

Independent Assurance Report

*Performance Audit –
Electricity Integrated
Regional Licence (EIRL3)*

*Rottnest Island
Authority*

November 2019



Mr Shane Kearney
A/Director Environment Heritage and Parks
Rottnest Island Authority
PO Box 693
Fremantle, WA 6959

19 November 2019

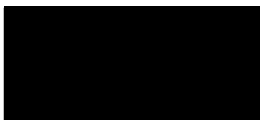
Subject: Rottnest Island Authority: 2019 EIRL3 Performance audit report

As stated in request DBCARIAQ1619, our offer submission and the acceptance of offer on 7 March 2019, we have completed the Electricity Integrated Regional Licence (EIRL3) Performance audit for Rottnest Island Authority for the period 1 April 2017 to 31 March 2019 and are pleased to submit our report to you.

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

If you have any questions or wish to discuss anything raised in the report, please contact on me on +61 422 002 354.

Yours sincerely



Justin Eve

Partner

Contents

1	Independent assurance practitioner's report	3
2	Executive summary	5
3	Summary of findings	15
4	Detailed findings and recommendations	75
5	Previous audit non-compliances and recommendations	155
6	Recommendations	166
	Appendix A – References	176



Notice to any reader of this report

This report has been prepared by PricewaterhouseCoopers ABN 52 780 433 757 ("PwC") for the use and benefit of Rottnest Island Authority in accordance with and for the purpose set out in our engagement terms with Rottnest Island Authority dated 7 March 2019.

PwC makes no representation concerning the appropriateness of this report for use by anyone other than the Client for the purpose described above. If any other person chooses to use or rely on this report they do so at their own risk. PwC accepts no duty, liability or responsibility in any way whatsoever: (a) in connection with the use of this report by any persons other than the Client; or (b) to the Client for the consequences of using or relying on this report for a purpose other than as referred to above.

This report may be disclosed to the Economic Regulation Authority of Western Australia ("ERA") for the purposes of Sections 13(1) of the Electricity Industry Act 2004 (WA).

PwC's liability is limited by a scheme approved under Professional Standards Legislation.

This disclaimer applies: (a) to the maximum extent permitted by law and, without limitation, to liability arising in negligence or under statute; and (b) even if PwC consents to any other party receiving or using this report.

1 *Independent assurance practitioner's report*

Independent assurance report on the Rottnest Island Authority Performance Audit 2019

To Shane Kearney, A/Director Environment Heritage and Parks:

Qualified Opinion

We have undertaken a reasonable assurance engagement on Rottnest Island Authority (RIA or licensee) compliance, in all material respects, with the general license conditions of EIRL3 (Electricity Integrated Regional License) and the relevant associated legislative obligations from the 2018 Electricity Compliance Reporting Manual (listed in Table 5), as evaluated against the "Economic Regulation Authority (ERA or the Authority) Audit and Review Guidelines: Electricity and Gas Licences (March 2019)" (the Guidelines and the Criteria) for the period 1 April 2017 to 31 March 2019.

In our opinion, except for the matters in the Basis for Qualified Opinion below, RIA has complied, in all material respects, with the EIRL3 and relevant associated legislative obligations from the 2018 Electricity Compliance Reporting Manual (listed in Table 5), as evaluated against Economic Regulation Authority Audit and Review Guidelines: Electricity and Gas Licences (March 2019) for the period 1 April 2017 to 31 March 2019.

Basis for Qualified Opinion

During the period from 1 April 2017 to 31 March 2019, RIA did not comply with twelve requirements of the EIRL3 and the relevant associated legislative obligations (in table 5), and of these, the following instances were rated as 'C-requiring significant improvement' and '3- non-compliant; moderate effect on customers or third parties', and therefore we qualify our opinion in this regard:

	Issue
Licence Obligation description (and ref#)	
343 A network operator must ensure that instrument transformers in its metering installations comply with the relevant requirements of any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act and any requirements specified in the applicable metrology procedure.	There are a number of instrument transformers which are non-compliant to the requirements and these need to be replaced in order to achieve compliance.
345 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.	Based on our inquiry, we noted that PFM does not maintain drawings detailing metering installation of all meters at Rottnest Island, consistent with good electricity industry practice.
349 If, under clause 3.14(2), a metering installation uses metering class CTs and VTs that do not comply with the Table 3 in Appendix 1, then the network operator must take the actions specified in order to achieve the accuracy requirements in Table 3 in Appendix 1.	On enquiry and walkthrough, it was noted that certain CT's on Rottnest Island are not compliant with Table 3 in Appendix 1. PFM and RIA have planned a Meter Replacement Project in the near future. This would involve not only updating the CT's, but the transformers and switchboards on Rottnest Island. As this is planned for the near future, RIA and PFM did not want to separately repair the CT's prior to this. This has resulted in several of the current CT's on Rottnest Island being non-compliant with Table 3 in Appendix 1 during the audit period. These meters are installed at Bathurst, Kingstown, Caroline Thomson, Longreach, Thomson Bay South, Tearooms and Geordie/Fays Bay. Six businesses are also metered via CT connected meters.

Further information on these non-compliances is included in Section 4 of this report

Independent assurance practitioner's report

We conducted our engagement in accordance with Standard on Assurance Engagements ASAE 3100 *Compliance Engagements* issued by the Auditing and Assurance Standards Board.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our qualified opinion.

RIA's responsibilities

RIA management is responsible for:

- (a) Identifying risks that threaten the conditions within the EIRL3 License and relevant associated legislative obligations from the 2018 Electricity Compliance Reporting Manual being met.
- (b) The compliance activity undertaken to meet the EIRL3 License Conditions and relevant associated legislative obligations from the 2018 Electricity Compliance Reporting Manual being met.
- (c) Identification and implementation of controls which will mitigate those risks that prevent the License Conditions being met and monitoring ongoing compliance.

Our independence and quality control

We have complied with the independence and other relevant ethical requirements relating to assurance engagements, and apply Auditing Standard ASQC 1 *Quality Control for Firms that Perform Audits and Reviews of Financial Reports and Other Financial Information, and Other Assurance Engagements* in undertaking this assurance engagement.

Our responsibility

Our responsibility is to express an opinion, on RIA's compliance with EIRL3 and relevant associated legislative obligations in all material respects, as evaluated against the Guidelines, for the period from 1 April 2017 to 31 March 2019. ASAE 3100 requires that we plan and perform our procedures to obtain reasonable assurance about whether RIA has complied, in all material respects, with the license, as evaluated against the conditions within the license, for the period from 1 April 2017 to 31 March 2019.

An assurance engagement to report on RIA's compliance with EIRL3 and relevant associated legislative obligations involves performing procedures to obtain evidence about the compliance activity and controls implemented to meet the conditions. The procedures selected depend on our judgement, including the identification and assessment of risks of material non-compliance with the License, as evaluated against the conditions within the license.

Inherent limitations

Because of the inherent limitations of an assurance engagement, together with the internal control structure, it is possible that fraud, error or non-compliance with compliance requirements may occur and not be detected.

A reasonable assurance engagement relating to the period from 1 April 2017 to 31 March 2019 does not provide assurance on whether compliance with the License will continue in the future.

Use of report

This report has been prepared for use by Rottneest Island Authority, for the purpose of Section 13(1) of the Electricity Industry Act 2004 (WA). We disclaim any assumption of responsibility for any reliance on this report to any person authority, or for any other purpose than that for which it was prepared.

[Redacted signature block]

Justin Eve

Partner

19 November 2019

Rottneest Island Authority
PwC

2 *Executive summary*

2.1 *Introduction and background*

The Rottnest Island Authority (RIA or the licensee) holds an Electricity Integrated Regional Licence (EIRL3) issued by the Economic Regulation Authority (ERA or the Authority) under Sections 13 (1) of the Electricity Industry Act 2004 (WA) (the Act).

Under Sections 13(1) of the Electricity Industry Act 2004 (WA) the RIA is required to provide to the Authority a Performance Audit of the Rottnest Island EIRL3 Licence. This is to be conducted by an independent expert acceptable to the Authority.

The licence has been granted for the area covering Rottnest Island, 18 km offshore of Fremantle, Western Australia and applies to the generation, retail and distribution services provided by RIA. The power generating facilities include cooling towers, fuel, oil and coolant tanks, control panels, air compressor, crane, fuel pump, main switchboard, SCADA system and power transformers. The generation, transmission and distribution facilities are operated by Programmed Facility Management (PFM) which have been contracted to provide the operation and maintenance services under a service availability agreement. Separate contracts with McGee's Property are in place to support the management of the retail side of the licence.

PricewaterhouseCoopers (PwC) has been engaged by RIA to conduct the performance audit in accordance with the Authority's "Audit and Review Guidelines: Electricity and Gas Licences (March 2019)" (the Guidelines) for the period 1 April 2017 to 31 March 2019. The Authority approved PricewaterhouseCoopers to undertake the audit in March 2019.

2.2 *Deviations from the audit plan*

35 obligations assessable on the audit plan dated 13 May 2019 were rated as Not Applicable to RIA during the audit. These were obligations 99, 123, 143, 144, 243, 243A, 275, 294, 295, 309, 311, 321, 324, 329, 334, 338, 339, 346, 347, 348, 350, 351, 352, 353, 355, 356, 357, 358, 359, 360, 361, 368, 423, 424 and 425.

2.3 *Observations*

In considering RIA's internal controls procedures, structure and environment, its compliance culture and its information systems specifically relevant to those license obligations subject to audit, we observed that RIA has established its control framework through policies and procedures which are explicitly aligned with License Obligations. RIA has published the Metrology procedure and completed the meter replacement program, which have resolved majority of non-compliances noted from the previous performance audit in 2017.

Overall RIA complied with the licence conditions apart from twelve (12) non-compliances. Recommendations for the non-compliances are as follows:

- RIA should put in a plan to upgrade the non-compliant instrument transformers. PFM and RIA should also maintain a compliance register to provide assurance all instrument transformers at Rottnest Island are compliant to the requirements. (Obligation #343).
- We recommend that PFM and RIA have a program in place to rectify non-compliant CT's within a reasonable time frame, including a capital expenditure commitment. PFM and RIA should also maintain a compliance register to provide assurance all CT's at Rottnest Island are compliant to the requirements. (Obligation #349).
- It is recommended that drawings of the metering installation on Rottnest Island are produced and maintained, to comply with good electricity industry practice. (Obligation #345).
- RIA should determine whether it intends to operate the holiday accommodation units as Type 7 connections, or if it intends for them to be metered connections that are not currently fitted with a meter. Per the Metering Code, the definition of a Type 7 connection point does not include residential short-stay accommodation. It is specific to small loads and loads consuming less than the starting electrical current of a meter. (Obligation #326).
- We recommend RIA to document evidence that each metering installation complies with the prescribed design requirements. RIA should also perform an update to the Metrology Procedure, to ensure that this procedure specifically addresses the design requirements of metering installations. (Obligation #342).

Executive summary

- It is recommended that McGee’s includes PFM’s 24 emergency phone number on their invoices. This is required by the Code, but is currently not complied with by McGee’s in their billing of customers. (Obligation #155).
- RIA should ensure if a bill cannot be based on an actual meter reading, an estimated bill is issued to the customer following the prescribed methodologies per Metering Code for creating estimated readings. (Obligation #159)
- RIA to ensure, when reviewing customers bill on request by the customer, that the customer is formally (supported by documented evidence) informed of the existence and operation of RIA’s internal complaints handling processes and details of applicable external complaints handling processes. (Obligation #172).
- RIA to ensure the network quality and reliability of supply independent report is published on RIA website no later than the 1 October dead-line following the reporting period. RIA should ensure controls and monitoring processes are in place to ensure compliance is achieved. (Obligation #483A).
- RIA to ensure the Network Quality report is provided to ERA not less than 7 days before it is published. RIA should ensure controls and monitoring processes are in place to ensure compliance is achieved. (Obligation #485).
- Ensure the annual electricity licence reporting datasheets report are issued to ERA no later than the 1 October dead-line following the reporting period. RIA should ensure controls and monitoring processes are in place to ensure compliance is achieved. (Obligation #124, #306).

2.4 Findings

The following tables summarise the assessments made during the audit of RIA’s compliance and the adequacy of controls in place for RIA to manage its compliance with the relevant obligations or conditions of the license.

Table 1 set out the rating scale defined by the ERA in the Guidelines for the assessment of the level of compliance with the conditions of the License.

Table 1: Control adequacy and compliance rating scale

Rating	Adequacy of Controls Rating Descriptions	Rating	Compliance Rating Description
A	Adequate controls – no improvement needed	1	Compliant
B	Generally adequate controls – improvement needed	2	Non-Compliant – minor impact on customers or third parties
C	Inadequate Controls – Significant improvement required	3	Non-Compliant – moderate effect on customers or third parties
D	No controls evident	4	Non-Compliant – major effect on customers or third parties
N/P	Not performed – A controls rating was not required	N/R	Not rated – No Activity took place during the audit period

Table 2 provide further detail on the control adequacy and compliance rating scales. The rating scales are defined by the Guidelines.

Table 2: Summary of finding, by compliance and controls ratings

Compliance Rating						
Control Rating	1	2	3	4	NR	Total
A	77	-	-	-	12	89
B	9	7	-	-	4	20
C	-	2	3	-	-	5
D	-	-	-	-	-	0
N/P	-	-	-	-	88	88
Total:	86	9	3	0	104	202

2.5 RIA's response to previous audit recommendations

The Audit considered RIA's progress in completing the action plans detailed in the 2017 post audit implementation plan.

Based on our examination of the relevant documents, discussion with staff and consideration of the results of this audit's observations against the compliance obligations, we have determined that RIA has completed seventeen (17) action plans detailed in the 2017 performance audit report and post audit implementation plan. It was noted that RIA has published the Metrology procedure and completed the meter replacement program, which have resolved the majority of non-conformances noted from the previous performance audit in 2017.

However, there are six (6) action plans still outstanding at the end of the audit period. These are either currently still in progress or we were unable to obtain sufficient evidence to provide assurance on the completion of the relevant action plans.

Refer to section 5 of this report for further detail.

2.5.1 Resolved during the current audit period

License Obligation Reference no./ Recommendation reference	Non Compliance/ Controls improvement	Date resolved and management action taken	Auditor's comments
18/2015	<p>Non-Compliant – Obligation 319</p> <p>Lick Ref: C5.1, Electricity Industry Metering Code clause 3.1</p> <p>A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and also comply with any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act.</p> <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</p>	<p>All meters installed. All meters were new and supplied with a certificate of conformance.</p> <p>Completed - November 2018</p> <p>Metrology procedure approved by ERA on 20 November 2017 and published on RIA website on 21 November 2018.</p> <p>Completed - November 2017</p>	No further action required

License Obligation Reference no./ Recommendation reference	Non Compliance/ Controls improvement	Date resolved and management action taken	Auditor's comments
	were replaced in 2013, 2014 and 2015, or when all meters will be compliant.		
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 subclasses 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>Refer to Obligation 319.</p> <p>Completed - November 2018</p>	No further action required
21/2015	<p>Non-compliant – 2/Obligation 327</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 3.5(3)</p> <p>A network operator must, unless otherwise agreed, for each metering installation on its network, on and from the time of its connection to the network, provide, install, operate and, subject to sub clause 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>Refer to Obligation 319.</p> <p>Completed - November 2018</p>	No further action required
28/2015	<p>Non-compliant – 2/Obligation 343</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 3.12(2)</p> <p>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>Completed - November 2018</p>	No further action required
29/2015	<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</p>	<p>Refer to Obligation 319.</p> <p>Completed - November 2018</p>	No further action required

License Obligation Reference no./ Recommendation reference	Non Compliance/ Controls improvement	Date resolved and management action taken	Auditor's comments
	<p>processes prescribed.</p> <p>PFM have confirmed that Horizon Power has not been appointed the metering data agent for Rottneest Island and therefore, their metrology procedure does not currently apply. As per Obligation 319 – The RIA does not have a metrology procedure in place.</p>		
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; <p>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;</p> <p>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;</p> <p>It also requires reporting at corporate level of any outages.</p> <p>Documents and processes are in place to manage and minimise the extent and duration of interruption Of the supply of electricity.</p>	<p>Completed- The RIA utilises both formal and informal channels to provide appropriate feedback to PFM. KPI's are scrutinised on a monthly basis as part of the monthly FUSS Service Report and where failures occur PFM is abated.</p>	No further action required.
02/2017	<p>B2/108</p> <p>There are no residential customers on Rottneest Island. Commercial customers separately liaise with Property Managers contracted by the RIA, McGee's 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. The audit found that Standard Form Contracts were sent to customers for signing but 2 were not returned.</p>	<p>Completed- There was just one exception where the SFC was not yet signed. This customer is the Rottneest Island Telecommunication Towers Telco who were not cooperating. This has now been completed.</p>	No further action required.
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. c)A total of 156</p>	<p>Refer to Obligation 319.</p> <p>Completed - November 2018</p>	No further action required

License Obligation Reference no./ Recommendation reference	Non Compliance/ Controls improvement	Date resolved and management action taken	Auditor's comments
	<p>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 (Rottnest Island Chamber of Commerce and 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>Refer to Obligation 319. Completed - November 2018</p>	<p>No further action required</p>
08/2017	<p>B2/326 The audit has found the network operator to be noncompliant 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 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 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>Refer to Obligation 319. Completed - November 2018</p>	<p>No further action required</p>

License Obligation Reference no./ Recommendation reference	Non Compliance/ Controls improvement	Date resolved and management action taken	Auditor's comments
09/2017	C2/327 The audit has found the network operator to be noncompliant 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	Refer to Obligation 319. Completed - November 2018	No further action required
10/2017	B2/333 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 targeted for completion (31/10/2017)	Refer to Obligation 319. Completed - November 2018	No further action required
11/2017	B2/342 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	Refer to Obligation 319. Completed - November 2018	No further action required
15/2017	C2/386 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 McGee's. 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. However draft metrology procedure existed during audit. The types of meters have been identified, see obligation 333 (item 23). PFM Meter Readings Monthly Procedure (PRO- RNII03-033-1) has been updated to ensure Code compliance, see items 8 & 22.	Refer to Obligation 319. Completed - November 2018	No further action required
16/2017	C2/430 At the time of the audit, the network operator could not determine a second value. Billing adjustments are made and invoices either reissued or the amount credited to the impacted customers. One instance of a credit applied to a bill was discovered during the audit. During the audit no approved Metrology procedure was sighted.	Refer to Obligation 319. Completed - November 2018	No further action required
17/2017	C2/434 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	Refer to Obligation 319. Completed - November 2018	No further action required

License Obligation Reference no./ Recommendation reference	Non Compliance/ Controls improvement	Date resolved and management action taken	Auditor's comments
18/2017	information C2/447 There wasn't an approved metrology procedure in place during the audit period and therefore there was no prescriptive procedure to comply with.	Refer to Obligation 319. Completed - November 2018	No further action required

2.5.2 Unresolved at the end of the current audit period

Recommendation reference (no/year)	Non-Compliance/Control improvement	Auditor's Recommendation	Action taken by the licensee by the end of the audit period
03/2017 (01/2019)	B2/131 Information is provided to customers via the Standard Form Contract and monthly utility bills. The Standard Form Contract includes the following: <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. The Utility Statements issued by McGee's to customers includes a 24hr telephone number for faults and emergencies stated on their statements and not invoices (EVIDENCE: INV. NOS. 109186 and 118903).	RIA to instruct McGee's 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. Two examples of AHR invoices during the audit period were provided and they included a 24hr telephone number for faults and emergencies on invoices 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.	Redesign of invoices underway – January 2020.
04/2017 (04/2019)	B2/155 Information is provided to customers via the Standard Form Contract and monthly utility bills. The Standard Form Contract includes the following: <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. The Utility Statements issued by McGees to customers includes a 24hr telephone number.	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.	Redesign of invoices underway – January 2020
05/2017 (02/2019)	B2/290 Documentation prepared by the licensee for information purposes is in accordance with the requirements. Both McGee's and AHR billings are not as user friendly and some information is not set out in an intuitive manner	AMR to increase font size for ease of reading and McGee's to include 24 hour service faults and difficulties contact number to front of invoice	Refer to 03/2017
12/2017 (11/2019)	C2/343 No evidence that instrument transformers in its metering installations comply with the	1. Submit Metrology Procedure for approval by ERA	1. Completed- November 2017

Recommendation reference (no/year)	Non-Compliance/Control improvement	Auditor's Recommendation	Action taken by the licensee by the end of the audit period
	relevant requirements of any applicable specifications or guidelines was discovered	2. Verify and demonstrate that any instrument transformers meet applicable specifications as set down in the Metrology Procedure	2. To be completed December 2019
13/2017 (13/2019)	B2/349 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.	Update non-compliant metering CTs as per plan	To be completed – December 2019
14/2017 (03/2019)	C2/379 Existing metering points are not secure. Not known whether new meters will have appropriate security protections.	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.	To be completed – December 2019

2.6 Scope and Objective

As stated in request DBCARIAQ1619, our offer submission and the acceptance of offer on 7 March 2019, we have conducted a reasonable assurance audit in order to state whether, in our opinion, based on our procedures, RIA has complied, in all material respects, with the conditions of its Licence as outlined in the approved Audit Plan (dated 13 May 2019) during the period 1 April 2017 to 31 March 2019.

