



Rottnest Island Authority

ERA Electricity Licence Performance Audit and Asset Management System Review Audit Report

November 2017

Executive summary

The Rottnest Island Authority (RIA or the licensee) holds an Electricity Integrated Regional Licence (EIRL3) issued by the Economic Regulation Authority (the Authority) under Sections 7 and 15 of the Electricity Industry Act 2004 (WA) (the Act). The licence enables the RIA to construct and operate the power generating and distribution facilities including to retail electricity sales in accordance with the licence conditions.

Sections 13 and 14 of the Act requires the RIA to provide the Authority with a report by an independent specialist on the measures taken by the licensee to meet the performance criteria specified in the licence and on the effectiveness of its Asset Management System. In May 2017 the RIA commissioned GHD to carry out the performance audit of their licence compliance and the Asset Management System review (the audit and review) for the period 1 April 2015 to 31 March 2017. The audit and review has been conducted and this report prepared in accordance with the "Authority's Audit and Review Guidelines: Electricity and Gas Licences (April 2014)" (the guidelines).

Auditor's Opinion: Performance Audit

On completion of the performance audit, after assessment and testing of the licensee's control environment, risk assessment process, information system, control activities and monitoring, the audit found several non-compliances and opportunities for improvement, which are listed in this report. Based on the processes, activities and corrective actions in place, the auditor has formed the opinion that, during the audit period of 1 April 2015 to 31 March 2017, Rottnest Island Authority's operation complied with the licence conditions.

Many of the non-compliances are as a result of not having an approved Metrology Procedure in place at the time of the audit and by implementing that procedure, when approved, will remedy these.

Auditor's Opinion: Asset Management System Review

On completion of the asset management system review, after assessment and testing of the licensee's control environment the auditor has formed the opinion that during the audit period of 1 April 2015 to 31 March 2017, Rottnest Island Authority's asset management system was operating adequately however some improvement is required.

The audit found several deficiencies and opportunities for improvement, which are listed in this report.

Post Audit and Post Review Implementation Plan

The audit and review has resulted, where applicable, in findings and recommendations that require corrective actions by the Licensee.

These recommendations are listed in the Post Audit and Review Implementation Plan 2017. The Licensee has completed responses including actions, responsibilities and dates for completion.

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1. Introduction

1.1 Purpose of this report

This Report covers the audit findings and recommendations of the operational audit and asset management system review of the Rottnest Island Authority (RIA) electricity licence, Rottnest Island EIRL3 Licence (1 April 2015–31 March 2017), performance audit and asset management review for submission to Economic Regulation Authority (ERA) in accordance with the requirements of the ERA.

The scope of services and licence compliance requirements are detailed in the Electricity Licence EIRL3, Version 5 Licence dated 1st July 2015. This Report has been prepared in accordance with the Authority's Audit and Review Guidelines: Electricity and Gas Licences (April 2014).

1.2 Limitations

This report: has been prepared by GHD for Rottnest Island Authority and may only be used and relied on by Rottnest Island Authority for the purpose agreed between GHD and the Rottnest Island Authority as set out in this report.

GHD otherwise disclaims responsibility to any person other than Rottnest Island Authority arising in connection with this report. GHD also excludes implied warranties and conditions, to the extent legally permissible.

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

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

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

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

1.3 Assumptions

This Report is an accurate representation of the findings and opinions of the auditors following the audit and review of the client's conformance to nominated Licence conditions. The audit provides a reasonable level of assurance on the effectiveness of control procedures however there are limitations due to the nature of the evidence available to the auditor, the sampling and checking of evidence, the limitations of internal controls and the need to use judgement in the assessment of evidence. The auditors have relied on evidence coming to the reviewer's attention showing that the control procedures are not effective, when the initial process and procedures do not provide sufficient evidence to the level that would be required by a review.

The Post Audit and Review Implementation Plan (PAIP) is a document prepared by the licensee in response to the recommendations provided by the audit and review. As it represents the licensee's views and actions it does not form part of the audit and review and is provided separately in accordance with the guidelines.

1.4 Approval of the Report by the Auditor

I, Alan Meagher hereby state that this audit and review report is an accurate representation of the audit teams findings and opinions.

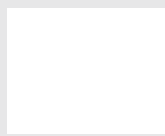
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Table 1-1 - Lead Auditor's Approval

Representation	Name	Signature	Position	Date
Lead Auditor	A Meagher		Principal Risk Consultant GHD	06/11/2017

2. Summary of Audit

2.1 The Audit Period

The performance audit and asset management system review covered the period from 1 April 2015 to the 30th March 2017.

2.2 The Assets Identified

The licence is granted for the Rottnest Island service area. Rottnest Island is located in the Indian Ocean, 19 km west of Fremantle in Western Australia.

The operation and maintenance of the assets are contracted to Programmed Facilities Management Pty Ltd (PFM).

The power station consists of seven diesel generators providing 2040 kW, one wind turbine generator operationally rated at 600 kW and a solar array operationally rated at 600 kW for a total generating capacity of 3240 kW.

Section 3 of the Electricity Industry Act 2004 defines a distribution system as infrastructure associated with the transportation of electricity at nominal voltages less than 66kV. The Act goes further to define a transmission system as infrastructure associated with the transportation of electricity at nominal voltages of 66kV or higher. Electricity on Rottnest Island is supplied over an 11 kV high voltage (HV) distribution system, both underground and overhead, and number of substations and a 415V low voltage (LV) distribution system.

The generation assets and transmission assets are below the requisite thresholds (30 MW for generation and 66 kV for transmission) that require the generation and transmission elements of RIA's integrated regional licence to be licenced. However, the RIA wishes to retain the generation and transmission elements of its integrated regional licence.

The audit was conducted through meetings at the RIA's offices in Fremantle and Rottnest Island, at PFM's office on Rottnest Island and through an extensive document review. A physical inspection of assets was carried out.

Comprehensive email and telephone linkups were also undertaken to resolve any unanswered questions.

The evaluation of the system effectiveness was carried out through an assessment of the control environment, information system, control procedures, supporting documentation and compliance attitude.

2.3 This Report

The report includes:

- (i) a summary of the objectives, the scope of the task and details of this audit and review,
- (ii) key findings and recommendations from this audit and review; and
- (iii) **separately**, a post audit and review implementation plan prepared by the licensee listing the audit and review recommendations and the responses and actions proposed by the RIA. The plan does not form part of the report and is provided separately to complete the documentation.

2.4 Licensee's Response to previous Audit and Review Recommendations

The audit and review considered the actions taken in response to the previous audit and review recommendations (for the period 1 April 2013 to 31 March 2015). The audit has confirmed that out of the fifty-four previous audit recommendations, all have been closed out with the exception of three which are in progress and ongoing or with a close out date by the end of August 2017. (see table below). These uncompleted items are included in the Post Audit Implementation Plan (PAIP) for this audit and review.

Details of the recommendations from the previous audit are listed in Table 2-1 and previous review in Table 2-2.

Table 2-1: Previous Non Compliances and Audit Recommendations

B. Table of Previous Non Compliances and Audit Recommendations				
C. Resolved during current Audit period				
Reference (no./year)	(Compliance rating/Legislative Obligation/details of the issue)	Auditors' Recommendation	Date Resolved	Further action required (Yes/No/Not applicable) & Details of further action required including current recommendation reference if applicable
02/2015	<p>Non-compliant – 2/Obligation 103</p> <p>Lic Ref: C20.2, C20.3, Electricity Industry Act section 14(1)(b)</p> <p>A licensee must notify details of the asset management system and any substantial changes to it to the Authority.</p> <p>There have been significant feasibility and development activities to implement a revised AMS. These have included the use of external entities such as Horizon Power to evaluate the AMS. The development has not been completed however there are sufficient changes to date, such as the creation of a new Strategic Asset Management Framework and the lapse of the Asset Management Plan to require notification to the Authority</p>	The Authority should be notified of the changes to the asset management system and of the program for completion of the development	See letters to the ERA dated 01/02/2016 (258906) and 10/06/2016 (269212).	No
03/2015	<p>Non-compliant – 2//Obligation 125</p> <p>Lic Ref: C17.1 & 17.2A licensee must publish any information it is directed by the Authority to publish, within the timeframes specified.</p>	Ensure there are procedures in place to cater for the publication of all information required by the Authority within the timeframes specified in the	30/3/2017	No

	The 2012/2013 Code of Conduct Report was published two days late on the RIA website due to staff absence as reported in the Compliance Reports – Electrical for 2014.	event of both planned and unplanned staff absences.		
04/2015	<p>Non-compliant – 2/Obligation 127</p> <p>Lic Ref: C29.1</p> <p>A distributor must create and maintain a Priority Restoration Register.</p> <p>Documents that are superseded or that could be misleading should be clearly identified and if applicable, removed from circulation. It is expected that only one Priority Restoration Register should be in existence.</p>	Ensure document control across multiple versions of Priority Restoration Register to remove potential ambiguity and incorrect use.	30/3/2017	No.
05/2015	<p>Non-compliant – 2/Obligation 130</p> <p>Lic Ref: C23.1, Code of Conduct clause 2.2 (1)</p> <p>A retailer or electricity marketing agent must ensure that standard form contracts, that are not unsolicited consumer agreements, are entered into in the manner set out, and the contract is provided as specified in clause 2.2(1).</p> <p>The Code of Conduct requires the Standard Form Contract (SFC) to show the supply address(s). The current SFC only shows one supply address for the business customer, however electricity is supplied to the business customer both at its business address and at its living address(es).</p>	The Standard Form Contract should show both the Business address and the rented unit addresses, either within the document or by referring to a separate schedule.	30/3/2017	No
06/2015	Non-compliant – 2/Obligation 131	As part of the tendering process for a new residential property manager,	30/3/2017	No

	<p>Lic Ref: C23.1, Code of Conduct clause 2.2 (2) Subject to subclause 2.2(3), the retailer or electricity marketing agent must give to the customer the specified information in subclause 2.2(2) no later than on, or with, the customer's first bill</p> <p>Two examples of RMA invoices during the audit period were provided – neither included a 24hr telephone number for faults and emergencies (EVIDENCE: INV. NOS. IV2684166, IV2684164).</p> <p>The audit found that general information on the safe use of electricity was not provided to customers during the audit period or made available via the RIA website.</p>	<p>ensure utility statements are compliant with Code requirements, including, among others, reference to a 24 hr telephone number for faults and emergencies.</p> <p>Publish general information on the safe use of electricity on the RIA website and refer to this in the Standard Form Contract.</p>	30/3/2017	No
07/2015	<p>Non-compliant – 1/Obligation 137</p> <p>Lic Ref: C5.1, Code of Conduct clause 2.4 (2) A retailer or electricity marketing agent must ensure that a customer is able to contact the retailer or electricity marketing agent on the retailer's or electricity marketing agent's telephone number during normal business hours for the purposes of enquiries, verifications and complaints.</p> <p>While McGees include separate telephone numbers for enquiries, 24hr faults, payment, interpretive services and the Energy Ombudsman, RMA only include a single general enquiries telephone number on customer bills.</p>	Refer obligation 131.	30/3/2017	No.

08/2015	<p>Non-Compliant – 2/Obligation 155 Lic Ref: C5.1, Code of Conduct clause 4.5(1) Unless the customer agrees otherwise, a retailer must include the minimum prescribed information in subclause 4.5(1) on the customer’s bill.</p> <p>RMA bills are compliant with all applicable requirements of subclause 4.5 (1) with the exception of:</p> <ul style="list-style-type: none"> • No. of days covered by the bill not explicit. • Average daily cost of consumption not stated. • Average daily consumption not stated. • Meter identification number not included. • Missing statement regarding available assistance for payment difficulties. • Missing telephone number for the electricity ombudsman. • Missing 24hr telephone number for faults and emergencies. <p>Usage comparison bar chart incorrectly labelling electricity consumption for the bill period, last bill period and same bill period last year.</p>	<p>Recommendation as per Obligation 131 – As part of the tendering process for a new residential property manager, ensures utility statements are compliant with Code requirements.</p>	30/3/2017	No.
09/2015	<p>Non-Compliant – 1/Obligation 158 Lic Ref: C5.1, Code of Conduct clause 4.7 Other than in respect of a Type 7 connection, a retailer must use its best endeavours to ensure that meter reading data is obtained as frequently as is required to prepare its bills; and, in any event, at least once every 12 months.</p> <p>PFM’s “PRO-RNI-I03-033-1 Meter Readings Monthly Procedure” provides for monthly meter</p>	<p>Update Meter Readings Monthly Procedure to refer to Electricity Industry Metering Code 2012 and associated clauses.</p>	30/3/2017	No.

	readings. This refers to the Electricity Industry Metering Code 2005. The applicable Code is now the Electricity Industry Metering Code 2012.			
10/2015	<p>Non-Compliant – 2/Obligation 172</p> <p>Lic Ref: C5.1, Code of Conduct clause 4.16(1)(a)</p> <p>If a review of a bill has been conducted and the retailer is satisfied that the bill is correct, the retailer may require a customer to pay the unpaid amount; must advise the customer that the customer may request the retailer to arrange a meter test in accordance with the applicable law; and must advise the customer of the existence and operation of the retailer’s internal complaints handling processes and details of any applicable external complaints handling processes.</p> <p>While customers are aware of the Standard Form Contract upon the execution of their business premise leases, the Code requires that a customer’s entitlement to further review is reiterated upon each complaint. In this regard, the audit found that customers were not advised as per Code requirements for the two complaints above.</p> <p>While RMA have been advised by the RIA to refer customer’s making a complaint to the “Utilities Customer Complaints Procedure” and there is evidence of this occurring on at least one occasion in an email to the Rottnest Hotel on 28 August 2014, it does not appear that this is routinely and consistently done for each and every complaint.</p> <p>The “Utilities Customer Complaints Procedure” does not specifically refer to a customer’s right for</p>	<p>Prepare and utilise a standard template when advising customers of the outcome of all bill reviews / complaints, referring to the Standard Form Contract and Utilities Customer Complaints Procedure either via website link or email attachment.</p> <p>Modify the Utilities Customer Complaints Procedure for consistency with the Standard Form Contract and include a customer’s right for a meter test.</p>	<p>30/3/2017</p> <p>30/3/2017</p>	<p>No.</p> <p>No.</p>

	a meter test.			
11/2015	<p>Non-Compliant – 2/Obligation 187</p> <p>Lic Ref: C5.1, Code of Conduct clause 5.1 The due date on the bill must be at least 12 business days from the date of that bill. Unless a retailer specifies a later date, the date of dispatch is the date of the bill.</p> <p>The audit found that there were at least two non-compliant RMA invoices even after the bill templates had been used and revised in May 2013 (IV2592320). RMA invoices IV2684166 and IV2684164 (both dated 7/08/13) have their Date Due set the same as the Invoice Date.</p>	<p>Refer to obligation 131</p> <p>– As part of the tendering process for a new residential property manager, ensure utility statements are compliant with Code requirements.</p>	30/3/2017	No
12/2015	<p>Non-Compliant – 2/Obligation 188</p> <p>Lic Ref: C5.1, Code of Conduct clause 5.2 A retailer must offer the following specified minimum payment methods: in person at one or more payment outlets located within the Local Government District of the customer's supply address; by mail; for residential customers, by Centrepay; electronically by means of BPay or credit card; and by telephone by means of credit card.</p> <p>The McGees bill examined shows payment can be made by phone, in person, by mail (cheque) and direct credit (electronically). Credit card payment is not offered by phone and electronically. BPay is also not offered as an electronic payment method. The RMA bills examined only show direct credit as an electronic payment method.</p>	<p>Confer with the Authority with respect to the practicality of offering and adding all minimum payment methods as per Code requirements.</p>	May 2016	No.

13/2015	<p>Non-Compliant – N/A /Obligation 189 Code of Conduct clause 5.3 A retailer must, prior to commencing a direct debit facility, obtain the customer’s verifiable consent and agree with the customer the date of commencement of the direct debit facility and the frequency of the direct debits.</p> <p>The Standard Form Contract also indicates payment can be made in person at the Contract Services office, Rottneest Island. Neither McGees or RMA indicate that payment in person is accepted at this location.</p>	Ensure consistency between Standard Form Contract and available payment methods / locations.	30/3/2017	No
14/2015	<p>Non-Compliant – 2/Obligation 280</p> <p>Lic Ref: C5.1, Code of Conduct clause 10.3A At least once a year, a retailer must provide a customer with written details of the retailer’s and distributor’s obligations to make payments to the customer under Part 14 of this Code and under any other legislation in Western Australia, including the amount of the payment and the eligibility criteria for the payment.</p> <p>A letter to customers dated 1 July 2013 was sighted – this included reference to clauses 14.1, 14.2 and 14.3, but omitted clauses 14.4 and 14.5.</p>	Edit the letter to customers sent by McGees each year – remove the clause numbering 14.1, 14.2 and 14.3 to cover the RIA’s obligations both as a retailer and a distributor.	01/8/2015	No
15/2015	<p>Non-Compliant – 2/Obligation 300</p> <p>Lic Ref: C5.1, Code of Conduct clause 12.1(3) A retailer or a distributor must advise the customer in accordance with subclause 12.1(3).</p>	Refer to obligation 172.	30/3/2017	No

	Findings as per Code of Conduct clause 4.16(1)(a), Obligation 172.			
16/2015	<p>Non-Compliant – 1/Obligation 301</p> <p>Lic Ref: C5.1, Code of Conduct clause 12.1(3) Upon receipt of a written complaint by a customer, a retailer or distributor must acknowledge the complaint within 10 business days and respond to the complaint within 20 business days.</p> <p>The complaint handling process described in the Standard Form Contract, section 17 states “A representative of the Rottnest Island Authority will acknowledge the complaint within 10 business days and shall address the complaint within 20 business days.” In contrast, the Utilities Customer Complaints Procedure states the “RIA will aim to acknowledge written queries or complaints by a customer within 10 business days and respond to queries or complaints by addressing the matters within 15 business days.”</p>	Ensure consistency between the Utilities Customer Complaints Procedure and Standard Form Contract.	11/01/2017	No
17/2015	<p>Non-Compliant – 2/Obligation 307</p> <p>Lic Ref: C5.1, Code of Conduct clause 13.3 The report specified in clause 13.1 must be published by the date specified by the Authority. In accordance with clause 13.3(2), a report is published if: - copies of it are available to the public without cost, at places where the retailer or distributor transacts business with the public; and</p>	Refer to obligation 125.	30/3/2017	No

	<p>- a copy of it is posted on the retailer or distributor's website.</p> <p>As per "Compliance Report – Electrical" sent to the Authority for the year ended 30/6/14, the 2012/13 Code of Conduct Report was published two days late on the RIA website due to a staff member's absence.</p>			
20/2015	<p>Non-compliant – 2/Obligation 326</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 3.5(1) and (2)</p> <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>Insufficient evidence supplied to determine metering installation compliance with prescribed functionality requirements.</p>	<p>Document the prescribed metering installation functionality requirements, including applicable drawings if necessary.</p>	30/3/2017	No.
22/2015	<p>Non-compliant – 2/Obligation 328</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 3.5(4)</p> <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>Establish a documented process to ensure that installations are performed as close as practicable to the connection point, with sample drawings and photos if appropriate.</p>	30/3/2017	No.

	Insufficient evidence supplied to determine compliance.			
23/2015	<p>Non-compliant – 2/Obligation 330</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 3.5(9)</p> <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>The audit found that no evidence was available to confirm that affected parties were advised as per Code requirements.</p>	Ensure a procedure is in place to advise affected parties of all metering installation non compliances. Evidence should be retained for auditing purposes.	30/3/2017	No.
24/2015	<p>Non-compliant – 1/Obligation 332</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 3.8</p> <p>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.</p> <p>Manual readings are taken on a monthly basis, at which time meters are inspected for unauthorised access. However, the audit found that this requirement was not specifically documented in</p>	Update “PRO-RNI-I03-033-1 Meter Readings Monthly Procedure” to include inspection of meters for unauthorised access.	30/3/2017	No.

	PFM's "PRO-RNI-I03-033-1 Meter Readings Monthly Procedure".			
25/2015	<p>Non-compliant – 3/Obligation 333</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 3.9(3)</p> <p>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.</p> <p>Insufficient evidence supplied to determine compliance with requirements.</p>	Confirm meter types applicable to Rottnest Island and provide evidence that metering installations meet requirements of Table 3 in Appendix 1 of the Code, including meters not yet replaced.	30/3/2017	No.
26/5015	<p>Non-compliant – 2/Obligation 340</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 3.11A(1)</p> <p>A network operator must ensure that the meters on its network are systematically sampled and tested for accuracy in accordance with AS 1284.13.</p> <p>Findings as per Electricity Industry Metering Code clause 3.1, Obligation 319.</p>	Refer to obligation 319 and 320	30/3/2017	No
27/2015	<p>Non-compliant – 2/Obligation 342</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 3.12(1)</p> <p>A network operator must ensure that each metering installation complies with at least the prescribed design requirements.</p> <p>Insufficient evidence supplied to determine</p>	<p>Compliance of metering installation with at least the prescribed design requirements should be documented through applicable drawings if necessary and installation conformance records.</p> <p>Refer to obligation 320</p>	30/3/2017	No.

	<p>compliance with prescribed design requirements. Metering installations comply with PFM's "PRO-RNI-I03-030-1 Meter Installation and Calibration Procedure" which requires compliance with the Electricity Industry Metering Code 2005.</p> <p>Compliance should be with the Electricity Industry Metering Code 2012.</p>			
29/2015	<p>Non-compliant – 2/Obligation 345</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 3.12(4)</p> <p>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.</p> <p>Metering installation drawings were not available for the audit.</p>	<p>Develop metering installation drawings / plans, integrated with document control and asset management systems.</p>	30/3/2017	No.
30/2015	<p>Non-compliant – 2/Obligation 349</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 3.14(3)</p> <p>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.</p>	<p>Document the compliance of all CTs and VTs with Table 3 in Appendix 1 of the Electricity Metering Code.</p>	30/3/2017	No.

	Compliance information was not available during the audit.			
31/2015	<p>Non-compliant – 3/Obligation 366</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 4.1(1)</p> <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>Distribution loss factor and reference test and calibration details and results are not included in the standing data maintained – this is a Code requirement.</p> <p>The audit found that instrument transformer connected ratio, calibration tables, summation scheme and data communication details are not included in the standing data maintained, however, insufficient information was supplied to determine applicability.</p> <p>Network tariff and customer contestability columns are included in the standing data maintained, but both columns are not populated with expected values.</p>	<p>Specify distribution loss factor and reference test and calibration details and results in metering register data.</p> <p>Document information to determine applicability of instrument transformer connected ratio, calibration tables, summation scheme and data communication details as per Table 2 of Code.</p> <p>[OFI] Specify network tariff description and customer contestability in metering register data.</p>	30/3/2017	No.
32/2015	<p>Non-compliant – 2/Obligation 367</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 4.1(2)</p> <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</p>	<p>Employ additional and documented controls to secure the local branch server from general office access. Ensure physical access to the server is maintained for authorised users only.</p>	30/3/2017	No.

	<p>standard of good electricity industry practice, hinder unauthorized access and enable unauthorized access to be detected.</p> <p>A local branch server exists on Rottnest Island – during the audit, it was discovered that the local branch server is not isolated (its physical security is reliant on the general security of the office building).</p>			
33/2015	<p>Non-compliant – 3/Obligation 369</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 4.2(1)</p> <p>A network operator must ensure that its registry complies with the Code and the prescribed clause of the market rules.</p> <p>Findings as per Electricity Industry Metering Code clause 4.1(1), Obligation 366.</p>	Refer to obligation 366.	30/3/2017	No.
34/2015	<p>Non-compliant – 3/Obligation 370</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 4.3(1)</p> <p>The standing data for a metering point must comprise at least the items specified.</p> <p>Findings as per Electricity Industry Metering Code clause 4.1(1), Obligation 366.</p>	Refer to obligation 366.	30/3/2017	No.
35/2015	<p>Non-compliant – 2/Obligation 380</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code</p>	Refer to obligation 367.	30/3/2017	No.

	<p>clause 4.8(4)(b)</p> <p>A network operator must have devices and methods in place that ensure that the data held in its metering database is secured from unauthorised local or remote access using the methods prescribed.</p> <p>Findings as per Electricity Industry Metering Code clause 4.1(2), Obligation 367.</p>			
36/2015	<p>Non-compliant – 3/Obligation 386</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 5.4(1)</p> <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>There is no documented procedure associated with the validation of meter readings.</p> <p>There were three instances during the audit period of better quality actual values (second value) being available and replacing their first (actual) value due to errors in the meter readings being discovered and reported by customers.</p>	<p>Confirm metering types employed on Rottnest Island and cross reference with Code requirements for verification and validation. Develop verification and validation procedures for meter readings as per electricity Industry Metering Code Appendix 2.</p> <p>[OFI] Amend “PRO-RNI-I03-033-1 Meter Readings Monthly Procedure” to ensure Code compliance.</p> <p>[OFI] Review verification and validation procedures on an ongoing basis to minimise the acceptance of incorrect data.</p>	30/3/2017	No.
37/2015	<p>Non-compliant – 3/Obligation 422</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 5.22(1)</p> <p>A network operator must validate energy data in accordance with this Code applying, as a</p>	Refer to obligation 386.	30/3/2017	No.

	<p>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>Findings as per Electricity Industry Metering Code clause 5.4(1), Obligation 386.</p>			
38/2015	<p>Non-compliant – 2/Obligation 442</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 5.37(1)(b)</p> <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>The Electricity Industry Metering Code Report 2013-2014 was provided to the Minister on 18/9/14 and published to the RIA website on 24/9/14, before the minimum 5 business day requirement had lapsed.</p>	<p>Incorporate a check prior to the publication of all required reports that confirms compliance with all minimum notice periods to the Minister and Authority.</p>	30/3/2017	No.
40/2015	<p>Non-compliant – 2/Obligation 462</p> <p>Lic Ref: C5.1, Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 5(1)</p> <p>A distributor or transmitter must, as far as reasonably practicable, ensure that electricity supply to a customer's electrical installations complies with prescribed standards.</p>	<p>Establish a documented process to evaluate the results of independent tests of network quality of supply. Evaluate applicable results.</p>	30/3/2017	No.

	Further tests by Nilsen for the period of 2014-15 have shown issues with the power supply quality however there has been no evaluation of the results.			
41/2015	<p>Non-compliant – 2/Obligation 481</p> <p>Lic Ref: C5.1, Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 25(2) A distributor or transmitter must make available, at no cost, a copy of a document setting out its complaint handling processes to a small customer who makes a complaint to the distributor or transmitter or who asks to be given such information.</p> <p>Findings as per Code of Conduct clause 4.16(1)(a), Obligation 172.</p>	Refer to obligation 172.	30/3/2017	No.
42/2015	<p>Non-compliant – 2/Obligation 484</p> <p>Lic Ref: C5.1, Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 27(1) A distributor or transmitter must prepare and publish a report about its performance in accordance with specified requirements.</p> <p>The required date for publication of the network performance report is 1 October of each year; the 2013 report was published late due to staff absence.</p>	Refer to obligation 125.	30/3/2017	No.
43/2015	<p>Non-compliant – 2/Obligation 485</p> <p>Lic Ref: C5.1, Electricity Industry (Network Quality</p>	Refer to obligation 447.	30/3/2017	No.

	<p>and Reliability of Supply) Code 2005 clause 27(3) A distributor or transmitter must give a copy of its report about its performance to the Minister and the Authority within the specified period.</p> <p>As per Obligation 484, the 2014 report was published before the minimum 7 business day requirement had lapsed.</p>			
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D. Unresolved during current Audit period			
Reference (no./year)	(Compliance rating/Legislative Obligation/details of the issue)	Auditors' Recommendation	Further action required (Yes/No/Not applicable) & Details of further action required
01/2015	<p>Non-compliant – 2/Obligation 102</p> <p>Lic Ref: C20.1, Electricity Industry Act section 14(1)(a) A licensee must provide for an asset management system (AMS).</p> <p>A revised AMS is being developed at present and will required completion of the development to achieve compliance</p>	<p>The AMS has been subject to development and change in the review period and its development has not been completed. The AMS should be finalised and documented</p>	<p>No.</p> <p>Strategic Asset Plan, now known as the Strategic Asset Management Plan (SAMP) is complete. Multi Utility Asset Management Plan (MUAMP) is in use. MAXIMO selected by RIA as the Asset Management System for all of the Island's assets</p> <p>Condition and life cycle assessments for all utility assets have been completed (except for the upgraded Waste Water Treatment Plant and Solar Farm). This was completed outside the audit period.</p>
18/2015	<p>Non-Compliant – 2/Obligation 319</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 3.1 A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and also comply with any</p>	<p>Confirm when all meters will have certificate of calibration and therefore be compliant.</p> <p>Provide evidence of calibration certificates for new meters.</p>	<p>Yes.</p> <p>At the time of the audit this action is in progress with a target completion date of 30/09/2017.</p>

	<p>applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act.</p> <p>A report showing the progress of the meter replacement roll-out and due date for completion was requested, but not provided.</p> <p>The Summary of Master Meter Replacement table does not clearly show how many meters were replaced in 2013, 2014 and 2015, or when all meters will be compliant.</p>	<p>Confirm with the Authority the options available to the RIA with respect to adopting a pre-approved metrology procedure (such as that used by Horizon Power).</p>	<p>At the time of the audit this action is in progress with a target completion date of 31/07/2017.</p> <p>At the time of the audit this action is in progress with a target completion date of 31/08/2017</p>
19/2015	<p>Non-Compliant – 2/Obligation 320</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 3.2(1)</p> <p>An accumulation meter must at least conform to the requirements specified in the applicable metrology procedure and display, or permit access to a display of the measurements specified in subclauses 3.2(1)(a)(b) using dials, a cyclometer, an illuminated display panel or some other visual means.</p> <p>PFM's "PRO-RNI-I03-030-1 Meter Installation and Calibration Procedure" prescribes that new meters must comply with the Metrology Procedure and National Measurement Act and be installed in accordance with the Electricity Industry Metering Code 2005. The applicable Code is now the Electricity Industry Metering Code 2012.</p>	<p>Update Meter Installation and Calibration Procedure to refer to Electricity Industry Metering Code 2012 and associated clauses.</p> <p>Refer to Obligation 319</p>	<p>This action has been completed (30/03/2017)</p> <p>Yes.</p> <p>At the time of the audit this action is in progress with a target completion date of 30/09/2017</p>
21/2015	<p>Non-compliant – 2/Obligation 327</p>	<p>Refer to obligation 319.</p>	<p>Yes.</p>

	<p>Lic Ref: C5.1, Electricity Industry Metering Code clause 3.5(3) A network operator must, unless otherwise agreed, for each metering installation on its network, on and from the time of its connection to the network, provide, install, operate and, subject to subclause 3.7(5), maintain the metering installation in the manner prescribed.</p> <p>Findings as per Electricity Industry Metering Code clause 3.1, Obligation 319.</p>		<p>At the time of the audit this action is in progress with a target completion date of 31/08/2017</p>
28/2015	<p>Non-compliant – 2/Obligation 343</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 3.12(2) A network operator must ensure that instrument transformers in its metering installations comply with the relevant requirements of any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act and any requirements specified in the applicable metrology procedure.</p> <p>The RIA does not have a metrology procedure in place.</p>	<p>Refer to obligation 319.</p>	<p>Yes.</p> <p>At the time of the audit this action is in progress with a target completion date of 31/08/2017</p>
39/2015	<p>Non-compliant – 2/Obligation 447</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 6.1(1) A network operator must, in relation to its network, comply with the agreements, rules, procedures, criteria and processes prescribed.</p>	<p>Refer to obligations 319.</p>	<p>Yes.</p> <p>At the time of the audit this action is in progress with a target completion date of 31/08/2017.</p>

	<p>PFM have confirmed that Horizon Power has not been appointed the metering data agent for Rottnest Island and therefore, their metrology procedure does not currently apply.</p> <p>As per Obligation 319 – The RIA does not have a metrology procedure in place.</p>		
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Table 2-2: Previous Asset System Improvements/Deficiencies and Review Recommendations

Table of Previous Review Ineffective Components Recommendations				
B. Resolved during current Audit period				
Reference (no./year)	(Asset management effectiveness rating/Asset Management System Component & Criteria/details of the issue)	Auditors' Recommendation	Date Resolved	Further action required (Yes/No/Not applicable) & Details of further action required including current recommendation reference if applicable
4/2015	<p>A2</p> <p>Asset Planning - Planning process and objectives reflect the needs of all stakeholders and is integrated with business planning.</p> <p>While the planning process is documented in the "Strategic Asset Investment Plan" (SAIP), the SAIP presented to the auditors during the review had been superseded however this was not evidenced to the auditors during the review.</p>	<p>Revise the process to ensure that current critical documentation such as the SAIP is clearly in use by responsible staff.</p>	30/3/2017	No.
1-3a/2015	<p>B2</p> <p>Asset Planning - Plans are regularly reviewed and updated.</p> <p>The reviews of the AMP and of the asset management system (AMS), which were in progress during the last review (2013), have not been completed. No AMP has been issued in the current review period. There is no program for the review and update of the AMS and AMP.</p>	<p>The process for the development and updating of the Asset Management Plan (AMP) should be documented.</p> <p>The extent of and the correlation between the PFM's and the RIA's asset management systems needs to be reviewed and defined.</p> <p>A program should be in place to update the AMP.</p>	30/3/2017	No.
5/2015	B2	A compliance (or breach) register should be implemented recoding	30/3/2017	No.

	<p>Asset creation and acquisition - Ongoing legal/environmental/safety obligations of the asset owner are assigned and understood.</p> <p>During the review period there were compliance breaches in respect of RIA however the breaches were not reported in registers and there was no recording of corrective actions and their closure.</p>	breaches of licence conditions, corrective actions, timing and closures.		
6/2015	<p>A2 Asset Disposal - Under-utilised and under-performing assets are identified as part of a regular systematic review process.</p> <p>The SAMF and the Financial Management Manual indicate an Asset Disposal Plan should be prepared, however this has not occurred.</p>	An Asset Disposal Plan should be prepared in accordance with the Financial Management Manual and the Strategic Asset Framework.	30/3/2017	No.
6a/2015	<p>B2 Asset Disposal - Disposal alternatives are evaluated.</p> <p>No record was available documenting the evaluation of asset disposal alternatives for the disposal of generator-set 7.</p>	An Asset Disposal Plan should be prepared in accordance with the Financial Management Manual and the Strategic Asset Framework.	30/3/2017	No.
5a/2015	<p>B2 Environmental Analysis - Compliance with statutory and regulatory requirements.</p> <p>RIA maintains the "RIA Electrical Water Gas Licence Compliance Register" which identifies the compliance requirements of the "Electricity Regional Licence", however it does not register breaches, corrective actions and closure of breaches.</p>	A compliance (or breach) register should be implemented recording breaches of licence conditions, corrective actions, timing and closures.	30/3/2017	No.

