta's compliance with Licence obligations. Key documents, which may be subject to audit, are not specifically disclosed in this plan. A list of documents examined will be included in the audit report.

Testing/review

Using the results of the risk assessment and systems analysis, detailed testing and analysis will be performed to compare those standards maintained by Alinta with the relevant sections and schedules of the Licence.

Controls testing is performed for those licence obligations with an audit priority of 1, 2 or 3 (refer to table 4), and where there is relevant activity. This method of testing will involve:

- Understanding the population of transactions
- Selecting a sample of transactions to examine compliance with relevant sections of applicable Codes/Regulations
- Comparing the sample selected to expected requirements as mandated by relevant sections of applicable Codes/Regulations.

In instances where a non-compliance has occurred, the audit will specifically assess the adequacy of related controls.

A full work program will be completed to record the specific aspects of our testing and analyses for each licence obligation. This work program will be based on:

- The audit priority determined by the risk assessment to be applicable each licence obligation
- The results of the systems analysis performed, as described above
- Deloitte's pre-determined sampling methodology, which takes account of the volume and frequency (e.g. daily, weekly, monthly, annual) of relevant transactions. Sample sizes typically range from 1 to 30, increasing with the volume and frequency of transactions
- The location of personnel and transactions to be tested.

Reporting

In accordance with the Audit Guidelines, all aspects of compliance with the Licence will be assessed according to the rating scale based on the work performed. Refer to **Table 5** below for the compliance levels that will be used for the performance audit.

Table 5: Compliance and control adequacy rating scale

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

The performance audit report will also be structured to address all key components expected by the Audit Guidelines, including:

- An executive summary containing all elements listed in section 11 of the Audit Guidelines
- Performance/compliance summary and rating, including a rating for the adequacy of Alinta's controls, for each licence condition – in tabular form
- Audit observations
- Where appropriate, recommendations on actions required to address areas of non-compliance.

Where appropriate, Alinta will provide a post audit implementation plan for incorporation into the report.

3 General information

All aspects of the audit will undergo quality assurance and review procedures as outlined in our previous communications. Before delivery of a final report, full quality procedures will be applied, including second partner review.

Key Alinta contacts

The key contacts for this audit are:

- Paul Grey Manager Generation Operations WA
- Fiona Wiseman Wholesale Regulation Manager
- Michael Roberts Manager - Asset Management
- Jeff Ey Plant Manager Newman Power Station.

Deloitte staff

Deloitte staff who will be involved with this assignment are:

- Richard Thomas Partner
- Andrew Baldwin Specialist Leader Regulatory Compliance and Lead Auditor
- David Herbert Senior Analyst
- Esther Ong Analyst
- Kobus Beukes Partner - Quality Assurance.

Resumes for key Deloitte staff are outlined in the proposal accepted by Alinta and subsequently presented to the Authority.

Timing

The initial risk assessment phase was completed on 30 September 2016, after which the draft audit plan and risk assessment were presented to Alinta for comment prior to submission to the Authority for review and approval.

The remainder of the fieldwork phase is scheduled to be performed in November 2016, enabling a report to be submitted to the Authority by the due date of 31 December 2016.

Deloitte's time and staff commitment to the completion of the audit is outlined in the proposal accepted by Alinta and subsequently presented to the Authority.

We propose to commence the engagement with an initial request for information/documentation and introductory meetings with Alinta's key representatives. A work program will then be refined to accommodate both the availability of those representatives to attend to audit requests as well as ensuring reports are prepared in time for submission to the Authority by 31 December 2016.

Appendix 1 – Risk assessment key

1-1 Criteria for classification

Source: Electricity Compliance Reporting Manual September 2014

Rating (type)	Classification of Non-Compliance	Criteria for classification
1	Major	<p>Classified on the basis that:</p> <ul style="list-style-type: none"> ▪ the consequences of non-compliance would cause major damage, loss or disruption to customers; or ▪ the consequences of non-compliance would endanger or threaten to endanger the safety or health of a person.
2	Moderate	<p>Classified on the basis that:</p> <ul style="list-style-type: none"> ▪ the consequences of non-compliance impact the efficiency and effectiveness of the licensee's operations or service provision but do not cause major damage, loss or disruption to customers; or ▪ the regulatory obligation is not otherwise classified as a Type 1 or a Type NR non-compliance. <p>Reclassification of Type 2 as a Type 1 may occur in circumstances of systematic non-compliance.</p>
NR	Minor	<p>Classified on the basis that:</p> <ul style="list-style-type: none"> ▪ the consequences of non-compliance are relatively minor – i.e. non-compliance will have minimal impact on the licensee's operations or service provision and do not cause damage, loss or disruption to customers; or ▪ compliance with the obligation is immeasurable; or ▪ the non-compliance is required to be reported to the Regulator under another instrument, guideline or code 6; or ▪ the non-compliance is identified by a party other than the licensee ; or ▪ the licensee only needs to use its reasonable endeavours or best endeavours to achieve compliance or where the obligation does not otherwise impose a firm obligation on the licensee. <p>Reclassification of Type NR as a Type 2 may occur in circumstances of:</p> <ul style="list-style-type: none"> ▪ systemic non-compliance; or ▪ a failure to resolve non-compliance promptly.