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

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

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

The ERA has summarised the requirements of the applicable legislation that it expects to be reported upon and included in the scope of this audit in its July 2018 Electricity Compliance Reporting Manual (**Reporting Manual**).

The Audit Plan approved by the ERA for this audit sets out RIA's Licence obligations confirmed to be included in the scope of the audit, along with the risk assessments and audit priority assigned to each licence obligation.

2.7 Approach

Our approach for this audit involved the following activities, which were undertaken during the period April to June 2019:

- Utilising the Guidelines and Reporting Manuals as a guide, developed a risk assessment, which involved discussions with key staff and document review to assess controls

Executive summary

- Developed an Audit Plan for approval by the ERA and an associated work program
- Interviews with relevant RIA staff to gain understanding of process controls (see **Appendix A** for staff involved)
- Reviewed relevant documentation and walked through processes and controls to assess overall compliance and effectiveness in accordance with Licence obligations (see **Appendix A** for reference listing)
- Sample tested relevant obligations (assessed as an audit priority 3 or 2) and where there was relevant activity, determine whether transactions complied with the requirements of the obligation
- Reporting of findings to RIA for review and response.

3 *Summary of findings*

Table 1 in section 2 above sets out the rating scale defined by the ERA in the Audit Guidelines for the assessment of the level of compliance with the condition of the License.

The remainder of this report provides:

- Summary of findings for the compliance obligations (at Table 5 below)
- Detailed findings, including relevant observation and recommendations (at section 4 below).

Table 5: Performance summary table - ratings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating							
					A	B	C	D	N/P	1	2	3	4	N/R			
Type 1 Reporting Obligations for all Licence Types																	
127	Electricity Industry Act, section 11	Distribution Licence, condition 6.9.1 Integrated Regional Licence, condition 6.9.1	A distributor must create and maintain a Priority Restoration Register.	5	✓					✓							
234	Electricity Industry Act, section 82	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.	4	✓					✓							
10 Electricity Industry (Obligation to Connect) Regulations – Licence Conditions and Obligations																	
72	Electricity Industry (Obligation to Connect) Regulations, regulation 3	Electricity Industry (Obligation to Connect) Regulations, regulation 4	A distributor must attach, or connect, premises to a distribution system if a retailer or customer takes prescribed action and the circumstances exist in regulation 5(1) of the Electricity Industry (Obligation to Connect) Regulations.	5		✓				✓							
73	Electricity Industry (Obligation to Connect) Regulations, regulation 3	Electricity Industry (Obligation to Connect) Regulations, regulation 5(5)	A distributor that is obliged to attach, or connect, premises to the distribution system under regulation 4 of the Electricity Industry (Obligation to Connect) Regulations must extend the distribution system to a suitable connection point.	5		✓				✓							

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
74	Electricity Industry (Obligation to Connect) Regulations, regulation 3	Electricity Industry (Obligation to Connect) Regulations, regulation 5(6)	The capacity and standard of an extension must be adequate for the supply required and in accordance with accepted good industry practice as would be applied by a prudent distributor.	5		✓					✓				
75	Electricity Industry (Obligation to Connect) Regulations, regulation 3	Electricity Industry (Obligation to Connect) Regulations, regulation 6	A distributor that is obliged to attach, or connect, premises to the distribution system under regulation 4 of the Electricity Industry (Obligation to Connect) Regulations must do so within a defined timeframe.	5		✓					✓				
76	Electricity Industry (Obligation to Connect) Regulations, regulation 3	Electricity Industry (Obligation to Connect) Regulations, regulation 7(1)	A distributor must energise premises in certain prescribed circumstances.	5		✓					✓				
77	Electricity Industry (Obligation to Connect) Regulations, regulation 3	Electricity Industry (Obligation to Connect) Regulations, regulation 8	A distributor that is obliged to energise premises must do so within a defined timetable.	5		✓					✓				
11 Electricity Industry (Customer Contracts) Regulations – Licence Conditions and Obligations															
78	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry Act, section 51	Where the licensee supplies electricity under a standard form contract, the standard form contract must comply with that licensee approved standard form contract on the ERA's website.	5	✓						✓				

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
99	Integrated Regional Licence, condition 6.2.1 Distribution Licence, condition 6.2.1	Electricity Industry (Customer Contracts) Regulations, regulation 36	The licensee must determine, from time to time, the default supplier for each connection point that connects to a distribution system operated by the licensee.	4											
100	Retail Licence, condition 6.8.1 Integrated Regional Licence, condition 6.8.1	Electricity Industry (Customer Contracts) Regulations, regulation 38	If a licensee becomes aware of a customer taking a supply of electricity that is deemed to be supplied under the licensee's standard form contract, the licensee must notify the customer within 5 days after becoming aware of it and provide specified information.	3	✓					✓					
12 Electricity Industry Act – Licence Conditions and Obligations															
101	Generation Licence, condition 5.3.1 Transmission Licence, condition 5.3.1 Distribution Licence, condition 5.3.1 Retail Licence, condition 5.3.1 Integrated Regional Licence, condition 5.3.1	Electricity Industry Act, section 13(1)	A licensee must provide the ERA with a performance audit conducted by an independent expert acceptable to the ERA, not less than once every 24 months.	5	✓					✓					
102	Distribution Licence, condition 5.1.1 Generation Licence, condition 5.1.1 Integrated Regional Licence, condition 5.1.1 Transmission Licence, condition 5.1.1	Electricity Industry Act, section 14(1)(a)	A licensee must provide for an asset management system.	5	✓					✓					

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating				
					A	B	C	D	N/P	1	2	3	4	N/R
103	Distribution Licence, condition 5.1.2 and 5.1.3 Generation Licence, condition 5.1.2 and 5.1.3 Integrated Regional Licence, condition 5.1.2 and 5.1.3 Transmission Licence, condition 5.1.2 and 5.1.3	Electricity Industry Act, section 14(1)(b)	A licensee must notify details of the asset management system and any substantial changes to it to the ERA.	5					✓					✓
104	Distribution Licence, condition 5.1.4 Generation Licence, condition 5.1.4 Integrated Regional Licence, condition 5.1.4 Transmission Licence, condition 5.1.4	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	✓					✓				
105	Distribution Licence, condition 4.2.1 Generation Licence, condition 4.2.1 Integrated Regional Licence, condition 4.2.1 Retail Licence, condition 4.2.1 Transmission Licence, condition 4.2.1	Electricity Industry Act, section 17(1) Economic Regulation Authority (Licensing Funding) Regulations 2014	A licensee must pay the prescribed licence fees to the ERA according to clauses 6, 7 and 8 of the Economic Regulation Authority (Licensing Funding) Regulations 2014.	5	✓					✓				

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating						
					A	B	C	D	N/P	1	2	3	4	N/R		
106	Distribution Licence, condition 4.1.1 Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Act, section 31(3)	A licensee must take reasonable steps to minimise the extent, or duration, of any interruption, suspension or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause.	4	✓						✓					
108	Integrated Regional Licence, condition 6.4.1 Retail Licence, condition 6.4.1	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 non- standard form contract that complies with the Act.	4	✓						✓					
109	Integrated Regional Licence, condition 6.6.1 Retail Licence, condition 6.6.1	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.	4	✓										✓	
111	Distribution Licence, condition 6.1.1 Integrated Regional Licence, 6.1.1 Retail Licence, condition 6.1.1	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	✓						✓					
13 Electricity Licences – Licence Conditions and Obligations																

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
116	Electricity Industry Act, section 11	Integrated Regional Licence, condition 6.4.2 Retail Licence, condition 6.4.2	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	✓										✓
117	Electricity Industry Act, section 11	Integrated Regional Licence, condition 6.4.3 Retail Licence, condition 6.4.3	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	✓										✓
118	Electricity Industry Act, section 11	Integrated Regional Licence, condition 6.5.1 Retail Licence, condition 6.5.1	A licensee can only amend the standard form contract with the ERA's approval.	5	✓										✓
119	Electricity Industry Act, section 11	Distribution Licence, condition 4.3.1 Generation Licence, condition 4.3.1 Integrated Regional Licence, condition 4.3.1 Retail Licence, condition 4.3.1 Transmission Licence, condition 4.3.1	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	✓					✓					

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating				
					A	B	C	D	N/P	1	2	3	4	N/R
121	Electricity Industry Act, section 11	Distribution Licence, condition 5.3.2 Generation Licence, condition 5.3.2 Integrated Regional Licence, condition 5.3.2 Retail Licence, condition 5.3.2 Transmission Licence, condition 5.3.2	A licensee must comply, and require its auditor to comply, with the ERA's standard audit guidelines for a performance audit.	4	✓					✓				
122	Electricity Industry Act, section 11	Distribution Licence, condition 5.1.5 Generation Licence, condition 5.1.5 Integrated Regional Licence, condition 5.1.5 Transmission Licence, condition 5.1.5	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	✓					✓				
123	Electricity Industry Act, section 11	Distribution Licence, condition 4.4.1 Generation Licence, condition 4.4.1 Integrated Regional Licence, condition 4.4.1 Retail Licence, condition 4.4.1 Transmission Licence, condition 4.4.1	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	N/A									

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
124	Electricity Industry Act, section 11	Distribution Licence, condition 4.5.1 Generation Licence, condition 4.5.1 Integrated Regional Licence, condition 4.5.1 Retail Licence, condition 4.5.1 Transmission Licence, condition 4.5.1	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.	3		✓						✓			
125	Electricity Industry Act, section 11	Distribution Licence, condition 3.8.1 and 3.8.2 Generation Licence, condition 3.8.1 and 3.8.2 Integrated Regional Licence, condition 3.8.1 and 3.8.2 Retail Licence, condition 3.8.1 and 3.8.2 Transmission Licence, condition 3.8.1 and 3.8.2	A licensee must publish any information as directed by the ERA to publish, within the timeframes specified.	3	✓						✓				

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
126	Electricity Industry Act, section 11	Distribution Licence, condition 3.7.1 Generation Licence, condition 3.7.1 Integrated Regional Licence, condition 3.7.1 Retail Licence, condition 3.7.1 Transmission Licence, condition 3.7.1	All notices must be in writing, unless otherwise specified.	3	✓					✓					
14 Code of Conduct – Licence Conditions and Obligations															
Marketing															
130	Electricity Industry Act, section 82	Code of Conduct, clause 2.2(1) Integrated Regional Licence, condition 6.3.1 Retail Licence, condition 6.3.1	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).	4	✓					✓					
131	Electricity Industry Act, section 82	Code of Conduct, clause 2.2(2) Integrated Regional Licence, condition 6.3.1 Retail Licence, condition 6.3.1	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.	4	✓					✓					

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
132	Electricity Industry Act, section 82	Code of Conduct, clause 2.3(1) Integrated Regional Licence, condition 6.3.1 Retail Licence, condition 6.3.1	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).	5	✓										✓
133	Electricity Industry Act, section 82	Code of Conduct, clause 2.3(2) Integrated Regional Licence, condition 6.3.1 Retail Licence, condition 6.3.1	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.	5	✓										✓
135	Electricity Industry Act, section 82	Code of Conduct, clause 2.3(5) Integrated Regional Licence, condition 6.3.1 Retail Licence, condition 6.3.1	Subject to subclause 2.3(3), a retailer or electricity marketing agent must obtain the customer's verifiable consent that the specified information in subclause 2.3(2) and 2.3(4), as applicable, has been provided.	5	✓										✓
137	Electricity Industry Act, section 82	Code of Conduct, clause 2.4(2) Integrated Regional Licence, condition 6.3.1 Retail Licence, condition 6.3.1	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.	4	✓						✓				

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating				
					A	B	C	D	N/P	1	2	3	4	N/R
138	Electricity Industry Act, section 82	Code of Conduct, clause 2.5(1) Integrated Regional Licence, condition 6.3.1 Retail Licence, condition 6.3.1	A retailer or electricity marketing agent must, on request, provide a customer with the information specified in subclause 2.5(1).	4	✓					✓				
Connection														
143	Electricity Industry Act, section 82	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.	4						N/A				
144	Electricity Industry Act, section 82	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; or the next business day if the request is received after 3pm or on a weekend or public holiday.	4						N/A				
Billing														
145	Electricity Industry Act, section 82	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.	4	✓					✓				

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating				
					A	B	C	D	N/P	1	2	3	4	N/R
146	Electricity Industry Act, section 82	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					✓					✓
147	Electricity Industry Act, section 82	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.	5					✓					✓
148	Electricity Industry Act, section 82	Code of Conduct, clause 4.2(3)	A retailer must give a customer written notice of a decision to shorten the customer's billing cycle within 10 business days of making the decision.	5					✓					✓
149	Electricity Industry Act, section 82	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					✓					✓
150	Electricity Industry Act, section 82	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					✓					✓

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
151	Electricity Industry Act, section 82	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					✓						✓
152	Electricity Industry Act, section 82	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					✓						✓
153	Electricity Industry Act, section 82	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					✓						✓
154	Electricity Industry Act, section 82	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.	4	✓					✓					
155	Electricity Industry Act, section 82	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.	4		✓					✓				
156	Electricity Industry Act, section 82	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	✓										✓

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating				
					A	B	C	D	N/P	1	2	3	4	N/R
157	Electricity Industry Act, section 82	Code of Conduct, clause 4.6	Subject to clauses 4.3 and 4.8, 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. 	4	✓					✓				
158	Electricity Industry Act, section 82	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.	4		✓				✓				
159	Electricity Industry Act, section 82	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.	4		✓					✓			
160	Electricity Industry Act, section 82	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).	4					✓					✓
161	Electricity Industry Act, section 82	Code of Conduct, clause 4.8(3)	On request, a retailer must inform a customer of the basis and the reason for the estimation.	4					✓					✓

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating				
					A	B	C	D	N/P	1	2	3	4	N/R
162	Electricity Industry Act, section 82	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.	4					✓					✓
163	Electricity Industry Act, section 82	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.	4					✓					✓
164	Electricity Industry Act, section 82	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.	4					✓					✓
165	Electricity Industry Act, section 82	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.	4					✓					✓
166	Electricity Industry Act, section 82	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.	5					✓					✓

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
167	Electricity Industry Act, section 82	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.	5					✓						✓
168	Electricity Industry Act, section 82	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.	4	✓					✓					
169	Electricity Industry Act, section 82	Code of Conduct, clause 4.14(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					✓						✓
170	Electricity Industry Act, section 82	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	5					✓						✓

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
			the remaining amount in accordance with subclause 4.14(2).												
171	Electricity Industry Act, section 82	Code of Conduct, clause 4.15	A retailer must review a customer's bill on request by the customer, subject to the customer paying: <ul style="list-style-type: none"> · 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) and · any future bills that are properly due. 	5	✓					✓					
172	Electricity Industry Act, section 82	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		✓					✓				

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating				
					A	B	C	D	N/P	1	2	3	4	N/R
173	Electricity Industry Act, section 82	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					✓					✓
174	Electricity Industry Act, section 82	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					✓					✓
175	Electricity Industry Act, section 82	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					✓					✓
176	Electricity Industry Act, section 82	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.8	5					✓					✓
176A.	Electricity Industry Act, section 82	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					✓					✓

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
177	Electricity Industry Act, section 82	Code of Conduct, clause 4.18(2)	<p>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:</p> <ul style="list-style-type: none"> · use its best endeavours to inform the customer within 10 business days of the retailer becoming aware of the error, defect, or default; and · subject to subclauses 4.18(6) and 4.18(7), ask the customer for instructions for the credit or repayment of the amount. 	5	✓					✓					
178	Electricity Industry Act, section 82	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					✓						✓
179	Electricity Industry Act, section 82	Code of Conduct, clause 4.18(4)	If instructions regarding repayment of an overcharged bill are not received within 20 business days of a retailer making the request, a retailer must use reasonable endeavours to credit the amount overcharged to a customer's account.	5					✓						✓
180	Electricity Industry Act, section 82	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					✓						✓

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating				
					A	B	C	D	N/P	1	2	3	4	N/R
181	Electricity Industry Act, section 82	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					✓					✓
182	Electricity Industry Act, section 82	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 the requirements specified in subclause 4.19(1).	5					✓					✓
183	Electricity Industry Act, section 82	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: <ul style="list-style-type: none"> · use its best endeavours to inform the customer within 10 business days; and · subject to subclauses 4.19(5) and 4.19(7), ask the customer for instructions about the repayment of the amount. 	5					✓					✓
184	Electricity Industry Act, section 82	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	5					✓					✓

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
			12 business days of receiving the instructions.												
185	Electricity Industry Act, section 82	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					✓						✓
186	Electricity Industry Act, section 82	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					✓						✓
Payment															
187	Electricity Industry Act, section 82	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.	4	✓					✓					
188	Electricity Industry Act, section 82	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.	4	✓					✓					

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating				
					A	B	C	D	N/P	1	2	3	4	N/R
189	Electricity Industry Act, section 82	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.	4					✓					✓
190	Electricity Industry Act, section 82	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.	4	✓					✓				
193	Electricity Industry Act, section 82	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.	4					✓					✓
194	Electricity Industry Act, section 82	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.	4					✓					✓
197	Electricity Industry Act, section 82	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).	4	✓					✓				

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating				
					A	B	C	D	N/P	1	2	3	4	N/R
198	Electricity Industry Act, section 82	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.	4					✓					✓
199	Electricity Industry Act, section 82	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).	4					✓					✓
201	Electricity Industry Act, section 82	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					✓					✓
201A.	Electricity Industry Act, section 82	Code of Conduct, clause 5.8(3)	A retailer may transfer one customer's debt to another customer if requested by the customer owing the debt, providing the retailer obtains the other customer's verifiable consent to the transfer.	5					✓					✓
Payment difficulties & financial hardship														
Disconnection & interruption														

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating				
					A	B	C	D	N/P	1	2	3	4	N/R
229	Electricity Industry Act, section 82	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					✓					✓
230	Electricity Industry Act, section 82	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					✓					✓
232	Electricity Industry Act, section 82	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					✓					✓
233	Electricity Industry Act, section 82	Code of Conduct, clause 7.5	A distributor who disconnects or interrupts 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.	5					✓					✓

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating				
					A	B	C	D	N/P	1	2	3	4	N/R
234	Electricity Industry Act, section 82	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.	5					✓					✓
Reconnection														
242	Electricity Industry Act, section 82	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					✓					✓
243	Electricity Industry Act, section 82	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).	5	N/A									
243A.	Electricity Industry Act, section 82	Code of Conduct, clause 8.1(3)	If a retailer does not forward the request for reconnection to the relevant distributor within the timeframes in subclause 8.1(2), the retailer will not be in breach of this clause (8.1) if the retailer causes the customer's supply address to be reconnected by the distributor within the timeframes in subclause 8.2(2) as if the distributor had received the request for reconnection from the retailer in accordance with subclause 8.1(2).	5	N/A									

