

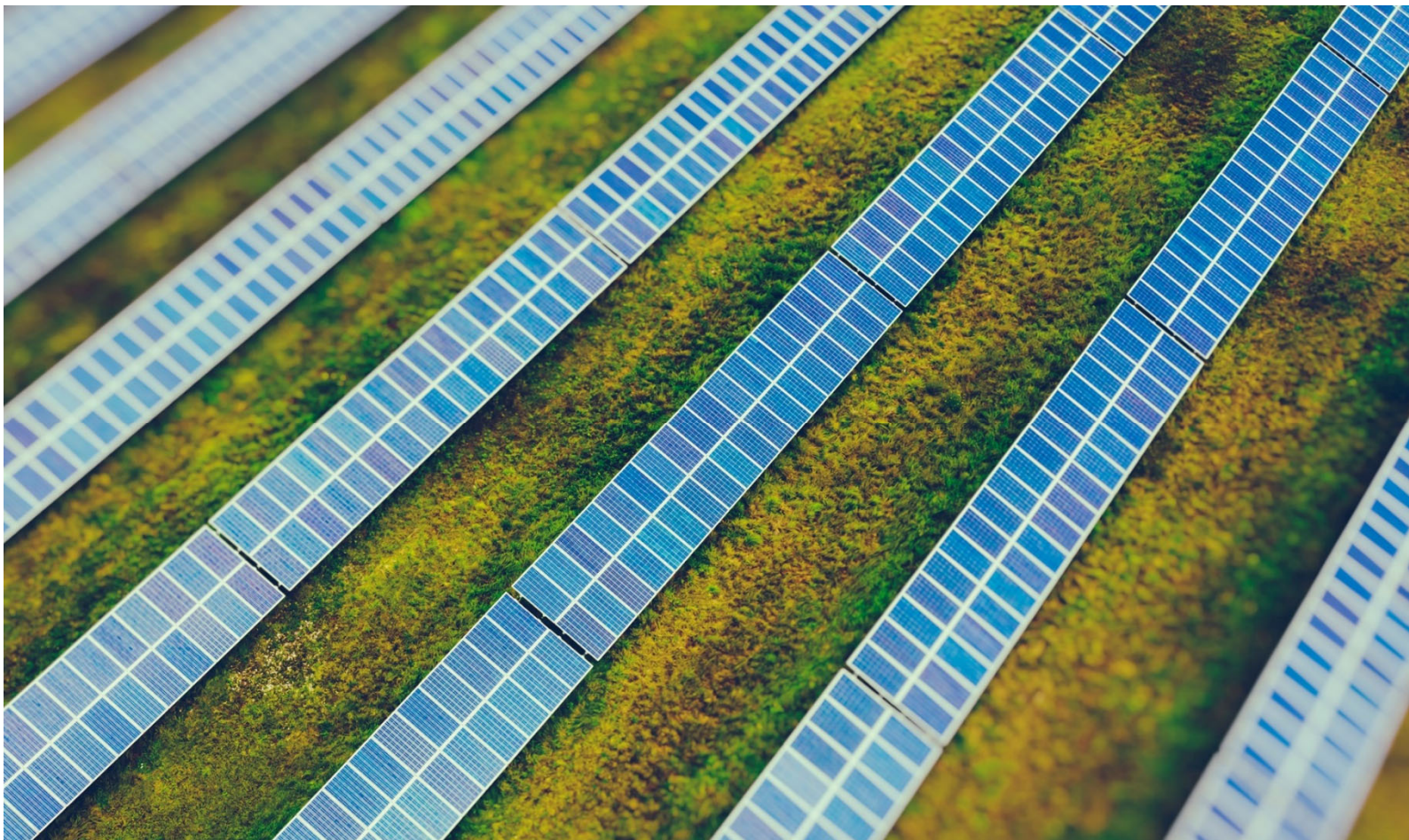


Peel Renewable Energy

Audit Report

Peel Renewable Energy

27 June 2022



→ **The Power of Commitment**

GHD Pty Ltd ABN 39 008 488 373

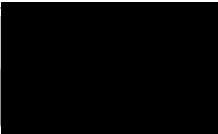

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Executive Summary

Background

The Economic Regulation Authority (ERA) is Western Australia's independent economic regulator that is responsible for administering the licensing schemes for gas, electricity and water services. The licencing regime is intended to ensure that Western Australian consumers and businesses operate in a fair, competitive and efficient environment.

Peel Renewable Energy (PRE or the licensee) is a subsidiary of Tas Gas Holdings Pty Ltd (formerly known as Enwave Australia Holdings Pty Ltd) (Parent Company) and have been granted an electricity distribution licence (EDL7), and an electricity retail licence (ERL28) in March 2020. These licences were issued by the ERA under section 19 of the Electricity Industry Act 2004 and enable the licensee to distribute and sell electricity to customers. The licensee had five metered customers during the reporting period and there have been no changes to the licences.

This is PRE's first audit and review with regard to their compliance with their respective licence requirements and their Asset Management System performance. The audit focussed on the effectiveness of PRE's systems and processes used to ensure compliance with the obligations, standards, outputs and outcomes as required by the licences.

Asset overview

PRE operates a distribution network and microgrid in the Peel Business Park (PBP) located in Western Australia's Peel region. Electricity is retailed to PRE customers inside the PBP. PRE generates electricity through a behind-the-meter microgrid which feeds into the main 22 kV switchboard of the PBP. PRE also has a physical connection to Western Power's 22 kV distribution network. Electricity is procured by PRE from Synergy under an electricity supply agreement. Electricity supply from Synergy provided through the Western Power network supplements the PRE Microgrid generated electricity. Electricity is distributed through two underground 22 kV circuits which reticulate throughout the PBP to several 22kV/415V distribution transformers. Individual customers and sites within the PBP are supplied by radial underground low voltage cables from these distribution substations and related switchgear.

Audit and review objectives

This audit has been conducted to assess the following:

1. PRE's level of compliance with the conditions of their electricity licences.
2. The effectiveness of PRE's asset management system.

This report outlines the findings of the audit and review conducted by GHD to assess PRE's performance against the above objectives. The audit and review covered the period from 5 March 2020 to 31 March 2022.

Licence Conditions Audit: Control Assessment – Findings and recommendations

Only five obligations were assessed for control procedures and control environment. Two of these are found to be adequate and no improvements are needed. Three of these are associated with non-compliance findings and thus their control procedures are assessed as needing small improvement. Description of these three non-compliance findings along with their recommendations are provided in the subsequent paragraphs, under compliance assessment,

The vast remainder of the obligations were not assessed for control procedure and control environment because either their audit priority was more than 3 (and hence not requiring assessment), or not applicable to PRE (e.g. small-use customers, pre-payment meters, special prescriptive criteria etc.)

Licence Conditions Audit: Compliance Assessment – Findings and recommendations

PRE's performance against the applicable obligations were assessed for compliance during the audit period. The majority of these were found to be compliant and PRE's undertakings did not disadvantage or affect its customers and/or code participants (third parties) in a negative manner during the audit period. PRE's performance against three applicable obligations are found to be non-compliant and they had minor affect to its customers or/and code participants. These three non-compliances pertain to the absence of Data Verification Request Form during the audit period and non-publishing of certain documents during the audit period. Recommendations to address these identified non-compliances have been provided to PRE.

The vast remainder of the obligations were found to be not applicable to PRE during the audit period (e.g. events did not occur, it is not a corporation, it does not have accumulation meters, its customers do not meet consumption threshold etc.) and hence their compliance was not rated.

The following recommendations are proposed for the non-compliances identified in the performance audit.

No	Description	Recommendations	No.
411	Electricity Industry Metering Code, clause 5.20(1) A network operator must, by not later than 6 months after the date this Code applies to the network operator, develop, in accordance with the communication rules, an Energy Data Verification Request Form.	PRE to develop Energy Data Verification Request Form to facilitate its customer to request verification of energy data in accordance to Metering Code clause 5.20. PRE may need to work together with WINconnect to develop this or delegate it to them.	9/2022
412	Electricity Industry Metering Code, clause 5.20(2) An Energy Data Verification Request Form must require a Code participant to provide the information prescribed.	PRE to develop Energy Data Verification Request Form to facilitate its customer to request verification of energy data in accordance to Metering Code clause 5.20. The Form must request NMI, checksum for the connection point, reason for the request, time period for interval meter and any relevant information.	10/2022
448B	Electricity Industry Metering Code, clause 6.18 A network operator must publish the document within 10 business days after notification of the ERA's approval under subclauses 6.13(1)(a)(i), 6.16 or 6.17.	Publish the documents as per the Metering Code clause 6.18. Refer to the definition and interpretation of words 'documents' and 'publish' in the Metering Code.	11/2022

Asset Management System Review – Findings and recommendations

All observations and findings are collated in Table 9 of this report. The key issues found and observed during the review period that have resulted in proposed recommendations are listed here in order of importance:

- Consolidated asset register – The review found that PRE do not maintain a single consolidated asset register. Primary and secondary asset are administrated by two different subcontractors. Registers were current and up to date; however, the review found that there were discrepancies between the asset identification numbering systems. Furthermore, neither register accommodates entry for specific asset management details e.g., maintenance schedules, asset performance, condition, and cost data (although, it is recognised that this information does get captured elsewhere).
- Consistent risk management application – PRE leverages their parent company's mature, comprehensive, and well documented Risk Management Policy and Framework; however, the review found that this risk framework is not consistently applied to the following aspects:
 - Asset failure risk.

- Operational risk; with a particular focus on Operational OT/IT system and documentation.
- Maintenance risk.
- Asset environment risk.
- Asset management system risk.

There is also no evidence that risk management techniques are used to inform asset replacement strategies, operational and maintenance priorities, contingency planning, emergency management plans etc.

- Document reviews – It was found that review for a suite of documents, including the Asset Management Plan, was outstanding and past their respective nominated due dates.
- Asset disposal/replacement strategies – Disposal alternatives and/or replacement strategies for key assets have not been considered as part of the asset management process.

The following recommendations have been proposed.