1-2 Consequence ratings

Source: Audit Guidelines: Electricity and Gas Licences April 2014

	Rating	Examples of non-compliance		
		Supply quality and reliability	Consumer protection	Breaches of legislation or other licence conditions
1	Minor	Breach of supply quality or reliability standards minor - affecting a small number of customers. Delays in providing a small proportion of new connections.	Customer complaints procedures not followed in a few instances. Small percentage of disconnections or reconnections not completed on time. Small percentage of bills not issued on time.	Legislative obligations or licence conditions not fully complied with, minor impact on customers or third parties. Compliance framework generally fit for purpose and operating effectively.
2	Moderate	Supply quality breach events that significantly impact customers; large number of customers affected and/or extended duration and/or damage to customer equipment. Supply interruptions affecting significant proportion of customers on the network for up to one day. Significant number of customers experiencing excessive number of interruptions per annum. Significant percentage of new connections not provided on time/ some customers experiencing extended delays.	Significant percentage of complaints not being correctly handled. Customers not receiving correct advice regarding financial hardship. Significant percentage of bills not issued on time. Ongoing instances of disconnections and reconnections not completed on time. Remedial actions not being taken or proving ineffective. Instances of wrongful disconnection.	More widespread breaches of legislative obligations or licence conditions over time. Compliance framework requires improvement to meet minimum standards.
3	Major	Supply interruptions affecting significant proportion of customers on the network for more than one day. Majority of new connections not completed on time/ large number of customers experiencing extended delays.	Significant failure of one or more customer protection processes leading to ongoing breaches of standards. Ongoing instances of wrongful disconnection	Wilful breach of legislative obligation or licence condition. Widespread and/or ongoing breaches of legislative obligations or licence conditions. Compliance framework not fit for purpose, requires significant improvement.

1-3 Likelihood ratings

Source: Audit Guidelines: Electricity and Gas Licences April 2014

	Level	Criteria
A	Likely	Non-compliance is expected to occur at least once or twice a year
B	Probable	Non-compliance is expected to occur every three years
C	Unlikely	Non-compliance is expected to occur at least once every 10 years or longer

1-4 Adequacy ratings for existing controls

Source: Audit Guidelines: Electricity and Gas Licences April 2014

Rating	Description
Strong	Strong controls that are sufficient for the identified risks
Moderate	Moderate controls that cover significant risks; improvement possible
Weak	Controls are weak or non-existent and have minimal impact on the risks

Appendix 2 – Risk assessment

The table below lists the obligations relevant to the Licence for the entire reporting period. For referencing purposes, obligation number and description are sourced from the September 2014 Reporting Manual.

No	Obligation reference	Obligation description	Type	Consequence	Likelihood	Inherent Risk Rating	Control Assessment	Audit Priority
8 Type 1 Reporting Obligations								
Obligations 234-238 and 257-258 are not applicable to Alinta's activities for the period subject to audit, as the Licence excludes Alinta from supplying to small use customers.								
127	Integrated Regional Licence condition 29.1	A distributor must create and maintain a Priority Restoration Register.	1	Major	Unlikely	High	Moderate	Priority 2
128	Integrated Regional Licence condition 29.3	The Priority Restoration Register must comply with any criteria determined by the Minister.	1	Major	Unlikely	High	Moderate	Priority 2
9 Electricity Industry Customer Transfer Code								
All obligations (1-71) are not applicable to Alinta activities for the period subject to audit for the following reasons:								
<ul style="list-style-type: none"> The Licence excludes Alinta from supplying to small use customers Under current arrangements, there is no practical possibility of a customer transfer. 								
10 Electricity Industry (Obligation to Connect) Regulations								
72	Electricity Industry (Obligation to Connect) 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.	2	Moderate	Probable	Medium	Moderate	Priority 4
73	Electricity Industry (Obligation to Connect) 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.	2	Moderate	Probable	Medium	Moderate	Priority 4
74	Electricity Industry (Obligation to Connect) 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.	2	Moderate	Probable	Medium	Moderate	Priority 4
75	Electricity Industry (Obligation to Connect) 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.	2	Moderate	Probable	Medium	Moderate	Priority 4
76	Electricity Industry (Obligation to Connect) Regulation 7(1)	A distributor must energise premises in certain prescribed circumstances.	2	Moderate	Probable	Medium	Moderate	Priority 4
77	Electricity Industry (Obligation to Connect) Regulation 8	A distributor that is obliged to energise premises must do so within a defined timetable.	2	Moderate	Probable	Medium	Moderate	Priority 4

No	Obligation reference	Obligation description	Type	Consequence	Likelihood	Inherent Risk Rating	Control Assessment	Audit Priority
11 Electricity Industry (Customer Contracts) Regulations								
All obligations (78-100) are not applicable to Alinta's activities for the period subject to audit as the Licence excludes Alinta from supplying to small use customers.								
12 Electricity Industry Act								
Obligations 108, 109, 111 and 113 are not applicable to Alinta's activities for the period subject to audit, as the Licence excludes Alinta from supplying to small use customers.								
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.	NR	Minor	Unlikely	Low	Moderate	Priority 5
102	Electricity Industry Act section 14(1)(a)	A licensee must provide for an asset management system.	NR	Minor	Probable	Low	Moderate	Priority 5
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.	2	Moderate	Probable	Medium	Moderate	Priority 4
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.	NR	Minor	Unlikely	Low	Moderate	Priority 5
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.	2	Moderate	Probable	Medium	Moderate	Priority 4
106	Electricity Industry Act section 31(3)	A licensee must take reasonable steps to minimise the extent or duration of any interruption, suspension or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause.	NR	Minor	Probable	Low	Moderate	Priority 5
107	Electricity Industry Act section 41(6)	A licensee must pay the costs of taking an interest in land or an easement over land.	2	Moderate	Probable	Medium	Moderate	Priority 4
110	Electricity Industry Act section 76	If a designation under section 71(1) of the Electricity Industry Act is in force a licensee must perform the functions of a retailer of last resort and must carry out the supplier of last resort plan if it comes into operation under section 70 of the Electricity Industry Act.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
13 Electricity Licences – Licence Conditions and Obligations								
Obligations 114-118 are not applicable to Alinta's activities for the period subject to audit, as the Licence excludes Alinta from supplying to small use customers.								
119	Integrated Regional Licence condition 12.1 or 24.1	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.	2	Moderate	Unlikely	Medium	Strong	Priority 4