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating				
					A	B	C	D	N/P	1	2	3	4	N/R
244	Electricity Industry Act, section 82	Code of Conduct, clause 8.2	A distributor must reconnect the customer's supply address on the request of a retailer within the timeframes specified in subclause 8.2(2).	5					✓					✓
Information & communication														
272	Electricity Industry Act, section 82	Code of Conduct, clause 10.1(1)	A retailer must give notice of any variations in its tariffs, fees and charges, to each of its customers affected by the variation no later than the next bill in the customer's billing cycle.	5	✓					✓				
273	Electricity Industry Act, section 82	Code of Conduct, clause 10.1(2)	On request and at no charge, a retailer must give or make available to a customer reasonable information on its tariffs, fees and charges, including any alternative tariffs that may be available to that customer.	5					✓					✓
274	Electricity Industry Act, section 82	Code of Conduct, clause 10.1(3)	A retailer must give or make available to a customer the information requested on tariffs, fees and charges within 8 business days of the date of receipt and, if requested, provide the information in writing.	5					✓					✓
275	Electricity Industry Act, section 82	Code of Conduct, clause 10.2(1)	On request, a retailer must provide a non-contestable customer with their billing data.	5	N/A									
276	Electricity Industry Act, section 82	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	5					✓					✓

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
			retailer must provide the data at no charge.												
277	Electricity Industry Act, section 82	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.	5					✓						✓
278	Electricity Industry Act, section 82	Code of Conduct, clause 10.2(4)	A retailer must keep a non-contestable customer's billing data for 7 years.	5	✓					✓					
280	Electricity Industry Act, section 82	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.	5	✓					✓					
281	Electricity Industry Act, section 82	Code of Conduct, clause 10.4	On request and at no charge, a retailer must give, or make available to, a customer general information on cost effective and efficient ways to utilise electricity; and the typical running costs of major domestic appliances.	5					✓						✓

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating				
					A	B	C	D	N/P	1	2	3	4	N/R
282	Electricity Industry Act, section 82	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					✓					✓
283	Electricity Industry Act, section 82	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					✓					✓
284	Electricity Industry Act, section 82	Code of Conduct, clause 10.7(1)	On request, a distributor must provide a customer with their consumption data.	5					✓					✓
285	Electricity Industry Act, section 82	Code of Conduct, clause 10.7(2)	If a customer requests their consumption data under subclause 10.7(1), the distributor must provide the information at no charge in the circumstances specified in subclause 10.7(2) (a)-(b).	5					✓					✓
286	Electricity Industry Act, section 82	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 · 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					✓					✓
287	Electricity Industry Act, section 82	Code of Conduct, clause 10.7(4)	A distributor must keep a customer's consumption data for 7 years.	5	✓					✓				

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
288	Electricity Industry Act, section 82	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					✓						✓
289	Electricity Industry Act, section 82	Code of Conduct, clause 10.8(2)	A distributor must publish information on distribution standards and metering arrangements on its website.	5	✓					✓					
290	Electricity Industry Act, section 82	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	✓					✓					
291	Electricity Industry Act, section 82	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					✓						✓
292	Electricity Industry Act, section 82	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	✓					✓					

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
294	Electricity Industry Act, section 82	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 (including independent multi-lingual and TTY services, and large print copies).	5											N/A
295	Electricity Industry Act, section 82	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.	5											N/A
296	Electricity Industry Act, section 82	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											✓
297	Electricity Industry Act, section 82	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											✓
Complaints & Dispute resolution															
298	Electricity Industry Act, section 82	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.	3		✓									✓

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating				
					A	B	C	D	N/P	1	2	3	4	N/R
299	Electricity Industry Act, section 82	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.	3	✓					✓				
300	Electricity Industry Act, section 82	Code of Conduct, clause 12.1(3)	A retailer or a distributor must advise the customer in accordance with subclause 12.1(3).	3	✓									✓
301	Electricity Industry Act, section 82	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 complaint within 20 business days.	3		✓								✓
302	Electricity Industry Act, section 82	Code of Conduct, clause 12.2	A retailer must comply with any guideline developed by the ERA to distinguish customer queries from complaints.	3	✓					✓				
303	Electricity Industry Act, section 82	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.	3					✓					✓
304	Electricity Industry Act, section 82	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).	3					✓					✓

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
Reporting															
305	Electricity Industry Act, section 82	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.	3	✓						✓				
306	Electricity Industry Act, section 82	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.	3		✓						✓			
307	Electricity Industry Act, section 82	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. 	3	✓						✓				
Service standard payments															
308	Electricity Industry Act, section 82	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						✓					✓
309	Electricity Industry Act, section 82	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.	5	N/A										

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
310	Electricity Industry Act, section 82	Code of Conduct, clause 14.2(1)	Subject to clause 14.6, a retailer must pay the specified compensation to a customer if: <ul style="list-style-type: none"> it fails to comply with any of the procedures specified in Part 6 or Part 7 prior to arranging for disconnection or disconnecting the customer for failure to pay a bill; or arranges for disconnection or disconnects the customer for failure to pay a bill in contravention of clauses 7.2, 7.3, 7.6 or 7.7 for failure to pay a bill. 	5					✓						✓
311	Electricity Industry Act, section 82	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.	5	N/A										
312	Electricity Industry Act, section 82	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					✓						✓
313	Electricity Industry Act, section 82	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 respond to a complaint within the timeframes prescribed in subclause 12.1(4).	5					✓						✓

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating				
					A	B	C	D	N/P	1	2	3	4	N/R
314	Electricity Industry Act, section 82	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					✓					✓
315	Electricity Industry Act, section 82	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					✓					✓
316	Electricity Industry Act, section 82	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					✓					✓
15 Electricity Industry Metering Code – Licence Conditions and Obligations														
319	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.1	A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and also comply with any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act.	3	✓					✓				

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating				
					A	B	C	D	N/P	1	2	3	4	N/R
320	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.2(1)	An accumulation meter must at least conform to the requirements specified in the applicable metrology procedure and display, or permit access to a display of the measurements that are specified in subclauses 3.2(1)(a)(b) using dials, a cyclometer, an illuminated display panel or some other visual means.	3	✓					✓				
321	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.3(1)	An interval meter must at least have an interface to allow the interval energy data to be downloaded in the manner prescribed using an interface compatible with the requirements specified in the applicable metrology procedure.	5	N/A									
322	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.3(3)	If a metering installation is required to include a communications link, the link must, where necessary, include a modem and isolation device approved under the relevant telecommunications regulations that allows the interval energy data to be downloaded in the manner prescribed.	5	✓					✓				
323	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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 electricity flows in each direction.	5					✓					✓

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
327	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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 3.7(5), maintain the metering installation in the manner prescribed, unless otherwise agreed.	4	✓						✓				
328	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	4	✓						✓				
329	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.5(6)	A network operator may only impose a charge for providing, installing, operating or maintaining a metering installation in accordance with the applicable service level agreement that it has with the user.	4	N/A										
330	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.5(9)	If a network operator becomes aware that a metering installation does not comply with the Code, it must advise affected parties of the non-compliance and arrange for the non-compliance to be corrected as soon as practicable.	4						✓					✓

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
331	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.7	All devices that may be connected to a telecommunications network must be compatible with the telecommunications network and comply with all applicable State and Commonwealth enactments.	5					✓						✓
332	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.8	Subject to clause 3.27, a network operator must ensure that, consistent with the standards of good electricity industry practice, each metering installation on its network is secured by devices or methods that hinder unauthorized access and enable unauthorized access to be detected.	4	✓					✓					
333	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.9(3)	Subject to subclauses 3.9(4), 3.9(5) and 3.9(7), each metering installation must meet at least the requirements for that type of metering installation as specified in Table 3 in Appendix 1 of the Code.	3	✓					✓					
334	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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											N/A

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating				
					A	B	C	D	N/P	1	2	3	4	N/R
335	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.9(9)	If compensation is carried out within the meter, then the resultant metering system error must be as close as practicable to zero.	5					✓					✓
336	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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					✓					✓
337	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.11(1)	A network operator must ensure that a metering installation on its network is operating consistently with good electricity industry practice to measure and record data, and 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	✓					✓				

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
338	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	3											N/A
339	Distribution Licence, condition 4.1.1 Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	4											N/A
340	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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	✓										✓
341	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission	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	5		✓					✓				

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
	Licence, condition 4.1.1		meters within 3 years of the testing of the population.												
342	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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			✓				✓				
343	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.12(2)	A network operator must ensure that instrument transformers in its metering installations comply with the relevant requirements of any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act and any requirements specified in the applicable metrology procedure.	2			✓					✓			
344	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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	✓						✓				

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating				
					A	B	C	D	N/P	1	2	3	4	N/R
345	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	2			✓					✓		
346	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.13(1)	A network operator must procure the user, or the user's customer, to install, or arrange for the installation of, a full check metering installation or partial check metering installation in accordance with the prescribed requirements.	3	N/A									
347	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.13(3)(c)	A partial check metering installation must be physically arranged in a manner determined by the network operator, acting in accordance with good electricity industry practice.	5	N/A									
348	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.13(4)	A check metering installation for a metering point must comply with the prescribed requirements.	5	N/A									

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating				
					A	B	C	D	N/P	1	2	3	4	N/R
349	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.14(3)	If, under clause 3.14(2), a metering installation uses metering class CTs and VTs that do not comply with the Table 3 in Appendix 1, then the network operator must take the actions specified in order to achieve the accuracy requirements in Table 3 in Appendix 1.	2			✓					✓		
350	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	3	N/A									
351	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	3	N/A									
352	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.16(3)	If a device is used as a data logger, the energy data for a metering point on the network must be collated in trading intervals or sub-multiples of a trading interval within the metering installation.	5	N/A									

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating										
					A	B	C	D	N/P	1	2	3	4	N/R						
353	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.16(3A)	If, under subclause 3.16(3), energy data for a metering point on the network is collated in sub-multiples of a trading interval, then the network operator must aggregate the energy data into trading intervals before providing it to a Code participant unless the Code participant agrees otherwise.	5																
355	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	5																
356	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.20(3)	A network operator may only impose a charge for the provision of metering installations with enhanced technology features in accordance with its applicable service level agreement with the user.	5																
357	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.21(1)	Meters containing an internal real time clock must maintain time accuracy as prescribed. Time drift must be measured over a period of 1 month.	5																

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating										
					A	B	C	D	N/P	1	2	3	4	N/R						
358	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.21(2)	If a metering installation includes measurement elements and an internal data logger at the same site, it must include facilities on-site for storing the interval energy data for the periods prescribed.	5																
359	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.22	A network operator providing one or more metering installations with enhanced technology features must be licensed to use, and access, the metering software applicable to all devices being installed and be able to program the devices and set parameters.	5																
360	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	5																
361	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	5																

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
364	Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.27	A person must not install a metering installation on a network unless the person is the network operator or a registered metering installation provider for the network operator doing the type of work authorised by its registration.	4	✓						✓				
365	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 3.29	A network operator must publish a list of registered metering installation providers, including the prescribed details, and update the list at least annually.	4	✓						✓				
366	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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	✓						✓				
367	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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).	3	✓						✓				

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating				
					A	B	C	D	N/P	1	2	3	4	N/R
368	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	3	N/A									
370	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.3(1)	The standing data for a metering point must comprise at least the items specified.	3	✓					✓				
379	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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	✓					✓				
380	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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	✓					✓				

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating				
					A	B	C	D	N/P	1	2	3	4	N/R
381	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.8(5)	Without limiting subclause 4.8(4), a network operator must ensure that electronic passwords and other electronic security controls are only issued to the specified authorised personnel and otherwise keep its records of electronic passwords, and other electronic security controls, secure from unauthorised access.	4	✓					✓				
382	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 4.9	A network operator must retain energy data in its metering database for each metering point on its network, including any energy data that has been replaced under subclause 5.24, for at least the periods, and with the level of accessibility, prescribed.	4		✓				✓				
385	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.3	A network operator must, for each metering point on its network, obtain energy data from the metering installation and transfer the energy data into its metering database by no later than 2 business days after the date for the scheduled meter reading for the metering point (or such other time as is specified in the applicable service level agreement).	3	✓					✓				
386	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission	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	✓					✓				

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
	Licence, condition 4.1.1														
387	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.4(1A)	The meter reading referred to in clause 5.4(1) must not be undertaken by the customer associated with the meter, and must be undertaken by a person who is employed or appointed by the network operator and who is suitably skilled in accordance with good electricity industry practice to carry out meter readings.	3	✓					✓					
403	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.17A(1)	A network operator must provide data for a metering point from its metering database to a person if (and to the extent that) the customer associated with the metering point gives the network operator a direction to do so that complies with subclause 5.17A(2).	4	✓										✓
404	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.17A(3)	A network operator must comply with a direction under subclause 5.17A(1) within the timeframes prescribed.	4					✓						✓

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating				
					A	B	C	D	N/P	1	2	3	4	N/R
422	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.22(1)	A network operator must validate energy data in accordance with this Code applying, as a minimum, the prescribed rules and procedures set out in Appendix 2 and must, where necessary, substitute and estimate energy data under this Code applying, as a minimum, the prescribed rules and procedures set out in Appendix 3.	3					✓					✓
423	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.22(2)	The network operator must use check metering data, where available, to validate energy data provided that the check metering data has been appropriately adjusted for differences in metering installation accuracy in accordance with subclause 3.13.	5										N/A
424	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.22(3)	If a check meter is not available or energy data cannot be recovered from the metering installation within the time required under this Code, then the network operator must prepare substitute values using a method contained in Appendix 3 and agreed where necessary with the relevant Code participants.	5										N/A
425	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.22(4)	If a network operator detects a loss of energy data or incorrect energy data from a metering installation, it must notify each affected Code participant of the loss or error within 24 hours after detection.	5										N/A

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating				
					A	B	C	D	N/P	1	2	3	4	N/R
426	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.22(5)	Substitution or estimation of energy data is required when energy data is missing, unavailable or corrupted, including in the circumstances described in this subclause.	5					✓					✓
427	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.22(6)	A network operator must review all validation failures before undertaking any substitution.	5					✓					✓
428	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.23(1)	If a network operator determines that there is no possibility of determining an actual value for a metering point, then the network operator must designate an estimated or substituted value for the metering point to be a deemed actual value for the metering point.	5					✓					✓
429	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.23(3)	If a network operator has designated a deemed actual value for a metering point then the network operator must: <ul style="list-style-type: none"> 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 	5					✓					✓

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
			was designated to be the deemed actual value.												
430	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.24(1)	If a network operator uses an actual value (first value) for energy data for a metering point, and a better quality actual or deemed actual value is available (second value), the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice.	5					✓						✓
431	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.24(2)	If a network operator uses a deemed actual value (first value) for energy data for a metering point, and a better quality deemed actual value is available (second value), then the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice.	5					✓						✓

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating				
					A	B	C	D	N/P	1	2	3	4	N/R
432	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.24(3)	If a network operator uses an estimated or substituted value (first value) for energy data for a metering point, and a better quality actual, deemed, estimated or substituted value is available (second value), then the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice or the user and its customer jointly request it to do so.	5					✓					✓
434	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.25	A network operator must ensure the accuracy of estimated energy data in accordance with the methods in its metrology procedure and ensure that any transformation or processing of data preserves its accuracy in accordance with the metrology procedure.	3	✓					✓				
449	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 6.20(4)	A network operator must amend any document in accordance with the ERA's final recommendation.	5					✓					✓
450	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 6.20(5)	The network operator must publish any document that has been amended under subclause 6.20(4).	5					✓					✓

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
16 Electricity Industry (Network Quality and Reliability of Supply) Code – Licence Conditions and Obligations															
462	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 5(1)	A distributor or transmitter must, as far as reasonably practicable, ensure that electricity supply to a customer’s electrical installations complies with prescribed standards.	3	✓						✓				
463	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 8	A distributor or transmitter must, so far as reasonably practicable, disconnect the supply of electricity to installations or property in specified circumstances, unless it is in the interest of the customer to maintain the supply.	3		✓									✓
464	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, 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.	3	✓						✓				
465	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 10(1)	A distributor or transmitter must, so far as reasonably practicable, reduce the effect of any interruption on a customer.	3	✓						✓				

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
466	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, 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.	3	✓						✓				
467	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 12(3)	A distributor must take prescribed action in the event of a significant interruption to a small use customer.	3	✓										✓
468	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, 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	✓						✓				
469	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 13(3)	The average total length of interruptions of supply is to be calculated using the specified method.	3	✓						✓				

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating				
					A	B	C	D	N/P	1	2	3	4	N/R
470	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, 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.	3					✓					✓
471	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, 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.	3					✓					✓
477	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, 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.	3	✓					✓				
478	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 23(2)	A distributor or transmitter must keep records of information regarding its compliance with specific requirements for the period specified.	3	✓					✓				

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
479	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 24(3)	A distributor or transmitter must complete a quality investigation requested by a customer in accordance with specified requirements.	3		✓									✓
480	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 24(4)	A distributor or transmitter must report the results of an investigation to the customer concerned.	3		✓									✓
481	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, 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.	3	✓						✓				
482	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 25(3)	A document setting out a distributor's or transmitter's complaint handling process must contain the specified information.	3	✓						✓				

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
483	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clauses 26(1) and (2)	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 reporting period of 3 years or as specified by the ERA.	3	✓						✓				
483A.	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clauses 26(3) and (4)	A distributor or transmitter must publish the audit report not later than 1 October following the reporting period.	3		✓						✓			
483B.	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 26(5)	A distributor or transmitter must give a copy of its audit report to the Minister and the ERA not less than 7 days before it is published.	3	✓						✓				
484	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 27(1)	A distributor or transmitter must annually prepare and publish a report about its performance in respect of each year ending on 30 June.	3	✓						✓				

Summary of findings

Licence Obligation Reference No.	License condition	Obligations under condition	Description	Audit priority	Controls rating					Compliance rating					
					A	B	C	D	N/P	1	2	3	4	N/R	
485	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 27(3)	A distributor or transmitter must give a copy of its report about its performance to the Minister and the ERA not less than 7 days before it is published.	3		✓						✓			

4 Detailed findings and recommendations

This section has been structured in subsections for the relevant Codes and Regulations against which we assessed RIA's compliance.