1-3b/2015	<p>B2 Asset operations - Operational policies and procedures are documented and linked to service levels required.</p> <p>The electrical assets operational policies are not sufficiently clear due to the lack of an up to date AMP.</p>	A program should be in place to update the AMP.	30/3/2017	No.
7/2015	<p>C2 Assets are documented in an Asset Register including asset type, location, material, plans of components, an assessment of assets' physical/structural condition and accounting data.</p> <p>At present the asset register is not complete. Work is still ongoing and some assets are not included (all of the HV system). A preventative maintenance plan has not been issued at this point.</p> <p>At present due to the asset management system database being in progress there is no link to asset drawings as drawings are out of date; there is a disconnect between drawings and physical installation.</p> <p>There is insufficient information to verify the link between the operational asset register (Maximo) and the current fixed accounting asset register (RIA).</p>	The asset register should be completed and should include those properties required in the Authority's Effectiveness Criteria.	30/3/2017	No.
9/2015	<p>B2 Asset operations - Operational costs are measured and monitored.</p>	Plan for recording and managing operational costs needs to be defined and the process documented.	30/3/2017	No.

	There is a lack of clarity on how operational costs will be tracked in future, whether they will be tracked in Maximo or another system.			
10/2015	<p>B2</p> <p>Asset Operations - Staff resources are adequate and staff receive training commensurate with their responsibilities.</p> <p>PFM use a "Rottnest Island Competency Matrix" which had been updated post the review period but required further updating as it still included ex-employees.</p>	The "Rottnest Island Competency Matrix" needs to be updated.	30/3/2017	No.
11/2015	<p>B1</p> <p>Regular inspections are undertaken of asset performance and condition.</p> <p>While individual asset maintenance tasks are generated monthly, no overall maintenance schedule was sighted so that the program of annual maintenance and inspections was not clear.</p>	Document which inspections are regularly performed and how often. Plan of annual maintenance and inspections should be clearly defined. This could be documented in the AMP.	30/6/2016	No.
11a/2015	<p>B1</p> <p>Maintenance plans (emergency, corrective and preventative) are documented and completed on schedule.</p> <p>While individual asset maintenance tasks are generated monthly, no overall maintenance schedule was sighted so that the program of annual maintenance and inspections is not clear.</p>	Document which inspections are regularly performed and how often. Plan of annual maintenance and inspections should be clearly defined. This could be documented in the AMP.	30/6/2016	No.
12/2015	<p>A2</p> <p>Adequate system documentation for users and IT</p>	[OFI]: Review procedure for document control between PFM and RIA systems	30/3/2017	No.

	<p>operators.</p> <p>During the review we received two versions of PFM's Restoration Priority Register Electrical Services – one issued 30/03/09 and last updated 15/11/12, the other issued/updated 14/8/13 (PRO-ROT-ELEC-41.01).</p>	<p>to ensure correct version control and currency.</p>		
13/2015	<p>B2</p> <p>Input controls include appropriate verification and validation of data entered into the system.</p> <p>The procedure used for the process of validation and verification conducted by PFM Melbourne for data provided by their Rottnest Island branch office, prior to the data being accepted by systems such as Maximo. This was requested during the review, but not received.</p> <p>Three meter readings were incorrectly read during the audit period.</p>	<p>[OFI]: Review verification and validation procedures on an ongoing basis to minimise the acceptance of incorrect data.</p>	30/3/2017	No.
14/2015	<p>B2</p> <p>Physical security access controls appear adequate.</p> <p>A local branch server exists on Rottnest Island – during the review, it was discovered that the local branch server is not isolated (its physical security is reliant on the general security of the office building).</p>	<p>Employ additional controls to isolate the physical security of the local branch server from general office security. Ensure physical access to the server is maintained for authorised users only.</p>	30/3/2017	No.
15/2015	<p>B2</p> <p>Data backup procedures appear adequate and backups are tested.</p>	<p>Maintain adequate evidence of regular failover, redundancy and restoration tests completed.</p>	30/5/2015	No.

	<p>While PFM provided evidence of a successful restore operation for the branch level server, this was dated 5th June 2015, outside of the audit period. More comprehensive test results for offsite managed systems were not sighted during the review.</p> <p>Evidence of RIA's failover, redundancy and restoration tests done during the audit period were sighted however the test documentation requires improvement.</p>			
16/2015	<p>B2</p> <p>The probability and consequences of asset failure are regularly assessed.</p> <p>In the new "Baseline Capex Risk Assessment 2014" there was no risk assessment on the HV Transmission Line or 11 kV Distribution poles, no risk identified for pole down, fire risk, vegetation fire, loss of environmental assets and habitat. The "Rottnest Island Fire Emergency Prevention, Preparedness Response and Risk Review 2012" by the Fire & Emergency Services Authority of WA (FESA) noted that "A significant scrub fire caused by a pole top fire was responded to by the RIVFRS. The fire was contained within one hour of initial response and burned a total of 2700m2.", This risk has not been captured in the risk assessment; in addition there were two pole top fires on the same day in the period 2013-14 (however the customers had back-up power and there was no interruption).</p> <p>No risk identified for loss of supply to nursery/emergency or loss of supply to borefields.</p>	<p>The "Baseline Capex RIA Risk Assessment 2014" should be re-assessed to include all significant assets and as per the findings (such as, but not limited to, pole top fires, HV transmission line, distribution pole down, loss of step up transformer, lack of transformer redundancy).</p>	30/3/2017	No.

	<p>The consequence of the loss of one of the step-up transformers is rated as inconsequential and the likelihood is rated as "rare"; however the SAP 2013 noted that the current demand is 1400 kW, maximum demand in 2009-10 was 1940 kW compared to a maximum capacity of 2140 kW. The lack of redundancy resulting from the use of two 1 MVA Step Up Transformers at the power house means that, if one transformer needs maintenance during the peak season, supply will be short of demand and consumption will have to be curtailed by up to around 50%.</p>			
16a/2015	<p>B2 Asset Planning - Likelihood and consequences of asset failure are predicted.</p> <p>It does not appear that all assets are covered by the "Baseline Capex RIA Risk Assessment 2014".</p>	<p>The "Baseline Capex RIA Risk Assessment 2014" should be re-assessed to include all significant assets and as per the findings (such as, but not limited to, pole top fires, HV transmission line, distribution pole down, loss of step up transformer, lack of transformer redundancy).</p>	30/3/2017	<p>No.</p> <p>The following things have been done: Asset condition, risk and consequence of failure are captured in Maximo. This is consistently reviewed during / after planned maintenance. The lifecycle model includes the evaluation of asset condition and risk amongst other elements and this will be incorporated into the Strategic Asset Investment Plan to underpin the Capex programmes. The Asset register now includes the below ground assets and is supported by the applicable maintenance programs.</p>
17/2015	A2	<p>Opportunities for improvement noted in PFM's Business Continuity Drills should be followed up and assessed.</p>	30/3/2017	No.

	<p>Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks.</p> <p>It does not appear that all the opportunities for improvement arising from Business Continuity Drills are actioned or evaluated further as in the last Drill a recommendation to establish individual back up power supply for the Nursing Post and the Police Station has not been documented in risk assessments.</p>			
18/2015	<p>B2</p> <p>The financial plan provides firm predictions on income for the next five years and reasonable indicative predictions beyond this period.</p> <p>No indicative predictions beyond the five years were available.</p>	<p>Indicative projections of income beyond five years should be prepared.</p>	30/3/2017	No.
19/2015	<p>B2</p> <p>There is an adequate process to ensure that the capital expenditure plan is regularly updated and actioned.</p> <p>The current CAPEX, the "Baseline Revised Capex Plan 2014 to 2019 v3 8" does not appear to be up-to-date, e.g.:</p> <ul style="list-style-type: none"> allocation of funds for Generator 1 replacement was set for Oct-Dec 2013, however the project had not yet gone to tender at the end of the Review period (31 March 2015); the next generator replacement in the CAPEX was number 3, due for Jan-Mar 2015, however this is still to occur; 	<p>The detailed CAPEX Plan should be updated at least annually.</p>	30/3/2017	No.

	the order of generator engine replacement is shown as 3, 5 and 2, however discussions with the licensee have indicated that the order of replacements may be 5, 2 and 6.			
19a/2015	<p>A2</p> <p>The plan provide reasons for capital expenditure and timing of expenditure.</p> <p>Some of the timing of individual projects in the detailed CAPEX, the "Baseline Revised Capex Plan 2014 to 2019 v3 8" does not appear to be consistent with actual activities.</p>	The detailed CAPEX Plan should be updated at least annually.	30/3/2017	No.
1-3c, 16b/2015	<p>C3</p> <p>The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan.</p> <p>Due to the lack of an up-to-date AMP, asset life and condition have not been updated in the AMP since 2011. A risk assessment has been carried out in 2014 however it does not appear to have documented all electricity assets. Condition of assets was due to be assessed in 2014 however no document has been sighted.</p>	<p>A program should be in place to update the AMP.</p> <p>The "Baseline Capex RIA Risk Assessment 2014" should be re-assessed to include all significant assets and as per the findings (such as, but not limited to, pole top fires, HV transmission line, distribution pole down, loss of step up transformer, lack of transformer redundancy).</p>	30/3/2017	No.
20/2015	<p>C2</p> <p>A review process is in place to ensure that the asset management plan and the asset management system described therein are kept current.</p> <p>No documented plan is in place to show what the review and development program is and when</p>	The asset management system and AMP review processes need to documented and monitored.	30/3/2017	No.

	those plans are due to be completed and implemented.			
1-3d/2015	<p>C2</p> <p>Independent reviews (e.g. internal audit) are performed of the asset management system.</p> <p>There has been extensive review of the asset management system performed both by the licensee and the operator, however most of the review has not been documented and has not identified the targets of the review, the structure of the revised asset management system and the correlation of PFM's system with the RIA's system.</p>	The process for the development and updating of the Asset Management Plan (AMP) should be documented	30/3/2017	No.
C. Unresolved during current Audit period				
Reference (no./year)	(Asset management effectiveness rating/Asset Management System Component & Criteria/details of the issue)	Auditors' Recommendation	Further action required (Yes/No/Not applicable) & Details of further action required	
1-3/2015	<p>C3</p> <p>Asset Planning - Asset management plan (AMP) covers key requirements.</p> <p>While the operation and maintenance of the assets has continued through the review period as per the framework established by the AMP 2011-12 there have been no updates to the AMP. A number of strategic and long range plans have been prepared however no detailed AMP has been maintained through the review period.</p> <p>While there is a process in the "Strategic Asset Management Framework" (SAMF) for the development of a strategic asset plan, there is no</p>	<p>The process for the development and updating of the Asset Management Plan (AMP) should be documented.</p> <p>The extent of and the correlation between the PFM's and the RIA's asset management systems needs to be reviewed and defined.</p> <p>A program should be in place to update the AMP.</p>	No.	<p>Strategic Asset Plan, now known as the Strategic Asset Management Plan (SAMP) is complete.</p> <p>Multi Utility Asset Management Plan (MUAMP) is in use.</p> <p>MAXIMO selected by RIA as the Asset Management System for all of the Island's assets</p> <p>Condition and life cycle assessments for all utility assets have been completed (except for the upgraded Waste Water Treatment Plant and Solar Farm). This was completed outside the audit period.</p>

	<p>process for the development and updating of the asset management plan. Subsequent clarification has indicated that the strategic asset plan is the new asset management plan however this was not evident during the review.</p>		
8/2015	<p>C2 Asset operations - Assets are documented in an Asset Register including asset type, location, material, plans of components, an assessment of assets' physical/structural condition and accounting data.</p> <p>At present the asset register is not complete. Work is still ongoing and some assets are not included (all of the HV system). A preventative maintenance plan has not been issued at this point.</p> <p>At present due to the asset management system database being in progress there is no link to asset drawings as drawings are out of date; there is a disconnect between drawings and physical installation.</p> <p>There is insufficient information to verify the link between the operational asset register (Maximo) and the current fixed accounting asset register (RIA).</p>	<p>The link between the Physical Asset Register and the Accounting Asset Register should be documented.</p>	<p>Yes. At the time of the audit, this actions is in progress with no target completion date noted.</p>

2.5 Summary of Issues and recommendations from the 2017 Performance Audit

Throughout the audit, the licensee's attitude towards compliance was always positive and cooperative.

On completion of the performance audit, after assessment and testing of the licensee's control environment, risk assessment process, information system, control activities and monitoring, the auditor has formed the opinion that, during the audit period of 1 April 2015 to 31 March 2017, Rottnest Island Authority's operation was in compliance with the licence conditions apart from minor non-compliances and opportunities for improvement including:

- McGee's 24 hour emergency number does not appear on their invoice but does appear on the corresponding statement.
- RIA to ensure appropriate feedback is provided to PFM as to their performance against set KPIs
- RIA to ensure that all Standard Form Contracts are signed and returned within the required timeframe
- AMR to increase font size on invoices for ease of reading and McGees to include increase font size on statements for ease of reading
- Verify the need to develop a "high level" metrology policy document to overarch the procedural document.
- Undertake meter calibration as per requirements
- Update non-compliant metering CTs as per plan
- Submit Draft Metrology Procedure to ERA for approval
- Implement appropriate meter reading and verification processes as per Metrology Procedure once approved

Table 2-3 below summarises the license performance non-compliances.

Table 2-3: Current Audit Non Compliances Recommendations

Table of Current Audit Non Compliances Recommendations			
B. Unresolved actions at end of current Audit period			
Reference (no./year)	Non Compliance/Controls improvement (Rating/Legislative Obligation/Details of Non Compliance or inadequacy of controls)	Auditors' Recommendation	Management action taken by end of Audit period
01/2017	<p>B1/106</p> <p>The licensee has taken reasonable steps to minimise the extent and duration of interruptions or restrictions of supply:</p> <ul style="list-style-type: none"> • A Service Agreement (FUSS) with PFM for the operation and maintenance of the power facilities at agreed service levels; • FUSS outlines expected service level performance indicators and RIA monitors them which is to form part of the decision process of the renewal of contract; • It requires that PFM maintains emergency response plans to manage emergencies including risk assessments and Risk Management Plan identifying the asset risks, risk likelihood and criticality and mitigating actions; • It also requires reporting at corporate level of any outages. <p>Documents and processes are in place to manage and minimise the extent and duration of interruption of the supply of electricity:</p>	<p>RIA to ensure appropriate feedback is provided to PFM as to their performance against set KPIs.</p>	
02/2017	B2/108	<p>RIA to ensure that all Standard Form Contracts are signed and returned</p>	

	<p>There are no residential customers on Rottnest Island. Commercial customers separately liaise with Property Managers contracted by the RIA, McGees and Access Housing for their commercial and residential (staff housing) premise requirements respectively. Tenants are not directly responsible for the lease and associated utility bills.</p> <p>All commercial customers are supplied with a standard contract (the Standard Form Contract) for the supply of electricity with the customer's business premise leasing agreement.</p> <p>The audit found that Standard Form Contracts were sent to customers for signing but 2 were not returned.</p>		
03/2017	<p>B2/131</p> <p>Information is provided to customers via the Standard Form Contract and monthly utility bills.</p> <p>The Standard Form Contract includes the following:</p> <ul style="list-style-type: none"> • reference to the Code of Conduct and tariff information being available from the RIA website • general information on the Code of Conduct, • assistance with payment difficulties; and • complaints handling. <p>The Utility Statements issued by McGees to customers includes a 24hr telephone number for faults and emergencies stated</p>	<p>RIA to instruct McGees to include the 24-hour emergency number on their invoices As part of the tendering process for a new residential property manager, ensure utility statements are compliant with Code requirements.</p> <p>Two examples of AHR invoices during the audit period were provided and they included a 24hr telephone number for faults and emergencies on invoices</p> <p>The audit found that general information on the safe use of electricity provided to customers during the audit period and was available via the RIA website.</p>	

	on their statements and not invoices (EVIDENCE: INV. NOS. 109186 and 118903).		
04/2017	<p>B2/155</p> <p>Information is provided to customers via the Standard Form Contract and monthly utility bills.</p> <p>The Standard Form Contract includes the following:</p> <ul style="list-style-type: none"> • reference to the Code of Conduct and tariff information being available from the RIA website • general information on the Code of Conduct, • assistance with payment difficulties; and • complaints handling. <p>The Utility Statements issued by McGees to customers includes a 24hr telephone number for faults and emergencies stated on their statements and not invoices (EVIDENCE: INV. NOS. 109186 and 118903).</p>	<p>RIA to instruct McGees to include the 24-hour emergency number on their invoices As part of the tendering process for a new residential property manager, ensure utility statements are compliant with Code requirements.</p> <p>Two examples of AHR invoices during the audit period were provided and they included a 24hr telephone number for faults and emergencies on invoices</p> <p>The audit found that general information on the safe use of electricity provided to customers during the audit period and was available via the RIA website.</p>	
05/2017	<p>B2/290</p> <p>Documentation prepared by the licensee for information purposes is in accordance with the requirements.</p> <p>Both McGees and AHR billings are not as user friendly and some information is not set out in an intuitive manner</p>	<p>AMR to increase font size for ease of reading and McGees to include 24 hour service faults and difficulties contact number to front of invoice</p>	

06/2017	<p>B2/319</p> <p>a) A Certificate of Calibration has been acquired for all meters installed post-2012 using the methodology for ensuring compliance by Horizon Power.</p> <p>b) Funds for phase 1 of the Meter Replacement Program had been approved. 11 x 3 phase current transformer meters, 70 x 3 phase meters and 75 x single phase meters have been purchased. Meter installation will occur on an ongoing basis until completion of the project. Funds for phase 2 for the Meter installation have been approved for 2017/18.</p> <p>c) A total of 156 electrical meters have been purchased and delivered to the Island in February 2017. Certificates of calibration will be provided with the new meters, once the meter replacement program has been completed. Detailed meter information (such as meter numbers, location, certificates and compliance evidence) and copies of certificates of calibration will be saved in MAXIMO and an asset number be allocated for each meter. PFM confirmed that the meters purchased meet the national smart meter specification.</p> <p>The new Draft Metrology Procedure had been completed and forwarded to stakeholders for consultation (Rottneest Island Chamber of Commerce and</p>	<p>a.) Verify that all newly installed meters are provided with calibration certificates on installation</p> <p>b.) Verify that Draft Metrology Procedure is approved and procedures implemented accordingly</p>	
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	<p>business community). The consultation on the Rottnest Island Metrology Procedure closed on 20 June 2017. No submissions were received from the stakeholders by the due date. The result was provided to the consultant on 4 July 2017 for preparation of the report to the ERA. The Draft Metrology Procedure and the stakeholder consultation report will be submitted to the ERA for review and approval end of July 2017. Target completion date is 31/08/2017. The RIA has a metrology procedure in place. however the document is extremely long (>100 pages)</p>		
07/2017	<p>C2/320 PFM's Meter Installation and Calibration Procedure" prescribe that new meters must comply with the Electricity Industry Metering Code During the audit period, there was no ERA approved metrology procedure in place. However a draft Metrology Procedure had been developed and is in the process of being submitted to ERA for approval</p>	<p>a.) Submit Metrology document to ERA for review and approval b.) Verify that any accumulation meters conform to the requirements specified in the applicable metrology procedure and display, or permit access to a display of the measurements using dials, a cyclometer, an illuminated display panel or some other visual means</p>	
08/2017	<p>B2/326 The audit has found the network operator to be non-compliant with this clause but has a program in place to rectify the issue over time. At the time of the audit the following information was noted. There are 528 connection points. Eco Energy were contracted by PFM to gather</p>	<p>Complete meter replacement and compliance program</p>	

	<p>information on the existing meter installations (survey). The survey was completed in January 2016. PFM is using the survey data to determine the non-compliant aspects of each meter and installation</p> <p>A process is in place for updating new connections.</p> <p>The Rottneest Island authority have purchased 157 meters which are currently being installed. These have certificates of calibration which will bring the number of compliant meters to 190 (planned to be completed around the end of October 2017). The remaining connection points are unmetered and are made up of RIA holiday accommodation units, type 7 connection points and other RIA infrastructure such as pump stations etc.</p>		
09/2017	<p>C2/327</p> <p>The audit has found the network operator to be non-compliant with this clause as the Metrology Procedure was in draft form and not approved and has not completed its meter replacement and compliance obligations but has a program in place to rectify the issue over time</p>	<p>a.) Complete meter replacement and compliance program</p> <p>b.) Submit Metrology Procedure for approval by ERA</p>	
10/2017	<p>B2/333</p> <p>The types of meters are identified by annual throughput at the connection point and the compliance status of all meters is determined (they remain non-compliant due to calibration).</p>	<p>Complete meter replacement program currently targeted for completion by 31/10/2017</p>	

	<p>This information is captured in the metering register</p> <p>This will remain non-compliant until completion of the meter replacement programme targeted for completion (31/10/2017)</p>		
11/2017	<p>B2/342</p> <p>PFM's Meter Installation and Calibration Procedure refers to the Electricity Industry Metering Code and associated clauses and includes an annual review of procedures.</p> <p>As part of the meter replacement programme, metering installations will be brought in line with current design requirements. Not all metering installations currently comply</p>	<p>Complete meter replacement program currently targeted for completion by 31/10/2017</p>	
12/2017	<p>C2/343</p> <p>No evidence that instrument transformers in its metering installations comply with the relevant requirements of any applicable specifications or guidelines was discovered</p>	<p>a.) Submit Metrology Procedure for approval by ERA</p> <p>b.) Verify and demonstrate that any instrument transformers meet applicable specifications as set down in the Metrology Procedure</p>	
13/2017	<p>B2/349</p> <p>Metering CT data spreadsheet (with photos) and the CTs have been checked for compliance with Table 3. Non - Compliant CTs will be changed during the Meter Replacement Programme.</p>	<p>Update non-compliant metering CTs as per plan</p>	
14/2017	<p>C2/379</p>	<p>RIA to confirm what devices and methods will be in-place to ensure that existing and new</p>	

	Existing metering points are not secure. Not known whether new meters will have appropriate security protections.	meter energy data cannot be access by local or remote unauthorised users.	
15/2017	<p>C2/386</p> <p>RIA has a service level agreement with the PFM to record meter data every month. This data audited for via PFM's internal QA process before being given to McGees. The verification and validation procedures for meter readings and validation within the registration process have been developed for the applicable metering types as per Electricity Industry Metering Code 2012, Appendix 2, but no evidence of implementation during the audit period was noted.</p> <p>However draft metrology procedure existed during audit.</p> <p>The types of meters have been identified, see obligation 333 (item 23).</p> <p>PFM Meter Readings Monthly Procedure (PRO-RNI-I03-033-1) has been updated to ensure Code compliance, see items 8 & 22.</p>	<p>Submit Metrology document to ERA for review and approval.</p> <p>Clause 6.8 states that the metrology report must as a minimum point to the documents and processes used to undertake the processes covered under Obligation 386. While the RIA metrology points to the processes and procedures and pointed to in the Audit findings, at the time of the audit it was not approved by the ERA. Hence the non-compliance. No change to report recommended.</p>	
16/2017	<p>C2/430</p> <p>At the time of the audit, the network operator could not determine a second value.</p>	<p>Complete meter replacement program and gain approval of the metrology procedure so that both first and second values can be measured</p>	

	<p>Billing adjustments are made and invoices either reissued or the amount credited to the impacted customers.</p> <p>One instance of a credit applied to a bill was discovered during the audit.</p> <p>During the audit no approved Metrology procedure was sighted.</p>		
17/2017	<p>C2/434</p> <p>Whilst there were no instances of estimated energy data recorded during the audit period and all meters are set to provide manual readings, no transformation or processing of data occurred. As no approved metrology procedure was available at the time of the audit the auditor has relied on interviews for information</p>	<p>Submit Metrology document to ERA for review and approval. Verify that accuracy of energy data recording is as per metrology procedure</p>	
18/2017	<p>C2/447</p> <p>There wasn't an approved metrology procedure in place during the audit period and therefore there was no prescriptive procedure to comply with.</p>	<p>Submit Metrology Procedure for approval by ERA</p>	

Table 2-4 - Summary of Audit Obligations Ratings

Compliance Licence Condition	Compliance Licence Condition	Audit Priority Applied (1=Highest 5-Lowest)	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 5 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 5 for details)					
			A	B	C	D	NP	1	2	3	4	N R	
2	Grant of licence	5					✓						✓
3	Term	5					✓						✓
4	Fees	5					✓						✓
5	Compliance	2		✓				✓					
6	Transfer of licence						✓						✓
7	Cancellation of licence						✓						✓
8	Surrender of licence						✓						✓
9	Renewal of licence						✓						✓
10	Amendment of licence (licensee)						✓						✓
11	Amendment of licence (Authority)						✓						✓
12	Accounting records	5	✓					✓					
13	Individual performance standards						✓						✓
14	Performance audit	5		✓				✓					
15	Reporting a change in circumstances	5					✓						✓
16	Provision of information	4	✓					✓					
17	Publishing information	5	✓					✓					
18	Notices	4	✓					✓					
19	Review of the Authority's decisions	5					✓						✓
20	Asset Management System	2		✓					✓				

Table 2-5 - Table 5 from ERA Guidelines

Table 5: Audit compliance and controls rating scales

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

2.6 Summary of Issues and Recommendations, 2017 Asset Management System Review

The review has found that Rottnest Island Authority’s asset management system has improved significantly since the last review period. The RIA have developed a suite of governing asset management artefacts and there is evidence that procedures and processes are followed. It is the opinion of the auditors that the asset management system is appropriate and capable of effectively managing the island assets to meet the RIA’s strategic objectives. The review has however found some deficiencies and improvement opportunities, which need to be addressed. These are listed in the table below together with the review recommendations.

Table 2-6 - AMS Ratings - Table 7 ERA Guidelines

Table 7: Asset management process and policy definition adequacy ratings

Rating	Description	Criteria
A	Adequately defined	<ul style="list-style-type: none"> Processes and policies are documented. Processes and policies adequately document the required performance of the assets. Processes and policies are subject to regular reviews, and updated where necessary. The asset management information system(s) are adequate in relation to the assets that are being managed.
B	Requires some improvement	<ul style="list-style-type: none"> Process and policy documentation requires improvement. Processes and policies do not adequately document the required performance of the assets. Reviews of processes and policies are not conducted regularly enough. The asset management information system(s) require minor improvements (taking into consideration the assets that are being managed).
C	Requires significant improvements	<ul style="list-style-type: none"> Process and policy documentation is incomplete or requires significant improvement. Processes and policies do not document the required performance of the assets. Processes and policies are significantly out of date. The asset management information system(s) require significant improvements (taking into consideration the assets that are being managed).
D	Inadequate	<ul style="list-style-type: none"> Processes and policies are not documented. The asset management information system(s) is not fit for purpose (taking into consideration the assets that are being managed).

Table 2-7 - AMS Performance Ratings from ERA Guidelines

Table 8: Asset management review performance rating scale

Rating	Description	Criteria
1	Performing effectively	<ul style="list-style-type: none"> The performance of the process meets or exceeds the required levels of performance. Process effectiveness is regularly assessed, and corrective action taken where necessary.
2	Opportunity for improvement	<ul style="list-style-type: none"> The performance of the process requires some improvement to meet the required level. Process effectiveness reviews are not performed regularly enough. Process improvement opportunities are not actioned.
3	Corrective action required	<ul style="list-style-type: none"> The performance of the process requires significant improvement to meet the required level. Process effectiveness reviews are performed irregularly, or not at all. Process improvement opportunities are not actioned.
4	Serious action required	<ul style="list-style-type: none"> Process is not performed, or the performance is so poor that the process is considered to be ineffective.

2.7 AMS Summary of Effectiveness

Table 2-8: AMS Summary of Effectiveness

	Asset Management System Component & Criteria (Refer Table 22)	Asset management Process and policy definition adequacy rating	Asset management performance rating
1	Asset Planning	B	2
1.1	Does the planning process and objectives reflect the need of all stakeholders and is it integrated with business planning?	B	2
1.2	Does the asset management plan cover all key requirements?	B	2
1.3	Have service levels been defined?	A	1
1.4	Have non-asset options (e.g. demand management) been considered?	B	2
1.5	Have the lifecycle costs of owning and operating assets been assessed?	B	2
1.6	Have funding options been evaluated?	A	1
1.7	Are the costings justified and have the cost drivers been identified?	A	1
1.8	Have the likelihood and consequences of asset failure been predicted?	B	2
1.9	Are the plans being regularly reviewed and updated?	B	2
1.10	Is the capability of the plant adequate to meet future demand?	B	2
2	Asset Creation and Acquisition	A	1
2.1	Are full project evaluations being undertaken for new assets, including comparative assessment of non-asset solutions?	A	1
2.2	Do evaluations include all life-cycle costs? Integrated with business planning?	A	2
2.3	Do projects reflect sound engineering and business decisions?	A	1
2.4	Are the commissioning tests documented and completed?	A	1
2.5	Have the ongoing legal/environmental/safety obligations of the asset owner been assigned and understood?	B	2
3	Asset Disposal	B	2
3.1	Are underutilised and underperforming assets identified as part of a regular systematic review process?	B	2
3.2	Are the reasons for underutilisation or poor performance critically examined and corrective action or disposal undertaken?	A	1
3.3	Are disposal alternatives evaluated?	A	1
3.4	Is there a replacement strategy for assets?	B	2
4	Environmental Analysis	A	1

	Asset Management System Component & Criteria (Refer Table 22)	Asset management Process and policy definition adequacy rating	Asset management performance rating
4.1	Are opportunities and threats in the system environment assessed?	A	1
4.2	Are Performance Standards (availability of service, capacity, continuity, emergency response etc.) measured and achieved?	A	1
4.3	Is there compliance with statutory and regulatory requirements?	A	1
4.4	Have customer service levels been achieved?	A	1
5	Asset Operations	B	2
5.1	Are the operational policies and procedures documented and do they link to the required service levels?	A	1
5.2	Is risk management applied to prioritise operations tasks?	B	2
5.3	Are assets documented in an Asset Register including asset type, location, material, plans of components, an assessment assets' physical/structural condition and accounting data?	B	2
5.4	Are operational costs measured and monitored?	B	2
5.5	Are staff receiving training commensurate with their responsibilities?	B	2
5.8	Is the current staffing arrangements and responsibilities adequate for effective asset operations?	A	1
6	Asset Maintenance	A	1
6.1	Have the maintenance policies and procedures been documented and linked to service levels required?	A	1
6.2	Are regular inspections undertaken of asset performance and condition?	A	1
6.3	Have the maintenance plans (emergency, corrective and preventative) been documented and completed on schedule?	A	1
6.4	Are the failures analysed and operational/maintenance plans adjusted where necessary?	A	1
6.5	Has risk management been applied to prioritise maintenance tasks?	A	1
6.6	Are the maintenance costs measured and monitored?	B	2
6.7	Is the current staffing arrangements and responsibilities adequate for effective asset maintenance?	A	1
7	Asset Management Information System	A	1
7.1	Is there adequate system documentation for users and IT operators?	A	1

	Asset Management System Component & Criteria (Refer Table 22)	Asset management Process and policy definition adequacy rating	Asset management performance rating
7.2	Do the input controls include appropriate verification and validation of date entered into the system?	A	1
7.3	Is there a logical security access control which is adequate, such as passwords?	A	1
7.4	Does the physical security access control appear adequate?	B	3
7.5	Does the data backup procedure appear adequate?	A	1
7.6	Are the data backups tested?	NR	NR
7.7	Are the key computations related to licensee performance reporting materially accurate?	A	1
7.8	Do the management reports appear adequate for the licensee to monitor licensee obligations?	A	1
8	Risk Management	B	1
8.1	Do risk management policies and procedures exist and are they being applied to minimise internal and external risks associated with the asset management system?	B	2
8.2	Are risks documented in a risk register and are treatment plans actioned and monitored?	B	1
8.3	Is the probability and consequences of asset failure being regularly monitored?	A	1
9	Contingency Planning	B	2
9.1	Are contingency plans documented, understood and tested to confirm their operability and to cover higher risks?	B	2
9.2	Is there a contingency plan for the unavailability or loss of key operational staff (including third party contract staff)?	B	2
10	Financial Planning	A	1
10.1	Does the financial plan state the financial objectives and strategies and actions to achieve the objectives?	A	1
10.2	Does the financial plan identify the source of funds for capital expenditure and recurrent costs?	A	1
10.3	Does the financial plan provide projections of operating statements (profit and loss) and statement of financial position (balance sheets)?	A	1
10.4	Does the financial plan provide firm predictions on income for the next five years and reasonable indicative predictions beyond this period?	A	1
10.5	Does the financial plan provide for the operations and maintenance, administration and capital expenditure requirements of the services?	A	1

	Asset Management System Component & Criteria (Refer Table 22)	Asset management Process and policy definition adequacy rating	Asset management performance rating
10.6	Are significant variances in actual/budget income and expenses identified and corrective action taken where necessary?	A	1
11	Capital Expenditure Planning	B	2
11.1	Is there a capital expenditure plan that covers issues to be addressed, actions proposed, responsibilities and dates?	A	1
11.2	Does the plan provide reasons for capital expenditure and timing of expenditure?	A	1
11.3	Is the capital expenditure plan consistent with the asset life and condition identified in the asset management plan?	B	2
11.4	Is there adequate process to ensure that the capital expenditure plan is regularly updated and actioned?	A	1
12	Review of AMS	B	1
12.1	Is there a review process in place to ensure that the asset management plan and the asset management system described therein are kept?	B	1
12.2	Are independent reviews (e.g. internal audit) of the asset management system reviewed?	A	1