Effectiveness Criteria	Rating	Recommendation	No/Year
Asset Planning			
Likelihood and consequences of asset failure are predicted	B3	PRE should leverage the parent company's comprehensive risk management framework and apply this to the regular assessment of risk (including threats and opportunities where applicable) related to the following: <ul style="list-style-type: none"> ● Asset failure risk ● Operational risk ● Maintenance risk ● Asset environment risk ● Asset management system risk The outcome and ongoing treatment of these assessments should inform the asset replacement strategy, operational and maintenance priorities, contingency planning, emergency management plan etc.	1/2022
Plans are regularly reviewed and updated	B3	PRE to review the adequacy of document review process and workflow to ensure plans and documents are reviewed by the due date.	2/2022
Asset Creation and Acquisition			
Evaluations include all life-cycle costs	B3	PRE to review business case development procedure to determine and document life cycle costs for new assets/	3/2022
Asset Disposal			
Disposal alternatives are evaluated	C1	Develop disposal/replacement plans for new assets. Section 3.3.3 Decommissioning, Demolition, Abandonment and/or Disposal of the AMP to either detail or make specific reference to the following: <ul style="list-style-type: none"> ● Disposal alternative evaluation process ● Replacement strategy for key electrical assets. ● An asset register of all assets 	4/2022
There is a replacement strategy for assets	C1	PRE to consider the key assets underpinning the operation of the site. The strategy should consider the asset operation and maintenance requirements, asset life cycle cost, lead times, contracting strategy, contingency plans and emergency management plan. The strategy is likely to be informed by the asset risk register.	5/2022
Environmental Analysis			
Opportunities and threats in the system environment are assessed	B3	Recommendation 1/2022 applies	-

Effectiveness Criteria	Rating	Recommendation	No/Year
Asset Operations			
Risk management is applied to prioritise operations tasks	A3	Recommendation 1/2022 applies	-
Assets are documented in an Asset Register including asset type, location, material, plans of components, an assessment of assets' physical/structural condition and accounting data	C3	PRE should develop a consolidated asset register that considers new and existing primary and secondary assets. PRE is discouraged from using separate assets registers for primary and secondary assets per current practice. The asset register should follow a standard asset naming convention (see recommendation 11) and take account of asset failure risk, life cycle costing and cost data. The asset register should allow for appropriate security provisions and disciplined application of QA/QC process to validate verify entered data. The asset register should align and coordinate with Operation IT interface systems (e.g., Trunk).	6/2022
Asset Maintenance			
Risk management is applied to prioritise maintenance tasks	A3	Recommendation 1/2022 applies	-
Asset Management Information System			
Adequate system documentation for users and IT operators	C3	PRE should quantify the operational risk associated with reliance and continuity of supply of Trunk software through Jarrah solutions. Treatment plans should be development in preparation for an event where the service level agreement with Jarrah Solutions were to be discontinued. IT or operational interface standards should be formulated and prepared in such a way that it is supplier agnostic and easily transferable to an alternate service provider, if required.	7/2022
Input controls include appropriate verification and validation of data entered into the system	B3	PRE is encouraged utilise an asset numbering procedure that ensures an aligned and consistent approach to asset identification across all contractors as the business park develops.	8/2022
Risk Management			
Risk management policies and procedures exist and are being applied to minimise internal and external risks associated with the asset management system	A3	Recommendation 1/2022 applies	-
Risks are documented in a risk register and treatment plans are actioned and monitored	C3		
The probability and consequence of risk failure are regularly monitored	A3		
Review of AMS			
A review process is in place to ensure that the asset management plan and the asset management system described therein are kept current	B3	Recommendation 2/2022 applies.	-

Asset Management System Review – Overall effectiveness

On completion of this review, the auditor's conclusion is that PRE's asset management system is operating effectively; however, the auditor has identified proposed areas of improvement for PRE to apply during the next audit period. The disciplined remediation of identified issues should be actioned as a priority in order to continue the effective management of assets as the Peel Business Park grows in size and complexity.

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1. Introduction

1.1 Background

The Economic Regulation Authority (ERA) is Western Australia's independent economic regulator that is responsible for administering the licensing schemes for gas, electricity and water services. This ensures Western Australian consumers and businesses operate in a fair, competitive and efficient environment.

PRE is a subsidiary of Parent Company. The Parent Company also owns gas distribution, transmission and retail companies in Tasmania and Victoria. PRE has an electricity distribution licence (EDL7), and an electricity retail licence (ERL28). The licences were issued by ERA under section 19 of the Electricity Industry Act 2004 and enables the licensee to distribute and sell electricity to customers. The licensee had five customers during the reporting period and there have been no changes to the licences.

1.2 Overview of Peel Renewable Energy

PRE owns and operates a microgrid which contributes to providing power to customers in the Peel Business Park (PBP). The PBP is located east of the Kwinana freeway, just off Lakes Road, in Western Australia's Peel region.

PRE has a physical connection to Western Power's 22 kV distribution network. Electricity is procured by PRE from Synergy under an electricity supply agreement. Electricity is then retailed to PRE customers inside the PBP. Electricity is also generated by the behind-the-meter microgrid which feeds into the main 22 kV switchboard; which offsets the electricity supply from the network.

Load is distributed by two underground 22 kV circuits which reticulates throughout the PBP to several 22kV/415V distribution transformers. Individual sites within the PBP are supplied by radial underground low voltage cables from these distribution substations and related switchgear.

The generation assets are owned by a Peel Renewable Energy Genco Pty Ltd, a separate Parent Company subsidiary. Review of generation assets is outside of this scope of this audit.

The customer metering arrangement is under a service agreement with Synergy whereby the customer meters are supplied, installed, commissioned and by Synergy on behalf of PRE. Metering data is sent from Synergy to PRE's billing agent, WinConnect.

PRE oversees and provides new customer connections following advice and design from CKE. Key operations are monitored by Jarrah Solutions; maintenance activities are conducted by Nilsen; and customer account management and billing are carried out by WinConnect.

1.3 Purpose and Limitation of this Report

1.3.1 Purpose

As required by the licenses, licensees are required to conduct a performance audit and asset management review that assesses the performance of the licensee against the license obligations.

The purpose of the performance audit was to assess the effectiveness of measures taken by the licensee to meet the conditions and legislative obligations referred to in the licence. The scope of the audit report includes assessing the adequacy and effectiveness of performance against the requirements of the licensee. This is conducted by considering:

- Process compliance
- Outcome compliance
- Output compliance
- Integrity of reporting; and
- Compliance with individual license conditions.

The asset management system review covers:

- a description of the audit or review objectives and the methodology used to conduct the review.
- the period over which the review has been performed.
- details of the licensee's representatives participating in the review
- details of key documents and other information sources examined by the auditor during the course of the audit
- any other information the auditor considers relevant to the audit or review scope of work.

1.3.2 Limitations

This report has been prepared by GHD for Peel Renewable Energy and may only be used and relied on by Peel Renewable Energy for the purpose agreed between GHD and Peel Renewable Energy as set out in section 1.3.1 of this report.

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

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

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

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

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

2. Scope and Objective

2.1 Objectives

The objective of this Audit and Review is to:

- Provide the ERA an independent assessment of PRE's compliance with all of the relevant obligations under the licences
- Provide to the ERA an independent assessment of the effectiveness of PRE's asset management system in relation to (EDL7), and (ERL28).
- Provide recommendations to address identified non-compliances.

2.2 Scope of Works

This audit and review involve an assessment of the following key areas using a risk-based approach (similar to ISO31000:2009):

- Process compliance: Effectiveness of systems and procedures
- Outcome compliance: Effectiveness of actual performance against license standards
- Output compliance: Effectiveness of records to indicate procedures are maintained
- Integrity of reporting: assessment of the completeness and accuracy of compliance and performance documentation

The scope of this audit and review involves:

- Assess performance against licence conditions for EDL7, and ERL28
- Assess performance against each asset management system effectiveness criteria

2.2.1 Performance Audit Excluded Conditions

Some of the license obligations have been excluded from the audit because they are not applicable to PRE. These excluded obligations are tabulated below:

Table 1 Licence Obligation Exclusions

Obligation Type	Obligation(s) No.	Comment
Type 1 reporting obligations for all licence types	235 – 238 257 – 258	PRE has neither residential customers nor the type of commercial customers who may have life support clients
Electricity Industry Customer Transfer Code – Licence conditions and obligations	1 – 70	Customer Transfer Code does not apply as PRE is the only retailer in this network
Code of Conduct – Licence conditions and obligations	129 134 136 141-142 147 191 – 196 200 202-227 231 238A 239 – 241 243A 245 – 271 279 293 – 295	PRE has no residential customers
Electricity Industry Metering Code – Licence conditions and obligations	362 – 363 395 – 396	PRE has no residential customers
Electricity licences - Licensee specific conditions and obligations	481 – 496	The target licensee for these obligations do not include PRE.

2.2.2 Asset Management System Review

The review of PRE's asset management system (AMS) covers the following asset management components:

- Asset planning
- Asset creation and acquisition
- Asset Disposal
- Environmental analysis
- Asset operations
- Asset maintenance
- Asset management information system
- Risk management
- Contingency planning
- Financial planning
- Capital expenditure planning
- Review of AMS

2.3 Methodology and Approach

GHD's approach involved working closely with PRE to identify actions and documents as soon as possible before the audit report was finalised. GHD's process and approach included:

- An initial discussion via teleconference with Parent Company / PRE to:
 - Identify the key processes and roles to be discussed
 - Review license conditions to be excluded
 - Discuss the audit plan
- Preparation of the draft audit plan for comment by the licensee. The audit plan listed the license obligations to be examined.
- Submission of the draft Audit Plan to the ERA for approval
- A start-up meeting and follow meetings via teleconference with business staff responsible for the audit area and assets. The call involved:
 - Demonstration of key systems
 - Identifying documents to be sampled to confirm procedures and assess compliance with AMS criteria and license obligations
 - Review of procedures
- Site visit to audit location on 29 April to review asset and locations and conduct face-face discussion with business staff.
- Preparation of a draft audit report for PRE's review and comment
- Preparation of a final report for submission to the ERA

2.3.1 Deviations From the Audit Plan

There are no deviations from the performance audit or AMS review plan described in the Audit Plan submitted to the ERA.

2.4 Previous Audit

There are no non-compliances of special interest or recommendations from a previous audit to review as this performance audit and AMS review is the first performed for these licences and AMS.

2.5 Time Period Covered by the Audit/Review

The audit and review will cover the period from 5 March 2020¹ to 31 March 2022.

2.6 Time Period of the Audit/Review Process

The audit/review commenced in March 2022 with the preparation of the draft Audit Plan. Interviews with PRE were conducted on the following dates via teleconference call on Microsoft Teams:

- 26 April – Asset Management (1)
- 28 April – Asset Management (2)
- 10 May – Retail License Performance Audit
- 17 May – Distribution License Performance Audit

¹ Both the Distribution and Retail license have a commencement dated of 5 March 2020

2.7 Details of the Licensee Representatives Participating in the Audit/Review

Details of representatives from PRE, Parent Company and contractor organisations are tabulated below.

Table 2 Details of Licensee

Personnel	Organisation
General Manager Operations & Engineering	Parent Company
Compliance Officer	Parent Company
General Manager	Peel Renewable Energy
Engineer	CKE Consulting
New Energy Lead	Synergy
Director	Jarrah Solutions Pty Ltd
High Energy Technician	Nilsen
Winconnect Account Manager	WINconnect
Graduate Electrical Engineer	WINconnect

2.8 Details of Key Documents and Other Information Sources

A list of documents reviewed in the audit and AMS review is listed in Appendix A.

2.9 Details of Auditors Participating in the Audit/Review

The audit and review team comprised of three (3) staff members from GHD.

Details of their roles in the audit/review process are summarised in Table 3.

Table 3 Details of Audit and Review Team Members from GHD

Name	Role	Summary of Task	Hours Utilised (hrs)
Henry Le	Auditor/Reviewer	<ul style="list-style-type: none"> Audit preparation Audit AMS Review Preparation of report 	120
Marcel Oosthuizen	Lead AMS Reviewer	<ul style="list-style-type: none"> Audit preparation AMS Review Project management 	50
Anuraag Malla	Lead License Auditor	<ul style="list-style-type: none"> Audit preparation Performance audit 	50

3. Performance Summary

Findings of the performance audit are summarised in a table with an adequacy of control and a compliance rating.

3.1 Assessment Rating Scales

In accordance with the Audit Guidelines, an assessment of PRE’s performance was completed using a rating of adequacy of control and compliance, as summarised in Table 4. The asset management effectiveness rating scale is outlined in Table 5 and Table 6.