Assessment of compliance adequacy

- **Findings** – the auditors understanding of the process and any issues that have been identified during the audit
- **Recommendations** – recommendations for improvement or enhancement of the process of control

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

Table 6: Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
Type 1 Reporting Obligations for all Licence Types							
127	Distribution Licence, condition 6.9.1 Integrated Regional Licence, condition 6.9.1	A distributor must create and maintain a Priority Restoration Register.	5	We observed the "Restoration Priority Register Electrical Services Procedure". Confirmed document is current and in place.	N/A. None noted.	A	1
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.	4	It was confirmed by RIA that there were no disconnections requested by a customer or instigated by RIA for non-payment of a bill during the audit period. A number of interruptions were carried out by PFM during the audit period and it was confirmed that these were due to unplanned outages for emergency reasons.	N/A. None noted.	A	1
10 Electricity Industry (Obligation to Connect) Regulations – Licence Conditions and Obligations							
72	Electricity Industry (Obligation to Connect) Regulations, regulation 4	A distributor must attach, or connect, premises to a distribution system if a retailer or customer takes prescribed action and the circumstances exist in regulation 5(1) of the Electricity Industry (Obligation to Connect) Regulations.	5	<p>Through our enquiry and system walkthrough, it was noted that RIA has in place, a "Distribution and Connection Manual" which includes RIA's responsibility relating to the "Electricity Industry (Obligation to Connect) Regulations" in s. 2.13.</p> <p>In section 3.4 of the Distribution and Connection Manual, RIA as distributor is responsible for:</p> <ul style="list-style-type: none"> - Metering arrangements - Type of connection - Date of connection or disconnection <p>However, this manual does not specifically address section 5(1) of the Electricity Industry (Obligation to Connect) Regulations.</p>	N/A. None noted.	B	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
73	Electricity Industry (Obligation to Connect) Regulations, regulation 5(5)	A distributor that is obliged to attach, or connect, premises to the distribution system under regulation 4 of the Electricity Industry (Obligation to Connect) Regulations must extend the distribution system to a suitable connection point.	5	<p>Through our enquiry and system walkthrough, it was noted that RIA has in place, a "Distribution and Connection Manual" which includes RIA's responsibility relating to the "Electricity Industry (Obligation to Connect) Regulations" in s. 2.13.</p> <p>In section 3.4 of the Distribution and Connection Manual, RIA as distributor is responsible for:</p> <ul style="list-style-type: none"> - Metering arrangements - Type of connection - Date of connection or disconnection <p>However, this manual does not specifically address section 4 of the Electricity Industry (Obligation to Connect) Regulations.</p>	N/A. None noted.	B	1
74	Electricity Industry (Obligation to Connect) Regulations, regulation 5(6)	The capacity and standard of an extension must be adequate for the supply required and in accordance with accepted good industry practice as would be applied by a prudent distributor.	5	<p>Through our enquiry and system walkthrough, it was noted that RIA has in place, a "Distribution and Connection Manual" which includes RIA's responsibility relating to the "Electricity Industry (Obligation to Connect) Regulations" in s. 2.13.</p> <p>In section 3.4 of the Distribution and Connection Manual, RIA as distributor is responsible for:</p> <ul style="list-style-type: none"> - Metering arrangements - Type of connection - Date of connection or disconnection <p>However, this manual does not specifically address section 5(6) of the Electricity Industry (Obligation to Connect) Regulations.</p>	N/A. None noted.	B	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
75	Electricity Industry (Obligation to Connect) Regulations, regulation 6	A distributor that is obliged to attach, or connect, premises to the distribution system under regulation 4 of the Electricity Industry (Obligation to Connect) Regulations must do so within a defined timeframe.	5	<p>Through our enquiry and system walkthrough, it was noted that RIA has in place, a "Distribution and Connection Manual" which includes RIA's responsibility relating to the "Electricity Industry (Obligation to Connect) Regulations" in s. 2.13.</p> <p>In section 3.4 of the Distribution and Connection Manual, RIA as distributor is responsible for:</p> <ul style="list-style-type: none"> - Metering arrangements - Type of connection - Date of connection or disconnection <p>However, this manual does not specifically address section 4 of the Electricity Industry (Obligation to Connect) Regulations.</p>	N/A. None noted.	B	1
76	Electricity Industry (Obligation to Connect) Regulations, regulation 7(1)	A distributor must energise premises in certain prescribed circumstances.	5	<p>Through our enquiry and system walkthrough, it was noted that RIA has in place, a "Distribution and Connection Manual" which includes RIA's responsibility relating to the "Electricity Industry (Obligation to Connect) Regulations" in s. 2.13.</p> <p>In section 3.4 of the Distribution and Connection Manual, RIA as distributor is responsible for:</p> <ul style="list-style-type: none"> - Metering arrangements - Type of connection - Date of connection or disconnection <p>However, this manual does not specifically address section 7(1) of the Electricity Industry (Obligation to Connect) Regulations.</p>	N/A. None noted.	B	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
77	Electricity Industry (Obligation to Connect) Regulations, regulation 8	A distributor that is obliged to energise premises must do so within a defined timetable.	5	<p>Through our enquiry and system walkthrough, it was noted that RIA has in place, a "Distribution and Connection Manual" which includes RIA's responsibility relating to the "Electricity Industry (Obligation to Connect) Regulations" in s. 2.13.</p> <p>In section 3.4 of the Distribution and Connection Manual, RIA as distributor is responsible for:</p> <ul style="list-style-type: none"> - Metering arrangements - Type of connection - Date of connection or disconnection <p>However, this manual does not specifically address section 8 of the Electricity Industry (Obligation to Connect) Regulations.</p>	N/A. None noted.	B	1
11 Electricity Industry (Customer Contracts) Regulations – Licence Conditions and Obligations							

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
78	Electricity Industry Act, section 51	Where the licensee supplies electricity under a standard form contract, the standard form contract must comply with that licensee approved standard form contract on the ERA's website.	5	<p>We observed Rottnest Island's Standard Form Contract on the Economic Regulation Authority website, which had been approved.</p> <p>As such, we accept that the contract complies with the standard form contract per the ERA website.</p> <p>We further inquired with McGee's and noted that the RIA Standard Form Contract was last amended in December 2016 (which falls outside the audit period), and provided us with email confirmation as well as a signed confirmation, which demonstrates that the Standard Form Contract complies with the ERA.</p>	N/A. None noted.	A	1
99	Electricity Industry (Customer Contracts) Regulations, regulation 36	The licensee must determine, from time to time, the default supplier for each connection point that connects to a distribution system operated by the licensee.	4	Not applicable. RIA is only supplier.	N/A. None noted.	N/P	N/A
100	Electricity Industry (Customer Contracts) Regulations, regulation 38	If a licensee becomes aware of a customer taking a supply of electricity that is deemed to be supplied under the licensee's standard form contract, the licensee must notify the customer within 5 days after becoming aware of it and provide specified information.	3	<p>We inquired with McGee's and noted that all new customers on Rottnest Island are provided with a lease contract, which includes the Standard Form Contract within it.</p> <p>As such, all customers are made aware of their electricity supply immediately upon signing their lease agreement and before moving in to the premises (and taking electricity supply). A sample of 10 standard form contracts were tested and validated.</p>	N/A. None noted.	A	1
12 Electricity Industry Act – Licence Conditions and Obligations							

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
101	Electricity Industry Act, section 13(1)	A licensee must provide the ERA with a performance audit conducted by an independent expert acceptable to the ERA, not less than once every 24 months.	5	RIA has commissioned an independent auditor (PricewaterhouseCoopers or 'PwC') to provide a performance audit for the period 1 April 2017 to 31 March 2019. The previous performance audit was performed by GHD in 2017 with the performance audit report published on the ERA website.	N/A. None noted.	A	1
102	Electricity Industry Act, section 14(1)(a)	A licensee must provide for an asset management system.	5	We note that the RIA has in place, an asset management system (AMS) which was reviewed by PwC for the period 1 April 2017 - 31 March 2019.	N/A. None noted.	A	1
103	Electricity Industry Act, section 14(1)(b)	A licensee must notify details of the asset management system and any substantial changes to it to the ERA.	5	RIA has advised that no substantial changes have been made to the asset management system during the audit period.	N/A. None noted.	N/P	N/R
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	RIA has commissioned an independent auditor (PricewaterhouseCoopers) to provide an asset management system (AMS) review report for the period 1 April 2017 to 31 March 2019. The previous AMS review was performed by GHD in 2017 with the review report published on the ERA website.	N/A. None noted.	A	1
105	Electricity Industry Act, section 17(1) Economic Regulation Authority (Licensing Funding) Regulations 2014	A licensee must pay the prescribed licence fees to the ERA according to clauses 6, 7 and 8 of the Economic Regulation Authority (Licensing Funding) Regulations 2014.	5	We performed a system walkthrough and obtained screen shot from Accounting system which confirmed annual license fees were paid to ERA in 2018, and the quarterly standing charge payments were made to ERA in 2018 and 2019.	N/A. None noted.	A	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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.	4	<p>We observed the "RIA - Electrical - Service Recovery and Contingency Plan", the "Restoration Priority Register Electrical Services Procedure" and the "Emergency Response Management Plan". Confirmed documents are current and in place.</p> <p>We also obtained and reviewed the "FUSS Rottnest Facilities Utilities and Support Services Contract".</p> <p>We note that this contract includes PFM's responsibilities regarding monitoring the operation of its electricity supply on the island.</p>	N/A. None noted.	A	1
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 non- standard form contract that complies with the Act.	4	<p>Through our enquiry and system walkthrough, it was noted that RIA does not have any residential customers, only commercial customers.</p> <p>All RIA customers at Rottnest Island are supplied electricity under the "Rottnest Island Standard Form Contract For The Supply Of Electricity". A sample of 10 customers was obtained to confirm this. We note that the standard form contract complies with the Electricity Industry Act 2004, and has been approved by the Economic Regulation Authority as it is published on their website in the following URL: https://www.erawa.com.au/electricity/electricity-licensing/standard-form-contracts.</p>	N/A. None noted.	A	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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.	4	<p>We performed a walkthrough with McGee's and noted that the latest amendment to RIA's Standard Form Contract occurred in December 2016. The Contract was updated as it referred to the 2014 Code of Conduct, and this Code of Conduct was updated in 2016. Hence the references were required to be updated.</p> <p>We obtained supporting documentation for this amendment, however we note that this amendment was not within the audit period. Accept as reasonable.</p>	N/A. None noted.	A	N/R
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	<p>We reviewed the Economic Regulation Authority website, noting that the Rottnest Island Authority is an authorised electricity licence holder in the following link: https://www.erawa.com.au/electricity/electricity-licensing/licence-holders Hence confirmed that RIA is able to supply electricity to small use customers.</p> <p>Further, we note that the Rottnest Island Authority is listed as a current member of the Energy and Water Ombudsman Western Australia, in the following link: http://www.ombudsman.wa.gov.au/ewowa/making_complaints/who_you_can_complain_about.htm</p> <p>Hence we are comfortable that RIA is able to supply electricity to small use customers.</p>	N/A. None noted.	A	1
13 Electricity Licences – Licence Conditions and Obligations							

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
116	Integrated Regional Licence, condition 6.4.2 Retail Licence, condition 6.4.2	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	Please refer to obligation 109 above.	N/A. None noted.	A	N/R
117	Integrated Regional Licence, condition 6.4.3 Retail Licence, condition 6.4.3	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	Please refer to obligation 109 above.	N/A. None noted.	A	N/R
118	Integrated Regional Licence, condition 6.5.1 Retail Licence, condition 6.5.1	A licensee can only amend the standard form contract with the ERA's approval.	5	Please refer to obligation 109 above.	N/A. None noted.	A	N/R
119	Distribution Licence, condition 4.3.1 Generation Licence, condition 4.3.1 Integrated Regional Licence, condition 4.3.1 Retail Licence, condition 4.3.1 Transmission Licence, condition 4.3.1	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	We note that both the 2016-2017 and 2017-2018 annual reports for the Rottneest Island Authority, comply with Australian Accounting Standards.	N/A. None noted.	A	1
121	Distribution Licence, condition 5.3.2 Generation Licence, condition 5.3.2 Integrated Regional Licence, condition 5.3.2 Retail Licence, condition 5.3.2 Transmission Licence, condition 5.3.2	A licensee must comply, and require its auditor to comply, with the ERA's standard audit guidelines for a performance audit.	4	The licensee has specified and the auditor (PricewaterhouseCoopers) has documented in the FY19 Audit Plan its compliance with the ERA's guidelines.	N/A. None noted.	A	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
122	Distribution Licence, condition 5.1.5 Generation Licence, condition 5.1.5 Integrated Regional Licence, condition 5.1.5 Transmission Licence, condition 5.1.5	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	The licensee has specified and the auditor (PricewaterhouseCoopers) has documented in the FY19 Audit Plan its compliance with the ERA's guidelines.	N/A. None noted.	A	1
123	Distribution Licence, condition 4.4.1 Generation Licence, condition 4.4.1 Integrated Regional Licence, condition 4.4.1 Retail Licence, condition 4.4.1 Transmission Licence, condition 4.4.1	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	Through our enquiry and system walkthrough, it was noted that this does not apply to the RIA for the period 2017 - 2019, as the company is in a positive working capital position and a net asset position per the 2017/2018 financial report.	N/A. None noted.	N/P	N/A
124	Distribution Licence, condition 4.5.1 Generation Licence, condition 4.5.1 Integrated Regional Licence, condition 4.5.1 Retail Licence, condition 4.5.1 Transmission Licence, condition 4.5.1	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.	3	ERA annual compliance report EIRL3 covering period July 2017 - June 2018 was submitted to ERA on 30 August 2018. The following 2017 annual electricity licence reporting datasheets were issued to ERA on 20 September and published on RIA website on 6 October 2017: <ul style="list-style-type: none"> • 2017 Electricity License Reporting Datasheets - Distribution • 2017 Electricity Performance Reporting Datasheets- Retail • 2017 Electricity License Reporting Datasheets Network Quality Reliability Code The following 2018 annual electricity licence reporting datasheets were submitted to ERA and published on the RIA website	Ensure the annual electricity licence reporting datasheets report are issued to ERA no later than the 1 October dead-line following the reporting period. RIA should ensure controls and monitoring processes are in place to ensure compliance is achieved.	B	2

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
				<p>on 23 October 2018, outside the 1 October deadline stipulated by the ERA.</p> <ul style="list-style-type: none"> 2018 Electricity License Reporting Datasheets Network Quality Reliability Code 2018 Electricity License Reporting Datasheets - Distribution 2018 Electricity Performance Reporting Datasheets - Retail 			
125	<p>Distribution Licence, condition 3.8.1 and 3.8.2</p> <p>Generation Licence, condition 3.8.1 and 3.8.2</p> <p>Integrated Regional Licence, condition 3.8.1 and 3.8.2</p> <p>Retail Licence, condition 3.8.1 and 3.8.2</p> <p>Transmission Licence, condition 3.8.1 and 3.8.2</p>	<p>A licensee must publish any information as directed by the ERA to publish, within the timeframes specified.</p>	3	<p>RIA provided ERA in the manner prescribed the following reports during the audit period:</p> <ul style="list-style-type: none"> ERA annual compliance report EIRL3 covering period July 2017 - June 2018 2018 Electricity License Reporting Datasheets Network Quality Reliability Code 2018 Electricity License Reporting Datasheets - Distribution 2018 Electricity Performance Reporting Datasheets - Retail 2017 Electricity License Reporting Datasheets - Distribution 2017 Electricity Performance Reporting Datasheets- Retail 2017 Electricity License Reporting Datasheets Network Quality Reliability Code 	N/A. None noted.	A	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
126	Distribution Licence, condition 3.7.1 Generation Licence, condition 3.7.1 Integrated Regional Licence, condition 3.7.1 Retail Licence, condition 3.7.1 Transmission Licence, condition 3.7.1	All notices must be in writing, unless otherwise specified.	3	All notices and correspondences between RIA and ERA have been in writing. A sample of notices were reviewed.	N/A. None noted.	A	1
14 Code of Conduct – Licence Conditions and Obligations							
Marketing							
130	Code of Conduct, clause 2.2(1) Integrated Regional Licence, condition 6.3.1 Retail Licence, condition 6.3.1	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).	4	Through our enquiry and system walkthrough, it was noted that RIA's standard form contracts are managed by McGee's, which acts as the agent for the retailer (RIA) It was also noted that RIA's Standard Form Contracts include a signing page which must be dated and signed by the customer at the date of entering into the contract. As such, we deem RIA's standard form contracts to comply with clause 2.2(1) of the code. Through further inquiry with McGee's, it was noted that on a yearly basis, McGee's sends an email to all 24 customers on Rottneest Island detailing: - New tariffs - Specific parts of the Code which are relevant - Where they can find the Code	N/A. None noted.	A	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
131	Code of Conduct, clause 2.2(2) Integrated Regional Licence, condition 6.3.1 Retail Licence, condition 6.3.1	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.	4	It was noted that the relevant details listed within subclause 2.2(2) are included in RIA's Standard Form Contract. Prior to signing this Contract, the customer is required to have read, signed and dated the contract.	N/A. None noted.	A	1
132	Code of Conduct, clause 2.3(1) Integrated Regional Licence, condition 6.3.1 Retail Licence, condition 6.3.1	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).	5	Through our enquiry and system walkthrough, it was noted that no non-standard contracts are issued by RIA. As such, this obligation is not rated. We further confirmed this through inquiries with McGee's.	N/A. None noted.	A	N/R
133	Code of Conduct, clause 2.3(2) Integrated Regional Licence, condition 6.3.1 Retail Licence, condition 6.3.1	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.	5	Through our enquiry and system walkthrough, it was noted that no non-standard contracts are issued by RIA. As such, this obligation is not rated. We further confirmed this through inquiries with McGee's.	N/A. None noted.	A	N/R
135	Code of Conduct, clause 2.3(5) Integrated Regional Licence, condition 6.3.1 Retail Licence, condition 6.3.1	Subject to subclause 2.3(3), a retailer or electricity marketing agent must obtain the customer's verifiable consent that the specified information in subclause 2.3(2) and 2.3(4), as applicable, has been provided.	5	Through our enquiry and system walkthrough, it was noted that no non-standard contracts are issued by RIA. As such, this obligation is not rated. We further confirmed this through inquiries with McGee's.	N/A. None noted.	A	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
137	Code of Conduct, clause 2.4(2) Integrated Regional Licence, condition 6.3.1 Retail Licence, condition 6.3.1	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.	4	It was noted that the RIA's phone number, website details and physical location are clearly located on every RIA Standard Form Contract. These details are further freely available on RIA's website. It was further noted that on the Standard Form Contracts and website, RIA's office hours are 8.30am - 4.15pm Monday to Friday. We also confirmed this through audit sampling two invoices to sample, in which noted that both invoices within the audit period complied with the requirements per the Code.	N/A. None noted.	A	1
138	Code of Conduct, clause 2.5(1) Integrated Regional Licence, condition 6.3.1 Retail Licence, condition 6.3.1	A retailer or electricity marketing agent must, on request, provide a customer with the information specified in subclause 2.5(1).	4	Please refer to obligation 137 above.	N/A. None noted.	A	1
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.	4	We note that as the RIA holds an Integrated Regional Licence which is issued by the Economic Regulation Authority (ERA). 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. There is no other distributor to forward customers' requests to.	N/A. None noted.	N/P	N/A

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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; or the next business day if the request is received after 3pm or on a weekend or public holiday.	4	We note that as the RIA holds an Integrated Regional Licence which is issued by the Economic Regulation Authority (ERA). 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. There is no other distributor to forward customers' requests to.	N/A. None noted.	N/P	N/A
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.	4	Through our enquiry and system walkthrough with McGee's, it was noted that McGee's bills RIA's 24 customers on a monthly basis. This has been consistent throughout the entire audit period. We further performed audit procedures over two sample tenants, obtaining their billing history from McGee's' CMS system and ensuring billing has solely occurred on a monthly basis.	N/A. None noted.	A	1
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	Through our enquiry and system walkthrough with McGee's, it was confirmed that McGee's does not place RIA's 24 customers on shortened billing cycles. This has been consistent throughout the entire audit period. We performed audit procedures over two sample tenants, obtaining their billing history from McGee's' CMS system and ensuring that they have not been placed on a shortened billing period.	N/A. None noted.	N/P	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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.	5	Not applicable. Confirmed with PFM that RIA does not have any residential customers. Further, McGee's confirmed that McGee's has never placed any customers who are experiencing financial hardship on a shortened billing cycle. There are no formal policy documents in place relating to a situation where customers are experiencing financial hardship, and this is deemed appropriate due to the small number of customers and the fact that these are all commercial customers.	N/A. None noted.	N/P	N/R
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 cycle within 10 business days of making the decision.	5	Please see obligation 146 above.	N/A. None noted.	N/P	N/R
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	Please see obligation 146 above.	N/A. None noted.	N/P	N/R
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	Please see obligation 146 above.	N/A. None noted.	N/P	N/R
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	Please see obligation 146 above.	N/A. None noted.	N/P	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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	Through our enquiry and system walkthrough with McGee's, it was noted that McGee's has not provided any bill-smoothing arrangements to RIA's 24 customers during the audit period. PwC selected two sample tenants, and performed audit procedures to confirm that bill smoothing has not occurred.	N/A. None noted.	N/P	N/R
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	Please see obligation 152 above.	N/A. None noted.	N/P	N/R
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.	4	Through our enquiry and system walkthrough with McGee's, it was noted that all 24 customers of Rottnest Island are sent their bills via email. We reviewed a full listing of email addresses for each of the 24 customers directly from McGee's CMS accounting system.	N/A. None noted.	A	1
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.	4	We performed a walkthrough with McGee's, and reviewed a sample of two invoices for the audit period. It was noted that both invoices complied with clause 4.5(1) and included all required information, except the 24 hour emergency phone number.	It is recommended that McGee's includes PFM's 24 emergency phone number on their invoices. This is required by the Code, but is currently not complied with by McGee's in their billing of customers.	B	2
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	Through our enquiry and system walkthrough with McGee's, it was noted that McGee's did not bill any of RIA's 24 customers for historical debt, during the audit period from April 2017 - March 2019. We confirmed this through obtaining a list of all payments during the audit period.	N/A. None noted.	A	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
157	Code of Conduct, clause 4.6	<p>Subject to clauses 4.3 and 4.8, a retailer must base a customer's bill on the following:</p> <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. 	4	<p>Through our enquiry and system walkthrough with McGee's, it was noted that McGee's bases its monthly bills to RIA's 24 customers, on meter readings performed on a monthly basis by PFM staff. McGee's do not obtain customer readings, and we further noted that there are no Type 7 connections on Rottnest Island during the audit period.</p> <p>We obtained supporting documentation from McGee's in the form of invoices, and PFM in the form of the Monthly Meter Reading Procedure, as well as meter readings for the audit period. We further obtain a listing from the metering database, which demonstrates how all meters are Type 6 during the audit period. No issues noted in testing performed.</p>	N/A. None noted.	A	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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.	4	<p>Through our enquiry and system walkthrough with McGee's, it was noted that PFM is responsible for all monthly meter reading for RIA's 24 customers. PFM have consistently provided metering data in a timely manner throughout the audit period. As McGee's prepares monthly invoices, PFM undertakes monthly meter readings.</p> <p>It was noted that in the event PFM is unable to obtain a meter reading for one particular month, McGee's will raise the electricity amount owing as \$0 on the customer's invoice for that particular month. This will then be rectified in the following month's invoice, with both month's amounts being recognised.</p> <p>PFM will provide metering data to Energy Tech, who transform the data into a readable excel spreadsheet. This is then provided to McGee's who input it into their invoicing system to generate a customer invoice.</p> <p>It was also noted that there is no formal policy held by McGee's or RIA in the event that metering data cannot be provided.</p>	N/A. None noted.	B	1
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.	4	<p>Through our enquiry and system walkthrough with McGee's, it was noted that that McGee's has not used estimation for any customer bills during the audit period.</p> <p>Where metering data is unable to be provided for a particular month, the electricity amount per the invoice will be nil, and the amount will be added to the next month's invoice.</p>	RIA should ensure if a bill cannot be based on an actual meter reading, an estimated bill is issued to the customer following the prescribed methodologies per Metering Code for creating estimated readings.	B	2