No	Obligation reference	Obligation description	Type	Consequence	Likelihood	Inherent Risk Rating	Control Assessment	Audit Priority
120	Integrated Regional Licence condition 13.4 or 25.4	A licensee must comply with any individual performance standards prescribed by the Authority.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
121	Integrated Regional 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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
122	Integrated Regional Licence condition 20.5	A licensee must comply, and must require the licensee's expert to comply, with the relevant aspects of the Authority's standard guidelines dealing with the asset management system.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
123	Integrated Regional 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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
124	Integrated Regional 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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
125	Integrated Regional 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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
126	Integrated Regional Licence condition 18.1	Unless otherwise specified, all notices must be in writing.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
127	Integrated Regional Licence condition 29.1	A distributor must create and maintain a Priority Restoration Register.	1	Major	Unlikely	High	Moderate	Priority 2
128	Integrated Regional Licence condition 29.3	The Priority Restoration Register must comply with any criteria determined by the Minister.	1	Major	Unlikely	High	Moderate	Priority 2
14 Code of Conduct								
All obligations (129-316) are not applicable to Alinta's activities for the period subject to audit as the Licence excludes Alinta from supplying to small use customers.								
15 Electricity Industry Metering Code – Licence Conditions and Obligations								
The following obligations are not applicable to Alinta's activities for the period subject to audit due to their application to:								
<ul style="list-style-type: none"> Operations within the South West Interconnected System, which is not applicable to Alinta's licensed areas: obligations 350-353, 436, 437 The Electricity Networks Corporation (Western Power) or the Electricity Generation and Retail Corporation (Synergy) only: obligations 354, 438-440 Supply to small use customers: obligations 362, 363, 395, 396. 								
Part 2 Code objectives and arms-length treatment								
317	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.	NR	Minor	Unlikely	Low	Moderate	Priority 5
318	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4

No	Obligation reference	Obligation description	Type	Consequence	Likelihood	Inherent Risk Rating	Control Assessment	Audit Priority
Part 3 Meters and metering installations								
319	Electricity Industry Metering Code clause 3.1	A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and also comply with any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act.	2	Moderate	Probable	Medium	Weak	Priority 3
320	Electricity Industry Metering Code clause 3.2(1)	An accumulation meter must at least conform to the requirements specified in the applicable metrology procedure and display, or permit access to a display of the measurements specified in subclauses 3.2(1)(a)(b) using dials, a cyclometer, an illuminated display panel or some other visual means.	2	Moderate	Probable	Medium	Weak	Priority 3
321	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
322	Electricity Industry Metering Code clause 3.3(3)	If a metering installation is required to include a communications link, the link must (where necessary), include a modem and isolation device approved under the relevant telecommunications regulations, to allow the interval energy data to be downloaded in the manner prescribed.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
323	Electricity Industry Metering Code clause 3.3A(1)	A network operator must ensure that bidirectional electricity flows do not occur at a metering point unless the metering installation for the metering point is capable of separately measuring and recording electricity flows in each direction.	2	Moderate	Probable	Medium	Moderate	Priority 4
324	Electricity Industry Metering Code clause 3.3B	A user who is aware of bi-directional flows at a metering point which was not previously subject to a bi-directional electricity flows or any changes in a customer's or user's circumstances in a metering point which will result in bi-directional electricity flows must notify the network operator within 2 business days.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
325	Electricity Industry Metering Code clause 3.3C	An accumulation meter or an interval meter that separately measures and records bi-directional electricity flows at the metering point must record the net electricity production transferred into the network that exceeds electricity consumption and the net electricity consumption transferred out of the network that exceeds electricity production.	2	Moderate	Probable	Medium	Moderate	Priority 4
326	Electricity Industry Metering Code clause 3.5(1) and (2)	A network operator must ensure that there is a metering installation at every connection point on its network which is not a Type 7 connection point. Unless it is a Type 7 metering installation, the metering installation must meet the functionality requirements prescribed.	2	Moderate	Probable	Medium	Weak	Priority 3
327	Electricity Industry Metering Code clause 3.5(3)	A network operator must, unless otherwise agreed, for each metering installation on its network, on and from the time of its connection to the network, provide, install, operate and, subject to subclause 3.7(5), maintain the metering installation in the manner prescribed.	2	Moderate	Probable	Medium	Weak	Priority 3
328	Electricity Industry Metering Code clause 3.5(4)	A network operator must ensure that, except for a Type 7 metering installation, the metering point for a revenue metering installation is located as close as practicable to the connection point in accordance with good electricity industry practice.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
329	Electricity Industry Metering Code clause 3.5(6)	A network operator may only impose a charge for providing, installing, operating or maintaining a metering installation in accordance with the applicable service level agreement between it and the user.	2	Moderate	Unlikely	Medium	Moderate	Priority 4