Table 4 Audit Compliance and Control Rating Scales

Adequacy of Controls Rating		Compliance Rating	
Rating	Description	Rating	Description
A	Adequate controls - no improvement needed	A	Compliant
B	Generally adequate controls - improvement needed	B	Non-compliant – minor impact on customers or third parties
C	Inadequate controls – significant improvement required	C	Non-compliant – moderate impact on customers or third parties
D	No controls evident	D	Non-compliant – major impact on customers or third parties
NR	Not rated – not applicable during the audit period	NR	Not rated – not applicable during the audit period

Table 5 Asset Management Process and Policy Definition Adequacy Rating

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

Table 6 Performance Rating Scale (Reviews)

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

3.2 Licence Conditions Compliance and Control Audit Ratings Summary

In accordance with the Audit Guidelines, an assessment of PRE’s compliance and its controls, against the obligations of its licence conditions ERL28 and EDL007, that existed during the audit period (from 5 March 2020 to 31 March 2022.) was undertaken. The following Table 7 list the number of licence obligations that were given each combination of compliance and control ratings. This table also allows PRE and the ERA to confirm that we have rated all relevant licence obligations and provides a simple summary of the PRE’s compliance during the audit period.

Table 7 Licence Conditions compliance and control audit ratings summary table

		Compliance rating					Total
		1	2	3	4	N/R	
Controls rating	A	2	-	-	-	-	2
	B	-	3	-	-	-	3
	C	-	-	-	-	-	-
	D	-	-	-	-	-	-
	N/P	82	-	-	-	237	319
	Total	84	3	-	-	237	324

We did not assess PRE’s control procedures and control environment for those licence obligations with an audit priority of 4 or 5 (and where they were either compliant or ‘not rated’), and hence rated their controls as ‘N/P’ or ‘not performed’ in accordance with the Audit Guidelines Section 5.1.6. We note the audit priority of the majority of PRE’s licence condition obligations were either 4 or 5, and also this audit being the first time PRE did not have any outstanding non-compliance.

Similarly, in those instances during the audit period where certain event did not occur, or activities or decisions were not undertaken, or were not relevant to PRE, we have rated the compliance of such obligations as ‘N/R’ or ‘not rated’.

3.3 AMS Review Effectiveness Summary

The AMS review assessed the effectiveness in delivering the services required under the operating license.

The review was conducted using the asset management adequacy and performance ratings as described in Table 5 and Table 6. A summary of outcomes of the review is provided in Table 8.

Table 8 AMS Review Results Summary

AMS Component	Adequacy Rating	AMS Performance Rating
1. Asset Planning	B	2
Planning process and objectives reflect the needs of all stakeholders and is integrated with business planning	A	1
Service levels are defined	A	1
Non-asset options (e.g., demand management) are considered	A	1
Lifecycle costs of owning and operating assets are assessed	A	1
Funding options are evaluated	A	1
Costs are justified and cost drivers identified	A	1
Likelihood and consequences of asset failure are predicted	B	3
Plans are regularly reviewed and updated	B	3
The capability of the plant is adequate to meet future demand	A	1
2. Asset creation and acquisition	A	2
Are full project evaluations being undertaken for new assets, including comparative assessment of non-asset solutions	A	1
Evaluations include all life-cycle costs	B	3
Projects reflect sound engineering and business decisions	A	1
Commissioning tests are documented and completed	A	1
Ongoing legal / environmental / safety obligations of the asset owner are assigned and understood	A	1
3. Asset Disposal	B	1
Under-utilised and under-performing assets are identified as part of a regular systematic review process	A	1
The reasons for under-utilisation or poor performance are critically examined and corrective action or disposal undertaken	NR	-
Disposal alternatives are evaluated	C	1
There is a replacement strategy for assets	C	1
4. Environmental Analysis	B	2
Opportunities and threats in the system environment are assessed	B	3
Performance Standards (availability of service, capacity, continuity, emergency response etc.) are measured and achieved	A	1
There is compliance with statutory and regulatory requirements	A	1
Customer service levels have been achieved	A	1

AMS Component	Adequacy Rating	AMS Performance Rating
5. Asset operations	B	2
Operational policies and procedures are documented and linked to service levels required	A	1
Risk management is applied to prioritise operations tasks	A	3
Assets are documented in an Asset Register including asset type, location, material, plans of components, an assessment of assets' physical/structural condition and accounting data	C	3
Accounting data is documented for assets	A	1
Operational costs are measured and monitored	A	1
Staff resources are adequate, and staff receive training commensurate with their responsibilities	A	1
6. Asset maintenance	A	2
Maintenance policies and procedures are documented and linked to service levels required	A	1
Regular inspections are undertaken of asset performance and condition	A	1
Maintenance plans (emergency, corrective, and preventative) are documented and completed on schedule	A	1
Failures are analysed and operational / maintenance plans adjusted where necessary	B	2
Risk management is applied to prioritise maintenance tasks	A	3
Maintenance costs are measured and monitored	A	1
The current staffing arrangements and responsibilities adequate for effective asset maintenance	A	1
7. Asset management information system	B	2
Adequate system documentation for users and IT operators	C	3
Input controls include appropriate verification and validation of data entered into the system	B	3
Logical security access controls appear adequate, such as passwords	A	1
Physical security access controls appear adequate	A	1
Data backup procedures appear adequate	A	1
Key computations related to licensee performance reporting are materially accurate	A	1
Management reports appear adequate for the licensee to monitor licence obligations	A	1
8. Risk management	B	3
Risk management policies and procedures exist and are being applied to minimise internal and external risks associated with the asset management system	A	3
Risks are documented in a risk register and treatment plans are actioned and monitored	C	3
The probability and consequence of risk failure are regularly monitored	A	3
9. Contingency planning	A	3
Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks	A	3
10. Financial planning	A	2

AMS Component	Adequacy Rating	AMS Performance Rating
The financial plan states the financial objectives and strategies and actions to achieve the objectives	A	1
The financial plan identifies the source of funds for capital expenditure and recurrent costs	A	1
The financial plan provides projections of operating statements (profit and loss) and statement of financial position (balance sheets)	A	1
The financial plan provides firm predictions on income for the next five years and reasonable indicative predictions beyond this period	A	2
The financial plan provides for the operations and maintenance, administration and capital expenditure requirements of the services	A	1
Significant variances in actual / budget income and expenses are identified and corrective action taken where necessary	B	2
11. Capital expenditure planning	B	2
There is a capital expenditure plan that covers issues to be addressed, actions proposed, responsibilities and dates	B	2
The plan provides reasons for capital expenditure and timing of expenditure	B	1
The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan	B	2
There is an adequate process to ensure that the capital expenditure plan is regularly updated and actioned	B	2
12. Review of AMS	B	2
A review process is in place to ensure that the asset management plan and the asset management system described therein are kept current	A	2
Independent reviews (e.g., internal audit) are performed of the asset management system	B	3

4. Observations and Findings

4.1 Licence Conditions Compliance and Control Audit

The following Table 9 list all the non-compliances identified during the audit of PRE's obligations against its retail (ERL28) and distribution (EDL007) licence conditions during the audit period. This table does not provide the observation details of those obligations deemed to be compliant or where the control rating was not performed and compliance rating was not rated during the audit period for the sake of brevity in the body of the report. The licence conditions compliance and control audit observation, in its' entirety is in Appendix B.

Table 9 Licence condition compliance and control audit – Non-compliance finding table

No	Obligation under Licence condition	Description	Control rating and observation	Compliance observation / comment
411	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.20(1) A network operator must, by not later than 6 months after the date this Code applies to the network operator, develop, in accordance with the communication rules, an Energy Data Verification Request Form.	B (Generally adequate controls - improvement needed) The general control environment and control procedures within PRE business during the audit period was observed to be adequate given its business context, its code participants (only Synergy and WINconnect, and no 3rd party retailers or generators) and customer base (only 5 large customers), all of whom could easily contact PRE. However, given the compliance observation, the control for this specific obligation was obviously missing during the audit period. The absence of this particular form denotes small improvement needed to control procedures, rather than to control environment.	2 (Non-compliant - minor effect on customers or third parties) We could not sight any evidence of Energy Data Verification Request Form within PRE documentation and in its website that existed within 6 months after PRE obtaining EDL07. The impact of this non-compliance is considered minor given the context of code participants within the Peel Business Park during the audit period and possibility of contacting PRE (and/or Synergy) with relative ease.
412	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 5.20(2) An Energy Data Verification Request Form must require a Code participant to provide the information prescribed.	B (Generally adequate controls - improvement needed) The general control environment and control procedures within PRE business during the audit period was observed to be adequate given its business context, its code participants (only Synergy and WINconnect, and no 3rd party retailers or generators) and customer base (only 5 large customers), all of whom could easily contact PRE. However, given the compliance observation, the control for this specific obligation was obviously missing during the audit period. The absence of this particular form containing specific	2 (Non-compliant - minor effect on customers or third parties) We could not sight any evidence of Energy Data Verification Request Form within PRE documentation and in its website. The impact of this non-compliance is considered minor given the context of code participants within the Peel Business Park during the audit period and possibility of contacting PRE (and/or Synergy) with relative ease.

No	Obligation under Licence condition	Description	Control rating and observation	Compliance observation / comment
			information request denotes small improvement needed to control procedures, rather than to control environment.	
448B	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Electricity Industry Metering Code, clause 6.18 A network operator must publish the document within 10 business days after notification of the ERA's approval under subclauses 6.13(1)(a)(i), 6.16 or 6.17.	B (Generally adequate controls - improvement needed) The general control environment and control procedures within PRE business during the audit period was observed to be adequate given its business context, its code participants (only Synergy and WINconnect, and no 3rd party retailers or generators) and customer base (only 5 large customers), all of whom could easily contact PRE. However, given the compliance observation, the control for this specific obligation was obviously missing during the audit period. This was promptly addressed (reactively) post audit questioning and PRE's website now hosts its model service level agreement and metrology procedure. The existence of document denotes relatively mature control environment vs. non-publication of those document denoting small improvement needed to control procedures.	2 (Non-compliant - minor effect on customers or third parties) Model service level agreement, metrology procedure, communication rules and reference that the mandatory link criteria is addressed due to the design and inbuilt characteristics of Type 4 metering installation which is an approved off-the-shelf product, constructed according to Australian standards and continues to remotely communicate with Synergy, could not be found in PRE's website during the audit. There is no evidence that these documents were available in its website during the audit period. There is also no evidence that they were made available in hardcopy (either for reference or for removal) in its office in WA during the audit period. Post audit questioning, we note that PRE has now uploaded its model service level agreement and metrology procedure in its website (i.e. post audit period). Given the context of code participants (only Synergy and WINConnect, and no 3rd party retailers or generators) and customer base (only 5 large customers) at Peel Business Park during the audit period, all of whom could easily contact PRE, this non-compliance is considered to have only minor effect on code participants and customers.