Table 2-9: Current Review Asset System Deficiencies/Recommendations

Table of Current Review Asset System Deficiencies/Recommendations			
B. Unresolved actions at end of current Audit period			
Reference (no./year)	Asset System Deficiency (Rating/Asset Management system Component & Effectiveness Criteria/Details of Asset System Deficiency)	Auditors' Recommendation	Management action taken by end of Audit period
01/2017	<p>B2</p> <p>Asset Planning - Does the planning process and objectives reflect the need of all stakeholders and is it integrated with business planning?</p> <p>There are no document control procedures identified</p>	<p>Apply document control procedures to SAP.</p>	
02/2017	<p>B2</p> <p>Asset Planning – Does the asset management plan cover all key requirements?</p> <p>The Multi Utility Asset Management Plan (MUAMP) is review each year and is a very comprehensive and large document. For efficiency reasons RIA propose to extend the review period from 1 year to 2 years.</p>	<p>1. Agree and get sign off on the proposed extended frequency of review and document accordingly.</p> <p>2. Determine and action accordingly if it is more efficient to break the MUAMP document out into separated documents for respective utility assets.</p>	

03/2017	<p>B2</p> <p>Asset Planning - Have non-asset options (e.g. demand management) been considered?</p> <p>No evidence of actively considered non-asset initiatives, related to electricity demand management at the consumer end, was presented to the Auditors.</p>	<p>Establish electricity demand management strategies for the major consumers of energy.</p>	
04/2017	<p>B2</p> <p>Asset Planning - Have the lifecycle costs of owning and operating assets been assessed?</p> <p>The Life Cycle Costing (LCC) model uses predicted costs and actual costs are not always recorded</p>	<p>Capture actual operational and maintenance costs of electricity production and regularly review against forecasted values</p>	
05/2017	<p>B2</p> <p>Asset Planning - Have the likelihood and consequences of asset failure been predicted?</p> <p>The Enterprise Risk Management Plan (ERMP) does not report residual risk after the application of controls</p>	<p>Assess and document the residual risk for risks identified in the ERMP</p>	
06/2017	<p>B2</p> <p>Asset Planning - Are the plans being regularly reviewed and updated?</p>	<p>Develop a document review program and articulate the process in respective management plans.</p>	

	The MUAMP does not clearly articulate the review cycle of every 2 years		
07/2017	<p>B2</p> <p>Asset Planning - Is the capability of the plant adequate to meet future demand?</p> <p>The review found that the network is not N-1 compliant. N-1 refers to an abnormal situation in which one asset that otherwise contributes to the system is out-of-service; the analysis is conducted under the assumption that the asset with the largest impact is out-of-service, thereby identifying the most conservative outcome.</p>	<ol style="list-style-type: none"> 1. Develop a software model of the electricity network. 2. Prioritize a risk review of the power system reliability and capacity requirements. 3. Consider larger transformers in future asset replacement plans 	
08/2017	<p>A2</p> <p>Asset Creation & Acquisition - Do evaluations include all life-cycle costs?</p> <p>Actual operational and maintenance cost are not always captured.</p>	<p>Capture actual operational and maintenance cost of electricity production and regularly review against forecasted values.</p>	
09/2017	<p>B2</p> <p>Asset Creation & Acquisition - Have the ongoing legal/environmental/safety obligations of the asset owner been assigned and understood?</p>	<p>RIA to ensure the operations and maintenance contractor keeps the breach register up to date.</p>	

	During the review period, it was found the breach register was not kept up to date		
10/2017	<p>B2</p> <p>Asset Disposal - Are underutilised and underperforming assets identified as part of a regular systematic review process?</p> <p>The LCC model only focuses on the assets in the Power House. No other evidence of other underutilised and underperforming assets processes were provided.</p>	<p>1. Continue with identification of legacy cable and joint locations.</p> <p>2. Update network drawings to show cable and joint locations.</p>	
11/2017	<p>B2</p> <p>Asset Disposal - Is there a replacement strategy for assets?</p> <p>There is an active program to replace wooden poles but no documented plan to replace aged underground legacy cables</p>	<p>Develop a program to identify underground legacy cables and joints and plan for their replacement.</p>	
12/2017	<p>B2</p> <p>Asset Operations – Is risk management applied to prioritise operations tasks?</p> <p>PFM maintain a “Power Risk Matrix” for the Powerhouse. The review noted however that no document control procedures are applied to this document e.g. previous</p>	<p>Apply document control procedures to “Power Risk Matrix”.</p>	

	visions, author, reviewer, dates or endorsements etc.		
13/2017	<p>B2</p> <p>Asset Operations – Are assets documented in an Asset Register including asset type, location, material, plans of components, an assessment assets’ physical/structural condition and accounting data?</p> <p>Accounting data is maintained in a separate accounting system called “Sage”. There is no direct interface between the asset management system (Maximo) and Sage. Assets are linked between registers through a unique asset identifier nominated by Sage and manually assigned to the corresponding asset in Maximo</p>	<p>1. The link between the physical asset register and accounting asset register is not documented.</p> <p>2. Software program to be developed to create a unique asset identification numbers</p>	
14/2017	<p>B2</p> <p>Asset Operations - Are operational costs measured and monitored?</p> <p>Some operational costs are monitored and captured on separate spreadsheets with in some cases predicted values used.</p>	<p>Capture actual operational costs of electricity production.</p>	
15/2017	<p>B2</p> <p>Asset Operations - Are staff receiving training commensurate with their responsibilities?</p>	<p>Develop a training register capturing staff’s training requirements and verification of competency where applicable</p>	

	It is unclear what specific training requirements are required by staff. A training register is not maintained.		
16/2017	<p>B2</p> <p>Asset Maintenance - Are the maintenance costs measured and monitored?</p> <p>Some maintenance costs are captured and noted in a separate spreadsheet.</p> <p>Information on labour hours and parts is entered into Navision, a system that is separate from Maximo</p>	Capture actual maintenance costs of electricity production.	
17/2017	<p>B3</p> <p>Asset Management Information System - Does the physical security access control appear adequate?</p> <p>All assets inspected had mechanical devices fitted for locking. A main switchboard outer cabinet was found to be unlocked, all others were secure</p>	<p>1. Formal notification to be sent to PFM from RIA highlighting non-compliance to electricity safety standards (maintain the security of assets with reference to unlocked main switchboard).</p> <p>2. Appropriate training to be provided to relevant personnel regarding asset security.</p>	
18/2017	<p>B2</p> <p>Risk Management - Do risk management policies and procedures exist and are they being applied to minimise internal and external risks associated with the asset management system?</p>	Establish and document a review period for Risk Management Framework (RMF) document. Undertake a review of the RMF to verify its currency	
19/2017	B1	Provide clear single responsible person or position as being responsible for the	

	<p>Risk Management - Are risks documented in a risk register and are treatment plans actioned and monitored?</p> <p>Appropriate high level risk were identified and treatments listed in the Power Risk Matrix. Risk ratings were determined however future action and risk owner were not clearly defined which may lead to confusion of implementation.</p>	<p>implementation of hazard treatments in the Power Risk Matrix register</p>	
20/2017	<p>B2</p> <p>Contingency Planning - Are contingency plans documented, understood and tested to confirm their operability and to cover higher risks?</p> <p>Disaster contingency plans (electricity) had not been reviewed and may not be current. There was no evidence of undertaking electricity disaster scenario drills and the electricity restoration priority list, in the opinion of the auditor, did not place restoration of communications and lighthouse in appropriate priority</p>	<p>1. For the loss of power station, or loss of electrical busbar scenario, clarify how the 5 day outage estimate was determined?</p> <p>2. Electrical contingency plan to be updated with likelihood of existing and eventually new generators being immediately available and contingencies if they are not available.</p> <p>3. Undertake selected electrical emergency scenario drills and record findings.</p> <p>4. Establish a review period for the Electrical Disaster Recovery Plan document and elevate the 3rd listed priority of electrical restoration to first priority. (Restore electricity to communications and lighthouse)</p>	

		5. RIA to investigate options to reduce estimated power outage downtime from 5 days.	
21/2017	B2 Contingency Planning - Is there a contingency plan for the unavailability or loss of key operational staff (including third party contract staff)? No particular written contingency plan was available, however, comprehensive operation and management data is available for reasonable ongoing operations should a key staff member cease duties.	Develop a plan to manage for the unplanned loss of key people. It is suggested that the plan be incorporated into Business Continuity Planning	
22/2017	B2 Capital Expenditure Planning - Is the capital expenditure plan consistent with the asset life and condition identified in the asset management plan? The underground paper-lead cables are legacy technology and are subject to failure at the joints. This ageing asset may not be adequately reflected in the capital expenditure plan, however, it will get assigned to capital expenditure if RIA align with PFM. Clear supporting evidence of the plan being supported by current asset	1. RIA to interrogate the PFM provided detailed condition reports including estimated remaining operating life to support in confirming asset capital replacement planning, including the paper-lead cables. 2. RIA to revise their capital expenditure plan and commence actions to secure appropriate future capital expenditure to meet the requirements of the updated plan	

	<p>condition reports with future asset life expectancy was not sighted</p> <p>A high level of reliance on emergency back-up (mainly portable generators) was evident</p>		
23/2017	<p>B1</p> <p>Review of AMS - Is there a review process in place to ensure that the asset management plan and the asset management system described therein are kept?</p> <p>The MUAMP does not mandate a set review period</p>	<p>Insert requirement in MUAMP that this document is reviewed every 2 years.</p>	

3. Objectives and Scope of Audit and Review

3.1 Background

The Rottnest Island Authority (the RIA or the licensee) generates and supplies electricity to Rottnest Island, Western Australia under the EIRL3 Electricity Integrated Regional licence (the licence) granted by the Economic Regulation Authority (the Authority) on 21 June 2006 (Licence is at Version 5, 1 July 2015).

The licence has been issued under Sections 7 and 15 of the Electricity Industry Act 2004 (WA) (the Act) and enables the licensee to construct and operate the power generating and distribution facilities and to retail electricity sales in accordance with the licence conditions.

Rottnest Island is located in the Indian Ocean, 19 km west of Fremantle in Western Australia. The electricity facility is operated by Programmed Facilities Management Pty Ltd (PFM) which has is contracted to provide the operation and maintenance services for the facility under a service availability agreement and is identified as the Facilities Utilities and Support Services (FUSS) contract. This contract was executed early in 2015 prior to the audit period and is in force for the entire audit and review period.

Power generating capacity consists of 2040 kW diesel power generation and 600 kW of wind - generated power and 600kW solar farm, with a total generating capacity of 3240 kW.

The generation assets and transmission assets are below the requisite thresholds (30 MW for generation and 66 kV for transmission) that require the generation and transmission elements of RIA's integrated regional licence to be licenced. However, the RIA wishes to retain the generation and transmission elements of its integrated regional licence due to contractual reasons.

The assets include:

- five Cummins diesel generators de-rated to 280 kW each
- two Detroit diesel generating sets rated at 320 kW
- one wind turbine generator operationally rated at 600 kW
- solar farm 600 kW
- dynamic resister
- the powerhouse and control building
- 11 kV HV distribution system, both overhead and underground
- a number of substations and associated switchgear
- 415V LV distribution system.

The power generating facilities include diesel generators cooling towers, fuel, oil and coolant tanks, control panels, air compressor, crane, fuel pump, main switchboard, SCADA system and power transformers.

There are around 25 customers supplied under the licence. All the RIA's customers are business customers (there are no residential customers).

Under sections 13 and 14 of the Act the RIA's systems are subject to independent performance audits and asset management system reviews at 24 month intervals or some other period as decided by the Authority. The performance audit is an audit of the effectiveness of measures

taken by the licensee to meet the performance criteria specified in the licence. The asset management system review is to determine the effectiveness of the licensee's asset management system.

GHD has been engaged by the RIA to conduct the performance audit and the asset management system review (the audit and review) for the period 1 April 2015 to 31 March 2017.

The audit and review has been conducted and this report prepared in accordance with the "Authority's Audit and Review Guidelines: Electricity and Gas Licences (April 2014)" (the guidelines).

3.2 Audit and Review Objectives

The purpose of the performance audit is to:

- Assess the effectiveness of measures taken by the licensee to meet the obligations of the performance and quality standards referred to in the licence.

The purpose of the asset management system review is to:

- Assess the effectiveness of the measures taken by the licensee for the proper management of assets used in the provision and operation of services and, where appropriate, for the construction or alteration of relevant assets.

3.3 Audit and Review Scope

3.3.1 Scope of Performance Audit

The scope of the performance audit is to audit the systems and the processes to assess their effectiveness in ensuring compliance with the standards, outputs and outcomes required by the licence, in detail:

- Assess the effectiveness of systems and procedures and the adequacy of internal controls;
- Consider performance against standards prescribed in the licence;
- Provide assurance of compliance to systems and procedures, existence of control and system output/records;
- Verify completeness and accuracy of performance reporting to the Authority;
- Verify compliance with any individual licence conditions.

3.3.2 Scope of Asset Management System Review

The scope of the asset management system review includes the assessment of the adequacy and effectiveness of the licensee's asset management system by evaluating the key processes of:

- Asset planning
- Asset creation/acquisition
- Asset disposal
- Environmental analysis
- Asset operations
- Asset maintenance

- Asset management information system
- Risk management
- Contingency planning
- Financial planning
- Capital expenditure planning
- Review of the asset management system.

Each of the system processes were evaluated against effectiveness criteria defined in the guidelines. The review priority focussed on the higher inherent risks as set out in the approved audit plan with respect to risk assessment. Asset Operations and Asset Maintenance having top priority. Other areas of strong focus were Asset Planning and Risk Management. Capital Expenditure Planning and Asset Planning also drew higher priority as a result of aging infrastructure identified during the review.

3.3.3 Key documentation

Key documentation examined by the auditors is listed in Appendix C.

3.4 Audit and Review Period

The audit and review covers the period 1 April 2015 to 31 March 2017. The audit and review was undertaken between June and July 2017. The audit follows the previous audit carried out for the period 1 April 2013 to 31 March 2015.

3.5 Audit and Review Methodology

The audit and review followed the methodology defined in the Authority's guidelines including:

- Examination of documentation;
- Preparation of the audit and review plan, risk assessment and system analysis;
- Fieldwork including the site document examination and meetings
- Reporting.

These activities were supported by additional investigations to further clarify aspects of the procedures and processes.

The audit and review plan was prepared which outlined the objectives, scope, risk assessment, system analysis, fieldwork plan, the report structure, key contacts and auditing staff.

The audit and review adopted a risk-based approach where a preliminary risk and materiality assessment assigned risk ratings. The risks resulting from lack of controls (inherent risks) and the strength of existing controls to mitigate the inherent risks were rated and audit and review priority assigned based on the above. Tests were also defined for each licence condition to assess the compliance and effectiveness of the current process.

The Asset Management Review followed the methodology outlined above and defined in the guidelines. The risk assessment was carried out on each asset management system (AMS) element to assess the effectiveness of the current asset management processes.

3.6 Licensee's Representation

Licensee representatives that participated in the audit and review meetings or were requested to clarify aspects of the licensee's operation were:

3.6.1 From Rottnest Island Authority:

- Janett Enke, Contract & Projects Officer
- Tracey Hornsey, Manager Major Contracts
- Peta Davis, Manager Infrastructure Risk & Audit
- Adrian Tirlie General Manager
- Othmar Beerli, Manager Corporate Finance & Procurement
- Rob Weir, Manager Major Projects
- Louie Ranauro, Project Manager
- Peter Morris, Chief Information Officer

3.6.2 From Programmed Facilities Management:

- Chris Derrick, Island Operations Manager
- Jode Mott, Island Operations Manager, Hospitality
- Orrin Neale, Island Engineer,
- Anesh Boodhram, Asset Manager
- Andrew De Weerd, Maintenance Planner
- Tiarne Wyatt, McGees Property

3.7 Locations Visited

The following facilities were visited during the audit and review:

- the RIA's head office, B Shed, Fremantle;
- the RIA's office, Rottnest Island;
- the RIA's power utility facilities (including PFM's office), Rottnest Island

3.8 GHD's Audit and Review Team

A summary of the auditing resources utilised in the performance of the audit and review is listed below.

Table 3-1 GHD Audit Team

Resource	Description	Hours
Robert Ceic	Project Manager, Report Reviewer	6
Alan Meagher	Principal Risk Consultant, Lead Auditor	168
Marcel Oosthuizen	Principal Electrical Engineer, Auditor, Verifier	94
Keith Smith	Power Systems Officer, Facility Inspector	19
Administration Support		15
Total Hours		302

3.9 Key Documents and Information

Main documents accessed by the auditors are listed in Appendix C.

3.10 Abbreviations

Act	Electricity Industry Act 2004 (WA)
AMIS	Asset Management Information System
AMP	Asset Management Plan
AMS	Asset Management System
AS	Australian Standard
Authority	Economic Regulation Authority
BC	Business Case
CAPEX	Capital Expenditure
CEO	Chief Executive Officer
Code of Conduct	Code of Conduct for the Supply of Electricity to Small Use Customers
DAT	Development Application Team
DB	Database
DMS	Document Management System
EC	Effectiveness Criteria
EERC	Economic Expenditure Reform Committee
EIRL3 (or licence)	Electricity Integrated Regional Licence 3
ERMP	Enterprise Risk Management Plan
ERA	Economic Regulation Authority
ERP	Enterprise Resource Planning
FESA	Fire & Emergency Services Authority of WA
FOU	Facilities, Operations and Utilities
FUSS	Facilities Utilities and Support Services
FY	Financial Year
HV	High Voltage
ICT	Information, Communications and Technology
IMO	Independent Market Operator
KPI	Key Performance Indicator
LCC	Lifecycle Costs
LEMC	Rottneest Island Local Emergency Management Committee
LV	Low Voltage

MUAMP	Multi Utility Asset Management Plan
MP20	Rottnest Island Master Plan - A 20 Year Vision
N/A	Not Applicable
NP	Not Performed
NQRS	Network Quality and Reliability of Supply
NR or N/R	Not Rated
O&M	Operation and Maintenance
OFI	Opportunity for Improvement
OHSE	Occupational Health, Safety and Environmental
OPEX	Operating Expenditure
PAIP	Post Audit Implementation Plan
PFM	Programmed Facilities Management Pty Ltd
RIA (or licensee)	Rottnest Island Authority
RIMP	Rottnest Island Management Plan
RMA	Rental Management Australia
SAMF	Strategic Asset Management Framework
SAIP	Strategic Asset Investment Plan
SLA	Service Level Agreement
SP	Strategic Plan
SS	spreadsheets
SWIS	South West Interconnected System
THD	Total Harmonic Distortion
YTD	Year to Date

Appendices

Appendix A - Licence Performance Audit Checklist

Licence Performance Audit Checklist

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
L1	Grant of Licence	<p>Licensee is granted a licence for the licence area to:</p> <ul style="list-style-type: none"> • construct and operate generating works or operate existing generating works • construct and operate a new distribution system or operate an existing distribution system and • sell electricity to customers for the purpose of supplying electricity to customers otherwise than through the SWIS, in accordance with the terms and conditions of this licence" 	5	A	1	Licensee has identified the licence area and is operating the plant in accordance with the conditions of the licence
L2	Licence Area	The licence area is the area as set out in plan ERA-EL-076(A)	5	A	1	The licensee has identified the licence area and the licence boundaries which correspond to the licence information.
L3	Licence Term	<p>Term Licence commences on the commencement date (21 June 2006) and continues until the earlier of:</p> <p>(a) the cancellation of the licence (clause 7)</p> <p>(b) surrender of licence (clause 8)</p> <p>(c) expiry (20 June 2036)</p>	5	A	1	The licence has been maintained during the audit period. There have been no changes to the licence such as cancellation, surrender, expiry or amendment during the audit period.
8 Type 1 Reporting Obligations for all Licence Types						

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
127	Distribution Licence, condition 29.1 Integrated Regional Licence, condition 29.1	A distributor must create and maintain a Priority Restoration Register	5	A	1	PFM maintain a Restoration Priority Register Electrical Services The Priority Restoration Register in respect to a black start scenario includes priority restoration from back-up generators.
128	Distribution Licence, condition 29.3 Integrated Regional Licence, condition 29.3	The Priority Restoration Register must comply with any criteria determined by the Minister.	4	NP	NR	Not Rated – There has been no criteria determined by the Minister during the audit period
234	Code of Conduct, clause 7.6	Subject to subclause 7.6(3), a retailer or distributor must comply with the limitations specified in clause 7.6 when arranging for disconnection or disconnecting a customer's supply address.	5	A	1	The audit did not find disconnections resulting from customer complaints. The Outage Registers during the audit period showed that all: <ul style="list-style-type: none"> • unplanned outages were triggered for emergency reasons; and • planned outages were reasonably managed. Section 5.2 of the "Standard form contract for the supply of electricity on Rottnest Island" addresses this clause.
235	Code of Conduct, clause 7.7(1)	Where a customer provides a retailer with confirmation from an appropriately qualified medical practitioner that a person residing at the customer's supply address requires life support equipment, the retailer must comply with subclause 7.7(1).	5	NP	NR	Not Rated – there were no life support supply addresses registered on Rottnest Island during the audit period.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
236	Code of Conduct, clause 7.7(2)	<p>14 A retailer must undertake the actions specified in subclauses 7.7(2)(e)-(g), if a customer registered with a retailer under subclause 7.7(1) notifies the retailer:</p> <ul style="list-style-type: none"> · that the person requiring life support equipment is changing supply address; that the customer, but not the person requiring life support equipment, is changing supply address; · of a change in contact details; <p>or</p> <p>that the address no longer requires registration as life support equipment address.</p>	5	NP	NR	There are no life support registered customers
237	Code of Conduct, clause 7.7(3)	<p>If a distributor has been informed by a retailer under subclause 7.7(1)(c) or by a relevant government agency that a person residing at a customer's supply address requires life support equipment, or of a change of details notified to the retailer under subclause 7.7(2), the distributor must comply with subclause 7.7(3).</p>	5	NP	NR	There are no life support registered customers

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
238	Code of Conduct, clause 7.7(4)	<p>Where life support equipment is registered at a customer's supply address under subclause 7.7(3), the distributor must:</p> <ul style="list-style-type: none"> · not disconnect the customer's supply address for failure to pay a bill while the person continues to reside at that address and requires the use of life support equipment; and · prior to any planned interruption, provide at least 3 business days written or electronic notice to the customer's supply address and use best endeavours to obtain acknowledgement (by verbal, written or electronic means) from the customer that the notice has been received, unless expressly requested in writing by the customer not to 	5	N/A	.N/A	There are no life support registered customers
257	Code of Conduct, clause 9.5(1)	<p>If a customer provides the retailer with confirmation from an appropriately qualified medical practitioner that a person residing at the address requires life support equipment, a retailer must not provide a pre-payment meter service at their supply address. Further, the retailer must, or must immediately arrange to, remove or render non-operational the</p>	N/A	N/A	N/A	Not Applicable as per Obligation 245

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
		pre-payment meter at no charge; replace or switch the pre-payment meter to a standard meter at no charge; and provide information to the pre-payment meter customer about the contract options available to the customer.				
258	Code of Conduct, clause 9.5(2)	If a retailer requests a distributor to revert a pre-payment meter under subclause 9.5(1), the distributor must revert the pre-payment meter within the time frames specified in subclause 9.5(2).	N/A	N/A	N/A	Not Applicable as per Obligation 245
11 Electricity Industry Act – Licence Conditions and Obligations						
101	Electricity Industry Act, section 14(1)(a)	A licensee must provide the ERA with a performance audit conducted by an independent expert acceptable to the ERA, not less than once every 24 months	5	A	1	The licensee has commissioned an independent specialist to provide the Authority with a performance audit and a report to cover the period of 24 months from 1 April 2015 to 31 March 2017.
102	Electricity Industry Act, section 14(1)(b)	A licensee must provide for an asset management system.	2	B	1	The licensee has implemented an asset management system (AMS) which has been subject to AMS review for the period from 1 April 2015 to 31 March 2017. It should be noted that the condition and life-cycle assessments for the solar farm were completed outside this audit period. No corrective action required.
103	Electricity Industry Act, section 14(1)(c)	A licensee must notify details of the asset management system	2	A	1	The licensee has not made significant changes to the asset management system (AMS) during the period from 1 April 2015 to 31 March 2017

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
		and any substantial changes to it to the ERA.				Significant changes were made in the previous audit period and ERA notified of such – Interviews with staff
104	Electricity Industry Act, section 14(1)(c)	A licensee must provide the ERA with a report by an independent expert about the effectiveness of its asset management system every 24 months, or such longer period as determined by the ERA.	5	A	1	The licensee has commissioned an independent specialist to provide the Authority with a report on the effectiveness of its AMS to cover a period of 24 months from 1 April 2015 to 31 March 2017.
105	Electricity Industry Act, section 17(1)	A licensee must pay the prescribed licence fees to the ERA according to clauses 6, 7 and 8 of the Economic Regulation Authority (Licensing Funding) Regulations 2014.	5	A	1	Through examination of evidence of licence fee payments the audit found: Both licence fee payments were within one month of the licence anniversary date of 21 June.
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	5	B	1	The licensee has taken reasonable steps to minimise the extent and duration of interruptions or restrictions of supply: <ul style="list-style-type: none"> • A Service Agreement (FUSS) with PFM for the operation and maintenance of the power facilities at agreed service levels; • FUSS outlines expected service level performance indicators and RIA monitors them which is to form part of the decision process of the renewal of contract; • It requires that PFM maintains emergency response plans to manage emergencies including risk assessments and Risk Management Plan identifying the asset risks, risk likelihood and criticality and mitigating actions;

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
						<p>• It also requires reporting at corporate level of any outages. Documents and processes are in place to manage and minimise the extent and duration of interruption of the supply of electricity: ACTION: RIA to ensure appropriate feedback is provided to PFM as to their performance against set KPIs.</p>
107	Electricity Industry Act, section 41(6)	A licensee must pay the costs of taking an interest in land or an easement over land	N/A	N/A	N/A	Not Applicable – the RIA is the authority on the Island.
108	Electricity Industry Act, section 54(1)	A retail or integrated regional licensee must not supply electricity to a small use customer otherwise than under a standard form contract or a nonstandard form contract that complies with the Act.	5	B	2	<p>There are no residential customers on Rottneest Island. Commercial customers separately liaise with Property Managers contracted by the RIA, McGees and Access Housing for their commercial and residential (staff housing) premise requirements respectively. Tenants are not directly responsible for the lease and associated utility bills. All commercial customers are supplied with a standard contract (the Standard Form Contract) for the supply of electricity with the customer's business premise leasing agreement. The audit found that Standard Form Contracts were sent to customers for signing but 2 were not returned. ACTION: RIA to ensure that all Standard Form Contracts are signed and returned</p>
109	Electricity Industry Act, section 54(2)	A licensee must comply with any direction by the ERA to amend the standard form contract and do so within the period specified.	5	NP	NR	<p>Not Rated – No requests to amend the Standard Form Contract were received by the RIA from the Authority over the audit period. The Standard Form Contract has been updated to and approved by ERA, to include a clause to</p>

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
						provide signees direction for requests to amend their contract.
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	N/A	N/A	N/A	Not Applicable – The RIA is not designated a supplier of last resort.
111	Electricity Industry Act, section 101	A retail, distribution or integrated regional licensee must not supply electricity to small use customers unless the licensee is a member of an approved scheme and is bound by, and compliant, with any decision or direction of the electricity ombudsman under the approved scheme	5	A	1	RIA is an Electricity Industry member of the Energy Ombudsman Scheme as indicated in the Ombudsman Fact Sheets. 1 complaint was received from a consumer during the audit period via the Energy Ombudsman which was resolved appropriately within the timeframe allowable.
112	Electricity Industry Act, section 115(1)	In relation to network infrastructure facilities covered by the Code, the network service provider or an associate of the network service provider, must not hinder or prevent: <ul style="list-style-type: none"> · access by any person to services under the Code; · the making of access agreements or other agreement in respect of those facilities; or the access to which a person is entitled under an access 	N/A	N/A	N/A	Not Applicable – the RIA is the only supplier in the licence area

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
		agreement or a determination made by way of arbitration.				
113	Electricity Industry Act, section 115(2)	A licensee that has, or is an associate of a person that has, access to services under an access agreement must not engage in conduct that hinders or prohibits access.	N/A	N/A	N/A	N/A
114	Integrated Regional Licence, condition 23.1 Retail Licence, condition 23.1	A licensee must ensure that an electricity marketing agent of the licensee complies with the applicable codes.	N/A	N/A	N/A	Not Applicable – the RIA does not engage electricity marketing agents.
115	Integrated Regional Licence, condition 23.2 Retail Licence, condition 23.2	The licensee must report a breach of the applicable code conditions by an electricity marketing agent to the ERA within the prescribed timeframe	N/A	N/A	N/A	Not Applicable – the RIA does not engage electricity marketing agents.
116	Integrated Regional Licence, condition 24.2 Retail Licence, condition 24.2	A licensee must, if directed by the ERA, review the standard form contract and submit to the ERA the results of that review within the time specified	5	NP	NR	Not Rated – No requests to amend the Standard Form Contract were received by the RIA from the Authority over the audit period.
117	Integrated Regional Licence, condition 24.3 Retail Licence, condition 24.3	A licensee must comply with any direction given by the ERA in relation to the scope, process and methodology of the standard form contract review	5	NP	NR	Not Rated – No requests to amend the Standard Form Contract were received by the RIA from the Authority over the audit period.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
118	Integrated Regional Licence, condition 25.1 Retail Licence, condition 25.1	A licensee can only amend the standard form contract with the ERA's approval.	5	A	1	Standard Form Contract amended by RIA and approved by ERA on 23/12/2017
119	Distribution Licence, condition 12.1 Generation Licence, condition 12.1 Integrated Regional Licence, condition 12.1 or 24.1 Retail Licence, condition 12.1 Transmission Licence, condition 12.1	A licensee and any related body corporate must maintain accounting records that comply with the Australian Accounting Standards Board Standards or equivalent International Accounting Standards.	4	A	1	For the years ended 30 June 2015 and 2016, based on the Annual Reports available on the licensee's website, the licensee's accounting records have been certified as compliant with the provisions of the Financial Management Act 2006. In both instances, the Auditor General's opinion has been that "the financial statements are based on proper accounts and present fairly, in all material respects, the financial position of the Rottneest Island Authority and its financial performance and cash flows...in accordance with Australian Accounting Standards and the Treasurer's Instructions."
12 Electricity Licences – Licence Conditions and Obligations						
120	Distribution Licence, condition 13.4 Generation Licence, condition 13.4 Integrated Regional Licence, condition 13.4 or 25.4 Retail Licence, condition 13.4 Transmission Licence, condition 13.4	A licensee must comply with any individual performance standards prescribed by the ERA.	N/A	NP	NR	Not Rated – No individual performance standards have been prescribed for the RIA by the Authority.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
121	Distribution Licence, condition 14.2 Generation Licence, condition 14.2 Integrated Regional Licence, condition 14.2 Retail Licence, condition 14.2 Transmission Licence, condition 14.2	A licensee must comply, and require its auditor to comply, with the ERA's standard audit guidelines for a performance audit.	4	A	1	The licensee has specified and the auditor has documented in the Audit Plan its compliance with the Authority's guidelines.
122	Distribution Licence, condition 20.5 Generation Licence, condition 20.5 Integrated Regional Licence, condition 20.5 Transmission Licence, condition 20.5	A licensee must comply, and must require the licensee's expert to comply, with the relevant aspects of the ERA's standard audit guidelines for an asset management system review.	4	A	1	The licensee has specified and the auditor has documented in the Audit Plan its compliance with the Authority's guidelines.
123	Distribution Licence, condition 15.1 Generation Licence, condition 15.1 Integrated Regional Licence, condition 15.1 Retail Licence, condition 15.1 Transmission	In the manner prescribed, a licensee must notify the ERA, if it is under external administration or if there is a significant change in the circumstances that the licence was granted which may affect the licensee's ability to meet its obligations	4	NP	NR	Not Rated – The RIA has not been under external administration or subject to a significant change in circumstances during the audit period.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
	Licence, condition 15.1					
124	Distribution Licence, condition 16.1 Generation Licence, condition 16.1 Integrated Regional Licence, condition 16.1 Retail Licence, condition 16.1 Transmission Licence, condition 16.1	A licensee must provide the ERA, in the manner prescribed, with any information that the ERA requires in connection with its functions under the Electricity Industry Act.	5	A	1	<p>The licensee is required to provide the information requested by the Authority:</p> <ul style="list-style-type: none"> • Reports (Performance Report and Audit Report) to be supplied under the Network Quality and Reliability of Supply (NQRS) Code to be published not less than seven days after they are provided to the Authority and, in any case, not later than the 1 October of each year (therefore to be issued to the Authority by the 20 September at the latest), • Reports pursuant to Clause 13.1 of the Code of Conduct for the Supply of Electricity to Small Use Customers (Code of Conduct) by the 20 September, • Reports pursuant to Clause 5.37 of the Electricity Industry (Metering) Code 2012 by the 20 September; exemption granted by ERA 29/09/2015 and • Annual Compliance reports covering all of its Type 1 and Type 2 licence obligations for each reporting year (1 July and ending 30 June) by 31 August immediately following the end of the financial year that is the subject of the report. <p>The audit has sampled the compliance evidence and found that:</p> <ul style="list-style-type: none"> • In 2015 and 2016 in regard to compliance with the NQRS Code, Metering Code and the Code of

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						<p>Conduct, reports and data sheets were submitted by the 20 September of the appropriate year (2015 reports and data sheets are also currently published on the RIA website at: http://ria.wa.gov.au/policy-and-reports/utility-reports/electrical-reports); and</p> <ul style="list-style-type: none"> • Compliance Reports – Electrical for the years ended 30 June 2015 and 2016 were submitted on 27 and 28 August of the same year respectively
125	Distribution Licence, condition 17.1 and 17.2 Generation Licence, condition 17.1 and 17.2 Integrated Regional Licence, condition 17.1 and 17.2 Retail Licence, condition 17.1 and 17.2 Transmission Licence, condition 17.1 and 17.2	A licensee must publish any information as directed by the ERA to publish, within the timeframes specified.	5	A	1	The RIA maintains a Licence Compliance Register or Utilities Compliance Spreadsheet that identifies all periodic information required by the Authority. PFM incorporate this into their FUSS Compliance and Licence Document to further ensure obligations are met on time.
126	Distribution Licence, condition 18.1 Generation Licence, condition 18.1 Integrated Regional Licence, condition 18.1 Retail Licence, condition 18.1 Transmission	All notices must be in writing, unless otherwise specified.	5	A	1	It was confirmed with the RIA that all notices are provided in writing. This was confirmed throughout the audit with evidence of a sample of notices being provided in writing.