No	Obligation reference	Obligation description	Type	Consequence	Likelihood	Inherent Risk Rating	Control Assessment	Audit Priority
330	Electricity Industry Metering Code clause 3.5(9)	If a network operator becomes aware that a metering installation does not comply with the Code, the network operator must advise affected parties of the non-compliance and arrange for the non-compliance to be corrected as soon as practicable.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
331	Electricity Industry Metering Code clause 3.7	All devices that may be connected to a telecommunications network must be compatible with the telecommunications network and comply with all applicable State and Commonwealth enactments.	2	Moderate	Probable	Medium	Weak	Priority 3
332	Electricity Industry Metering Code clause 3.8	Subject to clause 3.27, a network operator must, for each metering installation on its network, ensure that the metering installation is secured by means of devices or methods which, to the standard of good electricity industry practice, hinder unauthorized access and enable unauthorized access to be detected.	2	Moderate	Probable	Medium	Weak	Priority 3
333	Electricity Industry Metering Code clause 3.9(3)	Subject to subclauses 3.9(4), 3.9(5) and 3.9(7), each metering installation must meet at least the requirements for that type of metering installation specified in Table 3 in Appendix 1 of the Code.	2	Moderate	Probable	Medium	Weak	Priority 3
334	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 Type 3 metering installation for active energy only.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
335	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
336	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.	2	Moderate	Probable	Medium	Weak	Priority 3
337	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.	2	Moderate	Probable	Medium	Weak	Priority 3
338	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.	2	Moderate	Probable	Medium	Moderate	Priority 4
339	Electricity Industry Metering Code clause 3.11(3)	A Code participant who becomes aware of an outage or malfunction of a metering installation must advise the network operator as soon as practicable.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
340	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.	2	Moderate	Probable	Medium	Weak	Priority 3
341	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.	2	Moderate	Probable	Medium	Moderate	Priority 4

No	Obligation reference	Obligation description	Type	Consequence	Likelihood	Inherent Risk Rating	Control Assessment	Audit Priority
342	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.	2	Moderate	Probable	Medium	Weak	Priority 3
343	Electricity Industry Metering Code clause 3.12(2)	A network operator must ensure that instrument transformers in its metering installations comply with the relevant requirements of any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act and any requirements specified in the applicable metrology procedure.	2	Moderate	Probable	Medium	Weak	Priority 3
344	Electricity Industry Metering Code clause 3.12(3)	A network operator must provide isolation facilities, to the standard of good electricity industry practice, to facilitate testing and calibration of the metering installation.	2	Moderate	Probable	Medium	Weak	Priority 3
345	Electricity Industry Metering Code clause 3.12(4)	A network operator must maintain drawings and supporting information, to the standard of good electricity industry practice, detailing the metering installation for maintenance and auditing purposes.	2	Moderate	Probable	Medium	Weak	Priority 3
346	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.	2	Moderate	Probable	Medium	Moderate	Priority 4
347	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.	2	Moderate	Probable	Medium	Moderate	Priority 4
348	Electricity Industry Metering Code clause 3.13(4)	A check metering installation for a metering point must comply with the prescribed requirements.	2	Moderate	Probable	Medium	Moderate	Priority 4
349	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
355	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
356	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
357	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
358	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.	2	Moderate	Probable	Medium	Moderate	Priority 4
359	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4

No	Obligation reference	Obligation description	Type	Consequence	Likelihood	Inherent Risk Rating	Control Assessment	Audit Priority
360	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
361	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
364	Electricity Industry Metering Code clause 3.27	A person must not install a metering installation on a network unless the person is the network operator or a registered metering installation provider for the network operator doing the type of work authorised by its registration.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
365	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
Part 4 The metering database								
366	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.	2	Moderate	Probable	Medium	Weak	Priority 3
367	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.	2	Moderate	Probable	Medium	Moderate	Priority 4
368	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.	2	Moderate	Probable	Medium	Moderate	Priority 4
369	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.	2	Moderate	Probable	Medium	Weak	Priority 3
370	Electricity Industry Metering Code clause 4.3(1)	The standing data for a metering point must comprise at least the items specified.	2	Moderate	Probable	Medium	Weak	Priority 3
371	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.	NR	Minor	Unlikely	Low	Moderate	Priority 5
372	Electricity Industry Metering Code clause 4.5(1)	A Code participant must not knowingly permit the registry to be materially inaccurate.	NR	Minor	Unlikely	Low	Moderate	Priority 5
373	Electricity Industry Metering Code clause 4.5(2)	Subject to subclause 5.19(6), if a Code participant, other than a network operator, becomes aware of a change to, or an inaccuracy in, an item of standing data in the registry, then it must notify the network operator and provide details of the change or inaccuracy within the timeframes prescribed.	2	Moderate	Unlikely	Medium	Moderate	Priority 4

No	Obligation reference	Obligation description	Type	Consequence	Likelihood	Inherent Risk Rating	Control Assessment	Audit Priority
374	Electricity Industry Metering Code clause 4.6(1)	If the network operator is notified of a change to, or inaccuracy in, an item of standing data by a Code participant which is the designated source for the item of standing data under Table 2 in clause 4.3(1), then the network operator must update the registry to reflect the change to, or correct the inaccuracy in, the standing data.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
375	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, or otherwise becomes aware of a change to or inaccuracy in an item of standing data, then the network operator must undertake investigations to the standard of good electricity industry practice to determine whether the registry should be updated, and update the registry as required.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
376	Electricity Industry Metering Code clause 4.7	If standing data for a metering point is updated in the registry, the network operator must, within 2 business days after the update (or such other time as is specified in the applicable service level agreement) notify the update to the current user and each previous user, if the updated standing data relates to a period or periods when the previous user was the current user.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
377	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
378	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
379	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	2	Moderate	Probable	Medium	Moderate	Priority 4
380	Electricity Industry Metering Code clause 4.8(4)(b)	A network operator must have devices and methods in place that ensure and ensure that the data held in its metering database is secured from unauthorised local or remote access using the methods prescribed.	2	Moderate	Probable	Medium	Moderate	Priority 4
381	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.	2	Moderate	Probable	Medium	Moderate	Priority 4
382	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.	2	Moderate	Probable	Medium	Moderate	Priority 4
Part 5 Metering services								
383	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.	NR	Minor	Unlikely	Low	Moderate	Priority 5