4.2 Asset Management System Review

Table 10 Asset Management Review Observations

Asset Management Process / Effectiveness Criteria	Observations / Comments	Evidence
1. Asset Planning – Overall Rating: B2		
<p>Planning process and objectives reflect the needs of all stakeholders and is integrated with business planning - A1</p> <p>Service levels are defined - A1</p> <p>Non-asset options (e.g., demand management) are considered - A1</p> <p>Lifecycle costs of owning and operating assets are assessed – A1</p> <p>Funding options are evaluated - A1</p> <p>Costs are justified and cost drivers identified - A1</p> <p>Likelihood and consequences of asset failure are predicted – B3</p> <p>Plans are regularly reviewed and updated – B3</p>	<p>Asset Management Plan</p> <ul style="list-style-type: none"> • A detailed PRE asset management plan (AMP) has been developed and is current. • The AMP documents how PRE acts with regards to asset management to ensure the safe reliable and compliant operation of the Peel network. • The AMP gives an overview of the safety, operational and maintenance requirements and the financial aspects of managing the assets. The plan details high level processes related to asset selection, design, construction, commissioning, operation, maintenance, safety, asset monitoring, incident investigations, record keeping and reporting, audit and review requirements and change management of assets. • The key stakeholders are identified in the AMP and are as follows: <ul style="list-style-type: none"> ○ End use customers of network services provided. ○ Tenants, landholders and general public within PRE. ○ Electricity Retailers. ○ Neighbours of the Network and property holders in locations where the Network runs through public places or private landholdings. ○ Relevant regulatory and government authorities including Western Power, the Economic Regulation Authority (ERA), SafeWork WA, Energy and Water Ombudsman WA (EWOWA) and DevelopmentWA. ○ Subcontractors and other service providers operating within PRE. • The AMP specifically considered the interest of noted stakeholders e.g., safety reliability, capacity and quality of supply. • Requirements for new assets are based on customer requirements as they arise. Estimated utilisation of existing assets is evaluated as customer connections are negotiated with PRE. A considered approach is given to customers seeking a supply beyond 630 MVA which is currently the largest transformers installed in the network. <p>Levels of Service</p> <ul style="list-style-type: none"> • The AMP defines the key elements of their services to the customers and have defined performance indicating measures. • PRE also maintain a Network Performance and Planning Criteria Manual which defines PRE's operations criteria, fault conditions and steady state requirements and limits. This document is consistent with WA Distribution Connections Manual (WADCM). 	<p>Interview with Compliance Officer, General Manager Operations & Engineering, General Manager, Nilsen High Energy Technician, Jarrah Director and CKE Engineer conducted 26 April 2022</p> <p>Asset Management Plan BMSDOC-18-1983 Version 2.0 26 May 2021</p> <p>Site visit conducted on 29th April 2022 at Peel Business Park with General Manager.</p> <p>Emergency Management Plan BMSDOC-18-1969 Version 3.0 18 May 2021</p> <p>Formal Safety Assessment 11 June 2020</p> <p>Incident Investigation BMSDOC-18-353 Version 3.0 18 May 2021</p>

Asset Management Process / Effectiveness Criteria	Observations / Comments	Evidence
<p>The capability of the plant is adequate to meet future demand - A1</p>	<ul style="list-style-type: none"> • Service Level Agreements are in place with maintenance contractors Jarrah Solutions Pty Ltd (for secondary systems) and Nilsen (WA) Pty Ltd (for primary systems). • PRE have provided a template of a Contractor Monthly KPI Record and Performance, these are reported by PRE's contractors (Nilsen, Jarrah and CKE) on a monthly basis to monitor KPI metrics such as time lost. PRE has provided evidence that contractors are assessed against these KPIs. <p>Non-Asset Options</p> <ul style="list-style-type: none"> • PRE allow customers to undergo arrangements where they may incorporate forms of self-supply (such as rooftop solar). This is captured in PRE's Customer Self Supply Guidelines, which is issued to all customers. PRE and the customer can enter into an agreement, whereby roof space is leased by the customer to PRE for the installation of rooftop solar. This model facilitates a form of demand side management and could allow network capacity upgrades to be deferred. No customer has yet taken up this arrangement <p>Life Cycle Costs</p> <ul style="list-style-type: none"> • The AMP outlines the approach to optimally balance capital and recurrent expenditure, so that maintenance, replacement and augmentation of the electricity distribution network delivers the required level of services at the lowest possible life cycle cost. • Life cycle costs have been assessed for assets adopted from DevelopmentWA; no other major asset were procured during the audit period. The AMP articulates the process for calculating life cycle costing which needs to be applied to the purchase of subsequent assets and assessed as part of the next audit period. <p>Financial</p> <ul style="list-style-type: none"> • PRE is a subsidiary of the parent company. CAPEX and OPEX is primarily sourced by PRE from parent company. As part of the parent company's normal business planning cycle, forecasted revenue and expenditure would be collected from PRE's General Manager (GM), after which subsequent annual budgets as would be agreed. • The land, utility and roads infrastructure were developed and implemented by DevelopmentWA which is the State Government's central development agency of industrial, commercial and residential projects is. Assets were then transitioned to PRE as the operator of the facility. This was after parent company representatives undertook corporate strategy, business case and financial planning activities, the outcome of which was ultimately subject to board approval. Due diligence was applied to the transitioned assets from DevelopmentWA, and PRE commenced as operator in August 2020. • The PRE GM has delegated financial authority (DFA) to approve expenditure requirement to operate the facility. For expenditure beyond DFA approval is sought from parent company. • Parent company's internal cost controllers are responsible for accounting records and reporting. • Cost drivers have been identified and are articulated in the AMP. See section 5.3 and 9.3. 	<p>TECHNICAL REPORT AA20S1&EDD5 Rev A 29-Oct-20 by Jarrah</p> <p>ENWAVE – Peel Business Park 21-SEP-2020 Unplanned Outage and Auto Restoration Scheme Investigation Technical Report AA20S1&EDD5 Rev A 29 Oct 2020</p> <p>Network Performance and Planning Criteria Manual - NNPC (Peel) BMSDOC-18-2210 Version 3.0 20 April 2022</p> <p>Customer Self Supply Guidelines - CSSG (Peel) BMSDOC-18-2212 Version 2.0 27 August 2020</p> <p>Contractor Monthly KPI Record – PEEL Populated by Jarrah Solutions Pty Ltd Mar 2022</p> <p>Contractor Monthly KPI Record – PEEL Populated by Nilsen WA Mar 2022</p>

Asset Management Process / Effectiveness Criteria	Observations / Comments	Evidence
	<p>Asset Planning Processes</p> <ul style="list-style-type: none"> • Investments for new assets are reviewed in accordance with their parent company’s internal financial drivers, including financial considerations, technology choices, technical alternatives, operations and maintenance considerations and other aspects based technical advice from PRE, Nilsen and Jarrah. • PRE follow their parent company’s governance structure across the development and finance for new projects. • Designs for plant augmentation and remedial work are typically outsourced to engineering companies who specialise in the various services. • Performance analysis, comparisons between different solutions and preparation of tender documents is undertaken by PRE. <p>Asset Failure</p> <ul style="list-style-type: none"> • A formal safety assessment (FSA) was conducted to identify safety related impacts on workers, the public, other stakeholders and the environment. Operational hazards related to assets were identified, assessed and action plans and risk management strategies have been formulated. This is consistent with the requirements of AS5577. • This FSA is however aimed more at an asset portfolio level i.e., HV/LV network; that is, the likelihood of asset failure is not assessed on an individual group of assets basis e.g., transformers, cables, LV kiosks etc. • An emergency management plan has also been developed which outlines the procedures in response to emergency scenarios associated with electrical distribution assets at Peel Business Park. • PRE also uses their parent company’s Incident Investigation procedure which outlines the processes used to investigate accidents and incidents involving people, plant, property and environment. • A network incident investigation and report by Jarrah demonstrates compliance with their parent company’s Incident Investigation procedure. Incident outcome correspondence is however through email only and there is no formal network incident investigation and management process. <p>Review of documentation</p> <ul style="list-style-type: none"> • The AMP has a review process set up in their parent company’s internal document control system with a document controller monitoring the review schedule. Notifications for document review are sent by the document controller. <ul style="list-style-type: none"> ○ While undertaking this review, it has been found some documents that have reviews outstanding. This is attributed as a procedural error, as the review process for any given document is initiated via informal prompt from the controller only. <p>Future demand</p> <ul style="list-style-type: none"> • The AMP outlines a decision-making process for future investments with a basis in the expected growth and forecasted demand. The plant has been assessed to be fit for purpose for the projected customers with upgrades underway following clarifications and negotiations. 	<p>Contractor Monthly KPI Record – PEEL Populated by CKE Australia Pty Ltd Mar 2022</p>

Asset Management Process / Effectiveness Criteria	Observations / Comments	Evidence
	<ul style="list-style-type: none"> The AMP covers an overall strategy which will respond to opportunities or changes. However, augmentations and upgrades have had to be implemented in response to major developments in the business park due to a lack of existing plant capability. 	
2. Asset Creation and Acquisition – Overall Rating: A2		
<p>Are full project evaluations being undertaken for new assets, including comparative assessment of non-asset solutions – A1</p> <p>Evaluations include all life-cycle costs – B3</p> <p>Projects reflect sound engineering and business decisions – A1</p> <p>Commissioning tests are documented and completed – A1</p> <p>Ongoing legal / environmental / safety obligations of the asset owner are assigned and understood – A1</p>	<p>Asset Creation/Acquisition</p> <ul style="list-style-type: none"> The need for new assets is primarily driven by new customer connections and their respective loads. There is currently 5 commercial customers connected to the Peel network. Customer load requirements are used to determine the utilisation and effectiveness of existing assets. As an example, a recent assessment concluded that a particular client would need a 1MVA transformer, which is beyond the capacity of what the existing transformer(s) can provide. Therefore, PRE are planning to purchase the 1MVA transformer through a market engagement process. The AMP comprehensively documents the processes for the procurement of assets. How assets acquisition/creation links with an asset register is however not detailed. The initial electrical infrastructure was developed and implemented by DevelopmentWA, and subsequently transferred to PRE as the asset owner. PRE undertook a due diligence exercise on the adopted assets to ensure they are fit for purpose and sound engineering principals and standards were applied during its design and construction. e.g., testing records, commissioning records, operational handover documents etc were evidenced. Input from technical consultants (such as Sunrise Energy, CKE, and Lavan) is involved regularly in the decision-making process. Correspondence and minutes of meetings provided by PRE demonstrates evaluations being performed prior to asset acquisition. The asset details are captured on design drawings, primary assets spreadsheet and secondary assets register in the Trunk software system. No significant additional purchases were made for the network. NOTE: GHD considers the purchase of the generation assets e.g., solar farm, BESS as significant; however, these assets are outside the scope of this review. PRE's parent company's internal cost controllers are the main drivers for cost evaluation of new projects and developments within the business park. PRE follow their parent company's corporate financial policies with regards to project planning and purchasing. Life cycle costs have been assessed for assets adopted from DevelopmentWA; no other major asset were procured during the audit period. The AMP articulates the process for calculating life cycle costing which needs to be applied to the purchase of subsequent assets and assessed as part of the next audit period. <p>Commissioning</p> <ul style="list-style-type: none"> PRE's commissioning procedures ensure the network complies with legislation and licence requirements. This is achieved with a series of commissioning checklists. The AMP outlines that all testing, design changes, safety controls and regulatory compliance are to be approved prior to commissioning. PRE have provided commissioning documents including test sheets, completed 	<p>Interview with Compliance Officer, General Manager Operations & Engineering, General Manager, Nilsen High Energy Technician, Jarrah Director and CKE Engineer conducted 26 April 2022</p> <p>Interview with Compliance Officer, General Manager Operations & Engineering and General Manager conducted 28 April 2022</p> <p>Asset Management Plan BMSDOC-18-1983 Version 2.0 26 May 2021</p> <p>Western Power Test Report by Michael Close – Nilsen</p> <p>Site Acceptance Test Report by Michael Close – Nilsen</p> <p>Network Performance and Planning Criteria Manual - NNPC (Peel) BMSDOC-18-2210 Version 3.0 20 April 2022</p> <p>High Voltage Microgrid Operation Manual - PRE</p>