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	Licence, condition 18.1					
127	Distribution Licence, condition 29.1 Integrated Regional Licence, condition 29.1	A distributor must create and maintain a Priority Restoration Register	4	A	.1	PFM maintain a Restoration Priority Register Electrical Services The Priority Restoration Register in respect to a black start scenario includes priority restoration from back-up generators.
128	Distribution Licence, condition 29.3 Integrated Regional Licence, condition 29.3	The Priority Restoration Register must comply with any criteria determined by the Minister.	4	NP	NR	Not Rated – There has been no criteria determined by the Minister during the audit period.
13 Code of Conduct – Licence Conditions and Obligations						
129	Code of Conduct, clause 2.1 Integrated Regional Licence, condition 23.1 Retail Licence, condition 23.1	A retailer must ensure that its electricity marketing agents comply with Part 2 of the Code of Conduct	N/A	N/A	N/A	Not Applicable – The RIA does not use marketing agents.
130	Code of Conduct, clause 2.2(1) Integrated Regional Licence, condition 23.1 Retail Licence, condition 23.1	A retailer or electricity marketing agent must ensure that standard form contracts, which are not unsolicited consumer agreements, are entered into according to the manner set out, and the contract is provided as specified, in clause 2.2(1).	5	A	1	The Standard Form Contract forms part of standard lease agreements provided to customers and managed by McGees. Contracts are signed, witnessed, dated and copies provided to customers in the timeframe required. McGees confirm in an annual letter that they acknowledge and understand their obligations as outlined in the Code of Conduct for the Supply of

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						<p>Electricity to Small Use Customers and in particular Part 2, Division 2, Part 4, Division 2 and Part 5 (see letter dated 10/7/2016).</p> <p>The Code of Conduct requires the retailer or electricity marketing agent to show the supply address(es) on the bill.</p> <p>The current SFC only shows one supply address for the commercial customers, however electricity is supplied to the commercial customer both at its business address and at its residential address(es). Also refer to Obligation 108</p>
131	Code of Conduct, clause 2.2(2) Integrated Regional Licence, condition 23.1 Retail Licence, condition 23.1	Subject to subclause 2.2(3), the retailer or electricity marketing agent must give to the customer the specified information in subclause 2.2(2) no later than on, or with, the customer's first bill.	5	B	2	<p>Information is provided to customers via the Standard Form Contract and monthly utility bills. The Standard Form Contract includes the following:</p> <ul style="list-style-type: none"> • reference to the Code of Conduct and tariff information being available from the RIA website • general information on the Code of Conduct, • assistance with payment difficulties; and • complaints handling. <p>The Utility Statements issued by McGees to customers includes a 24hr telephone number for faults and emergencies stated on their statements and not invoices (EVIDENCE: INV. NOS. 109186 and 118903).</p> <p>ACTION: RIA to instruct McGees to include the 24-hour emergency number on their invoices As part of the tendering process for a new residential property manager, ensure utility statements are compliant with Code requirements.</p> <p>Two examples of AHR invoices during the audit period were provided and they included a 24hr telephone number for faults and emergencies on invoices</p>

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						The audit found that general information on the safe use of electricity provided to customers during the audit period and was available via the RIA website.
132	Code of Conduct, clause 2.3(1) Integrated Regional Licence, condition 23.1 Retail Licence, condition 23.1	A retailer or electricity marketing agent must ensure that non-standard contracts, which are not unsolicited consumer agreements, are entered into according to the manner set out, and the contract is provided as specified, in clause 2.3(1).	N/A	NP	NR	Not Rated – Only Standard Form Contracts are used by the RIA.
133	Code of Conduct, clause 2.3(2) Integrated Regional Licence, condition 23.1 Retail Licence, condition 23.1	A retailer or electricity marketing agent must ensure that the information specified in subclause 2.3(2) is provided to the customer before entering into a non-standard contract	N/A	NP	NR	Not Rated – Only Standard Form Contracts are used by the RIA.
134	Code of Conduct, clause 2.3(4) Integrated Regional Licence, condition 23.1 (Regional Power Corporation) Retail Licence, condition 23.1 (Electricity Retail Corporation)	The Electricity Generation and Retail Corporation or Regional Power Corporation, or an electricity marketing agent acting on behalf of Electricity Retail Corporation or Regional Power Corporation must ensure that the information specified in subclause 2.3(4) is provided to the customer before arranging a non-standard contract.	N/A	NP	NR	Not Rated – Only Standard Form Contracts are used by the RIA.
135	Code of Conduct, clause 2.3(5) Integrated Regional Licence, condition 23.1	Subject to subclause 2.3(3), a retailer or electricity marketing agent must obtain the customer's verifiable consent that	N/A	NP	NR	Not Rated – Only Standard Form Contracts are used by the RIA.

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	Retail Licence, condition 23.1	the specified information in subclause 2.3(2) and 2.3(4), as applicable, has been provided.				
136	Code of Conduct, clause 2.4(1) Integrated Regional Licence, condition 23.1 Retail Licence, condition 23.1	A retailer or electricity marketing agent must ensure that the inclusion of concessions is made clear to residential customers and any prices that exclude concessions are disclosed.	N/A	N/A	N/A	<p>Not Applicable – There are no residential customers on Rottneest Island.</p> <p>This was confirmed by RIA CEO Paolo Amaranti in a letter to the Authority on 21 December 2012 and the audit found no reason to dispute this position.</p> <p>Electricity bills for the commercial and related staff residential premises are in the name of and paid for by the businesses. Despite commercial and residential leases being managed by different agents (McGees and AHR respectively), both are in the name of the business only.</p>
137	Code of Conduct, clause 2.4(2) Integrated Regional Licence, condition 23.1 Retail Licence, condition 23.1	A retailer or electricity marketing agent must provide contact details, including a telephone number, to a customer and ensure that the customer is able to contact the retailer or electricity marketing agent during normal business hours for the purposes of enquiries, verifications and complaints	5	A	.1	<p>Customers are able to contact the RIA (normally via McGees, AHR or PFM) during normal business hours. Contact details, including telephone numbers, are clearly marked on AHR customer bills.</p> <p>While McGees include separate telephone numbers for enquiries, 24hr faults, payment, interpretive services and the Energy Ombudsman AHR only include a single general enquiries telephone number on customer bills.</p> <p>The 24hr fault number provided by PFM directs to Rottneest Island only during Summer. Outside of this peak period, the number is directed to a PFM call centre in Sydney. In either case, calls dispatch out actions on a priority basis as appropriate.</p>

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138	Code of Conduct, clause 2.5(1) Integrated Regional Licence, condition 23.1 Retail Licence, condition 23.1	A retailer or electricity marketing agent must, on request, provide a customer with the information specified in subclause 2.5(1).	N/A	N/A	N/A	Not Applicable – The RIA does not engage electricity marketing agents or directly contact customers for the purposes of marketing electricity.
139	Code of Conduct, clause 2.5(2) Integrated Regional Licence, condition 23.1 Retail Licence, condition 23.1	A retailer or electricity marketing agent who meets with a customer face to face must: <ul style="list-style-type: none"> · wear a clearly visible and legible identity card showing the information specified in subclause 2.5(2)(a); and · provide the written information specified in subclause 2.5(2)(b) as soon as practicable following a request by the customer. 	N/A	N/A	N/A	Not Applicable as per Obligation 138.
140	Code of Conduct, clause 2.6	A retailer or electricity marketing agent who visits a person's premises for the purposes of marketing must comply with any clearly visible signs indicating that canvassing is not permitted at the premises, or no advertising is to be left at the premises.	N/A	N/A	N/A	Not Applicable – The RIA do not visit a person's premises for the purposes of marketing.
141	Code of Conduct, clause 2.9 Integrated Regional Licence, condition 23.1 Retail Licence, condition 23.1	An electricity marketing agent must keep a record of complaints from customers or persons who are contacted by, or on behalf of, the electricity marketing agent for the purposes of marketing; and provide the electricity	N/A	N/A	N/A	Not Applicable – The RIA does not engage with electricity marketing agents.

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		ombudsman with all of the information that it has relating to a complaint, within 28 days of receiving a request for that information.				
142	Code of Conduct, clause 2.10 Integrated Regional Licence, condition 23.1 Retail Licence, condition 23.1	An electricity marketing agent must keep a record, or other information, required under the Code for at least 2 years after the last time that a customer or person was contacted by, or on behalf of, the electricity marketing agent, or after receipt of the last contact from, or on behalf of, the electricity marketing agent, whichever is later.	N/A	N/A	N/A	Not Applicable – The RIA does not engage with electricity marketing agents.
	CONNECTION					
143	Code of Conduct, clause 3.1(1)	If a retailer agrees to sell electricity to a customer or arrange for the connection of the customer's supply address, the retailer must forward the customer's request for the connection to the relevant distributor.	N/A	N/A	N/A	Not Applicable – the RIA has an integrated regional license on the Island. There are no other suppliers on the Island.
144	Code of Conduct, clause 3.1(2)	Unless the customer agrees otherwise, a retailer must forward the customer's request for the connection to the relevant distributor that same day, if the request is received before 3pm on a business day;	N/A	N/A	N/A	Not Applicable as per Obligation 143.

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		or the next business day if the request is received after 3pm or on a weekend or public holiday				
	BILLING					
145	Code of Conduct, clause 4.1	A retailer must issue a bill no more than once a month and at least once every 3 months, except for the circumstances specified in subclause 4.1	5	A	.1	McGees and AHR send bills to clients on a monthly basis. There were no instances during the audit period where this was not adhered to. The audit confirmed that no bills were issued for any greater period than 3 months. AHR contract commenced 1 Dec 2015 replacing RMA so all invoices are within the audit period
146	Code of Conduct, clause 4.2(1)	For the purposes of subclause 4.1(a)(ii), a retailer has given a customer notice if, prior to placing a customer on a shortened billing cycle, the retailer advises the customer of the information specified in subclause 4.2(1).	5	NP	NR	Not Rated – McGees and AHR have not placed any customers on shortened billing cycles during the audit period
147	Code of Conduct, clause 4.2(2)	If a residential customer informs a retailer that the customer is experiencing payment difficulties or financial hardship and the customer is assessed as experiencing payment difficulties or financial hardship, the retailer must not place that customer on a shortened billing cycle without that customer's verifiable consent.	N/A	N/A	N/A	Not Applicable – There are no residential customers on Rottneest Island.
148	Code of Conduct, clause 4.2(3)	A retailer must give a customer written notice of a decision to shorten the customer's billing	5	NP	NR	Not Rated – McGees and AHR have not placed any customers on shortened billing cycles during the audit period.

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		cycle within 10 business days of making the decision				
149	Code of Conduct, clause 4.2(4)	A retailer must ensure that a shortened billing cycle is for a period of at least 10 business days	5	NP	NR	Not Rated as per Obligation 148.
150	Code of Conduct, clause 4.2(5)	On request, a retailer must return a customer who is subject to a shortened billing cycle to the billing cycle that previously applied if the customer has paid 3 consecutive bills by the due date.	5	NP	NR	Not Rated as per Obligation 148
151	Code of Conduct, clause 4.2(6)	A retailer must inform a customer, who is subject to a shortened billing cycle, at least every 3 months about the conditions upon which the customer can be returned to the previous billing cycle.	5	NP	NR	Not Rated as per Obligation 148
152	Code of Conduct, clause 4.3(1)	Notwithstanding clause 4.1, on receipt of a request by a customer, a retailer may provide the customer with a bill that reflects a bill-smoothing arrangement with respect to any 12 month period.	5	NP	NR	Not Rated – McGees and RMA did not receive any customer requests for a bill smoothing arrangement over the audit period.
153	Code of Conduct, clause 4.3(2)	If a retailer provides a customer with a bill under a bill-smoothing arrangement, the retailer must ensure that the conditions specified in subclause 4.3(2) are met.	5	NP	NR	Not Rated as per Obligation 152.

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154	Code of Conduct, clause 4.4	A retailer must issue a bill to a customer at the customer's supply address, unless the customer has nominated another address or an electronic address	5	A	.1	Audit confirmed with McGees and AHR that bills are being issued to the addresses notified by customers; generally as per their lease agreements (otherwise, as directed by the customer). Customers are sufficiently aware that McGees and AHR currently act on behalf of the retailer, the RIA.
155	Code of Conduct, clause 4.5(1)	A retailer must include the minimum prescribed information in subclause 4.5(1) on a customer's bill, unless the customer agrees otherwise.	5	B	2	As per Obligation 131
156	Code of Conduct, clause 4.5(3)	If a retailer identifies and wishes to bill a customer for a historical debt, the retailer must advise the customer of the amount of the historical debt and its basis, before, with, or on the customer's next bill	5	NP	NR	Not Rated – McGees and AHR did not have customers with historical debt over the audit period.
157	Code of Conduct, clause 4.6(1)	A retailer must base a customer's bill on the following: <ul style="list-style-type: none"> · the distributor's or metering agent's reading of the meter at the customer's supply address; · the customer's reading of the meter in the circumstances specified in subclause 4.6(1)(b); or · if the connection point is a Type 7 connection point, the procedure is set out in the metrology procedure or Metering Code, or as set out in any applicable law. 	5	A	1	Section 8.3 of the Standard Form Contract states that "The Customer's consumption will be determined by a reading of the meter placed at the supply address". PFM read the meter, and provide the relevant data to McGees for billing.

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158	Code of Conduct, clause 4.7	Other than in respect of a Type 7 connection, a retailer must use its best endeavours to ensure that the meter reading data is obtained as frequently as required to prepare its bills	5	A	.1	PFM's "PRO-RNI-I03-033-1 Meter Readings Monthly Procedure" provides for monthly meter readings. This refers to the Electricity Industry Metering Code 2012. The audit confirmed that meter readings are taken monthly and recorded in spreadsheets, sighted electrical meter readings: Customer bills were sighted during the audit. The bills showed meter data consistent with a monthly billing cycle.
159	Code of Conduct, clause 4.8(1)	If a retailer is unable to reasonably base a bill on a reading of the meter, a retailer must give the customer an estimated bill.	5	NP	NR	Not rated – Refer to PFM's "PRO-RNI-I03-033-1 Meter Readings Monthly Procedure"
160	Code of Conduct, clause 4.8(2)	In circumstances where a customer's bill is estimated, a retailer must clearly specify on the customer's bill the information required under subclause 4.8(2).	5	NP	NR	Not rated – Refer to PFM's "PRO-RNI-I03-033-1 Meter Readings Monthly Procedure"
161	Code of Conduct, clause 4.8(3)	On request, a retailer must inform a customer of the basis and the reason for the estimation	5	NP	NR	Not Rated – McGees and AHR did not receive any customer requests with respect to estimation over the audit period.
162	Code of Conduct, clause 4.9	In accordance with clause 4.19, if a retailer gives a customer an estimated bill and the meter is subsequently read, the retailer must include an adjustment on the next bill to take account of the actual meter reading.	5	NP	NR	Not rated – Refer to PFM's "PRO-RNI-I03-033-1 Meter Readings Monthly Procedure"

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163	Code of Conduct, clause 4.10	If a customer satisfies the requirements specified in subclause 4.10, a retailer must use its best endeavours to replace an estimated bill with a bill based on an actual reading	5	NP	NR	Not Rated – McGees and AHR did not have any instances of bill estimation over the audit period.
164	Code of Conduct, clause 4.11(1)	If a customer requests the meter to be tested, and pays a retailer's reasonable charge (if any) for doing so, a retailer must request the distributor or metering agent to do so	5	NP	NR	Not Rated – No metering charges applied during the audit period
165	Code of Conduct, clause 4.11(2)	If the meter is tested and found to be defective, the retailer's reasonable charge for testing the meter (if any) is to be refunded to the customer	5	NP	NR	No customer complaints were received for the audit period in relation to excessive charges. No testing undertaken during the audit period, as a capital works program exists to replace existing meters.
166	Code of Conduct, clause 4.12(1)	If a retailer offers alternative tariffs and a customer applies to receive an alternate tariff and demonstrates to the retailer that they satisfy the conditions of eligibility, a retailer must change the customer to an alternate tariff within 10 business days of the customer satisfying those conditions.	N/A	NP	NR	Not Rated – there is only one tariff offered by the RIA throughout Rottneest Island.
167	Code of Conduct, clause 4.13	If a customer's electricity use changes, and the customer is no longer eligible to continue to receive an existing more beneficial tariff, a retailer must give the customer written notice prior to changing the customer to an alternative tariff.	N/A	NP	NR	Not Rated – there is only one tariff offered by the RIA throughout Rottneest Island.

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168	Code of Conduct, clause 4.14(1)	If a customer requests a retailer to issue a final bill at the customer's supply address, a retailer must use reasonable endeavours to arrange for that final bill in accordance with the customer's request.	5	A	1	The audit confirmed with McGees and AHR that bills are sent as per customer instructions, including any requirement for a final bill. There were no disconnections during the audit period
169	Code of Conduct, clause 4.14(2)	2 Subject to subclause 4.14(3), if a customer's account is in credit at the time of account closure, a retailer must, in accordance with the customer's instructions, transfer the amount of credit to another account that the customer has with the retailer or a bank account nominated by the customer, within 12 business days or other agreed time.	5	NP	NR	Not Rated – There were no customers in credit during the audit period.
170	Code of Conduct, clause 4.14(3)	If a customer's account is in credit at the time of account closure and the customer owes a debt to a retailer, the retailer may use that credit to offset the debt owed to the retailer by giving the customer written notice. If any amount remains after the set off, the retailer must ask the customer for instructions to transfer the remaining amount in accordance with subclause 4.14(2).	5	NP	NR	Not Rated – There were no customers in credit during the audit period.

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171	Code of Conduct, clause 4.15	A retailer must review a customer's bill on request by the customer, subject to the customer paying that portion of the bill under review that the customer and a retailer agree is not in dispute, or an amount equal to the average amount of the customer's bill over the previous 12 months (excluding the bill in dispute, whichever is less), and paying any future bills that are properly due.	5	NP	NR	<p>Review of customers' bills is covered by clause 8.6 of the Standard Form Contract. If a review is required, the RIA's practice is to respond to customers' requests within 10 business days and in writing. This requirement is also recorded as part of the Electrical Customer Complaints Reporting Register.</p> <p>There were no review requests during the audit period as per the Electrical Customer Complaints Reporting Registers – 2015/2016 and 2016/2017.</p>
172	Code of Conduct, clause 4.16(1)(a)	If a retailer has reviewed a customer's bill and is satisfied that the bill is correct, the retailer may require the customer to pay the unpaid amount. The retailer must advise the customer that the customer may request for a meter test in accordance with the applicable law; and also the existence and operation of the retailer's internal complaints handling processes and details of any applicable external complaints handling processes.	5	A	1	<p>The Standard Form Contract provides the customer with a summary of the complaint handling process and clarifies the customer's entitlement to refer the matter to the Ombudsman, request a meter test and have an additional review by a senior employee of the retailer.</p> <p>During the audit it was confirmed that the complaints process for this issue had not been used.</p>
173	Code of Conduct, clause 4.16(1)(b)	If a retailer has reviewed a customer's bill and is satisfied that the bill is incorrect, the retailer must adjust the bill in accordance with clauses 4.17 and 4.18.	5	A	1	<p>There were no instances of overcharging recorded in the Electrical Customer Complaints Reporting Registers – 2015/2016 and 2016/2017) during the audit period</p> <p>An overcharge relating to standing charges caused by McGee's clerical error was discovered by McGee's and appropriate credits were applied to</p>

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						overcharged accounts. No complaints were received
174	Code of Conduct, clause 4.16(2)	A retailer must inform a customer of the outcome of the review of a bill as soon as practicable	5	NP	NR	<p>The Standard Form Contract (section 8.6) provides for the RIA to address the review of bills within 20 business days. This requirement is also recorded as part of the Electrical Customer Complaints Reporting Register.</p> <p>No requests for reviews during the audit period were recorded within this time frame.</p> <p>(EVIDENCE: Electrical Customer Complaints Reporting Registers – 2015/2016 and 2016/2017)</p>
175	Code of Conduct, clause 4.16(3)	If a retailer has not informed a customer of the outcome of the review of a bill within 20 business days from the date of receipt of the request for review, the retailer must provide the customer with notification of the status of the review as soon as practicable.	5	NP	NR	Not rated – No requests were recorded during the audit period
176	Code of Conduct, clause 4.17(2)	If a retailer proposes to recover an amount undercharged as a result of an error, defect, or default for which the retailer or distributor is responsible (including where a meter has been found to be defective), a retailer must do so in the manner specified.	5	NP	NR	<p>Not Rated – The RIA did not propose to recover any amounts undercharged during the audit period.</p> <p>The Standard Form Contract provides for the recovery by RIA of any undercharged amount; if the error resides with the RIA, only the amount applicable to the preceding 12 months will be claimed.</p>

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176A.	Code of Conduct, clause 4.17(3)	A retailer may charge a customer interest on the undercharged amount or require the customer to pay a late fee, if the conditions in clause 4.17(3) are met	5	NP	NR	Not rated as per Obligation 176
177	Code of Conduct, clause 4.18(2)	If a customer (including a customer who has vacated the supply address) has been overcharged as a result of an error, defect, or default for which a retailer or distributor is responsible (including where a meter has been found to be defective), the retailer must use its best endeavours to inform the customer within 10 business days of the retailer becoming aware of the error, defect, or default. Subject to subclauses 4.18(6) and 4.18(7), the retailer must ask the customer for instructions if the amount should be credited to the customer's account or repaid to the customer directly.	5	NP	NR	Not rated as per Obligation 176
178	Code of Conduct, clause 4.18(3)	A retailer must pay the amount overcharged in accordance with the customer's instructions within 12 business days of receiving the instructions.	5	NP	NR	Not Rated – There were no instances where an overcharge required a refund to a customer during the audit period. Electrical Customer Complaints Reporting Registers – 2015/2016 and 2016/2017
179	Code of Conduct, clause 4.18(4)	If instructions regarding repayment of an overcharged bill are not received within 20	5	NP	NR	Not Rated – There were no instances where an overcharge required a refund to a customer during the audit period. Electrical Customer Complaints Reporting Registers – 2015/2016 and 2016/2017

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		business days of a retailer making the request, a retailer must use reasonable endeavours to credit the amount overcharged to a customer's account.				
180	Code of Conduct, clause 4.18(6)	Where the amount overcharged is less than \$100, a retailer may proceed to deal with the matter as outlined in subclause 4.18(6).	5	NP	NR	Not Rated – There were no instances where an overcharge required a refund to a customer during the audit period. Electrical Customer Complaints Reporting Registers – 2015/2016 and 2016/2017
181	Code of Conduct, clause 4.18(7)	A retailer may, by giving the customer written notice, use an amount overcharged to set off a debt owed to the retailer, provided that the customer is not a residential customer experiencing payment difficulties or financial hardship. If, after the set off, there remains an amount of credit, the retailer must deal with the amount of credit in accordance with subclauses 4.18(2) or 4.18(6), as applicable.	5	NP	NR	Not Rated – There were no instances where an overcharge required a refund to a customer during the audit period. Electrical Customer Complaints Reporting Registers – 2015/2016 and 2016/2017
182	Code of Conduct, clause 4.19(1)	If a retailer proposes to recover an amount of an adjustment which does not arise due to any act or omission of a customer, the retailer must comply with subclause 4.19(1).	5	NP	NR	Not Rated – There were no instances where an undercharge or overcharge required a refund to a customer during the audit period. Electrical Customer Complaints Reporting Registers – 2015/2016 and 2016/2017

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
183	Code of Conduct, clause 4.19(2)	If the meter is read under either clause 4.6 or clause 4.3(2)(d), and the amount of the adjustment is an amount owing to the customer, the retailer must use its best endeavours to inform the customer within 10 business days and ask the customer for instructions about the repayment of the amount subject to subclauses 4.19(5) and 4.19(7),.	5	NP	NR	Not Rated – There were no instances where an overcharge required a refund to a customer during the audit period. Electrical Customer Complaints Reporting Registers – 2015/2016 and 2016/2017
184	Code of Conduct, clause 4.19(3)	If a retailer receives instructions under subclause 4.19(2), the retailer must pay the amount in accordance with the customer's instructions within 12 business days of receiving the instructions.	5	NP	NR	Not Rated – There were no instances where an overcharge required a refund to a customer during the audit period. Electrical Customer Complaints Reporting Registers – 2015/2016 and 2016/2017
185	Code of Conduct, clause 4.19(4)	If a retailer does not receive instructions under subclause 4.19(2), within 5 business days of making the request, the retailer must use reasonable endeavours to credit the amount of the adjustment to the customer's account.	5	NP	NR	Not Rated – There were no instances where an overcharge required a refund to a customer during the audit period. Electrical Customer Complaints Reporting Registers – 2015/2016 and 2016/2017

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
186	Code of Conduct, clause 4.19(7)	A retailer may, after notifying the customer in writing, use an amount of an adjustment to set off that customer's debt owed to the retailer, provided that the customer is not a residential customer in payment difficulties or financial hardship. If, after the set off, there remains an amount of credit, the retailer must deal with that amount in accordance with subclause 4.19(2) or, if the amount is less than \$100, subclause 4.19(5).	5	NP	NR	Not Rated – There were no instances where an overcharge required a refund to a customer during the audit period. Electrical Customer Complaints Reporting Registers – 2015/2016 and 2016/2017
	PAYMENT					
187	Code of Conduct, clause 5.1	The due date on a bill must be at least 12 business days from the dispatch date of that bill unless otherwise agreed with a customer.	5	A	1	McGees and AHR electricity invoices selected at random listed due date at least 12 business days after date of issue.
188	Code of Conduct, clause 5.2	Unless otherwise agreed with a customer, a retailer must offer the customer at least the payment methods prescribed in clause 5.2.	5	A	1	McGees (commercial property management) and Access Housing Realty (residential property management) have added all minimum payment options as per Code requirements to their utilities invoices/statements. Centrepay as a payment option for residential properties will not be offered as the utility bills are being paid by the Rottnest Island businesses and the RIA only. New invoices that are compliant with the Code of Conduct requirements are being issued to customers since May 2016.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
189	Code of Conduct, clause 5.3	Prior to commencing a direct debit facility, a retailer must obtain a customer's verifiable consent and agree with the customer the date of commencement of the facility and the frequency of the direct debits.	5	NP	NR	<p>The amended Standard Form Contract is consistent with the property manager's offered payment options and locations, which include payments by credit card or electronic means (e.g. EFT and BPAY). These methods of payment follow standard banking practices. There is no auto debit option provided to customers as part of this contract.</p> <p>This Standard Form Contract was submitted to the ERA and approved (11/01/2017). It is RIA's understanding that the ERA approved document and is acceptable.</p> <p>The Standard Form Contract is available on the RIA website and in hard copy on request by customers. McGees have distributed the Standard Form Contracts to the customers (businesses on Rottnest Island) and are currently collecting the undersigned forms.</p>
190	Code of Conduct, clause 5.4	Upon request, a retailer must accept payment in advance from a customer. This will not require a retailer to credit any interest to the amounts paid in advance. Subject to clause 6.9, and unless otherwise agreed with a customer, the minimum amount for an advance payment that a retailer will accept is \$20	5	NP	NR	Not Rated – No customers have requested McGees or AHR to receive payments in advance over the audit period.
191	Code of Conduct, clause 5.5	If, due to illness or absence, a residential customer is unable to pay by way of the methods described in clause 5.2, a retailer must offer to redirect the	N/A	N/A	N/A	There are no residential customers on Rottnest Island

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
		customer's bill to a third person at no charge				
192	Code of Conduct, clause 5.6(1)	A retailer must not charge a residential customer a late payment fee in the circumstances specified in subclause 5.6(1).	N/A	N/A	N/A	There are no residential customers on Rottnest Island
193	Code of Conduct, clause 5.6(2)	If a retailer has charged a late payment fee in the circumstances set out in subclause 5.6(1)(c) because the retailer was not aware of the complaint, the retailer must refund the late payment fee on the customer's next bill.	N/A	N/A	N/A	There are no residential customers on Rottnest Island
194	Code of Conduct, clause 5.6(3)	A retailer must not charge an additional late payment fee in relation to the same bill within 5 business days from the date of receipt of the previous late payment fee notice.	N/A	N/A	N/A	There are no residential customers on Rottnest Island
195	Code of Conduct, clause 5.6(4)	A retailer must not charge a residential customer more than 2 late payment fees in relation to the same bill or more than 12 late payment fees in a year	N/A	N/A	N/A	There are no residential customers on Rottnest Island
196	Code of Conduct, clause 5.6(5)	If a residential customer has been assessed as being in financial hardship, a retailer must retrospectively waive any late payment fee charged to this customer's last bill prior to the assessment being made.	N/A	N/A	N/A	There are no residential customers on Rottnest Island

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
197	Code of Conduct, clause 5.7(1)	A retailer must not require a customer, who has vacated a supply address, to pay for electricity consumed at the customer's supply address in the circumstances specified in subclause 5.7(1).	5	A	1	The Standard Form Contract specifies the process for vacating premises and final billing. RMA – While individuals do frequently move in/out of supply addresses, these are not vacated from the point of view of the ultimate customers, which are the businesses. When a business wishes to vacate their supply address, they must provide 5 business days notice of its intent to leave or vacate the premises, At this point, RIA will provide a final meter reading on the date of departure to determine final charge payable.
198	Code of Conduct, clause 5.7(2)	If a customer reasonably demonstrates to a retailer that the customer was evicted or otherwise required to vacate a supply address, a retailer must not require the customer to pay for electricity consumed at that supply address from the date the customer gave the notice to the retailer.	5	NP	NR	Not Rated – No instances of customers (individual or business) evicted or required to vacate a supply address during the audit period
199	Code of Conduct, clause 5.7(4)	Notwithstanding subclauses 5.7(1) and (2), a retailer must not require a previous customer to pay for electricity consumed at the supply address in the circumstances specified in subclause 5.7(4).	5	NP	NR	Not Rated – As per Obligations 197 and 198 When a new business enters, they are not responsible for outstanding payments of previous business residents as a final meter reading was undertaken. A new meter reading will form the basis of commencement of usage.
200	Code of Conduct, clause 5.8(1)	A retailer must not commence proceedings to recover a debt from a residential customer who meets the criteria in subclause 5.8(2).	N/A	N/A	N/A	Not Applicable – There are no residential customers on Rottnest Island.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
201	Code of Conduct, clause 5.8(2)	A retailer must not recover, or attempt to recover, a debt from a person relating to a supply address other than the customer who the retailer has, or had, entered into a contract for the supply of electricity to that supply address	5	NP	NR	Not Rated – McGees and AHR reported no attempts of debt recovery over audit period.
201A.	Code of Conduct, clause 5.9	A retailer may transfer one customer's debt to another customer if requested by the customer owing the debt and provided that the retailer obtains the other customer's verifiable consent to the transfer.	5	NP	NR	Not Rated – McGees and RMA reported no attempts of debt transfer over audit period.
PAYMENT DIFFICULTIES & FINANCIAL HARDSHIP						
202	Code of Conduct, clause 6.1(1)	If a residential customer informs a retailer that the residential customer is experiencing payment problems, a retailer must assess whether the residential customer is experiencing payment difficulties or financial hardship within 5 business days; or, if the retailer cannot make the assessment within 5 business days, refer that customer to a relevant consumer representative to make the assessment.	N/A	N/A	N/A	Not Applicable – There are no residential customers on Rottneest Island. A letter from RIA CEO Paolo Amaranti to the Authority dated 25 March 2015 confirms that the RIA is not required to submit a Financial Hardship Policy
203	Code of Conduct, clause 6.1(3)	When undertaking an assessment under subclause 6.1(1)(a), a retailer must give reasonable consideration to the information prescribed in	N/A	N/A	N/A	Not Applicable as per Obligation 202.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
		subclause 6.1(3)(a), or advice prescribed in subclause 6.1(3)(b), unless a retailer adopts an assessment from a relevant consumer representative.				
204	Code of Conduct, clause 6.1(4)	Upon request, a retailer must advise a residential customer of the details and outcome of an assessment carried out under subclause 6.1(1).	N/A	N/A	N/A	Not Applicable as per Obligation 202.
205	Code of Conduct, clause 6.2(1)	If a residential customer is referred to a relevant consumer representative under subclause 6.1(1)(b), a retailer must grant a temporary suspension of actions for that customer.	N/A	N/A	N/A	Not Applicable as per Obligation 202.
206	Code of Conduct, clause 6.2(2)	A retailer must not unreasonably deny a residential customer's request for a temporary suspension of actions if the customer informs the retailer about payment problems under clause 6.1 and the customer demonstrates that an appointment with a relevant consumer representative has been made.	N/A	N/A	N/A	Not Applicable as per Obligation 202.
207	Code of Conduct, clause 6.2(3)	A retailer must allow a temporary suspension of actions for a period of at least 15 business days.	N/A	N/A	N/A	Not Applicable as per Obligation 202.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
208	Code of Conduct, clause 6.2(4)	A retailer must give reasonable consideration to a request by a residential customer or relevant consumer representative to allow additional time to assess a residential customer's capacity to pay	N/A	N/A	N/A	Not Applicable as per Obligation 202.
209	Code of Conduct, clause 6.3(1)(a)	If a residential customer is assessed as experiencing payment difficulties, a retailer must offer the alternative payment arrangements referred to in subclause 6.4(1), and advise the residential customer that additional assistance may be available if the prescribed circumstances apply.	N/A	N/A	N/A	Not Applicable as per Obligation 202.
210	Code of Conduct, clause 6.3(1)(b)	If a residential customer is assessed as experiencing financial hardship, a retailer must offer the alternative payment arrangements referred to in subclause 6.4(1)(b) and assistance in accordance with clauses 6.6 to 6.9.	N/A	N/A	N/A	Not Applicable as per Obligation 202.
211	Code of Conduct, clause 6.4(1)(a)	If a residential customer is experiencing payment difficulties, a retailer must offer the residential customer at least the following payment arrangements: <ul style="list-style-type: none"> · additional time to pay a bill; and · if requested by the residential customer, an interest-free and 	N/A	N/A	N/A	There are no residential customers