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
				<p>The code clause assumes an estimated bill will be issued to a customer if a bill cannot be based on an actual reading. Metering Code clause 5.3 requires a network operator to provide the retailer with energy data, which is either actual data or estimated data. Therefore, a default \$0 bill with nil reading is not compliant to the obligation. RIA should estimate a reading instead to avoid any potential bill shock for customers.</p> <p>It was also noted that there is no formal policy held by McGee's or RIA in the event that metering data cannot be provided.</p>			
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).	4	Please see obligation 159 above.	N/A. None noted.	N/P	N/R
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.	4	Please see obligation 159 above.	N/A. None noted.	N/P	N/R
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.	4	Please see obligation 159 above.	N/A. None noted.	N/P	N/R
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.	4	Please see obligation 159 above.	N/A. None noted.	N/P	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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.	4	Through our enquiry and system walkthrough with McGee's, it was noted that during the audit period, only one customer of the RIA requested for their meter to be tested. Upon further inquiry, this customer paid the invoice amount owing, and the test was never required to be carried out. We obtained an email confirming the above.	N/A. None noted.	N/P	N/R
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.	4	Not applicable. As discussed with McGee's, a meter has not been found to be defective during the audit period. Accept as reasonable.	N/A. None noted.	N/P	N/R
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.	5	Through our enquiry and system walkthrough with McGee's, it was noted that RIA does not offer alternative tariffs to customers. As such, no customers have applied for an alternative tariff in the audit period. We obtained the listing of tariffs during the audit period, noting that prices are consistent for all customers, and is reviewed and updated on an annual basis only.	N/A. None noted.	N/P	N/R
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.	5	Please see obligation 166 above.	N/A. None noted.	N/P	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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.	4	<p>Through our enquiry and system walkthrough with McGee's, it was noted that that during the audit period, McGee's has provided one final bill to a customer of the RIA.</p> <p>During May 2017, one customer terminated their lease contract and closed their business on the island.</p> <p>McGee's provided this customer's Termination Notice, as well as the bill summary for May 2017 which shows his final bill amount.</p> <p>We noted that the Termination Notice is dated 3 May 2017, and the final bill was billed on 4 May 2017. This appears to be reasonable and demonstrates McGee's "using reasonable endeavours to arrange for the final bill".</p>	N/A. None noted.	A	1
169	Code of Conduct, clause 4.14(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	No instances were noted of customer's account being in credit at the time of account closure.	N/A. None noted.	N/P	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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	No instances were noted of customer's account being in credit at the time of account closure.	N/A. None noted.	N/P	N/R
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: <ul style="list-style-type: none"> · 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) and · any future bills that are properly due. 	5	Through our enquiry and system walkthrough with McGee's, it was noted that during the audit period, there was only one instance of a customer asking McGee's and the RIA to review their bill. It was further noted that this client subsequently paid the bill owing, with no further issues or proceedings required. We obtained email supporting evidence for this request.	N/A. None noted.	A	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
172	Code of Conduct, clause 4.16(1)(a)	<p>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.</p> <p>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.</p>	5	<p>We note that during the audit period, there was only one request from a customer for McGee's/ RIA to review their electricity bill. Subsequently, the customer paid the bill amount owing with no further proceedings or action required.</p> <p>We note in the email correspondence between McGee's and the customer, McGee's advised the customer that they could request a meter test in accordance with the Code of Conduct. However, it was noted that the customer was not informed of the existence and operation of RIA's internal complaints handling processes and details of applicable external complaints handling processes.</p> <p>We reviewed the internal complaints register to confirm that no other requests for meter review, occurred during the audit period.</p>	RIA to ensure, when reviewing customers bill on request by the customer, that the customer is formally (supported by documented evidence) informed of the existence and operation of RIA's internal complaints handling processes and details of applicable external complaints handling processes.	B	2
173	Code of Conduct, clause 4.16(1)(b)	<p>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.</p>	5	<p>Please refer to 171 and 172 above. Although customer made a request for bill to be reviewed, the bill was not incorrect, and the customer subsequently paid the amount owing. Hence deemed not applicable.</p>	N/A. None noted.	N/P	N/R
174	Code of Conduct, clause 4.16(2)	<p>A retailer must inform a customer of the outcome of the review of a bill as soon as practicable.</p>	5	<p>Please refer to 171 and 172 above. Although customer made a request for bill to be reviewed, the bill was not incorrect, and the customer subsequently paid the amount owing. Hence deemed not applicable.</p>	N/A. None noted.	N/P	N/R
175	Code of Conduct, clause 4.16(3)	<p>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</p>	5	<p>Please refer to 171 and 172 above. Although customer made a request for bill to be reviewed, the bill was not incorrect, and the customer subsequently paid the amount owing. Hence deemed not applicable.</p>	N/A. None noted.	N/P	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
		notification of the status of the review as soon as practicable.					
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	<p>Please refer to obligation 171 above.</p> <p>Through our enquiry and system walkthrough with McGee's, it was noted that that during the audit period, one customer made a request for their bill to be reviewed.</p> <p>The bill was different from the original customer expectation, as Energy Tech read the meter based on the old meter and not the new meter installed. This resulted in additional charges being made to the final invoice to the customer. However, obligation 176 is deemed not applicable, because the amount undercharged was rectified in the final invoice sent to the customer, and therefore McGee's did not need to recover an amount.</p>	N/A. None noted.	N/P	N/R
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	Through our enquiry and system walkthrough with McGee's, it was noted that this has not occurred during the audit period. Hence deemed not applicable.	N/A. None noted.	N/P	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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: <ul style="list-style-type: none"> · use its best endeavours to inform the customer within 10 business days of the retailer becoming aware of the error, defect, or default; and · subject to subclauses 4.18(6) and 4.18(7), ask the customer for instructions for the credit or repayment of the amount. 	5	<p>Through our enquiry and system walkthrough with McGee's, one instance of obligation 177 was noted during the audit period.</p> <p>It was noted that on the customer's invoice, McGee's had accidentally raised the gas charge under electricity, and subsequently had to issue a credit note to the customer. We obtained supporting documentation for this transaction, and confirms that McGee's notified the customer and issued the credit the following day (well within the 10 days as stipulated in the clause)</p>	N/A. None noted.	A	1
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	<p>Please refer to obligation 177 above with one instance of over-charge, in which the credit note was issued to the customer the following day and corrected.</p> <p>It was confirmed that there were no other instances where an overcharge required a refund to a customer during the audit period.</p>	N/A. None noted.	N/P	N/R
179	Code of Conduct, clause 4.18(4)	If instructions regarding repayment of an overcharged bill are not received within 20 business days of a retailer making the request, a retailer must use reasonable endeavours to credit the amount overcharged to a customer's account.	5	<p>It was confirmed that there were no instances where an overcharge required a refund to a customer during the audit period.</p>	N/A. None noted.	N/P	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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	It was confirmed that there were no instances where an overcharge required a refund to a customer during the audit period.	N/A. None noted.	N/P	N/R
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	It was confirmed that there were no instances where an overcharge required a refund to a customer during the audit period.	N/A. None noted.	N/P	N/R
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 the requirements specified in subclause 4.19(1).	5	Through our enquiry and system walkthrough with McGee's, it was noted that McGee's has not proposed to recover any amounts from customers during the audit period. Hence this obligation is deemed not applicable.	N/A. None noted.	N/P	N/R
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: <ul style="list-style-type: none"> · use its best endeavours to inform the customer within 10 business days; and · subject to subclauses 4.19(5) and 4.19(7), ask the customer for instructions 	5	Through our enquiry and system walkthrough with McGee's, it was noted that McGee's has not informed any customers of adjustments to their bills during the audit period. Hence this obligation is deemed not applicable.	N/A. None noted.	N/P	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
		about the repayment of the amount.					
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	Through our enquiry and system walkthrough with McGee's, it was noted that McGee's has not informed any customers of adjustments to their bills during the audit period. Hence this obligation is deemed not applicable.	N/A. None noted.	N/P	N/R
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	Through our enquiry and system walkthrough with McGee's, it was noted that McGee's has not informed any customers of adjustments to their bills during the audit period. Hence this obligation is deemed not applicable.	N/A. None noted.	N/P	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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	Through our enquiry and system walkthrough with McGee's, it was noted that McGee's has not informed any customers of adjustments to their bills during the audit period. Hence this obligation is deemed not applicable.	N/A. None noted.	N/P	N/R
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.	4	Through our enquiry and system walkthrough with McGee's, it was confirmed that all bills sent to customers are due at least 12 business days from their dispatch date. Due to a moderate level of assurance required and due to monthly billing by RIA, we reviewed a sample of two invoices and noted that for both invoices, due date is over 12 days from dispatch date. Accept as reasonable.	N/A. None noted.	A	1
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.	4	We reviewed a sample of two invoices and noted that for both invoices, payment terms are clearly offered on the first page of both invoices and are in compliance to the payment methods prescribed in clause 5.2: (a) in person at 1 or more payment outlets located within the Local Government District of the customer's supply address - Yes, offered on RIA invoice, to be paid at Level 2, 26 Clive St, West Perth WA 6005 (b) by mail - Yes, offered on RIA invoice to PO Box 1285 West Perth WA 6872	N/A. None noted.	A	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
				(c) for residential customers, by Centrepay - No residential customers at RIA no not applicable (d) electronically by means of BPay or credit card - Yes, offered on RIA invoice with relevant instructions (e) by telephone by means of credit card or debit card - Yes, offered on RIA invoice with relevant instructions			
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.	4	PwC noted through inquiries with McGee's and inspection of a sample of invoices, that McGee's/RIA do not offer a direct debit facility. This has been consistent during the audit period.	N/A. None noted.	N/P	N/R
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.	4	Through our enquiry and system walkthrough with McGee's, it was noted that it is rare for customers to pay their electricity bills in advance. During the audit period, it was noted one instance of a customer prepayment. We obtained the Tenant Reconciliation for the audit period which confirms that this was the only instance of a prepayment. Accept as reasonable.	N/A. None noted.	A	1
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.	4	Through our enquiry and system walkthrough with McGee's, it was noted that McGee's/RIA has not charged a late payment fee to any of Rottnest Island's 24 customers during the audit period. We reviewed the tenant reconciliation which shows all payments during the audit period, and confirmed this.	N/A. None noted.	N/P	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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.	4	Please see obligation 193 above.	N/A. None noted.	N/P	N/R
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).	4	Through our enquiry and system walkthrough with McGee's, it was noted that only one customer terminated their lease contract and vacated the island during the audit period. We reviewed this customer's Termination Notice as well as the entire tenant reconciliation for the audit period. We then confirmed that no bills were charged to this customer after the date of termination. Hence accept as reasonable.	N/A. None noted.	A	1
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.	4	Not applicable during the audit period as confirmed with McGee's.	N/A. None noted.	N/P	N/R
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).	4	Please refer to obligation 205 above.	N/A. None noted.	N/P	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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	This has not occurred during the audit period as confirmed with McGee's.	N/A. None noted.	N/P	N/R
201A	Code of Conduct, clause 5.8(3)	A retailer may transfer one customer's debt to another customer if requested by the customer owing the debt, providing the retailer obtains the other customer's verifiable consent to the transfer.	5	This has not occurred during the audit period as confirmed with McGee's.	N/A. None noted.	N/P	N/R
Payment difficulties & financial hardship							
Disconnection & interruption							
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	It was confirmed that there have been no disconnections during the audit period, apart from disconnections due to planned outages in which customers were provided 72 hours' notice. Disconnection requirements are outlined in the Standard Form Contract and these are in line with the Code of Conduct requirements. Disconnection process is further outlined in the Rottnest Island Distribution and Connection Manual.	N/A. None Noted.	N/P	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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	It was confirmed that there have been no disconnections during the audit period. Disconnection requirements are outlined in the Standard Form Contract and these are in line with the Code of Conduct requirements. Disconnection process is further outlined in the Rottnest Island Distribution and Connection Manual.	N/A. None Noted.	N/P	N/R
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	It was confirmed that there have been no disconnections during the audit period. Disconnection requirements are outlined in the Standard Form Contract and these are in line with the Code of Conduct requirements. Disconnection process is further outlined in the Rottnest Island Distribution and Connection Manual.	N/A. None Noted.	N/P	N/R
233	Code of Conduct, clause 7.5	A distributor who disconnects or interrupts 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.	5	It was confirmed that there have been no disconnections during the audit period. Disconnection requirements are outlined in the Standard Form Contract and these are in line with the Code of Conduct requirements. Disconnection process is further outlined in the Rottnest Island Distribution and Connection Manual.	N/A. None Noted.	N/P	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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.	5	It was confirmed that there have been no disconnections during the audit period. Disconnection requirements are outlined in the Standard Form Contract and these are in line with the Code of Conduct requirements. Disconnection process is further outlined in the Rottnest Island Distribution and Connection Manual.	N/A. None Noted.	N/P	N/R
Reconnection							
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	It was confirmed that there have been no disconnections or reconnections during the audit period. Reconnection requirements are outlined in the Standard Form Contract and these are in line with the Code of Conduct requirements. Reconnection process is further outlined in the Rottnest Island Distribution and Connection Manual.	N/A. None noted.	N/P	N/R
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).	5	Not Applicable - RIA is both the distributor and retailer.	N/A. None noted.	N/P	N/A

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
243A	Code of Conduct, clause 8.1(3)	If a retailer does not forward the request for reconnection to the relevant distributor within the timeframes in subclause 8.1(2), the retailer will not be in breach of this clause (8.1) if the retailer causes the customer's supply address to be reconnected by the distributor within the timeframes in subclause 8.2(2) as if the distributor had received the request for reconnection from the retailer in accordance with subclause 8.1(2).	5	Not Applicable - RIA is both the distributor and retailer.	N/A. None noted.	N/P	N/A
244	Code of Conduct, clause 8.2	A distributor must reconnect the customer's supply address on the request of a retailer within the timeframes specified in subclause 8.2(2).	5	It was confirmed that there have been no disconnections or reconnections during the audit period. Reconnection requirements are outlined in the Standard Form Contract and these are in line with the Code of Conduct requirements. Reconnection process is further outlined in the Rottnest Island Distribution and Connection Manual.	N/A. None noted.	N/P	N/R
Information & communication							

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
272	Code of Conduct, clause 10.1(1)	A retailer must give notice of any variations in its tariffs, fees and charges, to each of its customers affected by the variation no later than the next bill in the customer's billing cycle.	5	Through our enquiry and system walkthrough with McGee's, it was noted that during the audit period and consistent with prior years, Tariffs on Rottnest Island are varied by McGee's/RIA annually and notice is provided to customers prior to the next billing cycle. It was confirmed through sample verification that RIA sends an email to all customers including details of tariff changes, any other significant events and relevant sections of the Code of Conduct.	N/A. None noted.	A	1
273	Code of Conduct, clause 10.1(2)	On request and at no charge, a retailer must give or make available to a customer reasonable information on its tariffs, fees and charges, including any alternative tariffs that may be available to that customer.	5	No customer requests were noted to be have been made during the audit period.	N/A. None noted.	N/P	N/R
274	Code of Conduct, clause 10.1(3)	A retailer must give or make available to a customer the information requested on tariffs, fees and charges within 8 business days of the date of receipt and, if requested, provide the information in writing.	5	No customer requests were noted to be have been made during the audit period.	N/A. None noted.	N/P	N/R
275	Code of Conduct, clause 10.2(1)	On request, a retailer must provide a non-contestable customer with their billing data.	5	Not applicable. All RIA customers are contestable.	N/A. None noted.	N/P	N/A

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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.	5	Not applicable. It was confirmed with McGee's that no requests have been made during the audit period. Accept as reasonable.	N/A. None noted.	N/P	N/R
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.	5	Not applicable. It was confirmed with McGee's that no requests have been made during the audit period. Accept as reasonable.	N/A. None noted.	N/P	N/R
278	Code of Conduct, clause 10.2(4)	A retailer must keep a non-contestable customer's billing data for 7 years.	5	Through our enquiry and system walkthrough with McGee's, it was noted that McGee's, as a real estate company, is obliged to retain all customer records and billing data for a 7 year period. All billing data is stored in the cloud securely, as well as in hard copy. An example was sighted of a customer to confirm this (Rottnest Hotel).	N/A. None noted.	A	1
280	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.	5	It was confirmed through sample verification that annually, RIA sends a letter to all customers including 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. None noted.	A	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
281	Code of Conduct, clause 10.4	On request and at no charge, a retailer must give, or make available to, a customer general information on cost effective and efficient ways to utilise electricity; and the typical running costs of major domestic appliances.	5	It was advised by RIA that no requests have been made for such information during the audit period.	N/A. None noted.	N/P	N/R
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	It was advised by RIA that no requests have been made for such information during the audit period.	N/A. None noted.	N/P	N/R
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	It was advised by RIA that no requests have been made for such information during the audit period.	N/A. None noted.	N/P	N/R
284	Code of Conduct, clause 10.7(1)	On request, a distributor must provide a customer with their consumption data.	5	It was advised by RIA that no requests have been made for such information during the audit period.	N/A. None noted.	N/P	N/R
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 information at no charge in the circumstances specified in subclause 10.7(2) (a)-(b).	5	It was advised by RIA that no requests have been made for such information during the audit period.	N/A. None noted.	N/P	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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: <ul style="list-style-type: none"> the request; or 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	It was advised by RIA that no requests have been made for such information during the audit period.	N/A. None noted.	N/P	N/R
287	Code of Conduct, clause 10.7(4)	A distributor must keep a customer's consumption data for 7 years.	5	PFM has raw data (meter readings) available on soft-copy from 2010 to 2019. We inspected the files on a system walkthrough and kept screenshots as evidence.	N/A. None noted.	A	1
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	It was advised by RIA that no requests have been made for such information during the audit period.	N/A. None noted.	N/P	N/R
289	Code of Conduct, clause 10.8(2)	A distributor must publish information on distribution standards and metering arrangements on its website.	5	We observed that Metrology Procedure and Distribution Manual are available on the RIA website.	N/A. None noted.	A	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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	It was noted that based on the documentation, provided during our walkthrough on 29 May 2019, (including contracts, agreements, email communications and notices), written information appears to be expressed in clear, simple and concise language during the audit period.	N/A. None noted.	A	1
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	Through our enquiry and system walkthrough with McGee's, it was noted that no customers have requested information on how to obtain the Code of Conduct during the audit period. Despite this, information on how to obtain the Code is printed on each invoice to all customers, and is included within all Standard Form Contracts. We sighted both 2 invoices and all Standard Form Contracts for the audit period, and sighted this information. Hence accept as reasonable.	N/A. None noted.	A	N/R
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	It was observed the Rotttnest Island Authority website, noting that the Code of Conduct was freely available in the following link: http://ria.wa.gov.au/policy-and-reports/utility-reports/electrical-reports	N/A. None noted.	A	1
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 (including independent multi-	5	Not applicable. Confirmed that Rotttnest Island Authority does not have any residential customers.	N/A. None noted.	N/P	N/A