Asset Management Process / Effectiveness Criteria	Observations / Comments	Evidence
	<p>commissioning forms for Western Power ensuring compliance and a site acceptance test (SAT) report by Nilsen. The SAT report details the SATs performed in line with relevant standards for all the assets including RMU, transformers and cables.</p> <ul style="list-style-type: none"> • Development of maintenance plans and schedules are done by Nilsen and Jarrah Solutions. • Multiple documents provided by PRE outline their acknowledgement and compliance with legal, environmental and safety obligations. This includes but is not limited to: <ul style="list-style-type: none"> ○ Asset Management Plan ○ Network Performance and Planning Criteria Manual ○ High Voltage Microgrid Operation Manual ○ Emergency Management Plan ○ Health Safety Environmental Management Plan ○ Environmental Policy • Commissioning documents such as test reports also outline compliance with relevant standards and safety requirements. 	<p>BMSDOC-18-1987 Version 3.0 5 November 2020</p> <p>Emergency Management Plan (EMP) PRE BMSDOC-18-1969 Version 3.0 18 May 2021</p> <p>Health Safety Environmental Management Plan (HSEMP) – Peel Renewable Energy MSDOC-18-2038 Version 4.0 13 May 2021</p> <p>Environment Policy BMSDOC-18-2283 Version 2 26 November 2020</p> <p>Compliance Plan Policy – PEEL BMSDOC-18-2282 Version 2.0 26 November 2020</p> <p>Health and Safety Policy - BMSDOC-18-2284 Version 2.0 26 November 2020</p> <p>Quality Policy BMSDOC-18-2286 Version 2.0 26 November 2020</p>

Asset Management Process / Effectiveness Criteria	Observations / Comments	Evidence
		<p>Risk Management Policy BMSDOC-18-503 Version 2.0 26 Novemeber 2020</p> <p>Completed Distribution Commissioning Forms</p>
<p>3. Asset Disposal – Overall Rating: B1</p>		
<p>Under-utilised and under-performing assets are identified as part of a regular systematic review process – A1</p> <p>The reasons for under-utilisation or poor performance are critically examined and corrective action or disposal undertaken – NR</p> <p>Disposal alternatives are evaluated – C1</p> <p>There is a replacement strategy for assets – C1</p>	<p>Overview</p> <ul style="list-style-type: none"> The business park is currently under development and most assets have been in operation for less than 2 years. As such, PRE assets have yet to undergo the asset disposal process. The AMP outlines a process for the decommissioning, demolition, abandonment and/or disposal of assets. Decommissioning of assets being replaced or renewed is included in the annual capital and maintenance program planning. The AMP notes that asset management and maintenance systems are regularly updated with decommissioned and abandoned assets; however, this is not yet applicable to the site. The primary means through which asset performance is assessed is through scheduled maintenance checklists. Asset utilisation is monitored through the SCADA system and historical load data is recorded. The data can be analysed to identify asset utilisation optimisation strategies for future application; though, GHD is of the opinion that current installed assets are fit for purpose and to WA Distribution Design standards. <p>Performance</p> <ul style="list-style-type: none"> A dedicated replacement or decommissioning strategy has not been documented; however, the AMP notes that procedures for decommissioning assets will be developed as required. Consideration and evaluation of disposal alternatives are not outlined in the AMP; however, assessment and management of environmental impact of disposal is accounted for. The AMP states that “Asset management and maintenance systems are regularly updated with decommissioned and abandoned assets”, however it is unclear which systems and registers is being referred to. A comprehensive suite of maintenance check sheet templates was developed and evidenced for the key electrical assets. Maintenance checklists include checks for performance and utilisation indicators. For example, substation battery cell voltage against specifications and functionality testing at intervals. Maintenance schedule is maintained and documented by Nilsen and Jarrah Solutions 	<p>Interview with Compliance Officer, General Manager Operations & Engineering, General Manager, Nilsen High Energy Technician, Jarrah Director and CKE Engineer conducted 26 April 2022</p> <p>Asset Management Plan BMSDOC-18-1983 Version 2.0 26 May 2021</p> <p>Maintenance Checklist for Substation Battery Equipment (PEEL) BMSDOC-18-2207 10 June 2021</p> <p>Electrical Equipment List by CKE 1917-ELI-04 V6 8 March 2022</p> <p>Jarrah Asset List exported from Trunk - Trunk_AssetList_20220426_ShortenedModels (Jarrah) 26 April 2022</p>

Asset Management Process / Effectiveness Criteria	Observations / Comments	Evidence
	<ul style="list-style-type: none"> GHD has evidenced completed check sheets for a sample of the assets. No defects of corrective actions were noted. Because the site is relatively new, many of the recommended testing intervals are beyond the current age of the asset life. Nilsen and Jarrah have however completed detailed SAT and commissioning records to demonstrate the adequacy asset performance. 	<p>Populated LV cable Maintenance Checklists – FSD-TX.LOT038 September 2021 by Nilsen</p>
4. Environmental Analysis – Overall Rating: B2		
<p>Opportunities and threats in the system environment are assessed – B3</p> <p>Performance Standards (availability of service, capacity, continuity, emergency response etc.) are measured and achieved – A1</p> <p>There is compliance with statutory and regulatory requirements – A1</p> <p>Customer service levels have been achieved – A1</p>	<p>Overview</p> <ul style="list-style-type: none"> PRE undertook a Formal Safety Assessment (FSA) of the Network in compliance with AS5577. As part of the FSA, risk related to the asset environment is assessed and quantified. The FSA underpinned the development of other key documents, of which some are: <ul style="list-style-type: none"> Maintenance Strategy High Voltage Micro Grid operation manual Safe Design Procedures Purchasing Policy Project Management Procedures Emergency Management Plan Compliance Management System Annual Audit Plan Asset Management Systems and Processes Outage, Reliability and Power Quality Management Plan The Healthy Safety Environmental Management Plan (HSEMP) is based on AS/NZS ISO 14001. The HSEMP has a section outlining environmental controls to minimise identified potential impacts. The HSEMP however does not define opportunities and threats, only environmental impacts. <p>Performance</p> <ul style="list-style-type: none"> Assets are monitored and controlled through a SCADA system licenced by Jarrah Solutions to which PRE is an annual subscriber. The SCADA system interfaces with protection devices that report on a suite of asset related data, which include: active and reactive power flow, breaker and isolator status, protection operation etc. Alarms are programmed to annunciate under abnormal system conditions. Event records are also stored by the protection relays which allows post-incident investigations to occur. All incidents related to system faults to date have been investigated by Jarrah solutions with learnings applied to optimise the performance of the system. The investigations are very thorough and comprehensive; however, the incident investigation process not documented and information is captured communicated via email. The PRE network is planned, designed and operated withing the criteria defined in the Network Performance and Planning Criteria. This document has been prepared to maintain consistency with the WADCM. This is to help ensure customers within business park have a comparable set of conditions, processes and requirements to those connecting to the Western Power network. 	<p>Peel Environmental Policy BMSDOC-18-2283 Version 2 26 November 2020</p> <p>Emergency Management Plan (EMP) PRE BMSDOC-18-1969 Version 3.0 18 May 2021</p> <p>Interview with Compliance Officer, General Manager Operations & Engineering, General Manager, Nilsen High Energy Technician, Jarrah Director and CKE Engineer conducted 26 April 2022</p> <p>Health Safety Environmental Management Plan (HSEMP) – Peel Renewable Energy MSDOC-18-2038 Version 4.0 13 May 2021</p>

Asset Management Process / Effectiveness Criteria	Observations / Comments	Evidence
	<ul style="list-style-type: none"> • PRE's key performance standards have been outlined in the AMP. PRE have defined the metrics by which these elements are measured and achieved. Table 1 in the AMP defines operational performance indicator targets and outlines a monthly reporting process where these performance indicators are being met. <ul style="list-style-type: none"> ○ These reports are populated on a monthly basis by PRE's contractors, namely Jarrah, Nilsen and CKE, capturing service level KPIs such as lost time and energy outages. • Based on records from WinConnect , which is also PRE's customer management agent, there have been no customer complaints over the audit period with regards to power supply. • PRE have developed a Compliance Management System which includes references to applicable standards, codes, and guidelines. The AMP also outlines specific power quality standards that must be monitored by Jarrah Solutions through the Trunk software. 	
5. Asset Operations – Overall Rating: B2		
<p>Operational policies and procedures are documented and linked to service levels required – A1</p> <p>Risk management is applied to prioritise operations tasks – A3</p> <p>Assets are documented in an Asset Register including asset type, location, material, plans of components, an assessment of assets' physical/structural condition and accounting data – C3</p> <p>Accounting data is documented for assets – A1</p> <p>Operational costs are measured and monitored – A1</p>	<p>Operational Overview</p> <ul style="list-style-type: none"> • PRE (a subsidiary of Parent Company) has a physical connection with Western Power's 22 kV distribution network. Electricity is procured by PRE from Synergy under an electricity supply agreement. Electricity is then retailed to PRE customers. Electricity is also generated by the behind-the-meter microgrid which feeds into the main 22 kV switchboard; which offsets the electricity supply from the network. <p>Load is distributed from by two underground 22 kV circuits which reticulates throughout the Peel Business Park (PBP) to several 22kV/415V distribution transformers. Individual sites within the PBP are supplied by radial underground low voltage cables from these distribution substations and related switchgear.</p> <ul style="list-style-type: none"> • The generation assets are owned by a Peel Renewable Energy Genco Pty Ltd, a separate parent company subsidiary. Review of generation assets is outside of this scope of this audit. • The customer metering arrangement is under a service agreement with Synergy whereby the customer meters are supplied by Synergy and then installed, commissioned and by PRE. Metering data is sent from Synergy to PRE's billing agent, WinConnect , which provides customer billing and care services for PRE. • Financial data based on customer metering is submitted to their parent company's corporate financial sector from WinConnect where it is reconciled. • The PRE major asset base comprises the following: <ul style="list-style-type: none"> ○ A 1MW solar farm and storage using 2MWh of battery (not part of this review) ○ One Main HV Switchboard - with the two incoming 22kV supplies from the Western power network and two outgoing circuits-breakers and one generation incomer circuit breaker for control/protection of the Network. ○ Four single-transformer 22kV/LV, 630 kVA distribution substations with associated LV switchboards. ○ Underground cable networks ○ Metering units 	<p>Interview with Compliance Officer, General Manager Operations & Engineering, General Manager, Nilsen High Energy Technician, Jarrah Director and CKE Engineer conducted 26 April 2022</p> <p>Interview with Compliance Officer, General Manager Operations & Engineering and General Manager conducted 28 April 2022</p> <p>Asset Management Plan BMSDOC-18-1983 Version 2.0 26 May 2021</p> <p>PEEL Microgrid Project – Enterprise Risk Register Dated 19 Sept 2019</p> <p>High Voltage Microgrid Operation Manual - PRE</p>