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
		fee-free instalment plan or other arrangement under which the residential customer is given additional time to pay a bill or to pay arrears (including any disconnection and reconnection charges), while being permitted to continue consumption				
212	Code of Conduct, clause 6.4(1)(b)	If a residential customer is experiencing financial hardship, a retailer must offer the residential customer at least the following payment arrangements: <ul style="list-style-type: none"> · additional time to pay a bill; and · an interest-free and fee-free instalment plan or other arrangement under which the residential customer is given additional time to pay a bill or to pay arrears (including any disconnection and reconnection charges), while being permitted to continue consumption. 	N/A	N/A	N/A	There are no residential customers
213	Code of Conduct, clause 6.4(2)	When offering or amending an instalment plan to a residential customer experiencing payment difficulties or financial hardship, a retailer must comply with subclause 6.4(2).	N/A	N/A	N/A	There are no residential customers

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
214	Code of Conduct, clause 6.4(3)	If a residential customer accepts an instalment plan offered by a retailer, the retailer must provide the residential customer with the information specified in subclause 6.4(3)(a) within 5 business days, and notify the residential customer of any amendments to the instalment plan at least 5 business days before they come into effect.	N/A	N/A	N/A	There are no residential customers
215	Code of Conduct, clause 6.6(1)	A retailer must give reasonable consideration to a request by a customer experiencing financial hardship, or a relevant consumer representative, for a reduction of the customer's fees, charges or debt.	5	NP	NR	No reported applications for special financial arrangements for payment hardships for the audit period
216	Code of Conduct, clause 6.6(2)	In giving reasonable consideration under subclause 6.6(1), a retailer should refer to the hardship procedures referred to in subclause 6.10(3).	5	NP	NR	Not Rated as per Obligation 215
217	Code of Conduct, clause 6.7	If it is reasonably demonstrated to a retailer that a customer experiencing financial hardship is unable to meet the customer's obligations under a previously elected payment arrangement, the retailer must give reasonable consideration to offering the customer an instalment plan or revising an existing instalment plan.	5	NP	NR	Not Rated as per Obligation 215

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
218	Code of Conduct, clause 6.8	A retailer must advise a customer experiencing financial hardship of the information specified in subclause 6.8(1).	5	NP	NR	Not Rated as per Obligation 215
219	Code of Conduct, clause 6.9(1)	A retailer must determine the minimum payment in advance amount for residential customers experiencing payment difficulties or financial hardship in consultation with relevant consumer representatives, as referred to in subclause 5.4(3).	5	NP	NR	Not Rated as per Obligation 215
220	Code of Conduct, clause 6.10(1)	A retailer must develop a hardship policy and hardship procedures to assist customers experiencing financial hardship to meet their financial obligations and responsibilities to the retailer	N/A	N/A	N/A	Not Applicable as per Obligation 202
221	Code of Conduct, clause 6.10(2)	A retailer must ensure that its hardship policy complies with the criteria specified in subclause 6.10(2).	N/A	N/A	N/A	Not Applicable as per Obligation 202
222	Code of Conduct, clause 6.10(3)	A retailer must ensure that its hardship procedures comply with the criteria specified in subclause 6.10(3).	N/A	N/A	N/A	Not Applicable as per Obligation 202
223	Code of Conduct, clause 6.10(4)	If requested, a retailer must give residential customers and relevant consumer representatives a copy of the retailer's hardship policy, including by post, at no charge.	N/A	N/A	N/A	Not Applicable as per Obligation 202

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
224	Code of Conduct clause 6.10(5)	A retailer must keep a record of the following: the relevant consumer representative organisations consulted on the contents of its hardship policy and hardship procedures; the dates the hardship policy and hardship procedures were established; the dates the hardship policy and hardship procedures were reviewed; and the dates the hardship policy and hardship procedures were amended.	N/A	N/A	N/A	Not Applicable as per Obligation 202
225	Code of Conduct, clause 6.10(6)	If directed by the ERA, a retailer must review its hardship policy and hardship procedures and submit the results of that review to the ERA within 5 business days after it is completed	N/A	N/A	N/A	Not Applicable as per Obligation 202
226	Code of Conduct, clause 6.10(7)	A retailer must comply with the ERA's Financial Hardship Policy Guidelines	N/A	N/A	N/A	Not Applicable as per Obligation 202
227	Code of Conduct, clause 6.10(8)	If a retailer makes a material amendment to its hardship policy, the retailer must submit a copy of the retailer's amended hardship policy to the ERA within 5 business days of the amendment.	N/A	N/A	N/A	Not Applicable as per Obligation 202
228	Code of Conduct, clause 6.11	A retailer must consider any reasonable request for alternative payment arrangements from a business	5	NP	NR	Not Rated – McGees and AHR did not report any business customers requesting alternative payment arrangements during the audit period

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
		customer who is experiencing payment difficulties				
	DISCONNECTION					
229	Code of Conduct, clause 7.1(1)	Prior to arranging for a disconnection of a customer's supply address for failure to pay a bill, a retailer must give the customer a reminder notice, which contains the information specified in subclause 7.1(1)(a), not less than 15 business days from the dispatch date of the bill. The retailer must use its best endeavours to contact the customer to advise of the proposed disconnection and give the customer a disconnection warning, in the manner and timeframes specified in subclause 7.1(1)(c).	5	NP	NR	Not Rated – McGees and AHR did not report any disconnections for failure to pay a bill during the audit period
230	Code of Conduct, clause 7.2(1)	A retailer must not arrange for a disconnection of a customer's supply address for failure to pay a bill in the circumstances specified in subclause 7.2(1).	5	NP	NR	Not Rated as per Obligation 229.
231	Code of Conduct, clause 7.3	In relation to dual fuel contracts, a retailer must not arrange for disconnection of a residential customer's supply address for failure to pay a bill within 15 business days from the date of disconnection of that customer's gas supply.	5	NP	NR	Not Rated as per Obligation 229.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
232	Code of Conduct, clause 7.4(1)	Unless the conditions specified in subclause 7.4(1) are satisfied, a retailer must not arrange for the disconnection of a customer's supply address for denying access to the meter.	5	NP	NR	Not Rated – McGees and AHR did not report any disconnections for denying access to the meter during the audit period.
233	Code of Conduct, clause 7.5	A distributor who disconnects a customer's supply address for emergency reasons must provide a 24-hour emergency line and use its best endeavours to restore supply as soon as possible.	2	A	1	A 24hr fault number is provided on billing from McGees and AHR. PFM has a disaster recovery plan and back up generation facilities are on standby.
234	Code of Conduct, clause 7.6	Subject to subclause 7.6(3), a retailer or distributor must comply with the limitations specified in subclauses 7.6(1)-(2) when arranging for disconnection or disconnecting a customer's supply address.	2	A	1	The audit did not find evidence of disconnections during the audit period. .
235	Code of Conduct, clause 7.7(1)	If a customer provides a retailer with confirmation from an appropriately qualified medical practitioner that a person residing at the customer's supply address requires life support equipment, the retailer must comply with subclause 7.7(1).7	5	NP	NR	Not Rated – there were no life support supply addresses registered on Rottnest Island during the audit period.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
236	Code of Conduct, clause 7.7(2)	A retailer must undertake the actions specified in subclauses 7.7(2)(e)-(g), if a customer registered with a retailer under subclause 7.7(1) notifies the retailer: <ul style="list-style-type: none"> · that the person requiring life support equipment is changing supply address; that the customer, but not the person requiring life support equipment, is changing supply address; of a change in contact details; or that the address no longer requires registration as life support equipment address. 	5	NP	NR	Not Rated as per Obligation 235.
237	Code of Conduct, clause 7.7(3)	The distributor must comply with subclauses 7.7(3)(a)-(b) if a distributor has been informed by a retailer under subclause 7.7(1)(c), or by a relevant government agency, that a person residing at a customer's supply address requires life support equipment, or of a change of details notified to the retailer under subclause 7.7(2).	5	NP	NR	There are no life support registered customers
238	Code of Conduct, clause 7.7(4)	If life support equipment is registered at a customers' supply address under subclause 7.7(3)(a), a distributor must comply with subclauses 7.7(4)(a) and (b).	5	NP	NR	There are no life support registered customers

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
238A.	Code of Conduct, clause 7.7(4A)	A distributor must use best endeavours to contact the customer, or someone residing at the supply address, prior to an interruption to restore supply to a supply address that is registered as a life support equipment address.	5	NP	NR	There are no life support registered customers
239	Code of Conduct, clause 7.7(5)	If a distributor has already provided notice of a planned interruption that will affect a supply address, prior to the distributor registering a customer's supply address as a life support equipment address, the distributor must use best endeavours to contact that customer or someone residing at the supply address prior to the planned interruption.	5	NP	NR	There are no life support registered customers
240	Code of Conduct, clause 7.7(6)	A retailer must contact the customer to ascertain whether life support equipment is required or to request re-certification in the timeframe, manner and circumstances specified in subclause 7.7(6).	5	NP	NR	There are no life support registered customers
241	Code of Conduct, clause 7.7(7)	A retailer or a distributor must remove the customers' details from the life support equipment register in the circumstances and timeframes specified in subclause 7.7(7).	5	NP	NR	There are no life support registered customers
RECONNECTION						

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
242	Code of Conduct, clause 8.1(1)	A retailer must arrange to reconnect a customer's supply address if the customer remedies their breach, makes a request for reconnection and pays the retailer's reasonable charges (if any) for reconnection, or accepts an offer of an instalment plan for the retailer's reasonable charges.	5	NP	NR	Not Rated – McGees and AHR did not report any reconnections relevant to this clause during the audit period
243	Code of Conduct, clause 8.1(2)	A retailer must forward the request for reconnection to the relevant distributor within the timeframes specified in subclause 8.1(2).	N/A	N/A	N/A	Not Applicable – the RIA has an integrated regional license on the Island. The licensee is both the retailer and the distributor.
244	Code of Conduct, clause 8.2	2 A distributor must reconnect the customer's supply address on the request of a retailer within the timeframes specified in subclause 8.2(2).	N/A	N/A	N/A	Not Applicable – the RIA has an integrated regional license on the Island. The licensee is both the retailer and the distributor.
PRE-PAYMENT METERS						
245	Code of Conduct, clause 9.1(2)	A distributor may only operate a pre-payment meter and a retailer may only offer a pre-payment meter service in an area that has been declared by the Minister by notice published in the Government Gazette	N/A	N/A	N/A	Not Applicable – prepayment meters are not used on Rottnest Island.
246	Code of Conduct, clause 9.2(1)	A retailer must not provide a pre-payment meter service at a residential customer's supply address without the verifiable consent of the customer or the	N/A	N/A	N/A	Not Applicable – prepayment meters are not used on Rottnest Island.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
		customer's nominated representative.				
247	Code of Conduct, clause 9.2(2)	A retailer must establish an account for each pre-payment meter operating at a residential customer's supply address	N/A	N/A	N/A	Not Applicable – prepayment meters are not used on Rottnest Island.
248	Code of Conduct clause 9.2(3)	A retailer must not, in relation to the offer of, or provision of a pre-payment meter service, engage in conduct that is misleading, deceptive or likely to mislead or deceive, or that is unconscionable, or exert undue pressure on a customer, nor harass or coerce a customer.	N/A	N/A	N/A	Not Applicable as per Obligation 245.
249	Code of Conduct, clause 9.3(1)	If a residential customer requests information on the use of a pre-payment meter, a retailer must advise the information specified in subclause 9.3(1) at no charge, and in clear, simple and concise language	N/A	N/A	N/A	Not Applicable as per Obligation 245.
250	Code of Conduct, clause 9.3(2)	No later than 10 business days after the time a residential customer enters into a pre-payment meter contract at that customer's supply address, a retailer must give, or make available to, that customer the information specified in subclauses 9.3(1) and 9.3(2)(a)-(s) at no charge.	N/A	N/A	N/A	Not Applicable as per Obligation 245.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
251	Code of Conduct, clause 9.3(3)	A retailer must ensure that the following information is shown on, or directly adjacent to, a residential customer's pre-payment meter: the positive or negative financial balance of the pre-payment meter within one dollar (\$1) of the actual balance; whether the pre-payment meter is operating on normal credit or emergency credit; a telephone number for enquiries; and the distributor's 24-hour telephone number for faults and emergencies.	N/A	N/A	N/A	Not Applicable as per Obligation 245.
252	Code of Conduct, clause 9.3(4)	On request and at no charge, a retailer must give a pre-payment meter customer the following information: total energy consumption; average daily consumption; and the average daily cost of consumption for the previous 2 years, or since the commencement of the pre-payment meter contract (whichever is shorter), divided into quarterly segments.	N/A	N/A	N/A	Not Applicable as per Obligation 245.
253	Code of Conduct, clause 9.3(5)	If the recharge facilities available to a residential customer change from the initial recharge facilities referred to in subclause (2)(r), a retailer must use reasonable endeavours to notify a pre-payment meter	N/A	N/A	N/A	Not Applicable as per Obligation 245.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
		customer in writing or by electronic means within 10 business days of the change				
254	Code of Conduct, clause 9.4(1)	If a pre-payment meter customer notifies a retailer that it wants to replace or switch a pre-payment meter to a standard meter, the retailer must send the specified information to the customer, and arrange with the relevant distributor to remove or render non-operational the pre-payment meter and replace or switch the pre-payment meter to a standard meter within 1 business day of the request	N/A	N/A	N/A	Not Applicable as per Obligation 245.
255	Code of Conduct, clause 9.4(2)	A retailer must not charge for reversion to a standard meter if a pre-payment customer is a residential customer and that customer, or their nominated representative, requests reversion of a pre-payment meter within 3 months of its installation or the date the customer agreed to enter into the pre-payment contract, whichever is later.	N/A	N/A	N/A	Not Applicable as per Obligation 245.
256	Code of Conduct, clause 9.4(4)	If a retailer requests the distributor to revert a pre-payment meter, a distributor must do so within 5 business days of receipt of the request for	N/A	N/A	N/A	Not Applicable as per Obligation 245.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
		supply addresses within the metropolitan region, and within 10 business days for supply addresses within regional areas.				
257	Code of Conduct, clause 9.5(1)	If a customer provides a retailer with confirmation from an appropriately qualified medical practitioner that a person residing at the supply address requires life support equipment, a retailer must not provide a pre-payment meter service in that address; or, if applicable, comply with the prescribed requirements in subclauses 9.5(1)(a)-(c).	N/A	N/A	N/A	Not Applicable as per Obligation 245.
258	Code of Conduct, clause 9.5(2)	If a retailer requests a distributor to revert a pre-payment meter under subclause 9.5(1), the distributor must revert the pre-payment meter within the time frames specified in subclause 9.5(2)(a)-(b).	N/A	N/A	N/A	Not Applicable as per Obligation 245.
259	Code of Conduct, clause 9.6	A retailer must ensure that a pre-payment meter service complies with the prescribed requirements in subclause 9.6	N/A	N/A	N/A	Not Applicable as per Obligation 245.
260	Code of Conduct, clause 9.7(a), (b) and (d)	A retailer must ensure that: at least 1 recharge facility is located as close as practicable to a pre-payment meter, and in any case no further than 40 kilometres away; a pre-payment meter customer can access a recharge facility at least 3 hours	N/A	N/A	N/A	Not Applicable as per Obligation 245.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
		per day, 5 days a week; and the minimum amount to be credited by a recharge facility does not exceed \$20 per increment.				
261	Code of Conduct, clause 9.8	If a pre-payment meter customer demonstrates to a retailer that the customer is entitled to receive a concession, the retailer must ensure that the pre-payment meter customer receives the benefit of the concession.	N/A	N/A	N/A	Not Applicable as per Obligation 245.
262	Code of Conduct, clause 9.9(1)	If requested by a pre-payment meter customer, a retailer must make immediate arrangements to check the metering data; test the pre-payment meter; and/or arrange for a test of the metering installation at the connection point.	N/A	N/A	N/A	Not Applicable as per Obligation 245.
263	Code of Conduct, clause 9.9(2)	If requested by a retailer, a distributor must check or test a pre- payment meter	N/A	N/A	N/A	Not Applicable as per Obligation 245.
264	Code of Conduct, clause 9.9(4)	If a pre-payment meter is found to be inaccurate or not operating correctly, a retailer must: immediately arrange for the repair or replacement of the pre-payment meter; correct any overcharging or undercharging; and refund any charges payable by a customer for testing the pre-payment meter.	N/A	N/A	N/A	Not Applicable as per Obligation 245.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
265	Code of Conduct, clause 9.10(1)	Subject to a pre-payment meter customer notifying a retailer of the proposed vacation date, the retailer must ensure that the pre-payment customer can retrieve all remaining credit at the time that customer vacates the supply address	N/A	N/A	N/A	Not Applicable as per Obligation 245.
266	Code of Conduct, clause 9.10(2)	If a pre-payment meter customer (including a customer who has vacated the supply address) has been overcharged as a result of an act or omission of a retailer or distributor, the retailer must use its best endeavours to inform and reimburse the pre-payment meter customer, (except in the circumstances in clause 9.10(7)) in the timeframe and manner specified.	N/A	N/A	N/A	Not Applicable as per Obligation 245.
267	Code of Conduct, clause 9.10(3)	The retailer must pay the amount in accordance with the pre- payment meter customer's instructions within 12 business days of receiving the instructions	N/A	N/A	N/A	Not Applicable as per Obligation 245.
268	Code of Conduct, clause 9.10(4)	If a retailer does not receive reimbursement instructions within 20 business days of making the request, the retailer must use reasonable endeavours to credit the amount overcharged to the customer's account.	N/A	N/A	N/A	Not Applicable as per Obligation 245.

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269	Code of Conduct, clause 9.10(6)	If a retailer proposes to recover an amount undercharged to a pre-payment meter customer as a result of an act or omission by the retailer or distributor, the retailer must comply with the conditions specified in subclause 9.10(6).	N/A	N/A	N/A	Not Applicable as per Obligation 245.
270	Code of Conduct, clause 9.11(1)	A retailer must give reasonable consideration to a request by a residential customer or relevant consumer representative for a waiver of any fee to replace or switch a pre-payment meter to a standard meter.	N/A	N/A	N/A	Not Applicable as per Obligation 245.
271	Code of Conduct, clauses 9.11(2) and (3)	If a retailer is informed by a pre-payment meter customer that the customer is experiencing payment difficulties or financial hardship, or the retailer identifies the customer as having been disconnected in the manner specified in subclause 9.11(2)(b), the retailer must, subject to subclause 9.11(3), use its best endeavours to contact the customer as soon as reasonably practicable to provide the information prescribed in subclause 9.11(2)(d)-(g).	N/A	N/A	N/A	Not Applicable as per Obligation 245.
INFORMATION & COMMUNICATION						
272	Code of Conduct, clause 10.1(1)	A retailer must give notice of any variations in its tariffs to	5	A	1	Tariffs are reviewed annually by the RIA and letters are sent to customers via McGees and AHR to

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		each of its customers affected by the variation no later than the next bill in the customer's billing cycle.				advise of these changes within the customers next billing cycle.
273	Code of Conduct, clause 10.1(2)	2 On request and at no charge, a retailer must provide a customer with reasonable information on its tariffs, including alternative tariffs	5	NP	NR	Not Rated – The RIA did not receive any ad-hoc requests from customers in regard to tariffs during the audit period.
274	Code of Conduct, clause 10.1(3)	A retailer must give a customer the information requested on tariffs within 8 business days of the date of receipt and, if requested, provide the information in writing.	5	NP	NR	Not Rated – No request for tariff information was received by McGees or AHR during the audit period.
275	Code of Conduct, clause 10.2(1)	On request, a retailer must provide a non-contestable customer with their billing data	N/A	N/A	N/A	Not Applicable – All customers on Rottnest Island are contestable as per ERA advice to the RIA by email on 19 September 2013 (Interviews with staff)
276	Code of Conduct, clause 10.2(2)	If a non-contestable customer requests billing data for a period less than the previous 2 years and no more than once a year, or in relation to a dispute with a retailer, the retailer must provide the data at no charge.	N/A	N/A	N/A	Not Applicable – All customers on Rottnest Island are contestable as per ERA advice to the RIA by email on 19 September 2013 (Interviews with staff)
277	Code of Conduct, clause 10.2(3)	A retailer must give the requested billing data under subclause 10.2(1) within 10 business days of the receipt of the request, or on payment of the retailer's reasonable charge for providing this data.	N/A	N/A	N/A	Not Applicable – All customers on Rottnest Island are contestable as per ERA advice to the RIA by email on 19 September 2013 (Interviews with staff)

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
278	Code of Conduct, clause 10.2(4)	A retailer must keep a non-contestable customer's billing data for 7 years	N/A	N/A	N/A	Not Applicable – All customers on Rottnest Island are contestable as per ERA advice to the RIA by email on 19 September 2013 (Interviews with staff)
279	Code of Conduct, clause 10.3	On request and at no charge, a retailer must provide a residential customer with information on the types of concessions available to the residential customer and the name and contact details of the organisation responsible for administering those concessions (if not the retailer). At least once a year, a retailer must provide a customer with written details of the retailer's and distributor's obligations to make payments to the customer under Part 14 of this Code and under any other legislation in Western Australia, including the amount of the payment and the eligibility criteria for the payment.	N/A	N/A	N/A	Not Applicable – There are no residential customers on Rottnest Island
280	Code of Conduct, clause 10.3A	A retailer must give a customer at least once a year written details of the retailer's and distributor's obligations to make payments to the customer under Part 14 of this Code and under any other legislation (including subsidiary legislation) in Western Australia including the amount of the payment and the	5	A	1	RIA sends annual advice to McGees and customers for payments available to customers under the Code of Conduct. There is no strict requirement for AHR to separately advise customers of payments available to them under the Code of Conduct, given the same customers are already being advised by McGees.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
		eligibility criteria for the payment.				
281	Code of Conduct, clause 10.4	Upon request and at no charge, a retailer must provide a customer with general information on cost effective and efficient ways to utilise electricity; and the typical running costs of major domestic appliances.	5	NP	NR	Not Rated – No request for information was received by McGees or AHR during the audit period. A list of Information is available to customers on request which is included in the Standard Form Contract,
282	Code of Conduct, clause 10.5	If asked by a customer for information relating to the distribution of electricity, a retailer must give the information to the customer or refer the customer to the relevant distributor for a response.	5	NP	NR	Not Rated – No requests for information was received by McGees or AHR during the audit period.
283	Code of Conduct, clause 10.6	On request and at no charge, a distributor must provide a customer with the information specified in subclause 10.6	5	NP	NR	Not Rated – No requests for information was received by McGees or AHR during the audit period
284	Code of Conduct, clause 10.7(1)	On request, a distributor must provide a customer with their consumption data.	5	NP	NR	Not Rated – No requests for consumption data was received by McGees or AHR for the audit period outside of what is already provided in monthly billing documents.
285	Code of Conduct, clause 10.7(2)	If a customer requests their consumption data under subclause 10.7(1), the distributor must provide the	5	NP	NR	Not Rated as per Obligation 284

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
		information at no charge in the circumstances specified in subclause 10.7(2)(a)-(b).				
286	Code of Conduct, clause 10.7(3)	A distributor must provide a customer with the requested consumption data within 10 business days of the receipt of the request or, within 10 business days of receipt of payment of the distributor's reasonable charge for providing the consumption data, if payment is required and requested by the distributor within 2 business days of the request	5	NP	NR	Not Rated as per Obligation 284
287	Code of Conduct, clause 10.7(4)	A distributor must keep a customer's consumption data for 7 years	4	A	1	Customer's consumption data is kept for at least seven years. Information is recorded on Meter reading Data Sheets and billing and these are kept for 7 years.
288	Code of Conduct, clause 10.8(1)	On request, a distributor must inform a customer how the customer can obtain information on distribution standards and metering arrangements prescribed under the specified Acts that are relevant to the customer or adopted by the distributor.	5	NP	NR	Not Rated – No requests for information was received by McGees or AHR during the audit period
289	Code of Conduct, clause 10.8(2)	A distributor must publish information on distribution standards and metering arrangements on its website.	3	A	1	Distribution standards and metering arrangements was published at: http://ria.wa.gov.au/policy-and-reports/utility-reports/electrical-reports

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						Rottnest Electrical Distribution Manual 2016 V2
290	Code of Conduct, clause 10.9	To the extent practicable, a retailer and distributor must ensure that any written information that must be given to a customer by the retailer or distributor or its electricity marketing agent under the Code of Conduct is expressed in clear, simple, concise language and in a format that is easy to understand.	5	B	2	Documentation prepared by the licensee for information purposes is in accordance with the requirements. Both McGees and AHR billings are not as user friendly and some information is not set out in an intuitive manner ACTION: AMR to increase font size for ease of reading and McGees to include 24 hour service faults and difficulties contact number to front of invoice.
291	Code of Conduct, clause 10.10(1)	On request, a retailer and a distributor must inform a customer how to obtain a copy of the Code of Conduct	5	NP	NR	Not Rated – No request was received by McGees or AHR during the audit period.
292	Code of Conduct, clause 10.10(2)	A retailer and distributor must make electronic copies of the Code of Conduct available on their websites, at no charge	5	A	.1	The Code of Conduct is available on the RIA website free of charge at: http://ria.wa.gov.au/policy-and-reports/utility-reports/electrical-reports
293	Code of Conduct clause 10.10(3)	A retailer and a distributor must make a copy of the Code of Conduct available for inspection, at no charge, at their respective offices.	5	A	1	The Code of Conduct is available on the RIA website free of charge at: http://ria.wa.gov.au/policy-and-reports/utility-reports/electrical-reports
294	Code of Conduct, clause 10.11(1)	On request and at no charge, a retailer and a distributor must make services available to a residential customer to assist the residential customer to interpret information provided by the retailer or distributor	NA	N/A	N/A	The Code of Conduct is available on the RIA website free of charge at: http://ria.wa.gov.au/policy-and-reports/utility-reports/electrical-reports There are no residential customers

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		(including independent multi-lingual and TTY services, and large print copies).				
295	Code of Conduct, clause 10.11(2)	For residential customers, a retailer and, if appropriate, a distributor, must include the information prescribed in subclause 10.11(2)(a) on its bills and bill-related information, reminder notices and disconnection warnings	N/A	N/A	N/A	There are no residential customers
296	Code of Conduct, clause 10.12(1)	On request and at no charge, a distributor must advise a customer of the availability of different types of meters, as well as their suitability for the customer's supply address, purpose, costs, and installation, operation and maintenance procedures.	5	NP	NR	No requests received during the audit period
297	Code of Conduct, clause 10.12(2)	On request, a retailer must advise a customer of the availability of different types of meters or refer the customer to the relevant distributor for a response.	5	NP	NR	The Code of Conduct is available on the RIA website free of charge at: http://ria.wa.gov.au/policy-and-reports/utility-reports/electrical-reports No requests received during the audit period
COMPLAINTS & DISPUTE RESOLUTION						
298	Code of Conduct, clause 12.1(1)	A retailer and distributor must develop, maintain and implement an internal process for handling complaints and resolving disputes.	5	A	1	The RIA has a system for managing complaints comprising of <ul style="list-style-type: none"> • Utilities Customer Complaints Procedure, • Utilities Customer Complaints Flow Chart – Process,

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						<ul style="list-style-type: none"> • Utilities Customer Complaints Flow Chart - Procedure; and • UTILITY (Electricity, Water, Gas) Customer Complaint Form. <p>Customers can lodge complaints to the RIA direct via their website, however no complaints were received via this portal during the audit period. Customers may also lodge complaints via McGees and AHR, being the billing agents. Complaints are captured in the Electrical Customer Complaints Reporting Register and acted on by the RIA as appropriate</p> <p>During the audit period one complaint was received via the Electrical Ombudsman which was resolved.</p>
299	Code of Conduct, clause 12.1(2)	The complaints handling process under subclause 12.1(1) must comply with the requirements specified in subclauses 12.1(2)(a), (b) and (c) and be made available at no cost	5	A	.1	The complaint handling process is described in the Standard Form Contract, The Standard Form Contract is provided to customers at the onset of every contract and complies with the requirements specified. The standard form contract is published on the website.
300	Code of Conduct, clause 12.1(3)	A retailer or a distributor must advise the customer in accordance with subclause 12.1(3).	5	A	1	<p>The complaint handling process is set out in the Standard Form Contract. A customer receives a copy of the signed contract which points to the complaints handling procedure and its location.</p> <p>Auditor was informed of RIA writing to complainant to refer to complaint handling process set out in the Standard Form Contract.</p>
301	Code of Conduct, clause 12.1(4)	On receipt of a written complaint by a customer, a retailer or distributor must acknowledge the complaint within 10 business days and respond to the	5	A	.1	Standard Form Contract states: "A representative of the Rottneest Island Authority will acknowledge the complaint within 10 business

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
		complaint within 20 business days				days and shall address the complaint within 15 business days” One complaint was received during the audit period which was dealt with within the stated timeframe.
302	Code of Conduct, clause 12.2	A retailer must comply with any guideline developed by the ERA to distinguish customer queries from complaints.	5	A	1	The Utilities Customer Complaints Procedure clearly defines a Customer Complaint vs. Customer Query. Its content reflects the intent of ERA’s “Customer Complaint Guideline” December 2016.
303	Code of Conduct, clause 12.3	On request and at no charge, a retailer, distributor and electricity marketing agent must give a customer information that will assist the customer to utilise the respective complaints handling processes	5	A	.1	One complaint was received via the Electricity Ombudsman which was resolved between RIA and the complainant No other complaints were received by McGees or AHR during the audit period
304	Code of Conduct, clause 12.4	When a retailer, distributor or electricity marketing agent receives a complaint that does not relate to its functions, it must advise the customer of the entity that it reasonably considers to be appropriate to deal with the complaint (if known).	5	A	1	The Utilities Customer Complaints Procedure covers all complaints relevant to day-to-day island operation.
	REPORTING					
305	Code of Conduct, clause 13.1	A retailer and a distributor must prepare a report in respect of each reporting year setting out the information specified by the ERA.	5	A	1	As per Obligation 124, the Electricity Reporting Datasheets Distribution Code of Conduct 2015-2016 and Electricity Reporting Datasheets Retail Indicators 2015-2016 are published at: http://ria.wa.gov.au/policy-and-reports/utility-reports/electrical-reports .

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306	Code of Conduct, clause 13.2	The report specified in clause 13.1 must be provided to the ERA by the date, and in the manner and form, specified by the ERA.	5	A	1	All reports during the audit period were provided to the authority by the due date and in the correct format.
307	Code of Conduct, clause 13.3	The report specified in clause 13.1 must be published by the date specified by the ERA. In accordance with clause 13.3(2), a report is published if: <ul style="list-style-type: none"> · copies are available to the public, without cost, in places where the retailer or distributor transacts business with the public; and · a copy is posted on the retailer or distributor's website. 	5	A	1	Referring to Obligation 305 response, reports are published at: http://ria.wa.gov.au/policy-and-reports/utility-reports/electrical-reports . Island will print a copy of the report and provide to client/user at no cost if requested.
SERVICE STANDARD PAYMENTS						
308	Code of Conduct, clause 14.1(1)	Subject to clause 14.6, a retailer must pay the stated compensation to a customer if the customer is not reconnected in accordance with the timeframes specified in Part 8.	5	NP	NR	Not Rated – There were no applicable reconnection requests from customers during the audit period
309	Code of Conduct, clause 14.1(2)	Subject to clause 14.6, if a retailer is liable to and makes a payment under subclause 14.1(1) due to an act or omission of a distributor, the distributor must compensate the payment to the retailer	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence.

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310	Code of Conduct, clause 14.2(1)	Subject to clause 14.6, if a retailer — (a) fails to comply with any of the procedures prescribed under Part 6 (if applicable and other than clauses 6.8, 6.9 and 6.10) and Part 7 (other than clauses 7.4, 7.5, 7.6, 7.7(1)(a), 7.7(1)(b), 7.7(2)(a) and 7.7(2)(c)) of the Code prior to arranging for disconnection or disconnecting a customer for failure to pay a bill; or (b) arranges for disconnection or disconnects a customer in contravention of clauses 7.2, 7.3, 7.6 or 7.7 for failure to pay a bill, the retailer must pay to the customer \$100 for each day that the customer was wrongfully disconnected .	5	NP	NR	Not Rated – There were no disconnections for failure to pay a bill during the audit period.
311	Code of Conduct, clause 14.2(2)	Subject to clause 14.6, if a retailer is liable to and makes a payment under subclause 14.2(1) due to an act or omission of a distributor, the distributor must compensate the payment to the retailer	N/A	N/A	. N/A	Not Applicable – The RIA has an Integrated Regional Licence.
312	Code of Conduct, clause 14.3(1)	Subject to clause 14.6, a retailer must pay the customer \$20 if the retailer has failed to acknowledge or respond to a complaint within the timeframes prescribed in subclause 12.1(4).	5	NP	NR	Not Rated as per Obligation 301.
313	Code of Conduct, clause 14.4(1)	Subject to clause 14.6, a distributor must pay the customer \$20 if the distributor has failed to acknowledge or	5	NP	NR	Not Rated – There were no customer complaints related to the distribution services during the audit period.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
		respond to a complaint within the timeframes prescribed in subclause 12.1(4).				
314	Code of Conduct, clause 14.5	Subject to subclause 14.6, if a distributor disconnects a customer's supply address other than as authorised by this Code or otherwise by law, or as authorised by a retailer, then the distributor must pay the customer \$100 for each day that the customer was wrongfully disconnected.	5	NP	NR	Not Rated – There were no wrongful disconnections during the audit period
315	Code of Conduct, clause 14.7(1)	A retailer that is required to make a compensation payment for failing to satisfy a service standard under clauses 14.1, 14.2 or 14.3 must do so in the manner specified in subclause 14.7(1).	5	NP	NR	Not Rated – There were no failures to satisfy service standards under clauses 14.1, 14.2 or 14.3 during the audit period.
316	Code of Conduct, clause 14.7(2)	A distributor that is required to make a compensation payment for failing to satisfy a service standard under clauses 14.4 or 14.5 must do so in the manner specified in subclause 14.7(2).	5	NP	NR	Not Rated – There were no failures to satisfy service standards under clauses 14.4 or 14.5 during the audit period.
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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and is the only supplier on Rottneest island.