No	Obligation reference	Obligation description	Type	Consequence	Likelihood	Inherent Risk Rating	Control Assessment	Audit Priority
384	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.	NR	Minor	Unlikely	Low	Moderate	Priority 5
385	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).	2	Moderate	Probable	Medium	Moderate	Priority 4
386	Electricity Industry Metering Code clause 5.4(1)	A network operator must, for each meter on its network, at least once in every 12 month period, undertake a meter reading that provides an actual value that passes the validation processes in Appendix 2.	2	Minor	Probable	Low	Moderate	Priority 5
387	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.	2	Moderate	Probable	Medium	Moderate	Priority 4
388	Electricity Industry Metering Code clause 5.4(2)	A user must, when reasonably requested by a network operator, assist the network operator to comply with the network operator's obligation under subclause 5.4(1).	2	Minor	Probable	Low	Moderate	Priority 5
389	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.	2	Minor	Unlikely	Low	Moderate	Priority 5
390	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
391	Electricity Industry Metering Code clause 5.6(1)	Subject to subclause 5.6(2), a network operator must provide validated, and where necessary, substituted or estimated energy data for a metering point to the user for the metering point and the IMO within the timeframes prescribed in subclause 5.6(1)(2).	2	Minor	Unlikely	Low	Moderate	Priority 5
392	Electricity Industry Metering Code clause 5.7	If a replacement energy data value is inserted in a metering database for a metering point, the network operator must provide replacement energy data to the user for the metering point and the IMO within the timeframes prescribed.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
393	Electricity Industry Metering Code clause 5.8	A network operator must provide a user with whatever information the network operator has that is necessary to enable the user to comply with its obligations under the Code of Conduct, within the time necessary for the user to comply with the obligations.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
394	Electricity Industry Metering Code clause 5.9	A network operator must provide standing data, provided to or obtained by it under this Code, to users where required to do so under any enactment.	2	Moderate	Unlikely	Medium	Moderate	Priority 4

No	Obligation reference	Obligation description	Type	Consequence	Likelihood	Inherent Risk Rating	Control Assessment	Audit Priority
397	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 a network operator must provide a user with a complete set of energy data for the a metering point within the timeframes prescribed.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
398	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
399	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
400	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
401	Electricity Industry Metering Code clause 5.16	If a user collects or receives energy data from a metering installation then the user must provide the network operator with the energy data (in accordance with the communication rules) within the timeframes prescribed.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
402	Electricity Industry Metering Code clause 5.17(1)	A user must provide standing data and validated, and where necessary substituted or estimated, energy data to the user's customer to which that information relates where the user is required by an enactment or an agreement to do so for billing purposes or for the purpose of providing metering services to the customer.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
403	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).	2	Moderate	Unlikely	Medium	Moderate	Priority 4
404	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
405	Electricity Industry Metering Code clause 5.18	If a user collects or receives information regarding a change in the energisation status of a metering point then the user must provide the network operator with the prescribed information, including the stated attributes, within the timeframes prescribed.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
406	Electricity Industry Metering Code clause 5.19(1)	A user must, when requested by the network operator acting in accordance with good electricity industry practice, use reasonable endeavours to collect information from customers, if any, that assists the network operator in meeting its obligations described in the Code and elsewhere, and provide that information to the network operator.	NR	Minor	Unlikely	Low	Moderate	Priority 5
407	Electricity Industry Metering Code clause 5.19(2)	A user must, to the extent that it is able, collect and maintain a record of the prescribed information in relation to the site of each connection point with which the user is associated.	NR	Minor	Unlikely	Low	Moderate	Priority 5

No	Obligation reference	Obligation description	Type	Consequence	Likelihood	Inherent Risk Rating	Control Assessment	Audit Priority
408	Electricity Industry Metering Code clause 5.19(3)	Subject to subclauses 5.19(3A) and 5.19(6), the user must within 1 business day after becoming aware of any change in an attribute described in subclause 5.19(2), notify the network operator of the change.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
409	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
410	Electricity Industry Metering Code clause 5.19(6)	The user must use reasonable endeavours to ensure that it does not notify the network operator of a change in an attribute described in subclause 5.19(2) that results from the provision of standing data by the network operator to the user.	NR	Minor	Unlikely	Low	Moderate	Priority 5
411	Electricity Industry Metering Code clause 5.20(1)	A network operator must, by not later than 6 months after the date this Code applies to the network operator, develop, in accordance with the communication rules, an Energy Data Verification Request Form.	2	Moderate	Probable	Medium	Weak	Priority 3
412	Electricity Industry Metering Code clause 5.20(2)	An Energy Data Verification Request Form must require a Code participant to provide the information prescribed.	2	Moderate	Probable	Medium	Moderate	Priority 4
413	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
414	Electricity Industry Metering Code clause 5.21(2)	A network operator must comply with any reasonable request under subclause 5.21(1)	2	Moderate	Unlikely	Medium	Moderate	Priority 4
415	Electricity Industry Metering Code clause 5.21(4)	A test or audit under subclause 5.21(1) is to be conducted in accordance with the metrology procedure and the applicable service level agreement.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
416	Electricity Industry Metering Code clause 5.21(5)	A Code participant must not request a test or audit under subclause 5.21(1) unless the Code participant is a user and the test or audit relates to a time or times at which the user was the current user or the Code participant is the IMO.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
417	Electricity Industry Metering Code clause 5.21(6)	A Code participant must not make a request under subclause 5.21(1) that is inconsistent with any access arrangement or agreement.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
418	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
419	Electricity Industry Metering Code clause 5.21(9)	Any written service level agreement entered into under subclause 5.21(7), must include a provision that no charge is to be imposed if the test or audit reveals a non-compliance with this Code.	2	Moderate	Unlikely	Medium	Moderate	Priority 4