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
		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.	5	Not applicable. Confirmed that Rottnest Island Authority does not have any residential customers.	N/A. None noted.	N/P	N/A
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	It was advised by RIA that no requests have been made for such information during the audit period.	N/A. None noted.	N/P	N/R
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	It was advised by RIA that no requests have been made for such information during the audit period.	N/A. None noted.	N/P	N/R
Complaints & Dispute resolution							

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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.	3	<p>It was noted that clause 16 of the RIA's Standard Form Contract includes procedures for dispute resolution and complaints resolution. These procedures involve the following:</p> <ul style="list-style-type: none"> - Utilities Customer Complaints Procedure - Utilities Customer Complaints Form <p>It was observed that both forms are freely available on the RIA website and a staff is specifically assigned to maintain and implement the internal complaints handling and disputes process.</p>	N/A. None noted.	A	1
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.	3	<p>It was observed the dispute resolution and complaints process within Clause 16 of RIA's Standard Form Contract, is provided to all customers.</p> <p>It was noted that the complaints process within this Contract appears to comply with the code, and is made freely available not only to all customers through the Standard Form Contract, but also on the RIA's website in the following link: http://ria.wa.gov.au/policy-and-reports/utility-reports</p> <p>The complaints handling procedure has been prepared in accordance to the Australian Standard. Furthermore, a staff is specifically assigned to maintain and implement the internal complaints handling and disputes process</p>	N/A. None noted.	A	1
300	Code of Conduct, clause 12.1(3)	A retailer or a distributor must advise the customer in accordance with subclause 12.1(3).	3	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. It was confirmed that RIA received no complaints during the audit period. RIA has in place a specific complaints handling procedure on its website.	N/A. None noted.	A	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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 complaint within 20 business days.	3	<p>Through our enquiry and system walkthrough with McGee's, it was noted that the Rottnest Island Utilities Customer Complaints Procedure, includes the following:</p> <p>"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> <p>While the Code of Conduct requires a distributor to acknowledge complaints in 10 business days and respond in 20 days, the RIA Utilities Customer Complaints Procedure states that RIA "will aim" to comply with this requirement.</p> <p>It was confirmed that RIA received no complaints during the audit period.</p>	N/A. None noted.	B	N/R
302	Code of Conduct, clause 12.2	A retailer must comply with any guideline developed by the ERA to distinguish customer queries from complaints.	3	It was that the Rottnest Island Utilities Customer Complaints Procedure includes definitions of a "Customer Complaint" and a "Customer Query". This allows the RIA to clearly distinguish between the two, consistent with the requirements in s.12.2 and ERA guidelines.	N/A. None noted.	A	1
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.	3	It was advised by RIA that no requests have been made for such information during the audit period.	N/A. None noted.	N/P	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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).	3	It was advised by RIA that there were no such formal instances noted of a complaint lodged which did not relate to RIA functions.	N/A. None noted.	N/P	N/R
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.	3	<p>It was noted that the RIA has prepared the following reports each reporting year during the audit period 2017 - 2019. These are included on the RIA website.</p> <ul style="list-style-type: none"> • 2018 Electricity License Reporting Datasheets Network Quality Reliability Code • 2018 Electricity License Reporting Datasheets - Distribution • 2018 Electricity Performance Reporting Datasheets - Retail • 2017 Electricity License Reporting Datasheets - Distribution • 2017 Electricity Performance Reporting Datasheets- Retail • 2017 Electricity License Reporting Datasheets Network Quality Reliability Code 	N/A. None noted.	A	1
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.	3	<p>The following 2017 datasheets and reports were provided to ERA on 20 September 2017, within the timeframe, manner and form specified by ERA.</p> <ul style="list-style-type: none"> • 2017 Electricity License Reporting Datasheets - Distribution • 2017 Electricity Performance Reporting Datasheets- Retail • 2017 Electricity License Reporting Datasheets Network Quality Reliability Code 	Ensure the annual electricity licence reporting datasheets report are provided to ERA no later than the 1 October deadline following the reporting period. RIA should ensure controls and monitoring processes are in place to ensure compliance is achieved.	B	2

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
				<p>The following 2018 datasheets and reports were provided to ERA in the manner and form specified by ERA, however these were provided on 23 October 2018, outside the timeframe (1 October) stipulated by the ERA.</p> <ul style="list-style-type: none"> • 2018 Electricity License Reporting Datasheets Network Quality Reliability Code • 2018 Electricity License Reporting Datasheets - Distribution • 2018 Electricity Performance Reporting Datasheets - Retail 			
307	Code of Conduct, clause 13.3	<p>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:</p> <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. 	3	Refer to Obligation #125.	N/A. None noted.	A	1
Service standard payments							
308	Code of Conduct, clause 14.1(1)	<p>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.</p>	5	<p>It was confirmed that there have been no planned reconnections during the audit period.</p> <p>Reconnection requirements are outlined in the Standard Form Contract and these are in line with the Code of Conduct requirements. Reconnection process is further outlined in the Rottnest Island Distribution and Connection Manual.</p>	N/A. None noted.	N/P	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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.	5	<p>It was confirmed that there have been no disconnections or reconnections during the audit period, apart from disconnections/reconnections during planned outages in which customers were provided 72 hours' notice. Furthermore, there were no formal customer complaints during the audit period, only customer queries which were all responded in a timely manner. Therefore the following Code of Conduct clauses within Part 14-Service Standard Payments did not apply to RIA during the audit period:</p> <ul style="list-style-type: none"> 14.1 Facilitating customer reconnections 14.2 Wrongful disconnections 14.3 Customer service 14.4 Customer service 14.5 Wrongful disconnections 14.6 Exceptions 	N/A. None noted.	N/P	N/A
310	Code of Conduct, clause 14.2(1)	<p>Subject to clause 14.6, a retailer must pay the specified compensation to a customer if:</p> <ul style="list-style-type: none"> · it fails to comply with any of the procedures specified in Part 6 or Part 7 prior to arranging for disconnection or disconnecting the customer for failure to pay a bill; or · arranges for disconnection or disconnects the customer for failure to pay a bill in contravention of clauses 7.2, 7.3, 7.6 or 7.7 for failure to pay a bill. 	5	<p>It was confirmed that there have been no disconnections or reconnections during the audit period. Furthermore, there were no formal customer complaints during the audit period, only customer queries which were all responded in a timely manner. Therefore the following Code of Conduct clauses within Part 14- Service Standard Payments did not apply to RIA during the audit period:</p> <ul style="list-style-type: none"> 14.1 Facilitating customer reconnections 14.2 Wrongful disconnections 14.3 Customer service 14.4 Customer service 14.5 Wrongful disconnections 14.6 Exceptions 	N/A. None noted.	N/P	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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.	5	RIA is a vertically integrated business and this obligation does not apply.	N/A. None noted.	N/A	N/A
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	It was confirmed that there have been no disconnections or reconnections during the audit period. Furthermore, there were no formal customer complaints during the audit period, only customer queries which were all responded in a timely manner. Therefore no payments were due to customers during the audit period.	N/A. None noted.	N/P	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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 respond to a complaint within the timeframes prescribed in subclause 12.1(4).	5	It was confirmed that there have been no disconnections or reconnections during the audit period. Furthermore, there were no formal customer complaints during the audit period, only customer queries which were all responded in a timely manner. Therefore no payments were due to customers during the audit period.	N/A. None noted.	N/P	N/R
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	It was confirmed that there have been no disconnections or reconnections during the audit period. Furthermore, there were no formal customer complaints during the audit period, only customer queries which were all responded in a timely manner. Therefore no payments were due to customers during the audit period.	N/A. None noted.	N/P	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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	It was confirmed that there have been no disconnections or reconnections during the audit period. Furthermore, there were no formal customer complaints during the audit period, only customer queries which were all responded in a timely manner. Therefore no payments were due to customers during the audit period.	N/A. None noted.	N/P	N/R
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	It was confirmed that there have been no disconnections or reconnections during the audit period. Furthermore, there were no formal customer complaints during the audit period, only customer queries which were all responded in a timely manner. Therefore no payments were due to customers during the audit period.	N/A. None noted.	N/P	N/R

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
15 Electricity Industry Metering Code – Licence Conditions and Obligations							
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.	3	<p>126 out of 205 meters at Rottneest Island have recently been replaced under the Meter Replacement Program which concluded December 2018. These new meters are supported by Certificates of Conformance, which provides assurance that the meters were calibrated and verified independently to ensure conformance to relevant accuracy requirements of AS62053. A sample of 3 meters were randomly selected from the meter database and verified for certificate of conformance - with all meters compliant.</p> <p>The remaining 79 meters have either been replaced outside the meter replacement programme, are within calibration or have not been replaced due to type 7 connection points (mostly street lighting). These include:</p> <ul style="list-style-type: none"> 4 x type 7 (street lights) 3 x decommissioned buildings (batching plant, saline bores, Mini golf SPS)) 13 x Schneider recently replaced, awaiting cert of conformance 40 Horizon power meters scheduled next calibration 2023 7 Landis & Gyr meters replaced outside replacement programme 8 x guest Accommodation <ul style="list-style-type: none"> 1 x Hotel meter 1 x RIA festival stage 1 x PFM workshop 1 x Powerhouse feeder 	N/A. None noted.	A	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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.	3	<p>It was noted that the Rottnest Island Authority has a Metrology Procedure in place, which defines accumulation meters and provides the minimum requirements for these types of meters.</p> <p>It was confirmed that newly installed meters are to comply with the Metrology Procedure, they therefore comply with the Metering Code 2012. Evidence was sighted on a sample of meters to confirm they meet the requirements of the Metrology Procedure.</p>	N/A. None noted.	A	1
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	There are no interval meters at RIA.	N/A. None noted.	N/P	N/A
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	<p>It was noted that the Rottnest Island Authority has a Metrology Procedure in place. Section 1.6 of the Procedure defines Metering Installation Components, which includes information relating to communications links.</p> <p>No Meters installed (other than the hotel meter- explained below) have the facilities to connect a communications link.</p> <p>It was noted that there is only one PV system on Rottnest Island, situated at the Rottnest Hotel. Noted through inquiry with PFM that this meter complies with the requirements per clause 3.3(3). This PV system is supported by an independent engineering compliance report which confirms that the system complies with all</p>	N/A. None noted.	A	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
				relevant codes, legislation and requirements set out by Western Power.			
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 electricity flows in each direction.	5	It was noted that RIA no longer accepts any solar applications or installations. There is only one PV (solar powered) system on Rottnest Island, situated at the Rottnest Hotel. This PV system is supported by an independent engineering compliance report which confirms that the system complies with all relevant codes, legislation and requirements set out by Western Power. Two applications were received during the audit period (2017 - 2019), however these were declined by PFM and RIA. This was confirmed through an email confirmation from Michelle Reynolds (CEO - RIA).	N/A. None noted.	N/P	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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.	5	There are no users on the RIA network; all the meters on the RIA network belong to RIA, hence this obligation is Not Applicable.	N/A. None noted.	N/P	N/A
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. 	5	It was noted that there is only one PV system on Rottnest Island, situated at the Rottnest Hotel. Noted through inquiry with PFM, review of technical reports and meter photographs that this meter complies with the requirements per clause 3.3C. Further, PFM confirmed that Rottnest Island does not offer any returns for electricity exported to the grid and therefore this is not recorded.	N/A. None noted.	A	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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.	2	It was confirmed through inquiries that RIA/PFM does not comply with this requirement. We note that not every connection point has an individual meter. There are 510 connection points on Rottneest Island and only 205 meters. The unmetered connection points are mainly made up of RIA holiday accommodation units.	RIA should determine whether it intends to operate the holiday accommodation units as Type 7 connections, or if it intends for them to be metered connections that are not currently fitted with a meter. Per the Metering Code, the definition of a Type 7 connection point does not include residential short-stay accommodation. It is specific to small loads and loads consuming less than the starting electrical current of a meter.	C	2
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 3.7(5), maintain the metering installation in the manner prescribed, unless otherwise agreed.	4	We confirmed through inquiries that RIA/PFM maintains a Metrology Policy which covers the installation and operation of meters on Rottneest island.	N/A. None noted.	A	1
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.	4	It was noted through inquiry with PFM that a metering replacement operation was completed in January 2019. This replacement operation ensured that all meters which required replacement were replaced and comply with standards per the Electricity Industry Metering Code. It was noted that all meters are installed within 30 meters of the load. We obtained the Metrology Procedure and Distribution & Connection Manual which confirms the above replacement has taken place and meters have been appropriately updated.	N/A. None noted.	A	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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.	4	There are no users on the RIA network, hence this obligation is Not Applicable.	N/A. None noted.	N/P	N/A
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.	4	No non-compliant metering installations were noted during the audit.	N/A. None noted.	N/P	N/R
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	We noted through inquiry with PFM that currently none of the meters on Rottnest Island have capability to connect to a telecommunications network. All meters are reviewed and read manually by PFM staff on a monthly basis. The primary reason for not installing smart meters was due to financial reasons - smart meters would have cost PFM / RIA roughly \$750 while the current meters cost \$150.	N/A. None noted.	N/P	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
332	Electricity Industry Metering Code, clause 3.8	Subject to clause 3.27, a network operator must ensure that, consistent with the standards of good electricity industry practice, each metering installation on its network is secured by devices or methods that hinder unauthorized access and enable unauthorized access to be detected.	4	It was confirmed with PFM that all 205 meters on Rottnest Island have a seal which prevents unauthorized access. We performed a site tour, and selected a random sample of 2 meters to test. We noted that both meters were sealed which prevented unauthorized access. It was further noted that PFM conducts a monthly review of all meters which involves recording the reading on the meter. This will ensure that any unauthorized access or tampering with meters is detected.	N/A. None noted.	A	1
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	It was noted through inquiry with PFM that all 205 meters on Rottnest Island are type 6 meters per Table 3 of Appendix 1 in the code. PFM has the Metrology Procedure in place, to ensure that any changes to the classification / type of these meters, are updated appropriately.	N/A. None noted.	A	1
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	It was noted that none of the 205 meters on Rottnest Island supply more than 1000 volts of electricity (HV), hence there are no HV meters at RIA on the output of generators. The generators generate at 415V and are metered via ComAp controller only. This obligation is deemed not applicable.	N/A None noted.	N/P	N/A

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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	It was noted that compensation has not been carried out within any of the 205 Rottnest Island meters in the past. Rottnest Island uses NMI approved meters which have regular calibration procedures in place as dictated by the RIA Metrology Procedure. NMI approved meters are accurate meters which automatically adjust the meter as required.	N/A None noted.	N/P	N/R
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	It was noted that none of the 205 meters on Rottnest Island are smart meters. Hence there are no programmable settings in the meters, and they are checked manually on a monthly basis. Further, all meters are NMI approved and compliant meters.	N/A None noted.	N/P	N/R
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	It was noted that all 205 meters on Rottnest Island are NMI approved and are manually checked on a monthly basis. These meters are calibrated and reviewed in accordance with the RIA Metrology Procedure, which is consistent with good electricity industry practice.	N/A None noted.	A	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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.	3	There are no users on the RIA network so this obligation is Not Applicable.	N/A. None noted.	N/P	N/A
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.	4	There are no users on the RIA network so this obligation is Not Applicable.	N/A. None noted.	N/P	N/A
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	<p>There were no meters that were scheduled to be sampled for calibration during the audit period.</p> <p>It was noted the Rottnest Island Authority has a Metrology Procedure in place and contains section 3.6 which includes details regarding the sampling of meters on its network.</p> <p>RIA's Metrology Procedure requires sampling to be done in accordance with AS 1284.13 as well as Schedules 1, 2, or 3 within the Metrology Procedure.</p>	N/A. None noted.	A	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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.	5	<p>It was noted that there no meters have been deemed to fail during the audit period. It was confirmed a meter replacement operation was completed in January 2019. Prior to this operation, there were 157 metres which required calibration. As calibration was more costly than replacement, PFM underwent the meter replacement process and replaced all meters to ensure they comply with the Code. The other remaining meters were replaced by Horizon Power in 2014.</p> <p>It was further noted that the Rottnest Island Authority has a Metrology Procedure in place. We note that the Metrology Procedure section 3.8 includes details regarding the replacement of meters should they fail sample testing. However, it was noted that this policy within RIA's Metrology Procedure does not ensure this process is completed within 3 years.</p>	N/A. None noted.	B	1
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	<p>There are meters at RIA with VT and CT connections. No evidence could be obtained that each metering installation complied with the prescribed design requirements. Furthermore, it was noted that the Rottnest Island Authority has a Metrology Procedure in place, however, it does not address the design of metering installations.</p>	<p>We recommend RIA to document evidence that each metering installation complies with the prescribed design requirements.</p> <p>RIA should also perform an update to the Metrology Procedure, to ensure that this procedure specifically addresses the design requirements of metering installations.</p>	C	2

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
343	Electricity Industry Metering Code, clause 3.12(2)	A network operator must ensure that instrument transformers in its metering installations comply with the relevant requirements of any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act and any requirements specified in the applicable metrology procedure.	2	It was noted that there are a number of instrument transformers which are non-compliant to the requirements and these need to be replaced in order to achieve compliance.	RIA to put in a plan to upgrade the non-compliant instrument transformers. PFM and RIA should also maintain a compliance register to provide assurance all instrument transformers at Rottnest Island are compliant to the requirements.	C	3
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	It was confirmed that fuse isolation is used throughout the metering installations on Rottnest Island. It was further noted that a Metrology Procedure is in place and Schedule 1 within the procedure requires suitable isolation facilities to be provided to facilitate testing and calibration of the metering installation.	N/A. None noted.	A	1
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.	2	Based on our inquiry, we noted that PFM does not maintain drawings detailing metering installation of all meters at Rottnest Island, consistent with good electricity industry practice.	It is recommended that drawings of the metering installation on Rottnest Island are produced and maintained, to comply with good electricity industry practice.	C	3
346	Electricity Industry Metering Code, clause 3.13(1)	A network operator must procure the user, or the user's customer, to install, or arrange for the installation of, a full check metering installation or partial check metering installation in accordance with the prescribed requirements.	3	Not Applicable as there are no users or users' customers on the RIA network.	N/A. None noted.	N/P	N/A

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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.	5	Not Applicable as there are no partial check meters on the RIA network.	N/A. None noted.	N/P	N/A
348	Electricity Industry Metering Code, clause 3.13(4)	A check metering installation for a metering point must comply with the prescribed requirements.	5	Not Applicable, as there are no check meters on the RIA network.	N/A. None noted.	N/P	N/A
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 take the actions specified in order to achieve the accuracy requirements in Table 3 in Appendix 1.	2	<p>On enquiry and walkthrough, it was noted that certain CT's on Rottnest Island are not compliant with Table 3 in Appendix 1. PFM and RIA have planned a Meter Replacement Project in the near future. This would involve not only updating the CT's, but the transformers and switchboards on Rottnest Island. As this is planned for the near future, RIA and PFM did not want to separately repair the CT's prior to this. This has resulted in several of the current CT's on Rottnest Island being non-compliant with Table 3 in Appendix 1 during the audit period.</p> <p>These meters are installed at Bathurst, Kingstown, Caroline Thomson, Longreach, Thomson Bay South, Tearooms and Geordie/Fays Bay. Six businesses are also metered via CT connected meters.</p>	We recommend that PFM and RIA have a program in place to rectify non-compliant CT's within a reasonable time frame, including a capital expenditure commitment. PFM and RIA should also maintain a compliance register to provide assurance all CT's at Rottnest Island are compliant to the requirements.	C	3
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.	3	<p>Through inquiry with PFM, we noted that all 205 meters on Rottnest Island are Type 6 meters or Type 7 meters. As such, this is deemed not applicable. We confirmed that all meters are type 6 or type 7 meters through inspecting the metering database.</p>	N/A. None noted.	N/P	N/A