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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	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and is the only supplier on Rottneest island.
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	B	2	<p>a) A Certificate of Calibration has been acquired for all meters installed post-2012 using the methodology for ensuring compliance by Horizon Power.</p> <p>b) Funds for phase 1 of the Meter Replacement Program had been approved. 11 x 3 phase current transformer meters, 70 x 3 phase meters and 75 x single phase meters have been purchased. Meter installation will occur on an ongoing basis until completion of the project. Funds for phase 2 for the Meter installation have been approved for 2017/18.</p> <p>c) A total of 156 electrical meters have been purchased and delivered to the Island in February 2017. Certificates of calibration will be provided with the new meters, once the meter replacement program has been completed. Detailed meter information (such as meter numbers, location, certificates and compliance evidence) and copies of certificates of calibration will be saved in MAXIMO and an asset number be allocated for each meter. PFM confirmed that the meters purchased meet the national smart meter specification.</p>

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
						<p>The new Draft Metrology Procedure had been completed and forwarded to stakeholders for consultation (Rottneest Island Chamber of Commerce and business community). The consultation on the Rottneest Island Metrology Procedure closed on 20 June 2017. No submissions were received from the stakeholders by the due date. The result was provided to the consultant on 4 July 2017 for preparation of the report to the ERA. The Draft Metrology Procedure and the stakeholder consultation report will be submitted to the ERA for review and approval end of July 2017. Target completion date is 31/08/2017. The RIA has a metrology procedure in place. however the document is extremely long (>100 pages)</p> <p>ACTION 1: Verify that all newly installed meters are provided with calibration certificates on installation</p> <p>ACTION 2: Verify that Draft Metrology Procedure is approved and procedures implemented accordingly</p>
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 that are specified in subclauses 3.2(1)(a)(b) using dials, a cyclometer, an illuminated display panel or some other visual means	2	C	.2	<p>PFM's Meter Installation and Calibration Procedure" prescribe that new meters must comply with the Electricity Industry Metering Code</p> <p>During the audit period, there was no ERA approved metrology procedure in place. However a draft Metrology Procedure had been developed and is in the process of being submitted to ERA for approval.</p> <p>ACTION 1 Submit Metrology document to ERA for review and approval</p> <p>ACTION 2 Verify that any accumulation meters conform to the requirements specified in the applicable metrology procedure and display, or</p>

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
						permit access to a display of the measurements using dials, a cyclometer, an illuminated display panel or some other visual means
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	5	NP	NR	Not Rated There are no interval meters used as such
14 Electricity Industry Metering Code – Licence Conditions and Obligations						
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 that allows the interval energy data to be downloaded in the manner prescribed	5	NP	NR	Not Rated – There are no metering installations on Rottneest Island requiring communication links
323	Electricity Industry Metering Code, clause 3.3A(1)	A network operator must ensure that bi-directional electricity flows do not occur at a metering point unless the metering installation for the metering point is capable of separately measuring and recording	3	A	1	Bi Directional meters have been installed for solar panel installations and any other bi-directional proposed installation is to be referred to the contractor for installing meters. Included in the draft Metrology Procedure

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
		electricity flows in each direction.				
324	Electricity Industry Metering Code, clause 3.3B	If a user is aware of bi-directional electricity flows at a metering point that was not previously subject to a bi-directional flows or any changes in a customer's or user's circumstances in a metering point that will result in bi-directional flows, the user must notify the network operator within 2 business days.	N/A	N/A	N/A	Not Applicable – There are no access contracts on Rottneest Island as defined by the Code
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: <ul style="list-style-type: none"> · 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 	3	A	1	As per Obligation 323

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
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 that is not a Type 7 connection point. Unless it is a Type 7 metering installation, the metering installation must meet the functionality requirements prescribed	3	B	2	<p>There are 528 connection points. Eco Energy were contracted by PFM to gather information on the existing meter installations (survey). The survey was completed in January 2016. PFM is using the survey data to determine the non-compliant aspects of each meter and installation</p> <p>A process is in place for updating new connections. The Rottnest Island authority have purchased 157 meters which are currently being installed. These have certificates of calibration which will bring the number of compliant meters to 190 (planned to be completed around the end of October 2017). The remaining connection points are un-metered and are made up of RIA holiday accommodation units, type 7 connection points and other RIA infrastructure such as pump stations etc.</p> <p>ACTION: Complete meter replacement and compliance program.</p>
327	Electricity Industry Metering Code, clause 3.5(3)	For each metering installation on its network, a network operator must provide, install, operate and, subject to subclause 3.5(7), maintain the metering installation in the manner prescribed, unless otherwise agreed.	3	C	2	<p>As per Obligation 326 Draft Metrology Procedure existed at the time of the audit.</p> <p>ACTION 1: Complete meter replacement and compliance program ACTION 2: Submit Metrology document to ERA for review and approval</p>
328	Electricity Industry Metering Code, clause 3.5(4)	Except for a Type 7 metering installation, a network operator must ensure that the metering point for a revenue metering installation is located as close as practicable to the connection point in accordance with good electricity industry practice	5	A	.1	A procedure for ensuring that metering installations are performed as close as practicable to the connection point is in use by PFM

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
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 that it has with the user.	N/A	N/A	N/A	Not Applicable There are no access contracts on Rottneest Island as defined by the Code
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, it must advise affected parties of the non-compliance and arrange for the non-compliance to be corrected as soon as practicable.	3	NP	NR	<p>Not rated because network operator is not aware of any existing meters to commercial users that do not comply with the code. Also metrology procedure is in the process of being approved by the ERA, and an action has been raised elsewhere in the report to get it approved.</p> <p>The Metering Installation Non-Compliance Procedure has recently been developed and is used by PFM in conjunction with the Metering Reading Monthly Procedure.</p> <p>Evidence regarding advising affected parties will be retained for auditing purposes however none was discovered</p>
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	5	NP	NR	Not Rated – There were no metering installations on Rottneest Island requiring communication links

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
332	Electricity Industry Metering Code, clause 3.8	Subject to clause 3.27, a network operator must ensure that each metering installation on its network is secured by devices or methods that hinder unauthorized access and enable unauthorized access to be detected, consistent with the standards of good electricity industry practice	4	A	1	The PFM Meter Readings Monthly Procedure (PRO-RNI-I03-033-1) includes inspection of meters for unauthorised access. Not all meter enclosures on the island can be locked, however the meter readings are taken manually on a monthly basis and each installation is checked for unauthorised access.
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 as specified in Table 3 in Appendix 1 of the Code.	3	B	2	The types of meters are identified by annual throughput at the connection point and the compliance status of all meters is determined (they remain non-compliant due to calibration). This information is captured in the metering register This will remain non-compliant until completion of the meter replacement programme (31/10/2017) ACTION: Complete meter replacement program currently targeted for completion by 31/10/2017
334	Electricity Industry Metering Code, clause 3.9(7)	A metering installation used to supply a customer with requirements above 1000 volts that requires a VT and whose annual consumption is below 750MWh must meet the relevant accuracy requirements of a Type 3 metering installation for active energy only.	5	NP	NR	Not Rated – As per “Rottnest Metering Database.xls”, there are no metering installations on Rottnest Island supplying customers above 1000 volts

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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.	5	NP	NR	Not Rated – Compensation was not carried out within any installed meters during the audit period
336	Electricity Industry Metering Code, clause 3.10	A network operator must ensure that any programmable settings in any of its metering installations, data loggers or peripheral devices, which may affect the resolution of displayed or stored data, satisfy the relevant requirements specified in the applicable metrology procedure and comply with any applicable instructions by the National Measurement Institute under the National Measurement Act.	5	NP	NR	Not Rated because: 1) New programmable meters are not installed as at the audit period; and 2) Metrology procedure was in draft form.
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 permits the collection of data within the time specified in the applicable service level agreement, for at least the percentages of the year specified.	3	A	1	RIA has a service level agreement with the PFM to record meter data. This data is sent to McGees who then bill the customer. Energy data is measured, recorded and reported as per PFM's "PRO-RNI-I03-033-1 Meter Readings Monthly Procedure".

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
338	Electricity Industry Metering Code, clause 3.11(2)	If an outage or malfunction occurs to a metering installation, the network operator must repair the metering installation in accordance with the applicable service level agreement.	N/A	N/A	N/A	Not Applicable – There are no users on Rottnest Island with access contracts and therefore service level agreements do not exist.
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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and is the only supplier on Rottnest island.
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.	3	A	1	<p>PFM has liaised with Horizon Power and Horizon confirmed they check and test their meters in batches, which complies with the Meter Code, clause 3.11A(1). Horizon Power have confirmed that the meters on Rottnest Island have been checked as part of the batch process.</p> <p>Meters on the Rottnest Island network will be systematically sampled and tested for accuracy in accordance with AS1284.13.</p> <p>The PFM Meter Replacement Procedure and Meter Calibration Procedure include guidelines for sampling and testing and which meter is to be tested when. This information is uploaded to Maximo and allocated to the appropriate electrical meter asset.</p>

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
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 of the meters in that population are removed and replaced with new meters within 3 years of the testing of the population.	2	NP	NR	Not Rated – Based on samples of meter reading data audited, there was no evidence of population failure during the audit period.
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.	3	B	2	PFM’s Meter Installation and Calibration Procedure refers to the Electricity Industry Metering Code and associated clauses and includes an annual review of procedures. As part of the meter replacement programme, metering installations will be brought in line with current design requirements. Not all metering installations currently comply. ACTION: Complete meter replacement program
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.	5	C	2	Draft Rottnest Island Metrology Procedure was sighted. During the audit no approved Metrology Procedure was available. No evidence that instrument transformers in its metering installations comply with the relevant requirements of any applicable specifications or guidelines was discovered ACTION 1 Submit Metrology document to ERA for review and approval ACTION 2: Verify and demonstrate that any instrument transformers meet applicable

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
						specifications as set down in the Metrology Procedure
344	Electricity Industry Metering Code, clause 3.12(3)	A network operator must provide isolation facilities of a standard consistent with good electricity industry practice, to facilitate testing and calibration of the metering installation.	5	A	1	Fuse isolation is used throughout the metering installations on Rottneest Island
345	Electricity Industry Metering Code, clause 3.12(4)	A network operator must maintain drawings and supporting information, of a standard consistent with good electricity industry practice, to detail the metering installation for maintenance and auditing purposes.	3	A	1	Each metering installation has been photographed and a spreadsheet has been created to monitor non-compliances. PFM is ISO 55001 certified which is the International Standard for Asset Management. Section 7.6.3 of ISO 55001:2014 outlines what the Asset Management System requires of documented information. The activities PFM currently address in this Section include: distribution, access, retrieval and use of documented information; storage and preservation, including preservation of legibility; control of changes (e.g. version control); retention and disposition. PFM utilise an online tool, Manage, which outlines the company's systems and processes, and facilitates the integration of document control and Asset Management Systems so that it can comply with our Certification.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
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.	N/A	N/A	N/A	Not Applicable - There are no access contracts on Rottneest Island as defined by the Code
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	N/A	N/A	N/A	Not Applicable – All supply is less than 100GWh per annum as per clause 3.13(1), Table 1.
348	Electricity Industry Metering Code, clause 3.13(4)	A check metering installation for a metering point must comply with the prescribed requirements	N/A	N/A	N/A	Not Applicable – All supply is less than 100GWh per annum as per clause 3.13(1), Table 1.
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 install meters of a higher class accuracy and/or 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	5	B	2	Metering CT data spreadsheet (with photos) and the CTs have been checked for compliance with Table 3. Non -Compliant CTs will be changed during the Meter Replacement Programme. ACTION: Update non-compliant metering CTs as per plan

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350	Electricity Industry Metering Code, clause 3.16(1)	The network operator must ensure that a Type 1 metering installation to Type 5 metering installation on the network has the facilities and functionality prescribed.	N/A	N/A	N/A	Not Applicable – Applies to wholesale electricity market
351	Electricity Industry Metering Code, clause 3.16(2)	The network operator must ensure that a Type 1 metering installation to Type 4 metering installation on the network includes a communications link	N/A	N/A	N/A	Not Applicable – Applies to wholesale electricity market
352	Electricity Industry Metering Code, clause 3.16(3)	If a device is used as a data logger, the energy data for a metering point on the network must be collated in trading intervals or sub-multiples of a trading interval within the metering installation.	N/A	N/A	N/A	Not Applicable – Applies to wholesale electricity market
353	Electricity Industry Metering Code, clause 3.16(3A)	If, under subclause 3.16(3), energy data for a metering point on the network is collated in sub-multiples of a trading interval, then the network operator must aggregate the energy data into trading intervals before providing it to a Code participant unless the Code participant agrees otherwise	N/A	N/A	N/A	Not Applicable – Applies to wholesale electricity market

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354	Electricity Industry Metering Code, clause 3.18(1)	The metering installation for the connection point must comply with the prescribed wholesale market metering installation requirements if the Electricity Retail Corporation supplies electricity to a contestable customer at a connection point under a non-regulated contract and in circumstances when, immediately before entering into the contract, the electricity retail corporation supplied electricity to the contestable customer under a regulated contract	N/A	N/A	N/A	Not Applicable – Applies to wholesale electricity market
355	Electricity Industry Metering Code, clause 3.20(1)	If reasonably requested by a Code participant, a network operator must provide enhanced technology features in a metering installation.	N/A	N/A	N/A	Not Applicable – Applies to wholesale electricity market
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 its applicable service level agreement with the user.	N/A	N/A	N/A	Not Applicable – Applies to wholesale electricity market

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
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.	5	NP	NR	Not Rated – Internal real time clocks are not used in the metering installations on Rottneest Island.
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.	5	NP	NR	Not Rated – There are no metering installation on Rottneest Island with these requirements.
359	Electricity Industry Metering Code, clause 3.22	2A 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	5	NP	NR	Not Rated – There are no metering installations on Rottneest Island with enhanced technology
360	Electricity Industry Metering Code, clause 3.23(a)	Where signals are provided from the meter for the user or the user's customer, a network operator must ensure that signals are isolated by relays or electronic buffers to prevent accidental or malicious damage to the meter.	N/A	N/A	N/A	Not Applicable – This does not apply to the meter installations on Rottneest Island

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
361	Electricity Industry Metering Code, clause 3.23(b)	Where signals are provided from the meter for the user or the user's customer, a network operator must provide the user, or the user's customer, with sufficient details of the signal specification to enable compliance with clause 3.23(c) of the Code.	N/A	N/A	N/A	Not Applicable – This does not apply to the meter installations on Rottnest Island
362	Electricity Industry Metering Code, clause 3.24A(1)	If a retailer requests a network operator to install a pre-payment meter at a connection point, then the pre-payment meter must be sufficient to enable the retailer to comply with the retailer's obligations under the Code of Conduct	N/A	N/A	N/A	Not Applicable – Prepayment meters are not used on Rottnest Island
363	Electricity Industry Metering Code, clause 3.24B(1)	If a retailer requests a network operator to replace a pre-payment meter at a connection point with a meter that is not a pre-payment meter, then the network operator must do so in accordance with this Code and the Code of Conduct	N/A	N/A	N/A	Not Applicable – Prepayment meters are not used on Rottnest Island
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.	3	A	1	PFM outsource all meter installations to EcoEnergy (WA). As part of this agreement, EcoEnergy (WA) are responsible for employing personnel that hold the correct licences for installing meters

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
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 update the list at least annually	5	A	.1	The RIA has published on its website (http://ria.wa.gov.au/policy-and-reports/utility-reports/electrical-reports) its registered metering installation provider and Electrical Contractor Programmed Facility Management (Licence number EC008521).
366	Electricity Industry Metering Code, clause 4.1(1)	A network operator must establish, maintain and administer a metering database containing standing data and energy data for each metering point on its network.	3	A	1	<p>PFM collect distribution loss factor, reference test, calibration details and results is specified in the metering register data as per PFM's "PRO-RNI-103-033-1 Meter Readings Monthly Procedure</p> <p>Documented information determines applicability of instrument transformer connection ratio, calibration tables, summation scheme and date communication details as per Table 2 of Code is provided.</p> <p>In accordance with Clause 4.3 (1) of the Electricity (Industry) Metering Code 2012 the Rottnest Island metering database comprises of all items specified in Table 2 of the Code, however items not relevant to Rottnest Island such as data communication details remain unpopulated and marked N/A. The RIA has an Integrated Regional Licence and there are no other users or Code participants.</p> <p>There is only one tariff offered by the RIA throughout Rottnest Island.</p> <p>All customers on Rottnest Island are contestable as per ERA advice to the RIA</p>

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367	Electricity Industry Metering Code, clause 4.1(2)	A network operator must ensure that its metering database with its associated links, circuits, information storage and processing systems are secured by devices or methods consistent with a good industry practice to hinder unauthorised access and enable unauthorised access to be detected.	4	A	1	<p>PFM is responsible for all metering related tasks associated with the license area</p> <p>PFM IT systems are subject to a Security Policy with the asset management system being identified as a “critical” system. Electronic firewalls and user access control are in place in accordance with good industry practice to prevent unauthorised access.(Interviews with staff and not fully evidenced)</p> <p>A local branch server exists on Rottnest Island – A newly installed electronic keypad on the external PFM office door has been installed and access to the office and server is maintained for authorised users only.</p> <p>General control / security of PFM’s computer systems is adequately covered as follows:</p> <ul style="list-style-type: none"> • ICT Acceptable Computer Usage Policy, • Mobility Policy; and • Security Policy. <p>PFM adhere to good industry practice with respect to password maintenance across all their systems, including level of complexity, frequency of change and similarity with previously used passwords.</p> <p>Physical security to facilities, including system servers appears adequate. PFM’s core systems are located in a Burswood data centre secured by swipe card. PFM’s servers have several levels of redundancy. Backup policies and disaster recovery are consistent with good industry practice (Interviews with staff)</p>

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
368	Electricity Industry Metering Code, clause 4.1(3)	A network operator must prepare and, if applicable, implement a disaster recovery plan to ensure that it is able, to rebuild the metering database and provide energy data to Code participants within 2 business days after the day of any disaster.	N/A	N/A	N/A	Not Applicable – There are no other Code participants within the licence area
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	N/A	N/A	N/A	The RIA has an Integrated Regional Licence and there are no other users or Code participants. It is not part of the SWIS and thus not need to comply with Market rules.
370	Electricity Industry Metering Code, clause 4.3(1)	The standing data for a metering point must comprise at least the items specified.	3	A	1	As per Obligation 366
371	Electricity Industry Metering Code, clause 4.4(1)	If there is a discrepancy between energy data held in a metering installation and in the metering database, the affected Code participants and the network operator must liaise to determine the most appropriate way to resolve the discrepancy.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other Code participants

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372	Electricity Industry Metering Code, clause 4.5(1)	A Code participant must not knowingly permit the registry to be materially inaccurate.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other Code participants
373	Electricity Industry Metering Code, clause 4.5(2)	Subject to subclause 5.19(6), if a Code participant, other than a network operator, becomes aware of a change to, or inaccuracy in, an item of standing data in the registry, then it must notify the network operator and provide details of the change or inaccuracy within the timeframes prescribed.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other Code participants
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 that is the designated source for the item of standing data under Table 2 in clause 4.3(1), then the network operator must update the registry to reflect the change to, or correct the inaccuracy in, the standing data.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other Code participants

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
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 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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other Code participants
376	Electricity Industry Metering Code, clause 4.7(1)	If standing data for a metering point is updated in the registry, the network operator must, within 2 business days after the update (or such other time as is specified in the applicable service level agreement) notify the update to the current user and each previous user, if the updated standing data relates to a period or periods when the previous user was the current user.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other users.
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	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other users.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
		associated connection points, using a password provided by the network operator that provides 'read only' access.				
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	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other users.
379	Electricity Industry Metering Code, clause 4.8(4)(a)	A network operator must have devices and methods in place to ensure that energy data held in its metering installation is secured from unauthorised local or remote access using the methods prescribed	4	C	2	Existing metering points are not secure. Not known whether new meters will have appropriate security protections. Corrective Action: RIA to confirm what devices and methods will be in-place to ensure that existing and new meter energy data cannot be access by local or remote unauthorised users.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
380	Electricity Industry Metering Code, clause 4.8(4)(b)	A network operator must have devices and methods in place to ensure that the data held in its metering database is secured from unauthorised local, or remote, access using the methods prescribed.	4	A	1	As per Obligation 367
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.	4	A	1	As per Obligation 367 Both PFM and RIA adhere to good industry practice with respect to password maintenance across all their systems, including level of complexity, frequency of change and similarity with previously used passwords. RIA user access is controlled via an on boarding process managed by HR that ensures access is only provided as required for the job function / role (as per ICT Access Request Form and Remote Access Request Form). Other relevant policy documents examined include Access Management Policy, Financial Management Access Policy, Secure USB Drive Access, ICT Access Request Form
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.	4	A	1	Records are kept for a minimum of 7 years

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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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other Code participants.
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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other Code participants.
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).	4	A	1	PFM's "PRO-RNI-I03-033-1 Meter Readings Monthly Procedure" requires that meter readings are entered into the database within 2 business days from the completion of the meter reading run. This was only confirmed via interviews with staff

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
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.	3	C	2	<p>RIA has a service level agreement with the PFM to record meter data every month. This data audited for via PFM's internal QA process before being given to McGees. The verification and validation procedures for meter readings and validation within the registration process have been developed for the applicable metering types as per Electricity Industry Metering Code 2012, Appendix 2, but no evidence of implementation during the audit period was noted.</p> <p>However draft metrology procedure existed during audit.</p> <p>The types of meters have been identified, see obligation 333 (item 23).</p> <p>PFM Meter Readings Monthly Procedure (PRO-RNI-I03-033-1) has been updated to ensure Code compliance, see items 8 & 22.</p> <p>ACTION: Submit Metrology document to ERA for review and approval.</p> <p>Clause 6.8 states that the metrology report must as a minimum point to the documents and processes used to undertake the processes covered under Obligation 386. While the RIA metrology points to the processes and procedures and pointed to in the Audit findings, at the time of the audit it was not approved by the ERA. Hence the non-compliance. No change to report recommended.</p>

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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	4	A	1	Meter readings during the audit period were outsourced to EcoEnergy (WA). There were no instances of a customer reading their own meter. Eco Energy warrants that readings are in accordance with legislative and applicable standards requirements Interviews with staff
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).	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other users
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	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other users

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other users
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).	N/A	N/A	N/A	Not Applicable - RIA is the Integrated Regional Licence holder. AEMO has no jurisdiction on Rottneest Island.
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.	N/A	N/A	N/A	Not Applicable as per Obligation 391
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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other users

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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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other users
395	Electricity Industry Metering Code, clause 5.10	A network operator must provide a subset of the standing data to a retailer in accordance with the provisions of Annex 4 of the Customer Transfer Code.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other retailers.
396	Electricity Industry Metering Code, clause 5.11	If a transfer occurs at a connection point, then within 2 business days after the transfer date, as defined in the Customer Transfer Code, the network operator must provide the incoming retailer with a copy of the standing data for each metering point associated with the connection point.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other users
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 network operator must provide a user with a complete set of energy data for the metering point	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other users

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
		within the timeframes prescribed.				
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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other users
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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other users
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	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other users

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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	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other users
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.	N/A	N/A	N/A	Not Applicable - There are no access contracts on Rottneest Island as defined by the Code.
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).	5	A	1	FUSS Contract includes responsibilities for compliance to all electricity licence requirements – metering and provision of data to customers included. No customer requests for data was discovered

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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.	5	NP	NR	No customer requests for data was discovered
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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other users
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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other users
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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other users

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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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other users
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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other users
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	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other users
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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other Code participants required to provide energy data.

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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	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other Code participants required to provide energy data.
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	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other Code participants required to provide energy data.
414	Electricity Industry Metering Code, clause 5.21(2)	A network operator must comply with any reasonable request under subclause 5.21(1).2	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other Code participants required to provide energy data.
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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other Code participants required to provide energy data.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other Code participants
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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other Code participants required to provide energy data.
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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other users
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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other users

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other Code participants required to provide energy data.
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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other Code participants required to provide energy data.
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.	3	A	1	There were no requirements for substitution or estimation of energy data during the audit period as per Obligation 159. PFM's "PRO-RNI-I03-033-1 Meter Readings Monthly Procedure" prescribes that energy data is substituted and estimated where required in accordance with the Electricity Industry (Metering) Code. Validation requirements are met as per Obligation 386.

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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.	N/A	N/A	N/A	Not Applicable – Check metering is not applicable for the supply levels on Rottneest Island
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.	4	NP	NR	Not Rated – No cases of substitution or estimation of energy data was required during the audit period.
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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other Code participants that provide energy data.
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.	5	NP	NR	Not Rated – No cases of substitution or estimation of energy data as required by this clause during the audit period.

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427	Electricity Industry Metering Code, clause 5.22(6)	A network operator must review all validation failures before undertaking any substitution.	5	NP	NR	Not Rated as per Obligation 426
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	5	NP	NR	Not Rated – There were no instances where an actual value could not be determined during the audit period
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.	5	NP	NR	Not Rated as per Obligation 428

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
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.	5	C	2	<p>At the time of the audit, the network operator could not determine a second value.</p> <p>Billing adjustments are made and invoices either reissued or the amount credited to the impacted customers.</p> <p>One instance of a credit applied to a bill was discovered during the audit.</p> <p>During the audit no approved Metrology procedure was sighted.</p> <p>ACTION: Complete meter replacement program and gain approval of the metrology procedure so that both first and second values can be measured</p>
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.	5	NP	NR	Not Rated – There were no instances of deemed actual values being used during the audit period
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	5	NP	NR	Not Rated – There were no instances of estimated or substituted values for energy data being used during the audit period.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
		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.				
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	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other Code participants providing energy data.
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.	5	C	2	<p>There were no instances of estimated energy data during the audit period. All meters are set to provide manual readings. No transformation or processing of data occurs.</p> <p>Draft Metrology Procedure existed at the time of the audit.</p> <p>ACTION: Submit Metrology document to ERA for review and approval. Verify that accuracy of energy data recording is as per metrology procedure</p>
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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other users.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
436	Electricity Industry Metering Code, clause 5.29	If a network operator makes an election under subclause 5.28 in respect of a network, then, (unless the election is terminated under the meter data agency agreement) the parties must undertake the activities prescribed, as applicable.	N/A	N/A	N/A	Not Applicable – RIAs network is not part of the SWIS.
437	Electricity Industry Metering Code, clause 5.30(1)	If a network operator makes an election under subclause 5.28 in relation to the network, then the parties must enter into an agreement in relation to the network, which must deal with at least the matters prescribed.	N/A	N/A	N/A	Not Applicable – RIAs network is not part of the SWIS.
438	Electricity Industry Metering Code, clause 5.31(1)	If a network operator makes an election under subclause 5.28 in relation to a network, the electricity networks corporation must assess the compliance of each metering installation in the network with this Code and notify the electing network operator of each non-compliant metering installation	N/A	N/A	N/A	Not Applicable – RIAs network is not part of the SWIS.
439	Electricity Industry Metering Code, clause 5.31(2)	For each non-compliant metering installation notified under subclause 5.31(1)(b), the electing network operator may, by notice to the electricity networks corporation, require the electricity networks corporation to upgrade a non-compliant metering installation, in which case the electricity	N/A	N/A	N/A	Not Applicable – RIAs network is not part of the SWIS.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
		networks corporation must undertake the upgrade in accordance with the metering data agency agreement and good electricity industry practice.				
440	Electricity Industry Metering Code, clause 5.34(2)	Except to the extent that the metering data agency agreement provides otherwise, the costs which may be recovered by the electricity networks corporation under subclause 5.34(1) must not exceed the amounts prescribed.	N/A	N/A	N/A	RIAs network is not part of the SWIS.
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	N/A	N/A	N/A	Not Applicable. RIA has notified auditor that it is not obliged to prepare these reports. These reports apply to the services of a retailer or generator under a third party network access, which they don't have.
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 ERA not less than 5 business days before it is published under subclause 5.37(3).	N/A	N/A	N/A	As per Obligation 441

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
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.	N/A	N/A	N/A	As per Obligation 441
444	Electricity Industry Metering Code, clause 5.37(2)	The report prepared by the network operator must include the information prescribed.	N/A	N/A	N/A	As per Obligation 441
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.	N/A	N/A	N/A	Rottnest Island customers are contestable and in Western Australia outside the Metropolitan area – this is the only class which needs to be included in the report. Refer to obligation 441.
446	Electricity Industry Metering Code, clause 5.38	network operator must keep such records of information as are required for the purposes of subclause 5.37, and must retain the information (in a format that is accessible within a reasonable period of time) for at least 7 years after the day on which a report containing the information is published under subclause 5.37(1)(c)	4	NA	NA	Refer to obligation 441.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
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.	3	C	2	There wasn't an approved metrology procedure in place during the audit period and therefore there was no prescriptive procedure to comply with ACTION: Submit Metrology document to ERA for review and approval.
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	N/A	N/A	N/A	No users with an access contract on Rottneast Island.
448A.	Electricity Industry Metering Code, clause 6.2	A network operator must, as soon as practicable and in any event no later than 6 months after the date this Code applies to it, submit to the ERA for its approval the prescribed documents in subclauses 6.2(a)-(d).	5	NP	NR	Because there are no other users there is no practical need for the model service level agreement and mandatory link criteria. Metrology procedure has been submitted to ERA and an action to get it approved has been recorded elsewhere within this report.
448B.	Electricity Industry Metering Code, clause 6.18	A network operator must publish the document within 10 business days after notification of the ERA's approval under subclauses 6.13(1)(a)(i), 6.16 or 6.17.	N/A	NP	NR	Not Rated, because metrology report had not been approved by the ERA during audit period.
448C.	Electricity Industry Metering Code, clause 6.19A(1)	A network operator must publish its communication rules as soon as practicable, and in any event within 6 months after the date this Code applies to it.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other users

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
448D.	Electricity Industry Metering Code, clause 6.19B(1)	Once communication rules have been published for a network under clause 6.19A, or amended under clause 6.21(3), the communication rules may only be amended thereafter in accordance with the communication rules made under subclause 6.7(1)(k) or clause 6.19C	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other users
449	Electricity Industry Metering Code, clause 6.20(4)	A network operator must amend any document in accordance with the ERA's final recommendation	5	NP	NR	Not Rated – There were no notices given by the Authority to amend documents during the audit period.
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).	5	NP	NR	Not Rated as per Obligation 449
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	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other Code participants.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other Code participants.
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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other Code participants.
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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other Code participants.
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	5	A	1	The RIA has an Integrated Regional Licence and there are no other Code participants. Section 17 of the Standard Form Contract covers RIA's confidentiality commitments to its customers.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
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.	5	A	1	<p>It was confirmed during the course of the audit that the RIA permits the disclosure of confidential information as required by the Code.</p> <p>RIA's Corporate Information Confidentiality Agreement signed by employees permits access to information for "legitimate business purposes".</p> <p>The RIA, PFM, McGees and AHR all provided requested information (including confidential) for the purposes of this audit.</p>
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	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other Code participants
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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other Code participants

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other Code participants
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.	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other Code participants
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).	N/A	N/A	N/A	Not Applicable – The RIA has an Integrated Regional Licence and there are no other Code participants
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.	2	B	1	The Independent Power Quality Monitoring and Evaluation Procedure has been developed. PFM provided auditor with the following reports for the audit period: 1) Power Quality Report written by Nilsen for period (Dec 2015- Jan 2016);

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
						<p>2) Power Quality Report written by RNM Solutions for period (1-17 March 2017) Which have raised issues to be investigated (relating to Power factors and long-time flicker values, however this is still within allowable limits stated within the Code.</p> <p>PFM have confirmed that there is a capital works proposal for replacement of Westralian and Landfill transformers.</p> <p>.</p>
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.	5	A	1	<p>The Standard Form Contract provides for the disconnection of supply where deemed necessary.</p> <p>An audit of the Outage Registers for 2015-2016 and 2016-2017 maintained by PFM indicated that the licensee took appropriate action with respect to both planned and unplanned disconnections</p>
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.	5	A	1	<p>As per Obligation 462. Outages are covered by performance indicators that are monitored by RIA and operations PFM monthly service reports</p> <p>The NQRS Report 2016 reported that there were no supply interruptions greater than 12 hours and no customer had more than the stipulated 16 occurrences of interruptions in 2015/16.</p>
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	2	A	.1	<p>PFM have in place contingency plans to manage emergencies and interruptions of supply to customers. The "Electrical Disaster Recovery Plan, Business Continuity Planning" includes for the provision of emergency supply in the case of a loss</p>

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
						of supply, such as portable diesel generators kept on standby at critical distribution points. PFM's "PRO-RNI-I03-034-1 Planned Outage Notification Procedure" stipulates that all "planned outages are to be undertaken to cause minimal disruption to customers."
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.	2	A	1	As per Obligation 465.
15 Electricity Industry (Network Quality and Reliability of Supply) Code – Licence Conditions and Obligations						
467	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 12(3)	A distributor must take prescribed action in the event of a significant interruption to a small use customer.	2	A	1	As per Obligation 465. Also the Standard Form Contract provides for the RIA and the customer to agree on methods to immediately restore the supply and/or maintenance and/or replacement of equipment. PF have in place the "PRO-RNI-I03-034-1 Planned Outage Notification Procedure" for the notification of interruptions to customers and the possible utilisation of alternative supply
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.	3	A	1	As per Obligation 465. Also the Standard Form Contract provides for the RIA and the customer to agree on methods to immediately restore the supply and/or maintenance and/or replacement of equipment. PF have in place the "PRO-RNI-I03-034-1 Planned Outage Notification Procedure" for the notification

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
						of interruptions to customers and the possible utilisation of alternative supply
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.	4	A	1	The total length of interruptions of supply has been calculated using the specified method over a four year period.
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.	5	A	1	The audit received confirmation from the RIA that no notice was received from the Minister under section 14 of the NQRS Code during the audit period
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.	5	NP	NR	Not Rated – The audit received confirmation from the RIA that no notice was received from the Minister under section 14 of the NQRS Code during the audit period
472	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 18	A distributor operating a relevant distribution system must, in specified circumstances, make a payment to a customer within a specific timeframe for a failure to give required notice of planned interruption.	5	NP	NR	Not Rated – No failure to give required notice of planned interruptions (72 hours) was found during the audit period, thus no payments were made to customers.