Asset Management Process / Effectiveness Criteria	Observations / Comments	Evidence
<p>Staff resources are adequate, and staff receive training commensurate with their responsibilities – A1</p>	<p>Operational Procedures and Interface</p> <ul style="list-style-type: none"> PRE has a High Voltage Microgrid Operation Manual which outlines the minimum required works for the safe plant operations, maintenance, and repairs. Operational requirements are detailed in the Network Performance and Planning Criteria Manual. The Network Performance and Planning Criteria Manual sets out specific power quality and operational limits of the network and outlines the planning criteria to achieve these service levels. The SCADA system (Trunk) is the site's operational interface and provides real-time monitoring information, data trending, alarming and reporting, which is backed up by a dual server. Trunk also documents operations as the plant historian. There is a SCADA station locally on site which visually display the plant operational status, however limited control of the plant can be performed remotely. Control of the site is fully autonomous via RTU and PLC control. PRE have outlined the metrics to be measured which defines their service levels and operation performance indicators and targets. The Trunk system actively and continuously monitors these levels and has sufficient reporting and notification capabilities to capture performance. There is no single consolidated asset register. Primary assets are registered by CKE using a spreadsheet. Secondary assets are registered in the Trunk software system. Trunk hosts sufficient information to generate an asset list, and assets have a unique identifier, and other asset details e.g., asset description and manufacturer. A separate primary equipment list is maintained by CK Engineering. Neither register accommodates entry of specific asset management details e.g., maintenance schedule, asset performance. However, the reporting process for performance is captured in the monthly operational performance indicators schedule. <p>These two documents are maintained and updated independently. The asset register by CKE records asset location and subcomponents but no condition information. PRE has not provided a master asset register that is updated alongside maintenance and operations activities. The current lists also do not record condition and accounting data.</p> <ul style="list-style-type: none"> The Enterprise Risk Register has identified and assessed operational risks of the Microgrid with control actions outlining accurate modelling and operational and maintenance programs to ensure reliability and performance of supply. This risk register only identifies operational risks on a whole site basis and does not outline risks on a per asset basis or per operational task basis. PRE does maintain a Priority Restoration Register, which specifies the priority order of customer power supply restoration based on customer type. <p>Contactors and Staffing</p> <ul style="list-style-type: none"> PRE's parent company underwent a typical tendering process to procure contractors for network operation and maintenance. Jarrah Solutions and Nielsen were appointed following a successful tender process. 	<p>BMSDOC-18-1987 Version 3.0 5 November 2020</p> <p>Network Performance and Planning Criteria Manual – NNPC (Peel) BMSDOC-18-2210 Version 3.0 20 April 2022</p> <p>Priority Restoration Register Updated 12 March 2022 Approved by General Manager</p> <p>Electrical Equipment List by CKE 1917-ELI-04 V6 8 March 2022</p> <p>Jarrah Asset List exported from Trunk - Trunk_AssetList_20220426_ShortenedModels (Jarrah) 26 April 2022</p> <p>1917-ELI-04 Electrical Equipment List_6 (CK).xlsm CKE Equipment List Ver 6.0 8-Mar-22</p> <p>Email correspondence from Compliance Officer: PRE Audit - Asset Acquisition Process 10 May 2022</p>

Asset Management Process / Effectiveness Criteria	Observations / Comments	Evidence
	<ul style="list-style-type: none"> ○ Jarrah Solutions is responsible operation and maintenance of secondary equipment e.g., SCADA systems, protection relays, control and communications equipment etc. ○ Nielsen is responsible operation and maintenance of primary equipment e.g., transformers, switchboards, cables, ring main units etc. <p>Both contractors are under service level agreements with PRE.</p> <ul style="list-style-type: none"> ● Operation of the site is fully autonomous, with monitoring performed by Jarrah Solutions through the Trunk system. ● Nilsen, Jarrah and CKE Engineering are required to submit monthly reports to PRE which is the primary method PRE assesses Contractor KPIs. ● Currently, this arrangement with various contractors results in effective operation of the microgrid. PRE require minimal staffing to operate the site. Meetings are conducted weekly with the technical consultants present to monitor ongoing operation of the assets. The Trunk system is also tested regularly by general managers from both PRE and the parent company. Furthermore, PRE uses a Training and Competency Matrix which outlines required certifications, training and training frequency for key operation positions. 	<p>Populated Contractor Monthly KPI Record – March 2022 – Jarrah Solutions Pty Ltd</p> <p>Populated Contractor Monthly KPI Record – March 2022 – CKE Australia Pty Ltd</p> <p>Populated Contractor Monthly KPI Record – March 2022 – Nilsen WA</p> <p>Training and Competency (Peel) BMSDOC-18-2508 Version 1</p>
6. Asset Maintenance – Overall Rating: A2		
<p>Maintenance policies and procedures are documented and linked to service levels required – A1</p> <p>Regular inspections are undertaken of asset performance and condition – A1</p> <p>Maintenance plans (emergency, corrective, and preventative) are documented and completed on schedule – A1</p> <p>Failures are analysed and operational / maintenance</p>	<p>Overview</p> <ul style="list-style-type: none"> ● Primary electrical asset maintenance is contracted to Nilsen. Nilsen is responsible for developing maintenance plans and schedules for the respective assets. The minimum requirement for maintenance is outlined in the High Voltage Microgrid Operation Manual. PRE has a maintenance strategy and maintenance check sheets which defines and captures Nilsen’s maintenance activities. These check sheets also have nominated frequency periods for their maintenance activities. <p>Maintenance check sheets include requirements for periodic performance and functional testing. PRE have provided samples of completed checklists for assets, including checks for asset condition and performance. Some tests are not yet due as the frequency period is still beyond the current asset life.</p> <ul style="list-style-type: none"> ● There is also an online system, maintained by Jarrah, that can track and record maintenance activities. Through this system, test certificates can be generated. ● The AMP describes the use of a Corrective Action Register. This register is maintained by their parent company and is part of a master corrective action register for all of the parent company’s operations. Nilsen’s maintenance activities capture ongoing testing, condition and performance monitoring which serves as a preventative maintenance for the network assets. ● PRE have developed an Emergency Management Plan which details personnel arrangements, to ensure continued operation and maintenance. The Emergency Management Plan also sets out corrective and preventative measures to maintain operations. 	<p>Interview with Compliance Officer, General Manager Operations & Engineering, General Manager, Nilsen High Energy Technician, Jarrah Director and CKE Engineer conducted 26 April 2022</p> <p>Interview with Compliance Officer, General Manager Operations & Engineering and General Manager conducted 28 April 2022</p> <p>Asset Management Plan BMSDOC-18-1983 Version 2.0 26 May 2021</p>

Asset Management Process / Effectiveness Criteria	Observations / Comments	Evidence
<p>plans adjusted where necessary – B2</p> <p>Maintenance costs are measured and monitored – A1</p> <p>The current staffing arrangements and responsibilities adequate for effective asset maintenance – A1</p>	<p>Maintenance Activities</p> <ul style="list-style-type: none"> Maintenance of all assets is conducted by Nilsen as scheduled. Documentation and tracking maintenance activities are done by Nilsen. Network faults are typically investigated by Jarrah, with report generated to be in line with their parent company’s Incident Investigation procedure. Where necessary, mitigation and prevention strategies are developed in response. PRE uses maintenance checklists which need to be populated by Nilsen when performing maintenance. These checklists nominate the maintenance period against all sub actions for each asset. These maintenance periods are mainly based on asset criticality and risk. However, no formal assessment has been performed to determine priority order for maintenance tasks. Nilsen produce a monthly report capturing their activities within the business park. These are used to monitor KPIs. Nilsen are contracted specifically for site maintenance and have sufficient access and capabilities for effective asset maintenance. Nilsen was contracted by PRE following their parent company’s corporate tendering process to ensure suitable capabilities for network maintenance. The key limitation of having Nilsen as maintenance staff is that they do not have access to Trunk and must rely on drawings and design documents. 	<p>Site visit conducted on 29th April 2022 at Peel Business Park with General Manager.</p> <p>PEEL Microgrid Project – Enterprise Risk Register Dated 19 Sept 2019 Formal Safety Assessment 11 June 2020</p> <p>Network Performance and Planning Criteria Manual - NNPC (Peel) BMSDOC-18-2210 Version 3.0 20 April 2022</p> <p>Maintenance Checklists for Low Voltage Cable Completed by Trevor Smith 1 September 2021</p> <p>Emergency Management Plan (EMP) – PRE BMSDOC-18-1969 Version 3.0 18 May 2021</p> <p>HV LV and Solar Generations Maintenance Strategy (PEEL) BMSDOC-18-2021 15 June 2021</p>
<p>7. Asset Management Information System – Overall Rating: B2</p>		
<p>Adequate system documentation for users and IT operators – C3</p>	<p>Information Systems</p>	<p>Interview with Compliance Officer, General Manager Operations & Engineering,</p>

Asset Management Process / Effectiveness Criteria	Observations / Comments	Evidence
<p>Input controls include appropriate verification and validation of data entered into the system – B3</p> <p>Logical security access controls appear adequate, such as passwords – A1</p> <p>Physical security access controls appear adequate – A1</p> <p>Data backup procedures appear adequate - A1</p> <p>Key computations related to licensee performance reporting is materially accurate – A1</p> <p>Management reports appear adequate for the licensee to monitor licence obligations – A1</p>	<ul style="list-style-type: none"> PRE outsources the network operational interface to Jarrah Solutions. Jarrah Solutions administers its own QA/QC procedures to authenticate and verify input, followed by onsite validation of system components and parameters through commissioning and maintenance procedures. A primary asset register is also maintained by CKE in excel format. The .xlsm file is current and there is evidence that a QA/QC process is undertaken to validate data entries. The document is version controlled and changes corresponds to design drawings. However, this is inconsistency between the numbering convention used to assign asset identification numbers in the .xlsm file and Trunk. For example, the 22kV breakers listed in the .xlsm file and Trunk differ. An asset number standard has not been developed. Jarrah Solutions provide a propriety SCADA system called Trunk which is used to monitor the system and record operational data. The Trunk system uses dual servers to backup operational data and has a UPS. This site operations are not dependent on the 100% availability of Trunk, as the site is designed to operate autonomously. Manual on-site intervention by operators is allowed for in the event that Trunk is out of service. There has been at least one instance where Trunk was down due to a fault communication link. <p>Security</p> <ul style="list-style-type: none"> Username and password authentication is required for access to Trunk. With administration access belonging to Jarrah Director and approval from General Manager (PRE). There are varying degrees of access, such as read/control privileges for users which is moderated by the administrator. The 22 kV switchboard and control equipment are housed in a secure substation building. Entry can only be gained by authorised personnel with issued keys to the building locks. Entry and exit of personnel are logged using a sign in sheet. External distribution assets are secured similar to how typical Western Power assets are secured. Opening of switchgear can only be done by authorised personnel with access keys. <p>Data entry and validation</p> <ul style="list-style-type: none"> Customer meter commissioning, installation, calibration and maintenance falls under the service agreement with Synergy. PRE still maintains ownership over the customer meters. Synergy reads all customer metering data remotely which is then ported to Synergy's internal data management system: SAP. Synergy then sends this data to PRE's billing agent, WinConnect , which stores all the data on PRE's behalf and performs their billing services accordingly. <p>WinConnect will validate the data sent from Synergy and raise issues to Synergy to ensure it is materially accurate. Synergy will then perform a review of the data provided and perform a retrospective check to verify the accuracy of the data. After billing the customers, all accounts are reconciled by their parent company's cost controllers.</p> <p>Management Reports</p> <ul style="list-style-type: none"> There is no explicit documentation detailing the operational interface services between PRE and Jarrah Solutions. It is unclear how the operational interface would be maintained if, for whatever reason, the 	<p>General Manager, Nilsen High Energy Technician, Jarrah Director and CKE Engineer conducted 26 April 2022</p> <p>Interview with Compliance Officer, General Manager Operations & Engineering and General Manager conducted 28 April 2022</p> <p>Asset Management Plan BMSDOC-18-1983 Version 2.0 26 May 2021</p> <p>PEEL Micro Grid Project – Enterprise Risk Register.xlsm</p> <p>Jarrah Asset List exported from Trunk - Trunk_AssetList_20220426_ShortenedModels (Jarrah) 26 April 2022</p> <p>1917-ELI-04 Electrical Equipment List_6 (CK).xlsm CKE Equipment List Ver 6.0 8-Mar-22</p>