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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.	3	Through inquiry with PFM, we noted that all 205 meters on Rottneest Island are Type 6 meters or Type 7 meters. As such, this is deemed not applicable. We confirmed that all meters are Type 6 or Type 7 meters through inspecting the metering database.	N/A. None noted.	N/P	N/A
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.	5	Not applicable. No smart meters (and therefore no data loggers) on Rottneest Island.	N/A. None noted.	N/P	N/A
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.	5	We note that "Code Participants" per the RIA's Metrology Procedure, include: <ul style="list-style-type: none"> - Network Operator - Retailers - Generators - Users - The Authority as specified in clause 1.2 of the Code Based on inquiries with PFM, we note that none of the above Code Participants exist within the Rottneest Island licence area, and hence this obligation is deemed not applicable.	N/A. None noted.	N/P	N/A

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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.	5	<p>We note that "Code Participants" per the RIA's Metrology Procedure, include:</p> <ul style="list-style-type: none"> - Network Operator - Retailers - Generators - Users <p>- The Authority as specified in clause 1.2 of the Code</p> <p>Based on inquiries with PFM, we note that none of the above Code Participants exist within the Rottnest Island licence area, and hence this obligation is deemed not applicable.</p>	N/A. None noted.	N/P	N/A
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.	5	<p>Through inquiry with PFM, we noted that all 205 meters on Rottnest Island are NMI approved meters, which do not possess any smart technology features, and which are manually checked and reset where required. Hence this obligation is deemed not applicable.</p>	N/A. None noted.	N/P	N/A
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	<p>Internal real time clocks are not used in the metering installations on Rottnest Island. We noted that PFM's Metrology Procedure section 3.5 requires the meter interval real time clock to be referenced to Australian Western Standard Time and maintained with certain levels of absolute error.</p>	N/A. None noted.	N/P	N/A
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	<p>Not applicable. No smart meters (and therefore no data loggers) on Rottnest Island.</p>	N/A. None noted.	N/P	N/A

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
359	Electricity Industry Metering Code, clause 3.22	A network operator providing one or more metering installations with enhanced technology features must be licensed to use, and access, the metering software applicable to all devices being installed and be able to program the devices and set parameters.	5	Through inquiry with PFM, it was noted that all 205 meters on Rottneest Island are NMI approved meters, which do not possess any smart technology features, and which are manually checked and reset where required. Hence this obligation is deemed not applicable.	N/A. None noted.	N/P	N/A
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.	5	Not applicable. No smart meters (and therefore no data loggers) on Rottneest Island.	N/A. None noted.	N/P	N/A
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.	5	Not applicable. No smart meters (and therefore no data loggers) on Rottneest Island.	N/A. None noted.	N/P	N/A
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.	4	PFM performs the installations and also contracts out to Energy Safety approved contractors for electrical installations (e.g. Rise Electrical). PFM website includes the electrical license of the approved contractor.	N/A. None noted.	A	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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.	4	The RIA has published its registered metering installation providers on its website (http://ria.wa.gov.au/policy-and-reports/utilityreports/electrical-reports) and Electrical Contractor, Programmed Facility Management (Licence number EC008521).	N/A. None noted.	A	1
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	Metering database is in place and supported by the Meter Reading Procedure.	N/A. None noted.	A	1
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).	3	The metering database in an excel spreadsheet, pass-word protected and saved on the local network drive which has back-ups in place. There is sufficient documentation available at PFM for users and operators of systems. System documentation governing the use and access of IT systems is available through RIA and these include: RIA Corporate policy statement – Information security management New user account identity and access request Operational Procedure – Identity and access management Operational Procedure – Information security management framework Operational Procedure – Acceptable use of IT Operational Procedure – Information security awareness Operational Procedure – IT logging and monitoring	N/A. None noted.	A	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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.	3	<p>We note that "Code Participants" per the RIA's Metrology Procedure, include:</p> <ul style="list-style-type: none"> - Network Operator - Retailers - Generators - Users <p>- The Authority as specified in clause 1.2 of the Code</p> <p>Based on inquiries with PFM, we note that none of the above Code Participants exist within the Rottneest Island licence area, and hence this obligation is deemed not applicable.</p>	N/A. None noted.	N/P	N/A
370	Electricity Industry Metering Code, clause 4.3(1)	The standing data for a metering point must comprise at least the items specified.	3	The Rottneest Island Metering Database includes columns for all standing data items however items relating to data communication are not applicable.	N/A None noted.	A	1
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	<p>Through inquiry with PFM, it was noted that all meters on Rottneest Island are covered with locked seals.</p> <p>We performed a site tour of the island and inspected two meters.</p> <p>Both meters were sealed in locked boxes, and hence appear to be secure from unauthorised local or remote access.</p>	N/A. None noted.	A	1
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	<p>The data held in the metering database is secured from unauthorised local/remote access through the following controls;</p> <ul style="list-style-type: none"> - The metering database spreadsheet is password protected to authorised personnel and the password is changed frequently on set intervals. - The metering database spreadsheet is stored on the local drive which is backed up regularly. 	N/A. None noted.	A	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
				<p>- Policies and procedures (system documentation) is in place to govern the use and access of IT systems</p> <p>System documentation governing the use and access of IT systems available include:</p> <ul style="list-style-type: none"> • RIA Corporate policy statement – Information security management • New user account identity and access request • Operational Procedure – Identity and access management <ul style="list-style-type: none"> • Operational Procedure – Information security management framework • Operational Procedure – Acceptable use of IT • Operational Procedure – Information security awareness • Operational Procedure – IT logging and monitoring 			
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	Refer to Obligation #380.	N/A None noted.	A	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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	Energy data is not recorded within the Metering Database. It is recorded separately on Meter Reading Spreadsheets. Sighted evidence of 7 years of data being kept.	N/A. None noted.	B	1
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).	3	It was confirmed on enquiry and documentation evidence that the Meter Readings Monthly Procedure requires that meter readings are entered into the database within 2 business days from the completion of the meter reading performed by the PFM electrician. The Metering Database spreadsheet does not currently have a column to record date and time of data entry. The Photos captured per meter reading (stored in local drive) contain date and time stamp, which were sighted during the audit.	N/A. None noted.	A	1
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	Meter readings are scheduled once a month. These readings are recorded on the monthly meter reading spreadsheet and provided to all stakeholders. We note that clause 4.3 "Energy Data Collection from Metering Installations" of the RIA's Metrology Procedure includes a requirement to undertake a meter reading at least once in every 12 month period.	N/A. None noted.	A	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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.	3	Meters readings are performed by PFM electricians who are all licensed electricians.	N/A. None noted.	A	1
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).	4	No customer requests for metering data was noted during the audit period. The FUSS contract between RIA and PFM includes responsibilities for compliance to metering license requirements including the provision of data to customers	N/A. None noted.	A	N/R
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.	4	No customer requests for metering data was noted during the audit period.	N/A. None noted.	N/P	N/R
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	RIA did not substitute or estimate metering data during the audit period, confirmed with McGee's and PFM.	N/A. None noted.	N/P	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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.	5	No check metering at Rottnest Island, not applicable.	N/A. None noted.	N/P	N/A
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.	5	No check metering at Rottnest Island, not applicable.	N/A. None noted.	N/P	N/A
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.	5	<p>We note that "Code Participants" per the RIA's Metrology Procedure, include:</p> <ul style="list-style-type: none"> - Network Operator - Retailers - Generators - Users <p>- The Authority as specified in clause 1.2 of the Code</p> <p>Based on inquiries with PFM, we note that none of the above Code Participants exist within the Rottnest Island licence area, and hence this obligation is deemed not applicable.</p>	N/A. None noted.	N/P	N/A

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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	RIA did not substitute or estimate metering data during the audit period, confirmed with McGee's and PFM.	N/A. None noted.	N/P	N/R
427	Electricity Industry Metering Code, clause 5.22(6)	A network operator must review all validation failures before undertaking any substitution.	5	RIA did not substitute or estimate metering data during the audit period, confirmed with McGee's and PFM.	N/A. None noted.	N/P	N/R
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	RIA did not substitute or estimate metering data during the audit period, confirmed with McGee's and PFM.	N/A. None noted.	N/P	N/R
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: <ul style="list-style-type: none"> · 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	RIA did not substitute or estimate metering data during the audit period, confirmed with McGee's and PFM.	N/A. None noted.	N/P	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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	RIA did not substitute or estimate metering data during the audit period, confirmed with McGee's and PFM.	N/A. None noted.	N/P	N/R
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	RIA did not substitute or estimate metering data during the audit period, confirmed with McGee's and PFM.	N/A. None noted.	N/P	N/R
432	Electricity Industry Metering Code, clause 5.24(3)	If a network operator uses an estimated or substituted value (first value) for energy data for a metering point, and a better quality actual, deemed, estimated or substituted value is available (second value), then the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice or the user and its customer jointly request it to do so.	5	RIA did not substitute or estimate metering data during the audit period, confirmed with McGee's and PFM.	N/A. None noted.	N/P	N/R

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
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.	3	We noted that the RIA's Metrology Procedure includes clause 12.2 "Requirement to Produce Substituted or Estimated Energy Data". Through inquiries with PFM, it was noted that no energy data has been estimated in the audit period 2017 - 2019.	N/A. None noted.	A	1
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	There were no notices issued by ERA to amend documents during the audit period.	N/A. None noted.	N/P	N/R
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	There were no notices issued by ERA to amend documents during the audit period.	N/A. None noted.	N/P	N/R
16 Electricity Industry (Network Quality and Reliability of Supply) Code – Licence Conditions and Obligations							
462	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 5(1)	A distributor or transmitter must, as far as reasonably practicable, ensure that electricity supply to a customer's electrical installations complies with prescribed standards.	3	<p>Network Quality Report is completed by independent specialists on an annual basis.</p> <p>The 2016-2017 report found that the system and processes within RIA and PFM are in compliance with the requirements of Part 2 of the Code "Quality and Reliability Standards"</p> <p>The 2017-2018 report found no-conformances.</p> <p>The annual performance reports did not identify any non-conformances which may affect the compliance rating for this obligation.</p>	N/A. None noted.	A	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
463	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 8	A distributor or transmitter must, so far as reasonably practicable, disconnect the supply of electricity to installations or property in specified circumstances, unless it is in the interest of the customer to maintain the supply.	3	<p>RIA did not perform any disconnections during the audit period.</p> <p>We note that RIA's Standard Form Contract section 5 "Disconnection and Reconnection" provides details of situations when disconnection will occur.</p> <p>We note that the Standard Form Contract has been approved by the ERA, and is listed on the ERA's website in the following link: https://www.erawa.com.au/electricity/electricity-licensing/standard-form-contracts</p> <p>However, no further specific procedures were evidenced to support the management of disconnections.</p>	N/A. None noted.	B	N/R
464	Electricity Industry (Network Quality and Reliability of Supply) Code, 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.	3	<p>Network Quality Report is completed by independent specialists on an annual basis. The 2016-2017 report found that the system and processes within RIA and PFM are in compliance with the requirements of Part 2 of the Code "Quality and Reliability Standards"</p> <p>The 2017-2018 report found no non-conformances.</p> <p>The annual performance reports did not identify any non-conformances which may affect the compliance rating for this obligation.</p>	N/A. None noted.	A	1
465	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 10(1)	A distributor or transmitter must, so far as reasonably practicable, reduce the effect of any interruption on a customer.	3	<p>Through review of PFM's Electrical Service Recovery and Contingency Plan, it was noted that the purpose of this plan is to maintain the supply of electricity on Rottneest Island with a minimum number and duration of interruptions.</p>	N/A. None noted.	A	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
466	Electricity Industry (Network Quality and Reliability of Supply) Code, 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.	3	Through review of PFM's Electrical Service Recovery and Contingency Plan, it was noted that the purpose of this plan is to maintain the supply of electricity on Rottnest Island with a minimum number and duration of interruptions. Per section 3.6.2 "Restoration" of this Plan, we note that the RIA holds 3 generators on the island at all times, and therefore in the event of a significant interruption, customers can promptly be connected to an alternative supply.	N/A. None noted.	A	1
467	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 12(3)	A distributor must take prescribed action in the event of a significant interruption to a small use customer.	3	No customers were noted during the audit period to have experienced interruptions that contravened 12(1) or 12(2). Through a review of PFM's Electrical Service Recovery and Contingency Plan, it was noted that the purpose of this plan is to maintain the supply of electricity on Rottnest Island with a minimum number and duration of interruptions.	N/A. None noted.	A	N/R
468	Electricity Industry (Network Quality and Reliability of Supply) Code, 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	Through a review of PFM's Electrical Service Recovery and Contingency Plan, it was noted that the purpose of this plan is to maintain the supply of electricity on Rottnest Island with a minimum number and duration of interruptions.	N/A. None noted.	A	1
469	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 13(3)	The average total length of interruptions of supply is to be calculated using the specified method.	3	The total length of interruptions of supply IS calculated using the specified method over a four year period.	N/A. None noted.	A	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
470	Electricity Industry (Network Quality and Reliability of Supply) Code, 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.	3	No instrument/notice issued by Minister during the audit period. Confirmed with RIA and PFM.	N/A. None noted.	N/P	N/R
471	Electricity Industry (Network Quality and Reliability of Supply) Code, 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.	3	This has not occurred during the audit period, confirmed with RIA and PFM.	N/A. None noted.	N/P	N/R
477	Electricity Industry (Network Quality and Reliability of Supply) Code, 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.	3	We reviewed the "FUSS Rottneest Facilities Utilities and Support Services Contract" and noted that this contract includes PFM's responsibilities regarding monitoring the operation of its electricity supply on the island.	N/A. None noted.	A	1
478	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 23(2)	A distributor or transmitter must keep records of information regarding its compliance with specific requirements for the period specified.	3	It was verified through a system walkthrough that all records of information regarding RIA's compliance with the Network Quality and Reliability of Supply code is held on its local drives for a period of 7 years. We reviewed the "FUSS Rottneest Facilities Utilities and Support Services Contract" and noted that this contract includes PFM's responsibilities regarding: - Relevant Period in respect of Records : A minimum of 7 years after the creation of the Record	N/A. None noted.	A	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
479	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 24(3)	A distributor or transmitter must complete a quality investigation requested by a customer in accordance with specified requirements.	3	Not applicable, no customer requests for a quality investigation during audit period. No specific documented procedures were evidenced supporting the process to conduct power quality investigations and reporting the findings to the customer.	N/A. None noted.	B	N/R
480	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 24(4)	A distributor or transmitter must report the results of an investigation to the customer concerned.	3	Not applicable, no customer requests for a quality investigation during audit period. No specific documented procedures were evidenced supporting the process to conduct power quality investigations and reporting the findings to the customer.	N/A. None noted.	B	N/R
481	Electricity Industry (Network Quality and Reliability of Supply) Code, 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.	3	We observed the Rottnest Island Authority website, noting that the "Utilities Customer Complaints Procedure" and "Utilities Customer Complaints Form" are both available at no cost on this website and contain the specified information. It was confirmed that the procedure includes the specified information, which is that the customer can refer its complaint to the Ombudsman if they are not happy with the outcome.	N/A. None noted.	A	1
482	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 25(3)	A document setting out a distributor's or transmitter's complaint handling process must contain the specified information.	3	We observed the Rottnest Island Authority website, noting that the "Utilities Customer Complaints Procedure" and "Utilities Customer Complaints Form" are both available. It was confirmed that the procedure includes the specified information, which is that the customer can refer its complaint to the Ombudsman if they are not happy with the outcome.	N/A. None noted.	A	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
483	Electricity Industry (Network Quality and Reliability of Supply) Code, clauses 26(1) and (2)	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 reporting period of 3 years or as specified by the ERA.	3	We observed the 2017 Network Quality and Reliability of Supply Performance Audit Report - Operation of Compliance Monitoring Systems	N/A. None noted.	A	1
483A	Electricity Industry (Network Quality and Reliability of Supply) Code, clauses 26(3) and (4)	A distributor or transmitter must publish the audit report not later than 1 October following the reporting period.	3	The 2017 Network Quality and Reliability of Supply Performance Audit Report - Operation of Compliance Monitoring Systems was published on RIA website on 6 October 2017.	Ensure the network quality and reliability of supply independent report is published on RIA website no later than the 1 October deadline following the reporting period. RIA should ensure controls and monitoring processes are in place to ensure compliance is achieved.	B	2
483B	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 26(5)	A distributor or transmitter must give a copy of its audit report to the Minister and the ERA not less than 7 days before it is published.	3	The 2017 Network Quality and Reliability of Supply Performance Audit Report - Operation of Compliance Monitoring Systems was provided to RIA on 20 September 2017, which was not less than 7 days before it was published on RIA website on 6 October 2017.	N/A. None noted.	A	1
484	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 27(1)	A distributor or transmitter must annually prepare and publish a report about its performance in respect of each year ending on 30 June.	3	The Rottnest Island Network Quality Report 2017-2018 was observed covering the audit period assessable at the time of audit.	N/A. None noted.	A	1

Detailed findings and recommendations

Ref No.	Obligations	Description	Audit priority	Observation	Recommendation	Controls rating	Compliance rating
485	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 27(3)	A distributor or transmitter must give a copy of its report about its performance to the Minister and the ERA not less than 7 days before it is published.	3	The Rottnest Island Network Quality Report 2017-2018 was provided to ERA on 23 October 2018, the same day it was published on the RIA website.	Ensure the Network Quality report is provided to ERA not less than 7 days before it is published. RIA should ensure controls and monitoring processes are in place to ensure compliance is achieved.	B	2

5 Previous audit non-compliances and recommendations

Table 7: Previous audit non-compliances and recommendations

Reference (No./year)	Legislative Obligation Ref.	Rating	Details of the issue	Auditors' Recommendation or action taken	Date Resolved	Further Action Required
A. Resolved before end of previous audit period						
None.						
B. Resolved during the current audit period						
18/2015	319	B2	<p>Non-Compliant – Obligation 319</p> <p>Lick Ref: C5.1, Electricity Industry Metering Code clause 3.1</p> <p>A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and also comply with any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act.</p> <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>All meters installed. All meters were new and supplied with a certificate of conformance.</p> <p>Metrology procedure approved by ERA on 20 November 2017 and published on RIA website on 21 November 2018.</p>	November 2017	No further action required

Previous audit non-compliances and recommendations

Reference (No./year)	Legislative Obligation Ref.	Rating	Details of the issue	Auditors' Recommendation or action taken	Date Resolved	Further Action Required
19/2015	320	B2	<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 subclasses 3.2(1) (a) (b) using dials, a cyclometer, an illuminated display panel or some other visual means.</p> <p>PFM's "PRO-RNI-Io3-030-1 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>	Refer to Obligation 319.	November 2018	No further action required
21/2015	327	B2	<p>Non-compliant – 2/Obligation 327</p> <p>Lic Ref: C5.1, Electricity Industry Metering Code clause 3.5(3)</p> <p>A network operator must, unless otherwise agreed, for each metering installation on its network, on and from the time of its connection to the network, provide, install, operate and, subject to sub clause 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>	Refer to Obligation 319.	November 2018	No further action required

Previous audit non-compliances and recommendations

Reference (No./year)	Legislative Obligation Ref.	Rating	Details of the issue	Auditors' Recommendation or action taken	Date Resolved	Further Action Required
28/2015	343	B2	<p>Non-compliant – 2/Obligation 343 Lic Ref: C5.1, Electricity Industry Metering Code clause 3.12(2)</p> <p>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>	Refer to Obligation 319.	November 2018	No further action required
39/2015	447	B2	<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>PFM have confirmed that Horizon Power has not been appointed the metering data agent for Rottneest Island and therefore, their metrology procedure does not currently apply. As per Obligation 319 – The RIA does not have a metrology procedure in place.</p>	Refer to Obligation 319.	November 2018	No further action required
01/2017	106	B1	<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; 	RIA to ensure appropriate feedback is provided to PFM as to their performance against set KPIs.	March 2019	Completed- The RIA utilises both formal and informal channels to provide appropriate feedback to PFM. KPI's are scrutinised on a