No	Obligation reference	Obligation description	Type	Consequence	Likelihood	Inherent Risk Rating	Control Assessment	Audit Priority
420	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
421	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.	2	Moderate	Probable	Medium	Moderate	Priority 4
422	Electricity Industry Metering Code clause 5.22(1)	A network operator must validate energy data in accordance with this Code applying, as a minimum, the prescribed rules and procedures set out in Appendix 2 and must, where necessary, substitute and estimate energy data under this Code applying, as a minimum, the prescribed rules and procedures set out in Appendix 3.	2	Moderate	Probable	Medium	Moderate	Priority 4
423	Electricity Industry Metering Code clause 5.22(2)	The network operator must use check metering data, where available, to validate energy data provided that the check metering data has been appropriately adjusted for differences in metering installation accuracy in accordance with subclause 3.13.	2	Moderate	Probable	Medium	Moderate	Priority 4
424	Electricity Industry Metering Code clause 5.22(3)	If a check meter is not available or energy data cannot be recovered from the metering installation within the time required under this Code, then the network operator must prepare substitute values using a method contained in Appendix 3 and agreed where necessary with the relevant Code participants.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
425	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
426	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
427	Electricity Industry Metering Code clause 5.22(6)	A network operator must review all validation failures before undertaking any substitution.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
428	Electricity Industry Metering Code clause 5.23(1)	If a network operator determines that there is no possibility of determining an actual value for a metering point, then the network operator must designate an estimated or substituted value for the metering point to be a deemed actual value for the metering point.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
429	Electricity Industry Metering Code clause 5.23(3)	If a network operator has designated a deemed actual value for a metering point then the network operator must repair or replace the meter or one or more of components of metering equipment (as appropriate) at the metering point and subclauses 5.24(3)(c) and 5.24(4) apply in respect of the estimated or substituted value which was designated to be the deemed actual value.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
430	Electricity Industry Metering Code clause 5.24(1)	If a network operator uses an actual value (first value) for energy data for a metering point, and a better quality actual or deemed actual value is available (second value), the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice.	2	Moderate	Unlikely	Medium	Moderate	Priority 4

No	Obligation reference	Obligation description	Type	Consequence	Likelihood	Inherent Risk Rating	Control Assessment	Audit Priority
431	Electricity Industry Metering Code clause 5.24(2)	If a network operator uses a deemed actual value (first value) for energy data for a metering point, and a better quality deemed actual value is available (second value), then the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
432	Electricity Industry Metering Code clause 5.24(3)	If a network operator uses an estimated or substituted value (first value) for energy data for a metering point, and a better quality actual, deemed, estimated or substituted value is available (second value), then the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice or the user and its customer jointly request it to do so.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
433	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
434	Electricity Industry Metering Code clause 5.25	A network operator must ensure the accuracy of estimated energy data in accordance with the methods in its metrology procedure and ensure that any transformation or processing of data preserves its accuracy in accordance with the metrology procedure.	2	Moderate	Probable	Medium	Weak	Priority 3
435	Electricity Industry Metering Code clause 5.27	Upon request from a network operator, the current user for a connection point must provide the network operator with customer attribute information that it reasonably believes are missing or incorrect within the timeframes prescribed.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
441	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
442	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).	2	Moderate	Unlikely	Medium	Moderate	Priority 4
443	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
444	Electricity Industry Metering Code clause 5.37(2)	The report prepared by the network operator must include the information prescribed.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
445	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
446	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).	2	Moderate	Unlikely	Medium	Moderate	Priority 4
Part 6 Documentation								
447	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.	2	Moderate	Probable	Medium	Weak	Priority 3