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
473	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 19	A distributor operating a relevant distribution system must, in specified circumstances, make a payment to a customer within a specific timeframe if a supply interruption exceeds 12 hours.	5	NP	NR	Not Rated – No supply interruptions exceeding 12 hours were found during the audit period, thus no payments were made to customers.
474	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 21(1)	A distributor operating a relevant distribution system must provide eligible customers with information about applying for payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.	5	A	1	Advice of customer right for payments is provided by the RIA to customers on an annual basis via McGees. There is no strict requirement for RMA to separately advise customers of right for payments, given the same customers are already being advised by McGees
475	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 21(2)	A distributor operating a relevant distribution system must provide written notice to customers about payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.	5	A	1	Advice of customer right for payments is provided by the RIA to customers on an annual basis via McGees. There is no strict requirement for RMA to separately advise customers of right for payments, given the same customers are already being advised by McGees
476	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 21(3)	A distributor operating a relevant distribution system must provide written notice to eligible customers about payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005 not less than once in each financial year.	5	A	1	As per Obligation 474

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
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.	2	A	1	FUSS contract has in place a set of strategies to monitor and ensure compliance of the network with requirements: Monthly Service Reports from PFM provide RIA a comprehensive review of the performance of the discharge of their duties under the FUSS contract including monitoring of the network and performance measures.
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	A	1	As per Obligation 477
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.	5	NP	NR	Not Rated – The audit confirmed that there were no quality investigations requested by customers during the audit period.
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.	5	NP	NR	Not Rated as per Obligation 479
481	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 25(2)	A distributor or transmitter must make available, at no cost, a copy of a document setting out its complaint handling processes to a small customer who makes a complaint to the distributor or transmitter or who asks to be given such information.	5	A	1	The Standard Form Contract sets out RIA's complaint handling processes, internally managed via the RIA's Utilities Customer Complaints Procedure. There were no instances of a customer requesting complaint handling documentation in the audit period. Refer to Obligation 172

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
482	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 25(3)	A document setting out a distributor's or transmitter's complaint handling process must contain the specified information	5	A	1	<p>The NQRS Code requires that the documentation provided to the customer on the complaint handling process includes reference to the electricity ombudsman.</p> <p>As per Obligation 481, the Standard Form Contract makes reference to the option available to a customer to refer a matter to the electricity ombudsman</p>
483	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 26	A distributor or transmitter must arrange for an independent audit and report on its systems for monitoring, and its compliance with specific requirements. This is to be carried out in respect of the operation of such systems during each year ending on 30 June.	3	A	1	<p>Independent audits and reports were arranged in both 2015 and 2016. And published on the RIA website at: http://ria.wa.gov.au/policy-and-reports/utility-reports/electrical-reports.</p>
484	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 27(1)	A distributor or transmitter must prepare and publish a report about its performance in accordance with specified requirements.	5	A	1	<p>Reports covering the license performance were published by the RIA.</p>
485	Electricity Industry (Network Quality and Reliability of Supply) Code 2005, clause 27(3)	A distributor or transmitter must give a copy of its report about its performance to the Minister and the ERA within the specified period.	5	A	1	<p>Reports covering the licensee performance were issued to the Authority and Minister and have been published in the ERA authored "2016 Annual Performance Report Energy Distributors". 2015/16 RIA annual report was signed-off by Island Authority Chairman and Deputy Chairman 19th September 2016. Refer to Rottnest Island website Policy & Reports – Annual Reports.</p>

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
486	Electricity Industry (Licence Conditions) Regulation, regulation 8	The licensee must submit to the Coordinator a draft renewable source electricity contract by the time specified in the Act or by the Coordinator.	NA	N/A	N/A	Not Applicable Do not apply to RIA
487	Electricity Industry (Licence Conditions) Regulation, regulation 8	The licensee must comply with a direction by the Coordinator to submit an amendment to the renewable source electricity contract by the time specified.	N/A	N/A	N/A	Not Applicable Do not apply to RIA
488	Electricity Industry (Licence Conditions) Regulation, regulation 6	The licensee must offer to purchase renewable source electricity from a renewable source electricity customer under an approved renewable source electricity contract.	N/A	N/A	N/A	Not Applicable Do not apply to RIA
489	Electricity Industry (Licence Conditions) Regulation, regulation 7	The licensee must submit to the Coordinator a written report detailing the amount of renewable source electricity purchased by the licensee and the cost of purchasing that renewable source electricity as soon as practicable at the end of each financial year.	N/A	N/A	N/A	Not Applicable Do not apply to RIA

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
490	Electricity Industry Act, section 61 and 65	The licensee must submit to the Coordinator a draft extension and expansion policy within the specified timeframe.	N/A	N/A	N/A	Not Applicable Do not apply to RIA
491	Electricity Industry Act, section 62, 64 and 65	The licensee must comply with a direction given by the Coordinator in relation to a draft extension and expansion policy or an amendment to an extension and expansion policy.	N/A	N/A	N/A	Not Applicable Do not apply to RIA
492	Electricity Industry Act, section 65	The licensee must implement arrangements set out in an approved extension and expansion policy.	N/A	N/A	N/A	Not Applicable Do not apply to RIA

Electricity compliance No.	Obligations under condition	License Obligation/Description	Audit Priority	Adequacy A,B = Y C,D = N	Compliance* 1=Y 2,3,4=N	Audit Findings
493	Electricity Industry Act, section 11	2 The licensee will operate and maintain a trouble call fault management system.	N/A	N/A	N/A	Not Applicable Do not apply to RIA
494	Electricity Industry Act, section 11	The licensee must provide prior notification to the ERA if it intends to outsource its trouble call fault management system	N/A	N/A	N/A	Not Applicable Do not apply to RIA
495	Electricity Industry Act, section 11	Prior to entering into a standard form contract or a non- standard contract with a customer, the licensee must provide the specified information verbally and in writing.	N/A	N/A	N/A	Not Applicable Do not apply to RIA
496	Electricity Industry (Customer Contracts) Regulations 2005 regulation 40	Subject to specified exceptions, the licensee must offer to supply electricity under a standard form contract to a customer who requests it.	N/A	N/A	N/A	Not Applicable Do not apply to RIA

Appendix B - Asset Management System Review Checklist

Asset Management System Review Checklist

1. Asset Planning

Key process: Asset planning strategies are focussed on meeting customer needs in the most effective and efficient manner (delivering the right service at the right price).

Outcome: Integration of asset strategies into operational or business plans will establish a framework for existing and new assets to be effectively utilised and their service potential optimised.

Review approach:

Assess the adequacy of the asset planning process.

Assess the adequacy of the asset management plan.

Assess whether the asset management plan is up to date and implemented in practice.

Assess whether the plan clearly assigns responsibilities and whether these have been applied in practice.

Effectiveness Criteria	Effectiveness	Comments
<p>1.1 Does the planning process and objectives reflect the need of all stakeholders and is it integrated with business planning?</p>	<p>Adequacy Rating: B Performance Rating: 2</p> <p>Corrective actions required: 1. Apply document control procedures to SAP.</p>	<p>RIA's planning processes follow the Treasury's annual Budget Cycle, however, 5-year and 20-year plans are also prepared to provide long term plans:</p> <ul style="list-style-type: none"> • The "Rottnest Island Management Plan" (RIMP) 2014 - 2019 is prepared at 5 year intervals and provides high level strategies and plans; the RIMP 2014-19 incorporates a 20 year plan, the "Rottnest Island Master Plan - A 20 Year Vision" (MP20), which accounts for the future development of the electricity utility. <p>The hierarchy of the major Asset Management documents maintained by the RIA and PFM are:</p> <ul style="list-style-type: none"> • Asset Management Policy (AM Policy) • Strategic Asset Investment Plan 2016-17 to 2026-27 (SAP) • Strategic Asset Management Plan (SAMP) • Multi Utility Asset Management Plan (MUAMP) <p>These documents define the shareholder and stakeholder requirements and the necessary asset management policies and strategies, including planning methodology, to service the identified requirements.</p> <p>The SAP is a 10-year plan, which provides the objectives, the status and needs of the assets, priorities for implementation as well as the annual investment. Business cases for large expenditure projects are also included in the SAP. The status of the SAP appears to be "first</p>

		<p>draft". There is no document control summary detailing: previous visions, author, reviewer, dates or endorsements etc.</p> <p>The SAMP and MUAMP provide progressively more detail regarding specific asset management processes and procedures.</p>
<p>1.2 Does the asset management plan cover all key requirements?</p>	<p>Adequacy Rating: B Performance Rating: 2</p> <p>Corrective actions required:</p> <p>1. The proposal is to have the MUAMP reviewed every 2 years, though this has not been formally articulated in any documentation or process.</p> <p>2. The MUAMP is a large document covering all utility assets. It may be more efficient to break the document out into separated documents for respective utility assets.</p>	<p>The SAMP outlines the systems and strategies targeted to control and manage the island's assets to the benefit of its stakeholders. The document aims to demonstrate alignment between stakeholder requirements, organisational objectives and the resulting asset management strategies service these requirements and objectives. The main aspects of the SAMP are:</p> <ul style="list-style-type: none"> • Overview of the main assets on the island; • Asset management systems framework outlining the high level AM objectives; • Strategic asset management considerations covering the stakeholder and requirements statutory compliance requirements, financial and investment forecasts and asset management information objectives; • Life cycle management covering strategies to manage assets prudently and efficiently through the implementation of life cycle strategies; • High level risk management framework; • Performance evaluation outlining the key performance indicators (KPI) reporting necessary for governance of the asset management program; • Continual improvement detailing the process to achieve continual improvement of asset performance, processes and procedures. <p>The SAMP was issued by PFM in July 2016 covering the period 2016 to 2017 and is reviewed and endorsed by the CEO annually.</p> <p>The current MUAMP covers the period 2016 to 2020 with the first draft issued in December 2016. The main aspects of the MUAMP are:</p> <ul style="list-style-type: none"> • Comprehensive asset details covering Power, Water, Waste Water, Bulk Storage; • Asset management fundamentals covering asset lifecycle stages, asset planning, asset risk management, maintenance planning, operations and decommissioning and disposal; • Document control covering the administration of asset data and details; • Safety and regulatory planning detailing the strategy to maintain compliance with safety and regulatory requirement for all utilities; • Capacity planning detailing long term plans to ensure that adequate capacity levels are maintained to service the forecasted demand for up to 10 years;

		<ul style="list-style-type: none"> • Reliability planning detailing programs to ensure alignment with customer service obligations; • Quality evaluation outlines the process of developing long and short term plans to ensure the quality of supply received at the customer’s point of connection and beyond meets the statutory requirements; • Asset life cycle cost details the review process and evaluation of the assets during their operating life (including run to failure); • Contingency planning for the failure of critical plant and the speedy recovery of services following server outage events. <p>The MUAMP covers the period 2016 to 2020 and is revised every 2 years. The first draft was submitted in July 2016 and a final version issued in Dec 2016.</p>
1.3 Have service levels been defined?	Adequacy Rating: A Performance Rating: 1	<p>Service levels between RIA and PFM are specified under the FUSS Contract and Service Specifications. Service levels are measured to KPI’s and reported on a monthly basis as per the “PFM KPI Performance Reporting Manual” which has been in effect since January 2015. These KPI’s include:</p> <ul style="list-style-type: none"> • Supply of electricity in accordance with regulatory conditions; • Regulatory audits and reports to be conducted and submitted as per regulatory body requirements; • No interruptions in provision of utility services outside the limits stipulated in the • Licence conditions; and • Compliance with Code of Conduct. <p>In addition the Service Agreement requires the operator to report the following on an annual basis:</p> <ul style="list-style-type: none"> • All maintenance activities scheduled to be performed during the following year; • Any amendments to the planned delivery of the services; • Anticipated renewal or replacement plans; • Overview of current relevant industry trends; • The maintenance condition of each item of Rottneest Island’s equipment.
1.4 Have non-asset options (e.g. demand management) been considered?	Adequacy Rating: B Performance Rating: 2 Corrective actions required: 1.Consider demand management	No evidence of actively considered non-asset initiatives, related to electricity demand management at the consumer end, was presented to the Auditors.

	strategies for the major consumers of energy.	
1.5 Have the lifecycle costs of owning and operating assets been assessed?	<p>Adequacy Rating: B Performance Rating: 2</p> <p>Corrective actions required:</p> <p>1. Capture actual operational and maintenance costs of electricity production and regularly review against forecasted values.</p>	<p>A life cycle costing (LCC) model “RIA Asset LCC Rev1” was developed and is maintained by PFM. The LCC model includes major assets e.g. Power House, HV Power Distribution, Desal Plant, Wind Turbine.</p> <p>The LCC model details the following:</p> <ul style="list-style-type: none"> • Asset information • Asset risk assessment • Serviceability index • Asset management strategy (aligns with O&M manuals) <p>The LCC model is reviewed quarterly. The review process of program is not formally articulated.</p> <p>Operational costs associated with the generators are predicted by the LCC model though actual costs are not always recorded and reported.</p> <p>Condition assessments is undertaken for assets listed in the LCC model and reported in a Computerised Maintenance Management System called “Maximo”. The assessment of the generators are recorded electronically using “Promap”, which links with and updates information in Maximo. Condition assessments for other assets e.g. poles and conductors, are assessed using a paper-based system followed by a manual update of Maximo.</p>
1.6 Have funding options been evaluated?	<p>Adequacy Rating: A Performance Rating: 1</p>	<p>RIA evaluate their funding options through the following planning documents:</p> <ul style="list-style-type: none"> • The RIMP provides the high level options available to the RIA for funding operations and capital expenditure; • The SAP 2016-17 summarises the risks of electricity utility and the required contribution from RIA, State and Federal Government to fund proposed activities.
1.7 Are the costings justified and have the cost drivers been identified?	<p>Adequacy Rating: A Performance Rating: 1</p>	<ul style="list-style-type: none"> • Drivers for expenditure are identified through a prioritisation process; activities may be justified on the basis of safety as higher rated priority.
1.8 Have the likelihood and consequences of asset failure been predicted?	<p>Adequacy Rating: B Performance Rating: 2</p>	<p>The SAMP and MUAMP outlines the risk methodology followed to identify, assess and treat risks associated with Island assets.</p>

	<p>Corrective actions required:</p> <p>1. Assess and document the residual risk for risks identified in the ERMP.</p>	<p>PFM have an Enterprise Risk Management Plan (ERMP) for the 2017/18 period and is under currently review. The ERMP clusters the technical, environmental, commercial, operational, reputational, and safety and health risks into 17 high-level risk statements.</p> <p>Comprehensive asset risk assessments are capture in the following documents:</p> <ul style="list-style-type: none"> • “RIA Asset Life Cycle Costing Spreadsheet” – this is for the Power House only. 52 assets are listed and assigned with a risk score calculated from likelihood and consequence values. • “Power Risk Matrix” – for all other electrical assets. 100+ entries are listed and assigned with a risk score calculated from likelihood and consequence values. Residual risk is also calculated based on proposed control measures. <p>The ERMP does not report the residual risk after application of risk controls.</p>
<p>1.9 Are the plans being regularly reviewed and updated?</p>	<p>Adequacy Rating: B Performance Rating: 2</p> <p>Corrective actions required:</p> <p>1. Develop a document review program and articulate the process in respective management plans.</p>	<p>The RIA have developed a range of asset management and planning documents.</p> <p>In general, all documents are subject to regular review though not all documents have a formal review procedure or program.</p> <p>The MUAMP covers the period 2016 to 2020 and is reviewed every 2 years; however, this is not clearly articulated in the MUAMP or other review procedure.</p>
<p>1.10 Is the capability of the plant adequate to meet future demand?</p>	<p>Adequacy Rating: B Performance Rating: 2</p> <p>Corrective actions required:</p> <p>1. Develop a software model of the electricity network. 2. Prioritize a risk review of the power system reliability and capacity requirements.</p>	<p>Capacity studies were recently undertaken and documented in the MUAMP. The results showed that there is sufficient network generation capacity for the next 10 years. Generation capacity is compliant to N-2 criteria. N-2 refers to an abnormal situation in which two assets that otherwise contribute to the system are out-of-service; the analysis is conducted under the assumption that the assets with the largest impact are out-of-service, thereby identifying the most conservative outcome.</p> <p>Review of capacity requirements is only triggered if major infrastructure is added to the system. The review found that there is no software model for the electrical network and power station.</p> <p>The review found that the network is not N-1 compliant. N-1 refers to an abnormal situation in which one asset that otherwise contributes to the system is out-of-service; the analysis is conducted under the assumption that the asset with the largest impact is out-of-service, thereby identifying the most conservative outcome.</p>

	3. Consider larger transformers in future asset replacement plans.	<p>There are four HV circuits supplied by two 1 MVA transformers at the powerhouse. The estimated peak load during summer is around 1.5 MVA. In the event that either of the two transformers are out of service (e.g. failure, maintenance), the remaining transformer would not be able to supply peak load demand.</p> <p>The RIA seem to prepare for this contingency by installing and running additional diesel generators closer to the load centres.</p> <p>There is one strategic spare transformer in the main substation, though to replace a failed transformer would not be a speedy exercise.</p>
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2. Asset creation and acquisition

Key process: Asset creation/acquisition means the provision or improvement of an asset where the outlay can be expected to provide benefits beyond the year of outlay.

Outcome: A more economic, efficient and cost effective asset acquisition framework, which will reduce demand for new assets, lower service costs and improve service delivery.

Review approach:

Assess the adequacy of policies and procedures covering the creation and acquisition of assets.

Select a sample of creations/acquisitions over the review period and confirm that adequate procedures have been followed and actual costs are as predicted.

Effectiveness Criteria	Effectiveness	Comments
2.1 Are full project evaluations being undertaken for new assets, including comparative assessment of non-asset solutions?	Adequacy Rating: A Performance Rating: 1	<p>The project evaluation process has not changed in a significant way since the previous review.</p> <p>Consideration of new assets has to follow processes of evaluation by both the operator, PFM, and the licensee. PFM prepares CAPEX plans between October and December for submission to the licensee.</p> <p>RIA has to maintain CAPEX levels below Treasury approved levels over the forthcoming four years. Project prioritisation is done based on a risk evaluation considering safety, compliance and criticality of continuity of service. Lower priority projects are discretionary. Selected projects are included in CAPEX plans. Planning at this point is based on Interviews with staff evidence of condition assessment and some condition based risk prioritisation is undertaken but not fully implemented yet.</p>

		<p>Once projects are identified, Business Cases (BC) are prepared for approval by management. A single pass approval is in place for projects under a discretionally value of around \$150k which require approval by the CFO, the General Manager and the CEO, whilst projects larger than this require a "two pass" approval.</p> <p>During the review process there were acquisitions of 3 major assets, which are:</p> <ul style="list-style-type: none"> • Waste water treatment plant • Solar farm • Dynamic resistor <p>Business cases were prepared for each of these assets.</p> <p>The BCs included the following:</p> <ul style="list-style-type: none"> • Strategic justification • Objectives and benefits • Solution options • Costs • Risks • Procurement and finance plan
2.2 Do evaluations include all life-cycle costs?	<p>Adequacy Rating: A Performance Rating: 2</p> <p>Corrective actions required: 1. Capture actual operational and maintenance cost of electricity production and regularly review against forecasted values.</p>	<p>Operational and maintenance form part of the life cycle cost calculations and are considered for major plant acquisitions. The life cycle costs are calculated and clearly articulated in the BC to justify the proposed solution. Actual operational and maintenance cost are not always captured.</p>
2.3 Do projects reflect sound engineering and business decisions?	<p>Adequacy Rating: A Performance Rating: 1</p>	<p>Input to the engineering evaluations are in most cases undertaken by the Island Engineer. In cases where the required technical input falls outside the expertise of the Island Engineer, a third party supplier is engaged to perform the engineering evaluations.</p>
2.4 Are the commissioning tests documented and completed?	<p>Adequacy Rating: A Performance Rating: 1</p>	<p>Inspection and test plans (ITS) have been recorded for major assets acquired over the last few years. There are some older assets for which no ITPs or commissioning documentation is made available e.g. generator 5 and 6 commissioned in the 1980's and 1990's respectively.</p>

<p>2.5 Have the ongoing legal/environmental/safety obligations of the asset owner been assigned and understood?</p>	<p>Adequacy Rating: B Performance Rating: 2</p> <p>Corrective Action Required:</p> <ol style="list-style-type: none"> 1. RIA to ensure the operations and maintenance contractor keeps the breach register up to date. 	<p>A process is in place for managing the legal/environmental/safety compliance of the asset operation, which is the responsibility of PFM; however, the RIA maintains an “Electrical, Water, Gas Licence Compliance Register” which lists compliance requirements and timing. PFM maintain a "Breach and Compliance Event Register" which lists breaches in operation but does not extend to outages and licence reporting obligations.</p> <p>During the review period, it was found the breach register was not kept up to date. The breach register provided by PFM did not show any entries for the FY14-15 and FY15-16 period. The FY16-17 showed one recorded breach.</p>
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3. Asset disposal

Key process: Effective asset disposal frameworks incorporate consideration of alternatives for the disposal of surplus, obsolete, underperforming or unserviceable assets. Alternatives are evaluated in cost benefit terms.

Outcome: Effective management of the disposal process will minimise holdings of surplus and underperforming assets and will lower service costs.

Review approach:

Assess the adequacy of policies and procedures covering the identification of underperforming assets, disposal of assets and replacement strategy.

Determine whether a regular review of the usefulness of assets is performed.

Select a sample of disposals over the review period and confirm that adequate procedures have been followed.

Effectiveness Criteria	Effectiveness	Comments
<p>3.1 Are underutilised and underperforming assets identified as part of a regular systematic review process?</p>	<p>Adequacy Rating: B Performance Rating: 2</p> <p>Corrective actions required:</p> <ol style="list-style-type: none"> 1. Continue with identification of legacy cable and joint locations. 2. Update network drawings to show 	<p>The high-level asset disposal process it presented in the MUAMP.</p> <p>Underutilised and underperforming assets are identified as part of the Life Cycle Costing (LCC) process and the need for disposal/replacement justified in the Strategic Asset Investment Plan.</p> <p>The LCC model only focuses on the assets in the Power House. No other evidence of other underutilised and underperforming assets processes were provided.</p> <p>PFM have developed an Asset Disposal Procedure “PRO-PFM-I03-002-1” which provide an overview of the activities required when considering the disposal of assets.</p>

	cable and joint locations.	<p>This is complimented by an “Asset Disposal Form” were the details of the disposed assets are captured.</p> <p>The review found that there were no updated drawings showing the underground cable or joint locations. The majority of these old cables are paper insulated which are now technically obsolete. Although obsolete, these cables do not pose a safety issue, as they are underground cables with no exposed live conductors. Furthermore, the cables are adequately protected by existing protection schemes. It is expected that that a program to identify and replace these cables will be required.</p>
3.2 Are the reasons for underutilisation or poor performance critically examined and corrective action or disposal undertaken?	Adequacy Rating: A Performance Rating: 1	<p>PFM undertake root cause analyses of failures of critical assets in line with best industry practice.</p> <p>For example, a root cause analysis was performed on a cable failure that occurred during the review period. On the 22/2/2017, a fault occurred on an 11kV feeder affecting supply to Oliver Hill, Wadjemup, Landfil and Lakehouse. A post event investigation found that the reason for the fault was moisture ingress to a cable joint due to pressure from a nearby tree’s root system. Potential solutions were recommended and actions assigned to nominated personal. Details of the investigation are documented in “RCA Template_ Cable Fault”.</p> <p>Apart from cable failure example, there was no other poor performing assets identified during the review period.</p> <p>There is a process for reporting plant performance, examining the reasons for poor performance leading to proposals for repair or disposal. Findings are documented in Monthly Reports and annual reviews. Inspections are carried out to confirm plant condition. Asset risk assessments also summarise plant risks and corrective actions. The information is then reported in the strategic plans and projects identified and prioritised.</p>
3.3 Are disposal alternatives evaluated?	Adequacy Rating: A Performance Rating: 1	<p>PFM’s Asset Disposal Procedure outlines the options available to dispose of assets. These include the following:</p> <ul style="list-style-type: none"> • Sale by tender • Sale by auction or direct sale • Salvage parts to use as spares • Scrapping • Donations <p>The Asset Manager, in conjunction with the RIA appointed specialist, determine the market value of an item, which is to be disposed of, by professional valuation or other</p>

		<p>appropriate means. The calculation of market value, with documentation if appropriate, must be provided to the authorised RIA representative prior to disposal of the asset.</p> <p>There were no examples of major asset disposals presented during the review process.</p>
3.4 Is there a replacement strategy for assets?	<p>Adequacy Rating: B Performance Rating: 2</p> <p>Corrective actions required: 1. Develop a program to identify legacy cables and joints.</p>	<p>The Strategic Asset Investment Plan (SAIP) presents a high-level strategy and estimated capital spend required to replace and maintain assets.</p> <p>In the next version of the SAIP, the RIA will present an update of this forecast derived from the remaining life assessments, Facility Condition Indexes (FCI), risk assessments and portfolio evaluations of asset relevance.</p> <p>There is an active program to replace the existing wooden poles of the overhead distribution network. Some of this work has already been undertaken by a third party service provider. The works include replacement of 20 poles per year, with approximate completion date of 2017/18.</p> <p>There is not an active program to replace the aged underground high voltage distribution cables; however, RIA are currently reviewing a recommendation, submitted by PFM, to have the cables replaced. Note that these cables do not pose a safety issue, as they are underground cables with no exposed live conductors. Furthermore, the cables are adequately protected by existing protection schemes. There is 1.6km of underground transmission cables, a relatively small amount quantity.</p>

4. Environmental Analysis

Key process: Environmental analysis examines the asset system environment and assesses all external factors affecting the asset system.

Outcome: The asset management system regularly assesses external opportunities and threats and takes corrective action to maintain performance requirements.

Review approach:

Review achievement of performance and service standards over the audit period.

Investigate any breaches and assess corrective action taken.

Review the adequacy of reporting and monitoring tools.

Effectiveness Criteria	Effectiveness	Comments
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4.1 Are opportunities and threats in the system environment assessed?	Adequacy Rating: A Performance Rating: 1	<p>Opportunities and threats in the system environment are assessed and an awareness was expressed during interviews.</p> <p>Capacity, reliability and optimisation planning is undertaken as part of the MUAMP. The MUAMP also identified customer trends, financial constraints and the LCC replacement liability of the aged condition of electrical infrastructure. Key risks related to assets are quantified under each of these categories. Appropriate strategies have been formulated to address those issues. Capital projects are then recommended as well as the predicted financial spend of a 5 year period.</p>
4.2 Are Performance Standards (availability of service, capacity, continuity, emergency response etc.) measured and achieved?	Adequacy Rating: A Performance Rating: 1	<p>Performance standards are defined in the SLAs. Monthly performance reports are issued by PFM under the FUSS contract. The service report outlines utilities performance such as planned and unplanned outages, trips, capacity, availability and outputs, updates, innovations and risk and opportunities. (Whilst this report covers all functions of PFM chapters are dedicated to electricity related operations).</p> <p>Planned and unplanned outages are recorded in "Planned and Operational Outages" spreadsheets for each FY.</p> <p>The FUSS requires that detailed reporting of response to faults be provided, requiring that Priority 1 faults be responded to within 20 minutes and rectified within 2 hours.</p>
4.3 Is there compliance with statutory and regulatory requirements?	Adequacy Rating: A Performance Rating: 1	It is the opinion of the auditors that compliance with statutory and regulatory requirements are achieved except for a few minor non-compliances.
4.4 Have customer service levels been achieved?	Adequacy Rating: A Performance Rating: 1	<p>Customer service levels are measured by PFM and verified yearly by an independent service provider.</p> <p>One complaint was received during the review period, which was satisfactorily resolved. No other complaints received so it is the opinion of the auditor that customer service levels have been achieved.</p>

5. Asset operations

Key process: Operations functions relate to the day-to-day running of assets and directly affect service levels and costs.

Outcome: Operations plans adequately document the processes and knowledge of staff in the operation of assets so that service levels can be consistently achieved.

Review approach:

Assess the adequacy of policies and procedures covering operations functions.

Assess the adequacy of staff resourcing and training.

Confirm the policies and procedures have been followed during the review period by testing of asset register, observation of operational procedures, analysis of costs, etc.

Assess the significance of exceptions identified and whether adequate corrective action has been taken.

Effectiveness Criteria	Effectiveness	Comments
5.1 Are the operational policies and procedures documented and do they link to the required service levels?	Adequacy Rating: A Performance Rating: 1	<p>Operational policies have been set up on the basis of commissioning an experienced operator to perform the function.</p> <p>The Computerised Maintenance Management System (CMMS) called "Maximo" is used to manage asset operations. Maximo creates a "job plan" at a set frequency, which details operational procedures for the particular asset and is in line with the applicable O&M manuals.</p> <p>PFM maintain a suite operational procedures, examples of which are:</p> <ul style="list-style-type: none">• The "Restoration Priority Register for Electrical Service" details the procedure to be following in the event of extensive outages.• The "Planned Outage Notification Procedure" PRO-RNI-I03-034-1 is in place to provide a minimum 72 hours advance notification to customers of planned outages and for providing alternative power supply.• The "Powerhouse Outages Procedure" PRO-RNI-I03-035-1 provides the operational response of power generation facilities to events such as trips, faults and power blackouts. <p>Service levels are defined in the "FUSS Contract" and reported on by PFM to the RIA on a monthly basis.</p> <p>RIA maintains oversight of PFM's activities in the following way: PFM were contracted in August 2014 to provide facilities, utilities and support services on Rottneast Island under the Facilities, Utilities and Support Services (FUSS) contract. Volume 2 of the Contract contains Service Specifications that provides detailed service levels for all services under the contract. Schedule 1, Estate Management Services, Schedule 2, Utilities Services and Schedule 3 Management and Compliance Services provide in detail on how PFM operations of the electricity assets are managed / overseen. The PFM operational policies and procedures are maintained in a document suite on the P drive and in IKnow. Selected RIA staff have access to IKnow and the RIA Manager Major Contracts currently has access to Maximo (PFM's</p>

		<p>Computerised Maintenance Management System). The RIA has requested more access points for selected staff to Maximo, which is currently being reviewed by PFM (software licences to be issued). The Facilities Management Operational Group (FMOG) meets monthly to discuss a variety of operational issues on the Island. This group consists of operational management staff from the RIA and PFM and is documented in minutes, notes for decision and action registers. The Asset Management Steering Committee meets monthly to discuss current issues in relation to asset conditions, life cycle costings, data collections etc. The Committee consists of operational management staff from the RIA and PFM and is documented in minutes and action registers. In preparation for the monthly FMOG meeting, PFM presents a Monthly Service Report that consists of Performance, Health Safety and Environment, Health and Safety Performance, Environment and Compliance Performance, Performance failures and points, Management and Compliance Reporting, Service Specification Information, Utilities, Innovation, Risk, etc. The report provides a monthly summary of the Powerhouse data and performance delivery. A separate KPI report provides monthly performance delivery reports as specified in the FUSS contract. These KPIs are closely monitored by the RIA and discussed at the monthly FMOG meeting. The PFM Island Operations Manager and the PFM Island Engineer are available on a daily basis on the Island to discuss issues as they arise.</p>
<p>5.2 Is risk management applied to prioritise operations tasks?</p>	<p>Adequacy Rating: B Performance Rating: 2</p> <p>Corrective actions required: 1. Apply document control procedures to "Power Risk Matrix".</p>	<p>PFM maintain a "Power Risk Matrix" for the Powerhouse. The review noted however that no document control procedures are applied to this document e.g. previous versions, author, reviewer, dates or endorsements etc.</p> <p>There is also a "Blackstart procedure" and "Disaster Recovery Plan" for recovery of electrical distribution network for high risk events.</p> <p>PFM's performance of the operational tasks are clearly defined and prioritised. Task performance is subject to a rating system Tasks which are not adequately performed within the defined times result in negative ratings and possibly penalties. Response and rectification times are set based on the risk and criticality of the task.</p>
<p>5.3 Are assets documented in an Asset Register including asset type, location, material, plans of components, an assessment assets' physical/structural condition and accounting data?</p>	<p>Adequacy Rating: B Performance Rating: 2</p> <p>Corrective actions required: 1. The link between the physical asset register and accounting asset</p>	<p>PFM maintain a register of assets as part of the Maximo system in a database called "FUSS Contract 0001".</p> <p>The database appears to be comprehensive and up to date. The database contains details related to the asset type, location (where practical), maintenance and operational plans (where applicable), condition assessments etc. For example, the review found that overhead poles and conductors, cables, generators, transformers, strategic spares were captured in the database.</p> <p>Accounting data is maintained in a separate accounting system called "Sage". There is no direct interface between the asset management system (Maximo) and Sage. Assets are linked between</p>

	<p>register is not documented.</p> <p>2. Software program to be developed to create a unique asset identification numbers.</p>	<p>registers through a unique asset identifier nominated by Sage and manually assigned to the corresponding asset in Maximo.</p> <p>Unique asset numbers to be created to synergise equipment identification between PFM's and RIA's asset registers.</p>
5.4 Are operational costs measured and monitored?	<p>Adequacy Rating: B Performance Rating: 2</p> <p>Corrective actions required:</p> <p>1. Capture actual operational costs of electricity production.</p>	<p>Some operational costs are monitored and captured in a separate spreadsheet.</p> <p>Information on labour hours and parts are entered into "Navision", a system that is separate from Maximo. Output of system is through Excel spreadsheets.</p> <p>Recording actual operating costs of electricity production informs pricing strategy, capital works and maintenance program development.</p>
5.5 Are staff receiving training commensurate with their responsibilities?	<p>Adequacy Rating: B Performance Rating: 2</p> <p>Corrective actions required:</p> <p>1. Develop a training register capturing staff's training requirements.</p>	<p>PFM maintain as Competency Matrix that details the skills held by staff members.</p> <p>Inductions are undertaken by all new staff and monthly toolbox are held.</p> <p>It is unclear what specific training requirements are required by staff. A training register is not maintained.</p>
5.8 Is the current staffing arrangements and responsibilities adequate for effective asset operations?	<p>Adequacy Rating: A Performance Rating: 1</p>	<p>PFM seem to be adequately resourced to operate the electricity network. The team consists of:</p> <ul style="list-style-type: none"> • 3 x Electricians • 2 x Powerhouse Supervisor • 1 x Asset Manager • 1 x Island Engineer <p>Services that cannot be provided by the team are outsourced to suitable third party suppliers and managed by the Island Engineer.</p>

Key process: Maintenance functions relate to the upkeep of assets and directly affect service levels and costs.