Asset Management Process / Effectiveness Criteria	Observations / Comments	Evidence
	<p>service level agreement with Jarrah Solutions were to be discontinued or an alternate supplier were to be onboarded. This risk has not been quantified or contingency plan developed.</p> <ul style="list-style-type: none"> • Meetings for business park operations and development are conducted weekly and recorded to track tasks. There are also monthly reporting schemes for PRE's financial budget and PRE's contractor KPIs. • Maintenance activities have been performed on schedule by Nilsen with adequate reporting via checklists and all incidents are adequately investigated and reported on by Jarrah. 	
8. Risk Management – Overall Rating: B2		
<p>Risk management policies and procedures exist and are being applied to minimise internal and external risks associated with the asset management system – A3</p> <p>Risks are documented in a risk register and treatment plans are actioned and monitored – C3</p> <p>The probability and consequence of risk failure are regularly monitored – A3</p>	<ul style="list-style-type: none"> • PRE leverages their parent company's mature, comprehensive and well documented Risk Management Policy and Framework. • This framework was applied during Peel Microgrid pre-development and construction phase of the projects. Relevant registers include the FSA and Enterprise Risk Register. Development and project risks were identified, quantified, controls established, and residual risk calculated. Evidence of mitigations plans actioned include, but is not limited to, emergency management plan and HSEMP. • However, the requirement for ongoing application of risk management processes to asset management activities was not evidenced, which include: <ul style="list-style-type: none"> ○ Asset failure risk ○ Operational risk ○ Maintenance risk ○ Asset environment risk ○ Asset management system risk 	<p>Interview with Compliance Officer, General Manager Operations & Engineering, General Manager, Nilsen High Energy Technician, Jarrah Director and CKE Engineer conducted 26 April 2022</p> <p>Interview with Compliance Officer, General Manager Operations & Engineering and General Manager conducted 28 April 2022</p> <p>Asset Management Plan BMSDOC-18-1983 Version 2.0 26 May 2021</p> <p>Site visit conducted on 29th April 2022 at Peel Business Park with General Manager.</p> <p>Enwave PEEL – FSA Electrical.xlsx 11 June 2020</p> <p>PEEL Micro Grid Project – Enterprise Risk Register.xlsm</p>

Asset Management Process / Effectiveness Criteria	Observations / Comments	Evidence
		<p>Email correspondence from Compliance Officer: PRE Audit - Asset Acquisition Process 10 May 2022</p>
<p>9. Contingency Planning – Overall Rating: A3</p>		
<p>Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks – A3</p>	<ul style="list-style-type: none"> PRE has an emergency management plan which outlines actions in the event of loss of supply and third-party damage. The Emergency Management Plan details emergency response personnel (a combination of PRE and contractor resources). The plan also sets out provisions seeking state or interstate entities based on the nature of the emergency. The plan also mentions a Duty Officer on call 24 hours, 7 days a week, responsible for operational control of the network and mobilising necessary resources for maintaining operation and maintenance activities and emergency response. An emergency exercise was scheduled to be conducted to assess PRE's emergency preparedness by their parent company, however, these have been delayed multiple times due to COVID restrictions by the state government and has not been conducted for this audit period. The Trunk system also has automated notifications based on system faults identified by the system monitoring software. The Trunk system operates according to the SCADA Alert Notification Process document provided by PRE. The Trunk system uses an automated paging system to send alert messages to management staff. The alert process has set procedures and points of contact based on the criticality of the alarm; on-call technicians are contacted if a response is not acknowledged within a specified timeframe. An emergency phone number is also publicly listed online for customer reported emergencies and reporting which is directed to the National Emergency Centre. The Emergency Centre will then work its way down a roster of staff to escalate issues. 	<p>Interview with Compliance Officer, General Manager Operations & Engineering, General Manager, Nilsen High Energy Technician, Jarrah Director and CKE Engineer conducted 26 April 2022</p> <p>Interview with Compliance Officer, General Manager Operations & Engineering and General Manager conducted 28 April 2022</p> <p>Asset Management Plan BMSDOC-18-1983 Version 2.0 26 May 2021</p> <p>Emergency Management Plan (EMP) – PRE BMSDOC-18-1969 Version 3.0 18 May 2021</p> <p>Peel Renewable Energy – SCADA Alert Notification Process 18 February 2021</p>
<p>10. Financial Planning – Overall Rating: A2</p>		
<p>The financial plan states the financial objectives and</p>	<p>Overview</p>	<p>Interview with Compliance Officer, General Manager</p>

Asset Management Process / Effectiveness Criteria	Observations / Comments	Evidence
<p>strategies and actions to achieve the objectives – A1</p> <p>The financial plan identifies the source of funds for capital expenditure and recurrent costs – A1</p> <p>The financial plan provides projections of operating statements (profit and loss) and statement of financial position (balance sheets) – A1</p> <p>The financial plan provides firm predictions on income for the next five years and reasonable indicative predictions beyond this period – A2</p> <p>The financial plan provides for the operations and maintenance, administration and capital expenditure requirements of the services – A1</p> <p>Significant variances in actual / budget income and expenses are identified and corrective action taken where necessary – B2</p>	<ul style="list-style-type: none"> Financial planning for the network is encapsulated under their parent company’s corporate financial strategy and policies. Their parent company serves as the predominant source of funds for capital expenditure and operational costs. According to the AMP, an annual budget is produced and review and approved by the parent company board. To monitor variances in budget and actual expenditures, a monthly expenditure report is submitted to the parent company by PRE and reviewed by parent company cost controllers and is subject to their financial review processes and procedures. All customer billing is also reconciled by the parent company. Furthermore, the AMP defines a Corrective Action Register to be maintained by PRE for issues raised requiring corrective action, however this would be separate their parent company’s processes and outputs. There is a “Financial” section in the AMP which details PRE’s procedure for financial management of the network. This strategy outlines a requirement to record maintenance expenditure. According to the AMP, a financial plan is forecasted for the year and approved by the parent company board. The AMP is developed cover a period of 5 years from 1 October 2019 until 30 Sep 2024 with general forecasts being reviewed annually. An annual budget is prepared annually which is reviewed and approved by their parent company. This budget includes operating and maintenance costs as well as engineering and sundry costs. A financial report was evidenced which states the financial position of PRE A long-term forecast has been evidenced, including projected long term (+5 years) costs. Standard management reporting practices are used to track budget against actual expenditure by their parent company. The parent company also has a financial accountant which reviews the budget with PRE (General Manager) monthly. These discussions coincide with monthly expenditure reports prepared by the parent company to be reviewed by their board. Actual v forecasted revenue is tracked on a monthly and annual basis on the profit and loss statement. The most material variance recorded relates to insurance expenses. The insurance expense does not appear to be re-forecasted to more accurate values in subsequent months. 	<p>Operations & Engineering, General Manager, Nilsen High Energy Technician, Jarrah Director and CKE Engineer conducted 26 April 2022</p> <p>Asset Management Plan BMSDOC-18-1983 Version 2.0 26 May 2021</p> <p>Statement of Profit and Loss Report April 2022.</p> <p>31 and 32 PEEL and PEEL GENCO BUDGET2.xlsx Budget Report Updated 10 June 2021</p> <p>Email correspondence from Compliance Officer 16 May 2022.</p>
<p>11. Capital Expenditure Planning – Overall Rating: B2</p>		
<p>There is a capital expenditure plan that covers issues to be</p>	<ul style="list-style-type: none"> Capital expenditure planning falls under their parent company’s corporate financial reporting process. CAPEX and OPEX information as part of a business case are to be prepared and submitted to their 	<p>Interview with Compliance Officer, General Manager Operations & Engineering,</p>

Asset Management Process / Effectiveness Criteria	Observations / Comments	Evidence
<p>addressed, actions proposed, responsibilities and dates – B2</p> <p>The plan provides reasons for capital expenditure and timing of expenditure – B1</p> <p>The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan – B2</p> <p>There is an adequate process to ensure that the capital expenditure plan is regularly updated and actioned – B2</p>	<p>parent company for approval, with a report being required if expenditure exceeds the DFA limit. Over the asset creation and acquisition process, life cycle costs have not been considered.</p> <ul style="list-style-type: none"> PRE's capital expenditure strategy until 2024 is outlined in the AMP. At this time, there are minimal considerations to augmentation or refurbishment. This section of the AMP does not identify specific expenditures or timing and reasoning for expenditure. The section in the AMP rather outlines PRE's overall strategy and approach. No reference to a specific financial or budgeting plan is defined in the AMP. PRE has provided correspondence showing the capital expenditure process, including approval, for new assets. In this process, reasons for expenditure, issues to be addressed, actions proposed, responsibilities and timeline have been identified in line with industry best practice. This process for asset creation and capital expenditure proceeds through email correspondence and meetings rather than a formalised documentation process, with final approval from their parent company. An operations and maintenance meeting to discuss the network planning and business development takes place weekly with technical consultants present where required. Minutes from these meetings also includes business case development and CAPEX planning and approvals. A detailed budget report has been evidenced, which includes a projected capital expenditure schedule with estimated quantities and timing, maintenance capital expenditures has also been evidenced, however, this is an estimated proportion of CAPEX of assets rather than considering the asset life and condition. Due to the developing nature of the network, the AMP CAPEX strategy states that a broad approach is taken with existing assets life and condition with respect to augmentation and refurbishment until 2024. Otherwise, there is no dedicated Capital Expenditure Plan to compare with the AMP's operation and maintenance strategy for asset life cycle. 	<p>General Manager, Nilsen High Energy Technician, Jarrah Director and CKE Engineer conducted 26 April 2022</p> <p>Interview with Compliance Officer, General Manager Operations & Engineering and General Manager conducted 28 April 2022</p> <p>Asset Management Plan BMSDOC-18-1983 Version 2.0 26 May 2021</p> <p>Minutes of Meeting number 2 conducted on 06 April 2020</p> <p>31 and 32 PEEL and PEEL GENCO BUDGET2.xlsx Budget Report Updated 10 June 2021</p> <p>Email correspondence from Compliance Officer: PRE Audit - Asset Acquisition Process 10 May 2022</p>
<p>12. Review of AMS – Overall Rating: A2</p>		
<p>A review process is in place to ensure that the asset management plan and the asset management system described therein are kept current – A2</p>	<ul style="list-style-type: none"> PRE's parent company has a document management system which tracks regular reviews of key asset documents such as the AMP, Network Performance and Planning Criteria Manual, Health Safety Environmental Management Plan among other documents that contribute to PRE's asset management planning. The parent company have a nominated document controller who monitors review due dates, alongside this, departments within the parent company responsible for key documents, such as Health and Safety will review relevant documents proactively. As mentioned in the asset planning effectiveness criteria, some key documents reviews are outstanding based on the versions provided for this audit. 	<p>Interview with Compliance Officer, General Manager Operations & Engineering, General Manager, Nilsen High Energy Technician, Jarrah Director and CKE Engineer conducted 26 April 2022</p>