No	Obligation reference	Obligation description	Type	Consequence	Likelihood	Inherent Risk Rating	Control Assessment	Audit Priority
448	Electricity Industry Metering Code clause 6.1(2)	A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed.	2	Moderate	Probable	Medium	Moderate	Priority 4
449	Electricity Industry Metering Code clause 6.20(4)	A network operator must amend any document in accordance with the Authority's final findings.	NR	Minor	Unlikely	Low	Moderate	Priority 5
450	Electricity Industry Metering Code clause 6.20(5)	The network operator must publish any document that has been amended under subclause 6.20(4).	2	Moderate	Unlikely	Medium	Moderate	Priority 4
Part 7 Notes and confidential information								
451	Electricity Industry Metering Code clause 7.2(1)	Code participants must use reasonable endeavours to ensure that they can send and receive a notice by post, facsimile and electronic communication and must notify the network operator of a telephone number for voice communication in connection with the Code.	NR	Minor	Probable	Low	Moderate	Priority 5
452	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.	2	Moderate	Probable	Medium	Moderate	Priority 4
453	Electricity Industry Metering Code clause 7.2(4)	If requested by a network operator with whom it has entered into an access contract, the Code participant must notify its contact details to a network operator within 3 business days after the request.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
454	Electricity Industry Metering Code clause 7.2(5)	A Code participant must notify any affected network operator of any change to the contact details it notified to the network operator under subclause 7.2(4) at least 3 business days before the change takes effect.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
455	Electricity Industry Metering Code clause 7.5	A Code participant must subject to subclauses 5.17A and 7.6 not disclose, or permit the disclosure of, confidential information provided to it under or in connection with the Code and may only use or reproduce confidential information for the purpose for which it was disclosed or another purpose contemplated by the Code.	2	Moderate	Probable	Medium	Moderate	Priority 4
456	Electricity Industry Metering Code clause 7.6(1)	A Code participant must disclose or permit the disclosure of confidential information that is required to be disclosed by the Code.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
Part 8 Dispute resolution								
457	Electricity Industry Metering Code clause 8.1(1)	If any dispute arises between any Code participants then (subject to subclause 8.2(3)) representatives of disputing parties must meet within 5 business days after a notice given by a disputing party to the other disputing parties and attempt to resolve the dispute by negotiations in good faith.	NR	Minor	Unlikely	Low	Moderate	Priority 5
458	Electricity Industry Metering Code clause 8.1(2)	If a dispute is not resolved within 10 business days after the dispute is referred to representative negotiations, the disputing parties must refer the dispute to a senior management officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.	NR	Minor	Unlikely	Low	Moderate	Priority 5
459	Electricity Industry Metering Code clause 8.1(3)	If the dispute is not resolved within 10 business days after the dispute is referred to senior management negotiations, the disputing parties must refer the dispute to the senior executive officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.	NR	Minor	Unlikely	Low	Moderate	Priority 5

No	Obligation reference	Obligation description	Type	Consequence	Likelihood	Inherent Risk Rating	Control Assessment	Audit Priority
460	Electricity Industry Metering Code clause 8.1(4)	If the dispute is resolved by representative negotiations, senior management negotiations or CEO negotiations, the disputing parties must prepare a written and signed record of the resolution and adhere to the resolution.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
461	Electricity Industry Metering Code clause 8.3(2)	The disputing parties must at all times conduct themselves in a manner which is directed towards achieving the objective in subclause 8.3(1).	NR	Minor	Unlikely	Low	Moderate	Priority 5
16 Electricity Industry (Network Quality and Reliability of Supply) Code – Licence Conditions and Obligations								
Obligations 467, 472 – 475 and 481-485 are not applicable to Alinta’s activities for the period subject to audit as the Licence excludes Alinta from supplying to small use customers. Note that obligations 472 – 475 relate to eligible persons who consume not more than 50 MWh of electricity per year								
462	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.	NR	Minor	Probable	Low	Moderate	Priority 5
463	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.	NR	Minor	Unlikely	Low	Moderate	Priority 5
464	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.	NR	Minor	Probable	Low	Moderate	Priority 5
465	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.	NR	Minor	Probable	Low	Moderate	Priority 5
466	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.	NR	Minor	Probable	Low	Moderate	Priority 5
468	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.	NR	Minor	Unlikely	Low	Moderate	Priority 5
469	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 13(3)	The average total length of interruptions of supply is to be calculated using the specified method.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
470	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4

No	Obligation reference	Obligation description	Type	Consequence	Likelihood	Inherent Risk Rating	Control Assessment	Audit Priority
471	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.	2	Moderate	Probable	Medium	Moderate	Priority 4
477	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.	NR	Minor	Probable	Low	Moderate	Priority 5
478	Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 23(2)	A distributor or transmitter must keep records of information regarding its compliance with specific requirements for the period specified.	2	Moderate	Probable	Medium	Moderate	Priority 4
479	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
480	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4

Appendix B – References

AETRH staff and representatives participating in the review

- Alinta Energy General Manager Pilbara O&M
- Alinta Energy Manager, Asset Management & Engineering
- Alinta Energy Finance Manager – Power Generation
- Alinta Energy Wholesale Regulation Manager
- Alinta Energy Manager Regulatory Compliance
- Alinta Energy Ellipse Team Leader
- AETRH Newman Power Station Manager.

Deloitte staff participating in the review

Name	Position	Hours
• Richard Thomas	Partner	3
• Andrew Baldwin	Account Director	40
• David Herbert	Senior Analyst	5
• Kobus Beukes	Quality Assurance Partner	1
• Esther Ong	Analyst	4

Key documents and other information sources examined

- FY15 and FY16 Annual Compliance Reports
- FY14 Alinta Holdings Group financial statements and supplementary notes
- FY15 Alinta Holdings Group financial statements and supplementary notes
- Regulatory Obligations Register
- ERA Licence payment tax invoices and ANZ Payment Detail Reports for October 2013, 2014 and 2015
- Accounting position paper – Operating and Capital Expenses Policy
- Electricity Licence Application Alinta Energy Transmission (Roy Hill) Pty Ltd 3 April 2014
- Example land access easement agreement
- Customer Power Purchase Agreement
- Newman Power Station and Roy Hill Transmission Line Strategic Asset Management Plan 2015
- Newman Power Station and Roy Hill Transmission Line Asset Management Plan 2015/16
- Alinta Energy Asset Management Framework
- KMI Incident Management Register
- Newman Power Station Emergency Response Plan
- Power Generation Weekly Performance Report
- Newman Power Station Q3 FY16 Revenue and expenditure (operating and capital) model
- IT Security Policy
- Alinta Energy back-up system protocol
- Application user approval matrix
- Accounts policies/Password Policy system parameters.