Previous audit non-compliances and recommendations

Reference (No./year)	Legislative Obligation Ref.	Rating	Details of the issue	Auditors' Recommendation or action taken	Date Resolved	Further Action Required
			<ul style="list-style-type: none"> 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>			monthly basis as part of the monthly FUSS Service Report and where failures occur PFM is abated.
02/2017	108	B2	<p>B2/108</p> <p>There are no residential customers on Rottnest Island. Commercial customers separately liaise with Property Managers contracted by the RIA, McGee's 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. The audit found that Standard Form Contracts were sent to customers for signing but 2 were not returned.</p>	RIA to ensure that all Standard Form Contracts are signed and returned	March 2019	Completed- There was just one exception where the SFC was not yet signed. This customer is the Rottnest Island Telecommunication Towers Telco who were not cooperating. This has now been completed.
06/2017	319	B2	<p>B2/319</p> <p>c) A Certificate of Calibration has been acquired for all meters installed post-2012 using the methodology for ensuring compliance</p>	Refer to Obligation 319.	November 2018	No further action required

Previous audit non-compliances and recommendations

Reference (No./year)	Legislative Obligation Ref.	Rating	Details of the issue	Auditors' Recommendation or action taken	Date Resolved	Further Action Required
			<p>by Horizon Power.</p> <p>d) 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. c)A total of 156 electrical meters have been purchased and delivered to the Island in February 2017.</p> <p>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 (Rottnest Island Chamber of Commerce and 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</p>			

Previous audit non-compliances and recommendations

Reference (No./year)	Legislative Obligation Ref.	Rating	Details of the issue	Auditors' Recommendation or action taken	Date Resolved	Further Action Required
			completion date is 31/08/2017.The RIA has a metrology procedure in place. however the document is extremely long (>100 pages)			
07/2017	320	C2	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	Refer to Obligation 319.	November 2018	No further action required
08/2017	326	B2	B2/326 The audit has found the network operator to be noncompliant 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 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 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 unmetered and are made up of RIA holiday accommodation units, type 7	Refer to Obligation 319.	November 2018	No further action required

Previous audit non-compliances and recommendations

Reference (No./year)	Legislative Obligation Ref.	Rating	Details of the issue	Auditors' Recommendation or action taken	Date Resolved	Further Action Required
			connection points and other RIA infrastructure such as pump stations etc.			
09/2017	327	C2	C2/327 The audit has found the network operator to be noncompliant 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	Refer to Obligation 319.	November 2018	No further action required
10/2017	333	B2	B2/333 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 targeted for completion (31/10/2017)	Refer to Obligation 319.	November 2018	No further action required
11/2017	342	B2	B2/342 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	Refer to Obligation 319.	November 2018	No further action required
15/2017	386	C2	C2/386 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 McGee's. The verification and	Refer to Obligation 319.	November 2018	No further action required

Previous audit non-compliances and recommendations

Reference (No./year)	Legislative Obligation Ref.	Rating	Details of the issue	Auditors' Recommendation or action taken	Date Resolved	Further Action Required
			<p>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. The types of meters have been identified, see obligation 333 (item 23). PFM Meter Readings Monthly Procedure (PRO- RNII03-033-1) has been updated to ensure Code compliance, see items 8 & 22.</p>			
16/2017	430	C2	<p>C2/430 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. One instance of a credit applied to a bill was discovered during the audit. During the audit no approved Metrology procedure was sighted.</p>	Refer to Obligation 319.	November 2018	No further action required
17/2017	434	C2	<p>C2/434 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</p>	Refer to Obligation 319.	November 2018	No further action required

Previous audit non-compliances and recommendations

Reference (No./year)	Legislative Obligation Ref.	Rating	Details of the issue	Auditors' Recommendation or action taken	Date Resolved	Further Action Required
			the audit the auditor has relied on interviews for information			
18/2017	447	C2	C2/447 There wasn't an approved metrology procedure in place during the audit period and therefore there was no prescriptive procedure to comply with.	Refer to Obligation 319.	November 2018	No further action required
C. Unresolved during the current audit period						
03/2017	131	B2	B2/131 Information is provided to customers via the Standard Form Contract and monthly utility bills. The Standard Form Contract includes the following: <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. The Utility Statements issued by McGee's to customers includes a 24hr telephone number for faults and emergencies stated on their statements and not invoices (EVIDENCE: INV. NOS. 109186 and 118903).	RIA to instruct McGee's 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. Two examples of AHR invoices during the audit period were provided and they included a 24hr telephone number for faults and emergencies on invoices 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.	To be completed January 2020	Redesign of invoices underway.
04/2017	155	B2	Information is provided to customers via the Standard Form Contract and monthly utility bills. The Standard Form Contract includes the following: <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 	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.	To be completed January 2020	Redesign of invoices underway.

Previous audit non-compliances and recommendations

Reference (No./year)	Legislative Obligation Ref.	Rating	Details of the issue	Auditors' Recommendation or action taken	Date Resolved	Further Action Required
			<p>difficulties; and</p> <ul style="list-style-type: none"> complaints handling. <p>The Utility Statements issued by McGees to customers includes a 24hr telephone number.</p>			
05/2017	290	B2	<p>B2/290</p> <p>Documentation prepared by the licensee for information purposes is in accordance with the requirements.</p> <p>Both McGee's and AHR billings are not as user friendly and some information is not set out in an intuitive manner</p>	AMR to increase font size for ease of reading and McGee's to include 24 hour service faults and difficulties contact number to front of invoice	Refer to B2/131	Refer to B2/131
12/2017	343	C2	<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>Submit Metrology Procedure for approval by ERA</p> <p>Verify and demonstrate that any instrument transformers meet applicable specifications as set down in the Metrology Procedure</p>	<p>1. Completed- November 2017</p> <p>2. To be completed December 2019</p>	<p>Determine location of assets by visual inspection, record them in a register and certify they meet clause 3.12 and therein the accuracy needed. By means of Visually checking all 205 meters that need to be sealed and behind an inaccessible door (not necessarily a lock, maybe a unique key), for the data collection to be kW, kVAR and kVA capable, and not to be a Type 7 connection point (being a data substitute for estimation purposes) by filling in the metering excel sheet.</p>

Previous audit non-compliances and recommendations

Reference (No./year)	Legislative Obligation Ref.	Rating	Details of the issue	Auditors' Recommendation or action taken	Date Resolved	Further Action Required
						In addition, RIA/PFM will survey all 510 connections to ensure that revenue and non-revenue connections have adequate metering.
13/2017	349	B2	B2/349 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.	Update non-compliant metering CTs as per plan	To be completed December 2019	Update any non-compliant metering if required after visual inspection
14/2017	379	C2	C2/379 Existing metering points are not secure. Not known whether new meters will have appropriate security protections.	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.	To be completed December 2019	Seal all revenue meters behind an inaccessible door (not necessarily a lock, maybe a unique key).

6 Recommendations

Table below outlines RIA’s current status on audit recommendations to address non-compliances and controls deficiencies.

Table 8: Status of recommendations

A. Unresolved during current review period			
Recommendation reference (no/year)	Non-Compliance/Control improvement	Auditor’s Recommendation	Action taken by the licensee by the end of the audit period
01/2019	<p>B2/131 Information is provided to customers via the Standard Form Contract and monthly utility bills. The Standard Form Contract includes the following: • reference to the Code of Conduct and tariff information being available from the RIA website</p> <ul style="list-style-type: none"> • general information on the Code of Conduct, • assistance with payment difficulties; and • Complaints handling. <p>The Utility Statements issued by McGee’s 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 McGee’s 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. Two examples of AHR invoices during the audit period were provided and they included a 24hr telephone number for faults and emergencies on invoices 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>	Redesign of invoices underway – January 2020.
02/2019	<p>B2/290 Documentation prepared by the licensee for information purposes is in accordance with the requirements.</p> <p>Both McGee’s and AHR billings are not as user friendly and some information is not set out in an intuitive manner</p>	AMR to increase font size for ease of reading and McGee’s to include 24 hour service faults and difficulties contact number to front of invoice	Redesign of invoices underway – January 2020.
03/2019	<p>C2/379 Existing metering points are not secure. Not known whether new meters will have appropriate security protections.</p>	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.	To be completed – December 2019
04/2019	<p>B2/155 Code of Conduct, clause 4.5(1) We performed a walkthrough with McGee’s, and reviewed a sample of two invoices for the audit period. It was noted that both invoices complied with clause 4.5(1) and</p>	It is recommended that McGee’s includes PFM’s 24 emergency phone number on their invoices. This is required by the Code, but is currently not complied with by McGee’s in their billing of customers.	Redesign of invoices underway – January 2020

A. Unresolved during current review period

	included all required information. However the invoices did not possess a 24 hour emergency phone number.		
05/2019	<p>B2/159 Code of Conduct, clause 4.8(1). Through our enquiry and system walkthrough with McGee’s, it was noted that that McGee’s has not used estimation for any customer bills during the audit period. Where metering data is unable to be provided for a particular month, the electricity amount per the invoice will be nil, and the amount will be added to the next month's invoice. The code clause assumes an estimated bill will be issued to a customer if a bill cannot be based on an actual reading. Metering Code clause 5.3 requires a network operator to provide the retailer with energy data, which is either actual data or estimated data. Therefore, a default \$0 bill with nil reading is not compliant to the obligation. RIA should estimate a reading instead to avoid any potential bill shock for customers. It was also noted that there is no formal policy held by McGee’s or RIA in the event that metering data cannot be provided</p>	RIA should ensure if a bill cannot be based on an actual meter reading, an estimated bill is issued to the customer following the prescribed methodologies per Metering Code for creating estimated readings.	A new policy on estimation of RIA utility bills will be implemented. Key provision of this policy includes the requirement for RIA to estimate a customer’s bill if it is unable to gain a read for the supply address. RIA will then bill the customer considering and ensuring the bill clearly states that it is an estimated reading- December 2019
06/2019	<p>B2/124 ERA annual compliance report EIRL3 covering period July 2017 - June 2018 was submitted to ERA on 30 August 2018. The following 2017 annual electricity license reporting datasheets were issued to ERA on 20 September and published on RIA website on 6 October 2017:</p> <ul style="list-style-type: none"> • 2017 Electricity License Reporting Datasheets - Distribution • 2017 Electricity Performance Reporting Datasheets- Retail • 2017 Electricity License Reporting Datasheets Network Quality Reliability Code <p>The following 2018 annual electricity license reporting datasheets were submitted to ERA and published on the RIA website on 23 October 2018, outside the 1 October deadline stipulated by the ERA.</p> <ul style="list-style-type: none"> ▪ 2018 Electricity License Reporting Datasheets Network Quality Reliability Code • 2018 Electricity License Reporting Datasheets - Distribution • 2018 Electricity Performance Reporting Datasheets - 	Ensure the annual electricity licence reporting datasheets report are issued to ERA no later than the 1 October dead-line following the reporting period. RIA should ensure controls and monitoring processes are in place to ensure compliance is achieved.	We will ensure the information is published by 1 October – October 2020

A. Unresolved during current review period			
	Retail		
07/2019	<p>B2/172 We note that during the audit period, there was only one request from a customer for McGee's/ RIA to review their electricity bill.</p> <p>Subsequently, the customer paid the bill amount owing with no further proceedings or action required.</p> <p>We note in the email correspondence between McGee's and the customer, McGee's advised the customer that they could request a meter test in accordance with the Code of Conduct. However, it was noted that the customer was not informed of the existence and operation of RIA's internal complaints handling processes and details of applicable external complaints handling processes.</p> <p>We reviewed the internal complaints register to confirm that no other requests for meter review, occurred during the audit period.</p>	RIA to ensure, when reviewing customers bill on request by the customer, that the customer is informed of the existence and operation of RIA's internal complaints handling processes and details of applicable external complaints handling processes.	We will ensure we inform the customers as required per the obligation - Ongoing
08/2019	<p>B2/306 The following 2017 datasheets and reports were provided to ERA on 20 September 2017, within the timeframe, manner and form specified by ERA.</p> <ul style="list-style-type: none"> • 2017 Electricity License Reporting Datasheets – Distribution • 2017 Electricity Performance Reporting Datasheets- Retail • 2017 Electricity License Reporting Datasheets Network Quality Reliability Code <p>The following 2018 datasheets and reports were provided to ERA in the manner and form specified by ERA, however these were provided on 23 October 2018, outside the timeframe (1 October) stipulated by the ERA.</p> <ul style="list-style-type: none"> • 2018 Electricity License Reporting Datasheets Network Quality Reliability Code 	Ensure the annual electricity licence reporting datasheets report are provided to ERA no later than the 1 October deadline following the reporting period. RIA should ensure controls and monitoring processes are in place to ensure compliance is achieved.	We will ensure the information is provided to ERA by 1 October- October 2020

A. Unresolved during current review period			
	<ul style="list-style-type: none"> 2018 Electricity License Reporting Datasheets - Distribution 2018 Electricity Performance Reporting Datasheets - Retail 		
9/2019	<p>C3/326 Electricity Industry Metering Code, clause 3.5(1) and (2) It was confirmed through inquiries that RIA/PFM does not comply with this requirement. We note that not every connection point has an individual meter. There are 510 connection points on Rottnest Island and only 205 meters. The unmetered connection points are mainly made up of RIA holiday accommodation units.</p>	<p>RIA should determine whether it intends to operate the holiday accommodation units as Type 7 connections, or if it intends for them to be metered connections that are not currently fitted with a meter. Per the Metering Code, the definition of a Type 7 connection point does not include residential short-stay accommodation. It is specific to small loads and loads consuming less than the starting electrical current of a meter.</p>	<p>Survey revenue and non-revenue connections to confirm the magnitude of revenue meters required. This survey will also capture any pre 2005 meters – March 2020</p>
10/2019	<p>C2/342 Electricity Industry Metering Code, clause 3.12(1) There are meters at RIA with VT and CT connections. No evidence could be obtained that each metering installation complied with the prescribed design requirements. Furthermore, it was noted that the Rottnest Island Authority has a Metrology Procedure in place, however, it does not address the design of metering installations.</p>	<p>We recommend RIA to document evidence that each metering installation complies with the prescribed design requirements. RIA should also perform an update to the Metrology Procedure, to ensure that this procedure specifically addresses the design requirements of metering installations.</p>	<p>Review Metrology Procedure – March 2020</p>
11/2019	<p>C3/343 Electricity Industry Metering Code, clause 3.12(2) It was noted that there are a number of instrument transformers which are non-compliant to the requirements and these need to be replaced in order to achieve compliance.</p>	<p>RIA to put in a plan to upgrade the non-compliant instrument transformers. PFM and RIA should also maintain a compliance register to provide assurance all instrument transformers at Rottnest Island are compliant to the requirements.</p>	<p>Determine location of assets by visual inspection, record them in a register and certify they meet clause 3.12 and therein the accuracy needed. By means of Visually checking all 198 meters that need to be sealed and behind an inaccessible door (not necessarily a lock, maybe a unique key), for the data collection to be kW, kVAR and kVA capable, and not to be a Type 7 connection point (being a data substitute for estimation purposes) by filling in the metering excel sheet. In addition, RIA/PFM will survey all 510 connections to ensure that revenue and non-revenue connections have</p>

A. Unresolved during current review period			
			adequate metering- December 2020
12/2019	<p>C3/345 Electricity Industry Metering Code, clause 3.12(4) Based on our inquiry, we noted that PFM does not maintain drawings detailing metering installation of all meters at Rottnest Island, consistent with good electricity industry practice.</p>	<p>It is recommended that drawings of the metering installation on Rottnest Island are produced and maintained, to comply with good electricity industry practice.</p>	Refer 15/2019 – December 2019
13/2019	<p>C3/349 Electricity Industry Metering Code, clause 3.14(3) On enquiry and walkthrough, it was noted that certain CT's on Rottnest Island are not compliant with Table 3 in Appendix 1. PFM and RIA have planned a Meter Replacement Project in the near future. This would involve not only updating the CT's, but the transformers and switchboards on Rottnest Island. As this is planned for the near future, RIA and PFM did not want to separately repair the CT's prior to this. This has resulted in several of the current CT's on Rottnest Island being non-compliant with Table 3 in Appendix 1 during the audit period.</p> <p>These meters are installed at Bathurst, Kingstown, Caroline Thomson, Longreach, Thomson Bay South, Tearooms and Geordie/Fays Bay. Six businesses are also metered via CT connected meters.</p>	<p>We recommend that PFM and RIA have a program in place to rectify non-compliant CT's within a reasonable time frame, including a capital expenditure commitment. PFM and RIA should also maintain a compliance register to provide assurance all CT's at Rottnest Island are compliant to the requirements.</p>	Refer 15/2019 – December 2019
14/2019	<p>B2/483A The 2017 Network Quality and Reliability of Supply Performance Audit Report - Operation of Compliance Monitoring Systems was published on RIA website on 6 October 2017.</p>	<p>Ensure the network quality and reliability of supply independent report is published on RIA website no later than the 1 October deadline following the reporting period. RIA should ensure controls and monitoring processes are in place to ensure compliance is achieved.</p>	We will ensure the information is published by 1 October – October 2020
15/2019	<p>B2/485 The Rottnest Island Network Quality Report 2017-2018 was provided to ERA on 23 October 2018, the same day it was published on the RIA website.</p>	<p>Ensure the Network Quality report is provided to ERA not less than 7 days before it is published. RIA should ensure controls and monitoring processes are in place to ensure compliance is achieved.</p>	We will ensure the information is provided to ERA not less than 7 days before it is published – October 2020

Appendix A – References

Personnel and documentation

Key contacts and Audit Team

On behalf of the licensee, key contacts for the performance audit were:

RIA Fremantle head office:

- Michael Seitz, Environment, Public Health and Compliance Coordinator

At the Rottnest Island Power utility facility, the operator, Programmed Facilities Management:

- Jodie Mott, Island Operations Manager

McGee’s West Perth head office:

- *Tiarne Wyatt, Property Manager*

The Audit and Review team comprised the following personnel:

- Justin Eve - Engagement Leader
- Sian Ashdown - Engagement Director
- Matthew Quinn – Asset Management Systems SME
- Sham Sikander - Team Manager
- Mily Foeng Vergel - Senior Consultant
- Madeline Avis – Senior Consultant

Documentation

Key documents reviewed as part of the audit included the following (see below).

1. Restoration Priority Register Electrical Services Procedure
2. Standard Form Contract - Rottnest Island Authority

Appendix A – References

3. GHD - ERA Electricity Licence Performance Audit and Asset Management System Review Audit Report
4. Strategic Asset Management Plan
5. Rottnest Multi Utility Asset Management Plan
6. Rottnest Island Authority - Annual Report 2017 - 2018
7. RIA - Electrical - Service Recovery and Contingency Plan
8. Licence Holders - Economic Regulation Authority Western Australia
9. Restoration Priority Register
10. Emergency Response Management Plan
11. Rottnest Island Authority _ Supply of Electricity on Rottnest Island
12. Utilities Customer Complaints Procedure
13. Utilities Customer Complaints Form
14. Metrology Procedure
15. Rottnest Distribution & Connection Manual
16. Water and Energy Ombudsman Western Australia
17. Annual Report 2016 - 2017
18. FUSS Rottnest Facilities Utilities and Support Services Contract
19. Email to ERA
20. ERA Approval of Amended Contract
21. Annual Email Notification to Customers
22. Invoice 1
23. Invoice 2

Appendix A – References

24. Tenant Reconciliation 1 April 2017 - 31 March 2019
25. Customer Email Address Listing
26. Tariffs
27. Email query by customer
28. Meter Customer Query
29. Notice of Termination of Lease
30. Meter Readings Monthly Procedure
31. Outage Registers 2017 - 2019
32. Rottnest Island Power Quality Report - February 2018
33. Orrin Neale - Service Connection Test Course
34. Rottnest Metering Database
35. Meter readings screenshots (walkthrough)
36. FUSS KPI Report - May 2019
37. Rottnest Hotel 7 Year data
38. EXAMPLE INVOICE 2019
39. EXAMPLE INVOICE FOR 2018
40. Calibration Evidence
41. All contracts
42. Electrical license paid
43. Operational_Procedure_-_Identity_and_access_management_8DkeEGJ (1)
44. Operational_Procedure_-_Information_security_management_framework (1)