Outcome: Maintenance plans cover the scheduling and resourcing of the maintenance tasks so that work can be done on time and on cost.

Review approach:

Assess the adequacy of policies and procedures covering maintenance functions.

Confirm the policies and procedures have been followed during the review period by testing of maintenance schedules, analyses of cost, etc.

Assess the significance of exceptions identified and whether adequate corrective action has been taken.

Effectiveness Criteria	Effectiveness	Comments
6.1 Have the maintenance policies and procedures been documented and linked to service levels required?	Adequacy Rating: A Performance Rating: 1	<p>Maintenance policies had been set on the basis of the contracted operator (PFM) providing the operation and maintenance services on site.</p> <p>The MUAMP details the maintenance strategy and process for major assets. PFM employ a preventative maintenance strategy with specific service level obligations. Reports are sent to RIA on a monthly base.</p> <p>A Preventative Maintenance Plan is then assigned to each asset and a maintenance frequency is set Maximo. Maximo then creates a Job Plan with associated Work Order at the required frequency.</p>
6.2 Are regular inspections undertaken of asset performance and condition?	Adequacy Rating: A Performance Rating: 1	<p>Depending on the O&M requirements of the plant, inspections are carried out on a weekly, monthly or annual basis. Inspections are performed of asset condition while asset performance is monitored through regular reporting.</p> <p>On overall maintenance program, "Utilities KPI 5 Forecast 2017/18 was presented. PFM have provided evidence of energised maintenance inspection work including Infrared Thermography, Ultrasonic and Visual and Mechanical inspection worksopes that were effective 1st November 2015.</p>
6.3 Have the maintenance plans (emergency, corrective and preventative) been documented and completed on schedule?	Adequacy Rating: A Performance Rating: 1	<p>Under the FOU contract and the Maximo database, PFM scheduled operational (non-capital) asset maintenance and Work Orders through Maximo. Current process generates a monthly spreadsheet on the 15th of each month, the "Preventive Maintenance Schedule" listing Work Orders due. Work Orders have start and finish dates and allocated trade or service area. If jobs are not completed by the due date, the job is flagged. An "Open Work Order Report" is generated monthly and included in PFM Monthly Reports to the RIA. Jobs not completed on time receive a penalty rating and a negative KPI. Monetary penalties apply on a month-by-month basis if certain thresholds are reached. Much of the preventive maintenance is carried out during the off-peak season, between the end of April and early November.</p>

		<p>PFM maintains an overall program of scheduled maintenance - "Utilities KPI 5 Forecast 2017/18". Target and actual completion dates are tracked and reported on.</p> <p>Similar to preventative maintenance practices identified above, corrective maintenance and emergency maintenance plans are in place. Related Work Orders are scheduled through Maximo, where tasks are assigned priority ratings to quantify criticality. The highest priority, P1, is related to safety. Priorities are set by RIA in the contract with PFM. Work Orders have start and finish dates and allocated trade or service area. If jobs are not completed by the due date, the job is flagged. An "Open Work Order Report" is generated monthly and included in PFM Monthly Reports to the RIA. Furthermore, there is an emergency response plan in place for dealing with emergencies; emergencies are dealt with as they come about.</p>
<p>6.4 Are the failures analysed and operational/maintenance plans adjusted where necessary?</p>	<p>Adequacy Rating: A Performance Rating: 1</p>	<p>Failures are recorded in the annual "Operational Outage Register". Incident reports are completed for each failure. There was evidence to show that maintenance is adjusted to respond to the failures.</p> <p>For example, a root cause analysis was performed on a cable failure that occurred during the review period. On the 22/2/2017, a fault occurred on an 11kV feeder affecting supply to Oliver Hill, Wadjemup, Landfil and Lakehouse. A post event investigation found that the reason for the fault was moisture ingress to a cable joint due to pressure from a nearby tree's root system. Potential solutions were recommended and actions assigned to nominated personal. Details of the investigation are documented in "RCA Template_ Cable Fault".</p> <p>A recommendation from this investigation was to add cable joint kits to the critical spares list.</p>
<p>6.5 Has risk management been applied to prioritise maintenance tasks?</p>	<p>Adequacy Rating: A Performance Rating: 1</p>	<p>The MUAMP outlines the maintenance strategy and planning process. The process prioritises the types of preventative maintenance categories as follows:</p> <ul style="list-style-type: none"> • Statutory – legal requirement. • Mandatory – A requirement under OEM to maintain the warranty and / or as a Risk mitigation approach to manage a risk factor against an asset. This is as a last resort in terms of risk management and must be subject to a risk assessment. • Preventive – will provide the asset with a prolonged life usually recommended in O&M documentation or other sources including reliability workshops but not a statutory requirement. <p>Maintenance tasks, which incur significant capital cost, are subject to prioritisation in terms of risk, which rates safety, reliability and compliance as critical criteria.</p>

		<p>Under the contractual arrangements with PFM, performance of maintenance tasks is prioritised and task performance is subject to a rating system, tasks which are not adequately performed within the defined times result in negative ratings and in possible penalties.</p> <p>In reactive maintenance, higher priority applies to faults that endanger life or cause injury, or cause immediate material damage to property (It is noted that reactive maintenance can take place when unexpected failures occur, such as a failed underground cable, preventive maintenance cannot prevent all failures).</p>
6.6 Are the maintenance costs measured and monitored?	<p>Adequacy Rating: B Performance Rating: 2</p> <p>Corrective actions required:</p> <ol style="list-style-type: none"> 1. Capture actual maintenance costs of electricity production. 	<p>Some maintenance costs are captured and noted in a separate spreadsheet.</p> <p>Information on labour hours and parts is entered into Navision, a system that is separate from Maximo. Output of system is through Excel spreadsheets.</p> <p>Recording actual maintenance costs of electricity production informs pricing strategy, capital works and maintenance program development.</p>
6.7 Is the current staffing arrangements and responsibilities adequate for effective asset maintenance?	<p>Adequacy Rating: A Performance Rating: 1</p>	<p>PFM seem to be adequately resourced to maintain the electricity network. The team consists of:</p> <ul style="list-style-type: none"> • 3 x Electricians • 2 x Powerhouse Supervisor • 1 x Asset Manager • 1 x Island Engineer <p>Services that cannot be provided by the team are outsourced to suitable third part suppliers and managed by the Island Engineer.</p>

7. Asset Management Information System

Key process: An asset management information system is a combination of processes, data and software that support the asset management functions.

Outcome: The asset management information system provides authorised, complete and accurate information for the day-to-day running of the asset management system. The focus of the review is the accuracy of performance information used by the licensee to monitor and report on service standards.

Review approach:

Assess the adequacy of policies and procedures covering the general control and security of the computer systems used to provide management information on service standards/licence obligations.

Confirm that management reports on service standards/licence obligations are being reviewed and significant exceptions to service standards are promptly followed up and actioned.

Effectiveness Criteria	Effectiveness	Comments
7.1 Is there adequate system documentation for users and IT operators?	Adequacy Rating: A Performance Rating: 1	<p>The Rottnest Island electricity network assets are managed using the following IT systems:</p> <ul style="list-style-type: none"> • PFM's Maximo – Asset management database • PFM's Promap – electronic condition assessment of generator assets • RIA's Sage – Financial Asset Database <p>There is no direct interface between the Maximo and Sage. Assets are linked between registers through a unique asset identifier nominated by Sage and manually assigned to the corresponding asset in Maximo.</p> <p>The database appears to be comprehensive and up to date. The database contains details related to the asset type, location, maintenance and operational plans (where applicable), condition assessments etc.</p> <p>The RIA have the following suite of documents to govern the access and use of its IT systems, these include:</p> <ul style="list-style-type: none"> • Access Management Policy • RIA's Financial Management Information System Access Policy • Remote Access Policy • Secure USB Drive Access • ICT Access Request Form • Remote Access Request Form <p>These documents are current and up to date and no security breaches were recorded for the review period.</p>
7.2 Do the input controls include appropriate verification and validation of data entered into the system?	Adequacy Rating: A Performance Rating: 1	<p>PFM's Promap automatically push captured information regarding condition assessments to Maximo. Apart from this all other data is manually entered from spreadsheets of template word documents. A Quality Assurance (QA) system is in place that validates/verifies a sample base of work orders via random selection.</p>
7.3 Is there a logical security access control which is adequate, such as passwords?	Adequacy Rating: A Performance Rating: 1	<p>Access to RIA and PFM ICT systems are controlled by user generated password security systems. The ICT security system allows for tiered access depending on the individual's level of authority. The depth of access is established when the employee is on boarded and strictly controlled through the ICT Access Request Form and Remote Access Request Form.</p>

<p>7.4 Does the physical security access control appear adequate?</p>	<p>Adequacy Rating: B Performance Rating: 3</p> <p>Corrective actions required:</p> <ol style="list-style-type: none"> 1. Formal notification to be sent to PFM highlighting non-compliance to electricity safety standards. 2. Appropriate training to be provided to relevant personnel regarding asset security. 	<p>The following network assets were inspected:</p> <ul style="list-style-type: none"> • Ring main switches (RMU's) • Integrated Package Substation (IPS's) • Main Switchboards <p>Access (opening of cubicle doors) to these electrical assets is restricted to authorised personnel only. Most assets were secured by padlocks or mechanical keying mechanism to which only authorised personnel have a key. The Main Switchboard to the Island commercial precinct was found unlocked. The issues was immediately raised with the Island Engineer who took action to secure the lock on the unit.</p> <p>The general physical security measures taken to secure the RIA and PFM offices, warehouse and powerhouse appear to be adequate.</p> <p>Entry to offices and warehouse is secured with locks or mechanical number pads. There are padlocks at gates to the powerhouse. Keys are restricted to authorised personnel and facilities are secured by the last person leaving each day.</p> <p>PFM's core systems are located in a Burswood data centre secured by swipe card. A list of authorised users is maintained.</p>
<p>7.5 Does the data backup procedure appear adequate?</p>	<p>Adequacy Rating: A Performance Rating: 1</p>	<p>RIA's servers are hot mirrored to a location in Malaga, such that any failure at the East Perth location would result in zero system downtime. This was recently tested, with no user reporting any issues. In addition, multiple backups are taken of each site, with restore operations tested on a regular basis. RIA's Information Backup Policy "requires that all stored data, any information derived from this data and stored as part of the Authority's database and all applications which exist and are identified in the "Authority Application Register" be fully backed up and recoverable".</p> <p>PFM's servers have several levels of redundancy. In addition to local disk redundancy via RAID, email failover is available from Burswood to Kewdale and other critical systems such as Maximo can become available in as quickly as 5 minutes following a failure. Backup policies and disaster recovery are consistent with good industry practice.</p>
<p>7.6 Are the data backups tested?</p>	<p>NR</p>	<p>Data is backed up regularly.</p>

7.7 Are the key computations related to licensee performance reporting materially accurate?	Adequacy Rating: A Performance Rating: 1	All appropriate documentation was provided upon request and it is the opinion of the auditor that sufficient accuracy is applied to material accurate.
7.8 Do the management reports appear adequate for the licensee to monitor licensee obligations?	Adequacy Rating: A Performance Rating: 1	It is the opinion of the auditor that management reports appear to be adequate for the licensee to monitor licensing obligations. An example is the Network Quality and Reliability of Supply Independent Audit Report (2015-16) [available on RIA website] and Finance and Audit Committee Meeting briefing and minutes.

8. Risk Management

Key process: Risk management involve the identification of risks and their management within an acceptable level of risk.

Outcome: An effective risk management framework is applied to manage risks related to the maintenance of service standards.

Review approach:

Assess the adequacy of policies and procedures covering risk management and contingency planning.

Assess whether the risk management policies and procedures have been applied in practice.

Assess the adequacy of staff understanding and training on risk management.

Effectiveness Criteria	Effectiveness	Comments
8.1 Do risk management policies and procedures exist and are they being applied to minimise internal and external risks associated with the asset management system?	Adequacy Rating: B Performance Rating: 2 Corrective Actions: 1. Establish a review period for Risk Management Framework (RMF) document.	<p>The RIA have a "Risk Management Policy" in place, which is current and up to date.</p> <p>The RIA have a "Risk Management Framework", which details the method and procedure for the management of risks that threatens to adversely impact the RIA, its customers, people, assets finance, plans, operations or other stakeholders. There was no evidence of a review of this document since its inception in 2009, however, there is evidence of regular reviews of the risk register as shown in Finance and Audit Committee Meeting briefing and minutes.</p> <p>PFM have developed an Enterprise Risk Management Plan (ERMP) for the 2017/18 period and is under currently review.</p> <p>The ERMP includes the risk of a "breakdown of major assets which may lead to loss of major utilities".</p> <p>Management documents to quantify and manage risks with respect to the electricity network include:</p> <ul style="list-style-type: none"> • The "Power Risk Matrix".

		<ul style="list-style-type: none"> • Critical spares register (current). • Weekly and monthly monitoring and reporting (current). • The “Restoration Priority Register for Electrical Service” details the procedure to be following in the event of extensive outages. • The "Planned Outage Notification Procedure" PRO-RNI-I03-034-1 is in place to provide a minimum 72 hours advance notification to customers of planned outages and for providing alternative power supply. <p>The "Powerhouse Outages Procedure" PRO-RNI-I03-035-1 provides the operational response of power generation facilities to events such as trips, faults and power blackouts. RIA’s “Risk Management Framework” document mandates that risks are re-evaluated after treatment with controls to ensure adequacy.</p> <p>Note that as of April 2017 the RIA “Risk Management Framework” is under review, the main revision of this document relates to the reporting lines and management structure.</p>
<p>8.2 Are risks documented in a risk register and are treatment plans actioned and monitored?</p>	<p>Adequacy Rating: B Performance Rating: 1</p> <p>Corrective Actions required:</p> <p>1. Provide clear single responsible person or position as being responsible for the implementation of hazard treatments in the Power Risk Matrix register</p>	<p>Risks are captured as part of the RIA Strategic Risk Register, LCC, Power Risk Matrix. Risk are quantified and a risk owner is assigned. Internal risk meetings are held monthly where the progress of identified risks and treatment plans being actioned are tracked. That is, risks are assigned and treatment plans are actioned and monitored.</p> <p>The Power Risk Matrix (hazard register) captured appropriate risks, offered treatments and stated the hazard and action owners. Hazards associated with poles, RMUs, Substations, Power House, electricity supply to lighthouse, bore-field, guns, and stables were captured and recorded.</p> <p>It was not clear on the Power Risk Matrix who was independently responsible for hazard treatment action implementation as numerous entries shared the responsibility between RIA and PFM. It is advisable for one person to be responsible even if the action is delegated and avoid “joint ownership” as one party may well believe the other has actioned the item when it hasn’t been.</p>
<p>8.3 Is the probability and consequences of asset failure being regularly monitored?</p>	<p>Adequacy Rating: A Performance Rating: 1</p>	<p>The probability and consequences of asset failure are being regularly monitored. The “RIA Risk Management Framework”, “ERMP” and “MUAMP” consistently outline calculating item risk scores according to likelihood/consequence method with regard to asset failure. It was found that operational, maintenance and organisational risk entries, in the respective risk registers, were evaluated according to this method.</p> <p>“Risk Management Framework” document mandates that risks are re-evaluated after treatment with controls to ensure adequacy.</p> <p>As identified in Item 8.2 above, the Power Risk Matrix captured appropriate risks, offered treatments and stated the hazard and action owners, which addresses item 16/05 in Table 2-2.</p>

9. Contingency Planning

Key process: Contingency plans document the steps to deal with unexpected failure of an asset.

Outcome: Contingency plans have been developed and tested to minimise any significant disruption to service standards.

Review approach:

Determine whether contingency plans have been developed and are current.

Determine whether contingency plans have been tested. If so, review the results to confirm that any improvements identified have been actioned.

Effectiveness Criteria	Effectiveness	Comments
9.1 Are contingency plans documented, understood and tested to confirm their operability and to cover higher risks?	<p>Adequacy Rating: B Performance Rating: 2</p> <p>Corrective Actions Required:</p> <ol style="list-style-type: none"> 1. For the loss of power station, or loss of electrical busbar scenario, clarify how the 5 day outage estimate was determined? 2. Contingency plan to be updated with likelihood of existing and eventually new generators being immediately available and contingencies if they are not available. 	<p>The Review sighted PFM's "Electrical Disaster Recovery Plan" last issued in September 2016, which addresses several failure scenarios for the power generation facilities and transmission and distribution assets. This document has no written review period recorded within it.</p> <p>"Rottnest Island Fire Emergency Prevention, Preparedness Response and Risk Review 2012" document was sighted, and contains mitigation steps to handle scenarios such as pole down, pole top fires and clashing conductors. Details regarding any recent emergency response exercises were requested but not provided.</p> <p>RIA have stated that at the time of the audit, a proposal for the purchase of standby diesel generators for \$330,000 was being prepared and had been tabled at the last Board meeting on 25 August 2017. Board decision was outstanding at the time. The proposed purchase of five various size backup generators and the refurbishment of the RIA owned 135 KVA portable generator covers all of the contingencies noted above, including the busbar loss.</p> <p>There are currently five stand-by generators of various size in various locations on the Island to mitigate the risks power outages and failures. The contingency plan estimates the maximum outage would be 5 days. These generators will remain on the Island until the decision of purchase is made and RIA owned generators will be stationed on the Island.</p>

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- 3. Undertake selected emergency scenario drills and record findings.
 - 4. Establish a review period for the Electrical Disaster Recovery Plan document and elevate the 3rd listed priority of electrical restoration to first priority. (Restore electricity to communications and lighthouse).
 - 5. RIA to investigate options to reduce estimated power outage downtime from 5 days.
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9.2 Is there a contingency plan for the unavailability or loss of key operational staff (including third party contract staff)?

Adequacy Rating: B
Performance Rating: 2

No particular written contingency plan was available, however, comprehensive operation and management data is available for reasonable ongoing operations should a key staff member cease duties.

Corrective Action:

- 1. Develop a plan to manage for the unplanned loss of key people. It is suggested that the plan be incorporated into Business Continuity Planning.

Key process: The financial planning component of the asset management plan brings together the financial elements of the service delivery to ensure its financial viability over the long term.

Outcome: A financial plan that is reliable and provides for the long-term financial viability of the services.

Review approach:

Obtain an understanding of the financial planning, budgeting and reporting process and assess its effectiveness.

Obtain a copy of the current financial plan (including budget/actual) and assess whether the process is being followed.

Effectiveness Criteria	Effectiveness	Comments
10.1 Does the financial plan state the financial objectives and strategies and actions to achieve the objectives?	Adequacy Rating: A Performance Rating: 1	Financial objectives and strategies are stated in the plan and actions to achieve the objectives are developed.
10.2 Does the financial plan identify the source of funds for capital expenditure and recurrent costs?	Adequacy Rating: A Performance Rating: 1	The source of funds are identified for capital expenditure and recurrent costs. A contingency fund is available should extraordinary costs impact.
10.3 Does the financial plan provide projections of operating statements (profit and loss) and statement of financial position (balance sheets)?	Adequacy Rating: A Performance Rating: 1	The plan includes projections of operating costs. A financial statement is reported yearly and a monthly balance sheet maintained.
10.4 Does the financial plan provide firm predictions on income for the next five years and reasonable indicative predictions beyond this period?	Adequacy Rating: A Performance Rating: 1	The plan states predictions until 2026-2027.
10.5 Does the financial plan provide for the operations and maintenance, administration and capital expenditure requirements of the services?	Adequacy Rating: A Performance Rating: 1	Operational, maintenance, administration expenses and capital expenditure are accounted for, in the financial plan.
10.6 Are significant variances in actual/budget income and expenses identified and corrective action taken where necessary?	Adequacy Rating: A Performance Rating: 1	The past 2 years have balanced actual against budget to a working level.

11. Capital Expenditure Planning

Key process: The capital expenditure plan provides a schedule of new works, rehabilitation and replacement works, together with estimated annual expenditure on each over the next five or more years. Since capital investments tend to be large and lumpy, projections would normally be expected to cover at least 10 years, preferably longer. Projections over the next five years would usually be based on firm estimates.

Outcome: A capital expenditure plan that provides reliable forward estimates of capital expenditure and asset disposal income, supported by documentation of the reasons for decisions and evaluation of alternatives and options.

Review approach:

Obtain an understanding of the capital expenditure planning process and assess its effectiveness.

Obtain a copy of the capital expenditure plan for the current year and assess whether the process is being followed.

Effectiveness Criteria	Effectiveness	Comments
11.1 Is there a capital expenditure plan that covers issues to be addressed, actions proposed, responsibilities and dates?	Adequacy Rating: A Performance Rating: 1	A capital expenditure plan covers the current issues to be addressed with proposed actions, responsibilities and dates identified.
11.2 Does the plan provide reasons for capital expenditure and timing of expenditure?	Adequacy Rating: A Performance Rating: 1	Recent history demonstrates appropriate management of capital expenditure and its timing. The plan outlines future capital expenditure and the timing thereof.
11.3 Is the capital expenditure plan consistent with the asset life and condition identified in the asset management plan?	Adequacy Rating: B Performance Rating: 2 Corrective actions required: 1. RIA to interrogate the provided detailed condition reports including estimated remaining operating life to support in confirming asset capital replacement planning, including the paper-lead cables.	The underground paper-lead cables are legacy technology and are subject to failure at the joints. This ageing asset may not be adequately reflected in the capital expenditure plan, however, it will get assigned to capital expenditure if RIA align with PFM. Clear supporting evidence of the plan being supported by current asset condition reports with future asset life expectancy was not sighted. PFM provide a spreadsheet titled Rottnest Island Authority – Power House Assets that provides information on asset condition and expected operational life. It provides a serviceability index, LCC Capex & Opex values and overall risk and consequence of loss. Actual asset operation and maintenance costs are not accurately captured and compared to estimated costs used in the LCC modelling A high level of reliance on emergency back-up (mainly portable generators) was evident. This is due to the design of the interconnected network; it is not possible to reconfigure this network to accept back-feeding or ring-feeding, hence, back-up generation is required in outage/emergency

	2. RIA to revise their capital expenditure plan and commence actions to secure appropriate future capital expenditure to meet the requirements of the updated plan.	situations. This is currently being dealt with and is included in the SAIP. Once addressed, reliance on emergency back-up will be reduced.
11.4 Is there adequate process to ensure that the capital expenditure plan is regularly updated and actioned?	Adequacy Rating: A Performance Rating: 1	RIA have a regular and appropriate process of review and update of their capital expenditure plan.

12. Review of AMS

Key process: The asset management system is regularly reviewed and updated.

Outcome: Review of the Asset Management System to ensure the effectiveness of the integration of its components and their currency.

Review approach:

Determine when the asset management plan was last updated and assess whether any significant changes have occurred.

Determine whether any independent reviews have been performed. If so, review results and actions taken.

Consider the need to update the asset management plan based on the results of this review.

Determine when the AMS has last reviewed.

Effectiveness Criteria	Effectiveness	Comments
12.1 Is there a review process in place to ensure that the asset management plan and the asset management system described therein are kept?	Adequacy Rating: B Performance Rating: 1 Corrective Action: 1. Insert requirement in MUAMP that this document is reviewed every 2 years.	Significant steps were taken by the RIA and PFM to address the shortcomings noted by the previous Review related to the Rottneast Island AMS. The key documents governing the management of the island assets are: <ul style="list-style-type: none"> • "Draft Strategic Asset Investment Plan" 2016-17 to 2026-27 (SAP). The SAP is a 10 year plan which provides the objectives, the status and needs of the assets, priorities for implementation as well as the annual investment. An annual review reflects the work completed during the previous twelve months in assessing and cataloguing the asset portfolio, and in improving stakeholders' understanding of the investment drivers behind the maintenance of the assets on the Island.

		<ul style="list-style-type: none"> • Strategic Asset Management Plan 2016-2017 (SAMP). The SAMP outlines the systems and strategies targeted to control and manage the island’s assets to the benefit of its stakeholders. This document is reviewed annually. • The Multi Utility Asset Management Pan 2016 to 2020. The MUAMP provides a description of the overall system components, and summarises key asset and planning information at a single point in time with the purpose to identify the financial consequences of delivering services through physical assets. PFM maintain a register of assets as part of the Maximo system in a database called “FUSS Contract 0001”. The database appears to be comprehensive and up to date. The database contains details related to the asset type, location, maintenance and operational plans (where applicable), condition assessments etc.
12.2 Are independent reviews (e.g. internal audit) of the asset management system reviewed?	Adequacy Rating: A Performance Rating: 1	Internal review of AMS by GHD and PFM contract by KPMG.

Appendix C – Key document list

Category	Document Title
Performance Audit	*Email 23/03/2017 – J.E to stockholders 2015 electrically - Recommendations 31-35 Completed - 17-20 Addressed
Performance Audit	*Email from ERA advised RIA that monitoring would continue Scheduled review September 2017 from Cherie Barnes ERA.
Performance Audit	No further update required as part of 2017 Audit.
Performance Audit	*Letter from ERA approving amended standard form contract from Nicola Cusworth ERA to Paolo Amaramti.
Performance Audit	Standard form contract last updated 18/11/2016 (blank)
Performance Audit	Standard form contract Geordie Café 06/05/2017 (Under old contract until new signed)
Performance Audit	EL payments electronic recorded. Invoice 12/06/2017 June 17 to June 2018
Performance Audit	14/15 Network Quality and Reliability of supply report (1 major every day)
Performance Audit	15/16 (20/9) Quality and Energy Audit (same as above) (Published on ERA Website)
Performance Audit	Email exemption 5.37 of metering from ERA –
Performance Audit	Paul Reid Paid 29/09/2015 (ACP 14/15 -731/08/2015
Performance Audit	Annual compliance reports (1 July 2015 – 30 June 2016) Submitted 14/09/2016
Performance Audit	Performance Reports 21/09/2016 (15/16 -) (29/09/2015)
Performance Audit	Performance Reports 14/15 – (15/10/15)
Performance Audit	(Network Oval Resubmitted 16/10/2015)
Performance Audit	Dist and Retail 29/09/2015 ERA
Performance Audit	Licence compliance Register (Internal Document) Electronic
Performance Audit	172 – Complaints Register 171 only 1 – resolved 7
Performance Audit	notified complaint 02/05/2017 RIA McGee 02/03/2017
Performance Audit	Utility tariff table to both 02/02/2016 (letter)
Performance Audit	Code of conduct - Free of charge on website
Performance Audit	Unities / Customer complaints procedure
Performance Audit	Unities / Customer Flow chart process
Performance Audit	Unities / Customer Flow chart procedure
Performance Audit	Unities (electrical, Water and Gas) Customer complaint form
Performance Audit	Priority Registration Register
Performance Audit	Facilities, Operations & Utilities contract
Performance Audit	NQRS supply interruptions.
Performance Audit	342 Meter installation / calibration Procedure PFM
Performance Audit	Annual compliance report – procedure to advise
Performance Audit	319/20 Progress report meter replacement
Performance Audit	Service Failures
Performance Audit	GER copy of Standards Form Contract
Performance Audit	Annual Reports
Performance Audit	2015 Post Review Implementation Plan
Performance Audit	Annual Report 2015 -2016
Performance Audit	Rottnest Island Management Plan 2014 -2019
Performance Audit	Rottnest Island Management Plan Progress Report 2016

Performance Audit	Utilities Customer Complaints Procedure
Performance Audit	Utilities Customer Complaints Form
Performance Audit	NQRS Datasheets 2015- 2016
Performance Audit	Application for connection
Performance Audit	Electricity Data Sheets - Distribution Manual 2016
Performance Audit	Rottnest Electrical Distribution Manual 2016
Performance Audit	NQRS Independent Audit Report 2015 - 2016
Performance Audit	Application for commercial connections & power upgrades
Performance Audit	Electricity Reporting Data Sheets - Retail 2015 -2016
Performance Audit	Application to Relocate electrical supply equipment
Performance Audit	Standard Form contract
Performance Audit	NQRS Report 2015/16 (21/09/16) 2044-15 (23/09/15)
Performance Audit	Rottnest Island Electricity Safety Manual
Performance Audit	Code of Conduct for the Supply of Electricity to Small Use Customers
Performance Audit	Rottnest Island - Metrology Procedure 2017
Performance Audit	Certificates of Calibration
Performance Audit	PFM - PRO - ANI - 103-034 1- Planned Outage Notification Proc.
Performance Audit	Electrical Customer Complaints Registers 2015/2016 + 2016/2017
Performance Audit	McGees Email - Tiarne Wyatt list of signed + outstanding SFCs
Performance Audit	Quarterly Audit and Review Report 2015
Performance Audit	McGees Property electricity Invoice and Statement
Performance Audit	Utilities Compliance Spreadsheet
Performance Audit	RIA Letter to customers for Electricity Supply July 2016
Performance Audit	AHR Letter to RIA confirming obligations for Electricity Supply
Performance Audit	AHR Letter to customer certification of tariff increase
Performance Audit	McGees Letter to RIA confirming obligations for Electricity Supply
Performance Audit	RIA Letter to Energy + Water Ombudsman responding to customer complaint 2/05/2017
Performance Audit	RIA Electrical Customer Complaints reporting Register 2016/17
Performance Audit	AHR electricity Invoice x 2
AMS	Standby Diesel Generator Option Analysis
AMS	Stand by Generator Study Map option 1,2,3
AMS	Rottnest Island Authority - Strategic asset Plan 16/17 - 26/27
AMS	RIA Access Management Policy
AMS	RIA Financial Management Information System Access Policy
AMS	RIA Remote Access Policy
AMS	RIA secure USB Drive Access
AMS	RIA ICT Access Request Form
AMS	RIA remote Access Form
AMS	RIA Financial Sustainability Minutes of Meeting
AMS	RIA Internal Audit and Risk Update Minutes of Meeting
AMS	RIA Risk Management Policy
AMS	RIA Risk Management Framework
AMS	RIA Minutes of Meeting ERA Audit Recommendation Follow Up Report
AMS	RIA Internal Audit Risk Management Follow Up Minutes of Meeting

AMS	RIA Quarterly Strategic Risk register review + update Report
AMS	RIA Risk West Report Business Continuity Workshop
AMS	Horizon Power Single Line Diagrams P.S. concept design
AMS	Horizon Power Single Line Diagrams RIPS WA - H0300050-001
AMS	PFM - service Report x 4
AMS	RIA CFO Report 30 June 2016
AMS	RIA Project Disposal Form
AMS	RIA Project Completion/Asset Addition Form
AMS	RIA Corporate Policy Schedule Register
AMS	RIA CFO Report 31 March 16
AMS	RIA CFO Report 30/June/15
AMS	RIA CFO Report 30/April/17 * 2016/17 Budget Performance
AMS	Asset Management Policy
AMS	Strategic Asset Investment Plan 2016-17 to 2026-27 (SAP)
AMS	Strategic Asset Management Plan (SAMP)
AMS	Multi Utility Asset Management Plan (MUAMP)
AMS	Rottneest Island Management Plan (RIMP) 2014 - 2019
AMS	Rottneest Island Master Plan - A 20 Year Vision (MP20)
AMS	PFM KPI Performance Reporting Manual
AMS	life cycle costing (LCC) model
AMS	Generator O&M Manuals
AMS	Enterprise Risk Management Plan (ERMP) 2017/18 PFM
AMS	RIA Asset Life Cycle Costing Spreadsheet
AMS	Power Risk Matrix
AMS	Water treatment plant business case
AMS	Generator Inspection and test plans
AMS	Electrical, Water, Gas Licence Compliance Register
AMS	Breach register
AMS	Asset Disposal Procedure "PRO-PFM-I03-002-1"
AMS	RCA Template_ Cable Fault Report
AMS	Service level agreements
AMS	Monthly service reports
AMS	Planned and Operational Outages
AMS	Planned Outage Notification Procedure
AMS	Restoration Priority Register for Electrical Service
AMS	Powerhouse Outages Procedure" PRO-RNI-I03-035-1
AMS	Blackstart procedure
AMS	Power Risk Matrix
AMS	PFM Competency Matrix
AMS	FUSS Contract 0001
AMS	Utilities KPI 5 Forecast 2017/18
AMS	MUAMP
AMS	Preventative Maintenance Plan
AMS	Preventive Maintenance Schedule
AMS	Open Work Order Report

AMS	RCA Template_ Cable Fault Report
AMS	PFM's Maximo – Asset management database
AMS	PFM's Promap – electronic condition assessment of generator assets
AMS	RIA's Sage – Financial Asset Database
AMS	RIA Risk Management Policy
AMS	RIA Risk Management Framework
AMS	RIA Minutes of Meeting ERA Audit Recommendation Follow Up Report
AMS	RIA Internal Audit Risk Management Follow Up Minutes of Meeting
AMS	RIA Quarterly Strategic Risk register review + update Report
AMS	RIA Risk West Report Business Continuity Workshop
AMS	Risk Management Policy
AMS	Risk Management Framework
AMS	Enterprise Risk Management Plan (ERMP) 2017/18
AMS	Power Risk Matrix
AMS	Critical spares register
AMS	weekly and monthly monitoring and reporting (current)
AMS	Powerhouse Outages Procedure PRO-RNI-I03-035-1
AMS	Planned Outage Notification Procedure PRO-RNI-I03-034-1
AMS	“Restoration Priority Register for Electrical Service”
AMS	RIA Strategic Risk Register
AMS	Rottnest Island Fire Emergency Prevention, Preparedness Response and Risk Review 2012
AMS	Electrical Disaster Recovery Plan
AMS	Power House Assets
AMS	LCC Capex & Opex values
AMS	Draft Strategic Asset Investment Plan" 2016-17 to 2026-27 (SAP).
AMS	Strategic Asset Management Plan 2016-2017 (SAMP)
AMS	Multi Utility Asset Management Pan 2016 to 2020
AMS	FUSS Contract 0001
AMS	Internal AMS review reports

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Document Status

Revision	Author	Reviewer		Approved for Issue		
		Name	Signature	Name	Signature	Date
0 – Issued for use	A.Meagher A.Saldanha	R.Ceic		R Ceic		05.11.17

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