Appendix C – Post Audit Implementation Plan

Issue 1/2016

Obligation 103: *Electricity Industry Act section 14.1(b)*

Through discussions with the Manager Asset Management & Engineering and General Manager Pilbara O&M; and consideration of AETRH's Asset Management Framework and Site Asset Management Plans, we determined that AETRH's asset management system has further evolved since the Authority was advised of the details of the system at the time of AETRH's application for its Licence. The key enhancement made during the period subject to this audit relates to the use of the SPM Asset software for supplementing the capabilities of the Ellipse system in AETRH's approach to assessing and treating risks.

Judgement is required to determine whether changes to the asset management system during the audit period are sufficiently substantial as to require specific notification to the Authority in accordance with the requirements of section 14(1) of the Act. AETRH had not specifically considered this requirement and does not have a protocol in place for determining whether the requirement has been triggered.

As it may be reasonable to form a view either way, we consider AETRH has not breached the requirements of the Act.

Recommendation 1/2016

AETRH establish a protocol for determining what constitutes a "substantial change" in its asset management system and for duly notifying the Authority when appropriate.

Action Plan 1/2016

AETRH will amend its Management of Change procedure to include a definition of a "substantial change" to the asset management system, requiring management under that procedure and which will acknowledge the requirement to notify the Authority of any such change.

Responsible Person: Manager, Asset Management & Engineering

Target Date: 31 December 2016

Issue 2/2016

- Obligation 319:** *Metering Code clause 3.1*
Obligation 320: *Metering Code clause 3.2(1)*
Obligations 326, 327: *Metering Code clauses 3.5(1), (2) and (3)*
Obligation 331: *Metering Code clause 3.7*
Obligation 332: *Metering Code clause 3.8*
Obligation 333: *Metering Code clause 3.9(3)*
Obligation 336: *Metering Code clause 3.10*
Obligation 337: *Metering Code clause 3.11(1)*
Obligations 340, 341: *Metering Code clauses 3.11A(1) and (2)*
Obligations 342 to 344: *Metering Code clauses 3.12(1) to (3)*
Obligation 345: *Metering Code clause 3.12(4)*
Obligation 357: *Metering Code clause 3.21(1)*
Obligation 366: *Metering Code clause 4.1(1)*
Obligation 369: *Metering Code clause 4.2(1)*
Obligation 370: *Metering Code clause 4.3(1)*
Obligation 411: *Metering Code clause 5.20(1)*
Obligation 422: *Metering Code clause 5.22(1)*
Obligation 434: *Metering Code clause 5.25*
Obligation 447: *Metering Code clause 6.1(1)*

AETRH maintains two meters on its electricity transmission and distribution network for measuring and recording energy data relating to electricity transferred to its single customer's delivery points. AETRH's PPA with its customer specifies AETRH's obligations for installing, operating and maintaining metering equipment in accordance with *Good Engineering and Operating Practices* and the Metering Code. All energy data from these meters is captured within Alinta Energy's Honeywell Experion system.

Although AETRH has demonstrated that it has operated its meters and recorded related energy data to the satisfaction of its customer throughout the period subject to this audit:

1. AETRH has not fully complied with the requirements to:
 - Maintain drawings and supporting information, to the standard of good electricity industry practice, detailing the metering installation for maintenance and auditing purposes (**obligation 345**)
 - Maintain and administer a metering database containing the required standing data in accordance with Part 4 of the Metering Code (**obligations 366, 369 and 370**)
 - Develop an Energy Data Verification Request Form (**obligation 411**).
2. AETRH has not established a clear metering management plan or framework for demonstrating its:
 - Installation and maintenance of meters in accordance with an applicable metrology procedure, the specifications of the National Measurement Institute under the *National Measurements Act*; and the functionality and testing requirements outlined in Part 3 of the Metering Code (**obligations 319, 320, 326, 327, 331 to 333, 336, 337, 340 to 344, 434**)
 - Management of validated energy data (**obligation 422**)
 - Compliance with all applicable agreements, rules, procedures, criteria and processes outlined in Part 6 of the Metering Code (**obligation 447**).

We also note that AETRH has not complied with clause 6.2 of the Metering Code, which requires a network operator to submit a proposed model service level agreement, metrology procedure and mandatory link criteria to the Authority for its approval (clause 6.2 of the Metering Code is not referenced in the Reporting Manual and was not included in the audit plan). We acknowledge that there are no other users of AETRH's transmission and distribution network and no foreseeable prospect of a request to use the network.

<p>Recommendation 2/2016</p> <p>AETRH:</p> <ol style="list-style-type: none"> 1. Establish a formal metering database, maintain drawings and supporting information and develop an Energy Data Verification Request Form to ensure its compliance with the requirements of the Metering Code. 2. Prepare a metering management plan (or similar) to: <ol style="list-style-type: none"> a. Incorporate the requirements of the Metering Code relevant to AETRH's metering operations b. Consolidate and expand on the obligations contained in the PPA. 3. Reach a position on its approach for addressing the technical requirements of clause 6.2 of the Metering Code. 	<p>Action Plan 2/2016</p> <p>AETRH will:</p> <ol style="list-style-type: none"> 1. Establish a formal metering database, maintain drawings and supporting information and develop an Energy Data Verification Request Form to ensure its compliance with the requirements of the Metering Code. 2. Prepare a metering management plan to incorporate the requirements of the Metering Code relevant to AETRH's metering operations. 3. Reach a position on its approach for addressing the technical requirements of clause 6.2 of the Metering Code. <p>Responsible Person: General Manager Pilbara O&M</p> <p>Target Date: 31 March 2017</p>
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