

EGL02 Walkaway Wind Power Pty Ltd 2021 Post Audit Implementation Plan

Recommendation reference	Non- compliance	Auditor's recommendation	Action to be taken by the licensee	Responsible Person(s)	Target Completion Date
1/2021	<p>B2 Obligation 105 - 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.</p> <p>During the audit period, Standing Data Charges were paid outside the required payment terms on 3 occasions and the Annual Licence fee was paid late on 1 occasion.</p> <p>The non-compliance was noted in the previous audit (Ref 1/2016) and the corrective action to ensure all ERA invoices received were forwarded to accounts payable within 1 working day of receiving them was noted to not be effective in all instances.</p>	<p>Review internal control processes and develop corrective actions to ensure payment of licence fees in accordance with the obligations.</p> <p>Update the Compliance Task for the payment of Annual Licence fees included in the Risk Wizard system (ref task 5500 – WWFW1 Gen-Licence – Payment of Annual Generation Fee) to include a reference that failure to pay within required timeframes would result in non-compliance with EGL02;</p> <p>Ensure that the required personnel were aware of the licence payment requirements;</p> <p>Implement internal measures to ensure communications from the accounts department of the ERA are copied to the Site Manager, Alinta Wind Farm, Walkaway and the nominated ERA contact (GM Renewables O&M) to reduce the risk of late payment. Particularly with respect to the standing charges invoice payments, which were due at varying times dependent on date of issue by the ERA.</p>	<p>Date Resolved – 23/11/2021 To ensure compliance with Annual and Standing Charges Licence payments, the Licensee confirmed and verified outside the scope of the audit period:</p> <p>The compliance task (Risk Wizard Task 5500) for Annual Licence Payments was updated to include a reference that failure to pay within required timeframes would result in non-compliance with EGL02.</p> <p>Awareness to the requirement for payment of licence fees was noted by responsible personnel. Accounts has been informed of the requirement.</p> <p>For standing data charges invoice payments, the Licensee has implemented internal measures to ensure communications from accounts at the ERA are copied to the Site Manager, Alinta Wind Farm, Walkaway, and the nominated ERA contact (GM Renewables O&M) to reduce the risk of late payment.</p>	<p>Site Manager</p> <p>Site Manager</p> <p>Site Manager</p>	<p>Completed</p> <p>Completed</p> <p>Completed</p>
2/2021	<p>B2 Obligation 123 - 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.</p> <p>The Licensee did not notify the ERA within 10 business days of the change in corporate circumstances, in relation to the change in ownership of the Walkaway Wind Farm, as required by the Generation Licence.</p>	<p>Licensee develops clearly defined roles of responsibility, accountability, consulting, and informing with regards to the requirements of EGL02. Linking the process to a change management procedure is also recommended. For example, through the development of a RACI Matrix for legislative requirements that may require awareness at a more senior level within the organisation.</p>	<p>The Licensee will develop a RACI matrix for legislative requirements relating to EGL02.</p>	<p>General Manager O&M Renewables</p>	<p>15 March 2022</p>
3/2021	<p>B2 Obligation 124 - 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</p> <p>Failure to submit standing data by due date and inaccurate reporting of non-compliances in Annual Compliance Report.</p>	<p>Review and develop the control procedures and processes for compliance reporting to ensure that integrity of reporting (i.e., the completeness and accuracy of the compliance reports provided to the ERA). Specifically, to capture all the required compliance obligations, for example:</p> <p>Review accounts to verify the timely payment of Annual and Standing Charges licence fees;</p>	<p>Licensee has created a compliance task to include checking of ERA invoice payment dates relative to due dates</p>	<p>Site Manager</p>	<p>Completed</p>

	<p>Review the submission Standing Data to the ERA (i.e. due 30 September annually) and Annual Compliance Reports (i.e., due 31 August annually);</p> <p>Inclusion of the details in the Risk Wizard task with respect the Type 1 and 2 reportable obligations from the Electricity Compliance Reporting Manual to ensure these are to be considered in the preparation of the Annual Compliance Report;</p> <p>The need to check if the Electricity Compliance Reporting Manual has been updated by the ERA and reference to obligation number could be incorporated into Risk Wizard Task;</p> <p>Development of a RACI Matrix to communicate leadership and accountability and improve compliance awareness;</p> <p>Undertaking an internal audit would assist in ensuring compliance was not retrospective;</p> <p>Earlier preparation of the Annual Compliance Report to facilitate a thorough review of compliance obligations (noted all submitted very close to the due date);</p> <p>Detailing the scope of the requirements within the control procedures, such as, Asset Management Plan or SRMTMP;</p> <p>Completion of the Compliance Plan noted as “to be written” (refer section 3.10 Regulatory Compliance of the AMP)</p>	<p>Licensee has compliance tasks to review submission of standing data annual compliance reports to the ERA</p> <p>Licensee has amended compliance task obligation 124 to include all type 1 and 2 reportable obligations from the Electricity Compliance Reporting Manual</p> <p>Licensee has amended compliance task obligation 124 to include checking if the Electricity Compliance Reporting Manual has been updated by the ERA and to review changes (if any) against existing compliance tasks</p> <p>The Licensee will develop a RACI Matrix to communicate leadership and accountability and improve compliance awareness</p> <p>Compliance task created to review compliance to EGL02 licence conditions 6 months prior to submission date of annual compliance report</p> <p>Compliance task for Annual Compliance Report is scheduled 2 months prior to due date</p> <p>The Licensee will detail obligation requirements in the Asset Management Plan and SRMTMP</p> <p>The Licensee will complete and publish the Compliance Plan</p>	<p>Site Manager</p> <p>Site Manager</p> <p>Site Manager</p> <p>General Manager O&M Renewables</p> <p>Site Manager</p> <p>Site Manager</p> <p>Site Manager</p> <p>General Manager O&M Renewables</p>	<p>Completed</p> <p>Completed</p> <p>Completed</p> <p>15 March 2022</p> <p>Completed</p> <p>Completed</p> <p>15 March 2022</p> <p>15 March 2022</p>
--	---	--	---	---