



Recommendation reference (no./year)	Non-compliance / Controls improvement (Rating / Licence obligation reference number & licence obligation / Details of non-compliance or inadequacy of controls)	Auditor's recommendation	Action proposed to be taken by the licensee	Responsible person(s)	Target completion date
01/2020	<p>B3 (105) Payment of prescribed fees</p> <ul style="list-style-type: none"> • 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. • Standing Data Charges were paid outside the required payment terms on 2 occasions during the audit period.. 	<p>It is recommended, to ensure ongoing compliance, the Licensee update the Compliance Manual to reference both the Annual and Quarterly licence fees payable and the associated Compliance Calendar to ensure that the requirement to pay Annual Licence fees occurs within 30 days after the anniversary of issue of the licence (i.e before the 23rd July each year) and the quarterly Standing Data charges are paid within 30 days of receipt of invoice..</p>	<p>Wind Portfolio undertakes to review the current internal notification process for the payment of prescribed fees and to take any necessary action to ensure invoices are processed expediently to ensure payment is made by the due date.</p>	Risk & Compliance Manager	31/03/2021
02/2020	<p>B2 (124) Annual Compliance Report</p> <ul style="list-style-type: none"> • 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 • Late submission of Annual Compliance Report 2017-2018 reporting year. Failure to submit standing data by due date 	<p>APA corporate systems have been implemented in response and compliance since was noted. However, further actions at a site level could be considered to embed operational controls for the submission of compliance reporting requirements i.e. Include item as a standing agenda for July and September APA/SGRE - Operation & Maintenance Meeting (Refer Item no 5 Commercial & Compliance) to ensure compliance is achieved. The development of strategically timed internal audits to verify compliance could also be considered. i.e. July to ensure licence payments, reporting is in progress, etc.</p>	<p>Wind Portfolio undertakes to review the current process for suitable improvements to ensure appropriate notifications and processes are in place to prevent possible future compliance issues.</p>	Risk & Compliance Manager	31/03/2020