Asset Management Process / Effectiveness Criteria	Observations / Comments	Evidence
<p>Independent reviews (e.g., internal audit) are performed of the asset management system – B3</p>	<ul style="list-style-type: none"> Jarrah's Tunk serves as PRE's primary asset management system. Jarrah complies with PRE's monthly reporting structure, documenting all of PRE's KPIs with respect to their service levels. This is done alongside PRE's other contractors that contribute to asset management, such as Nilsen for maintenance and CKE for operations and design. The AMP also outlines drills, tests and exercises for emergency preparedness. These exercised have yet to be performed during the audit period due to delays caused by the COVID pandemic restricting interstate travel. Furthermore, an internal or external audit of the Trunk system has not been performed. Trunk is however a regular item on the weekly meeting agenda, wherein the effectiveness if the system is tested on a regular basis by their parent company and PRE general managers 	<p>Interview with Compliance Officer, General Manager Operations & Engineering and General Manager conducted 28 April 2022</p> <p>Email correspondence from Compliance Officer 16 May 2022</p>

5. Recommendations

5.1 Licence Condition Compliance and Control Audit

Table 11 Licence Condition Compliance and Control Audit Recommendations Summary

No	Description	Recommendations	No.
411	Electricity Industry Metering Code, clause 5.20(1) A network operator must, by not later than 6 months after the date this Code applies to the network operator, develop, in accordance with the communication rules, an Energy Data Verification Request Form.	PRE to develop Energy Data Verification Request Form to facilitate its customer to request verification of energy data in accordance to Metering Code clause 5.20. PRE may need to work together with WINconnect to develop this or delegate it to them.	9/2022
412	Electricity Industry Metering Code, clause 5.20(2) An Energy Data Verification Request Form must require a Code participant to provide the information prescribed.	PRE to develop Energy Data Verification Request Form to facilitate its customer to request verification of energy data in accordance to Metering Code clause 5.20. The Form must request NMI, checksum for the connection point, reason for the request, time period for interval meter and any relevant information.	10/2022
448B	Electricity Industry Metering Code, clause 6.18 A network operator must publish the document within 10 business days after notification of the ERA's approval under subclauses 6.13(1)(a)(i), 6.16 or 6.17.	Publish the documents as per the Metering Code clause 6.18. Refer to the definition and interpretation of words 'documents' and 'publish' in the Metering Code.	11/2022

5.2 Asset Management Review

All recommendations in Table 12 have not yet been addressed by the Licensee. As per the ERA guidelines, recommendations are only given to performance ratings of 3 and 4 or process and policy ratings of C and D.


Table 12 AMS Review Recommendations Summary

Effectiveness Criteria	Rating	Recommendation	No/Year
Asset Planning			
Likelihood and consequences of asset failure are predicted	B3	PRE should leverage the parent company's comprehensive risk management framework and apply this to the regular assessment of risk (including threats and opportunities where applicable) related to the following: <ul style="list-style-type: none"> Asset failure risk Operational risk Maintenance risk Asset environment risk Asset management system risk The outcome and ongoing treatment of these assessments should inform the asset replacement strategy, operational and maintenance priorities, contingency planning, emergency management plan etc.	1/2022
Plans are regularly reviewed and updated	B3	PRE to review the adequacy of document review process and workflow to ensure plans and documents are reviewed by the due date.	2/2022
Asset Creation and Acquisition			
Evaluations include all life-cycle costs	B3	PRE to review business case development procedure to determine and document life cycle costs for new assets/	3/2022
Asset Disposal			
Disposal alternatives are evaluated	C1	Develop disposal/replacement plans for new assets. Section 3.3.3 Decommissioning, Demolition, Abandonment and/or Disposal of the AMP to either detail or make specific reference to the following: <ul style="list-style-type: none"> Disposal alternative evaluation process Replacement strategy for key electrical assets. An asset register of all assets 	4/2022
There is a replacement strategy for assets	C1	PRE to consider the key assets underpinning the operation of the site. The strategy should consider the asset operation and maintenance requirements, asset life cycle cost, lead times, contracting strategy, contingency plans and emergency management plan. The strategy is likely to be informed by the asset risk register.	5/2022
Environmental Analysis			
Opportunities and threats in the system environment are assessed	B3	Recommendation 1/2022 applies	-

Effectiveness Criteria	Rating	Recommendation	No/Year
Asset Operations			
Risk management is applied to prioritise operations tasks	A3	Recommendation 1/2022 applies	-
Assets are documented in an Asset Register including asset type, location, material, plans of components, an assessment of assets' physical/structural condition and accounting data	C3	PRE should develop a consolidated asset register that considers new and existing primary and secondary assets. PRE is discouraged from using separate assets registers for primary and secondary assets per current practice. The asset register should follow a standard asset naming convention (see recommendation 11) and take account of asset failure risk, life cycle costing and cost data. The asset register should allow for appropriate security provisions and disciplined application of QA/QC process to validate verify entered data. The asset register should align and coordinate with Operation IT interface systems (e.g., Trunk).	6/2022
Asset Maintenance			
Risk management is applied to prioritise maintenance tasks	A3	Recommendation 1/2022 applies	-
Asset Management Information System			
Adequate system documentation for users and IT operators	C3	PRE should quantify the operational risk associated with reliance and continuity of supply of Trunk software through Jarrah solutions. Treatment plans should be development in preparation for an event where the service level agreement with Jarrah Solutions were to be discontinued. IT or operational interface standards should be formulated and prepared in such a way that it is supplier agnostic and easily transferable to an alternate service provider, if required.	7/2022
Input controls include appropriate verification and validation of data entered into the system	B3	PRE is encouraged utilise an asset numbering procedure that ensures an aligned and consistent approach to asset identification across all contractors as the business park develops.	8/2022
Risk Management			
Risk management policies and procedures exist and are being applied to minimise internal and external risks associated with the asset management system	A3	Recommendation 1/2022 applies	-
Risks are documented in a risk register and treatment plans are actioned and monitored	C3		
The probability and consequence of risk failure are regularly monitored	A3		
Review of AMS			
A review process is in place to ensure that the asset management plan and the asset management system described therein are kept current	B3	Recommendation 2/2022 applies.	-

6. Confirmation of the Audit and Review

I confirm that the audit and review carried for PRE on 26 April – 17 May 2022 and recorded in this report is an accurate presentation of our findings and opinions.




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Appendix A

Key Documents Reviewed

Description	Document Title	Document No.	Version	Revision Date
Compliance Plan Policy	COMPLIANCE PLAN POLICY - PEEL	BMSDOC-18-2282	2.0	26-Nov-20
Connection Agreement Terms and Conditions	Connection Agreement Terms and Conditions	BMSDOC-18-2290	1.0	6-Oct-20
Emergency Management Plan	Emergency Management Plan (EMP) – PRE	BMSDOC-18-1969	3.0	18-May-21
Environment Policy	ENVIRONMENT POLICY	BMSDOC-18-2283	2.0	26-Nov-20
Health And Safety Policy	HEALTH AND SAFETY POLICY	BMSDOC-18-2284	2.0	26-Nov-20
Health Safety Environmental Management Plan	Health Safety Environmental Management Plan (HSEMP) – Peel Renewable Energy	BMSDOC-18-2038	4.0	13-May-21
High Voltage Microgrid Operation Manual	High Voltage Microgrid Operation Manual - PRE	BMSDOC-18-1987	3.0	5-Nov-20
HV LV And Solar Generations Maintenance Strategy	HV LV and Solar Generations Maintenance Strategy (PEEL)	BMSDOC-18-2021	2.0	15-Jun-21
Network Performance And Planning Criteria Manual	Network Performance and Planning Criteria Manual - NNPC (Peel)	BMSDOC-18-2210	3.0	20-Apr-22
Quality Policy	QUALITY POLICY	BMSDOC-18-2286	2.0	26-Nov-20
Risk Management Policy	RISK MANAGEMENT POLICY	BMSDOC-18-503	2.0	26-Nov-20
Minutes of Meeting	MINUTES OF MEETING / ACTION PLAN	-	-	6-Apr-20
Minutes of Meeting	MINUTES OF MEETING / ACTION PLAN	-	-	7-Sep-20
Minutes of Meeting	MINUTES OF MEETING / ACTION PLAN	-	-	3-May-21
Minutes of Meeting	MINUTES OF MEETING / ACTION PLAN	-	-	19-Apr-20
Investigation Report	TECHNICAL REPORT	AA20S1&EDD5	Rev A	29-Oct-20
Testing and Maintenance Sheets - Completed	EP-HVD038-SXD	BMSDOC-18-1989	1.0	1-Sep-21
Incident Investigation Procedure	Standard Operating Procedure - Incident Investigation	BMSDOC-18-353	3.0	18-May-21
Maintenance Sheets - Completed	LV Cables Test Sheets.PDF	-		1-Sep-21

Description	Document Title	Document No.	Version	Revision Date
SCADA ALERT NOTIFICATION PROCESS	NRC alarm notification process Ver 2.pdf	-	2.0	18-Feb-21
NRC Alarm Report	NRC InboundAssetReportPdf (1).pdf	-		31-Mar-21
Functional Safety Assessment	(Register) Enwave PEEL - FSA Electrical.xlsx	-		11-Jun-20
Electrical Equipment List	1917-ELI-04 Electrical Equipment List_6 (CK).xlsm	1917-ELI-04	6.0	8-Mar-22
Asset Management Plan	Asset Management Plan (Electricity) PEEL	BMSDOC-18-1983	2.0	26-May-21
Enterprise Risk Register	PEEL Micro Grid Project - Enterprise Risk Register.xlsm	-	-	19-Sep-19
Asset List - Exported from Trunk	Trunk_AssetList_20220426_ShortenedModels (Jarrah).csv	-	-	26-Apr-22
Email Correspondence - Acquisition Process	Collated by Compliance Officer	-	-	10-May-22
Distribution Commissioning Form - Completed	LV Cable TEST Lot 2.pdf	-	-	8-May-20
Distribution Commissioning Form - Completed	LV Cable TEST Lot 38.pdf	-	-	8-May-20
Distribution Commissioning Form - Completed	PBP HV2.pdf	-	-	8-May-20
Distribution Commissioning Form - Completed	PBP HV8.pdf	-	-	8-May-20
Distribution Commissioning Form - Completed	TFTPZ \$nswo \$sx7 < 2 h j \$	1\$	-	6-May-20
Distribution Commissioning Form - Completed	PBP RMU Lot 38.pdf	-	-	6-May-20
Distribution Commissioning Form - Completed	PBP TX Lot 38.pdf	-	-	6-May-20
Distribution Commissioning Form - Completed	Streetlight Test Sheet LOT 38.pdf	-	-	1-Sep-21
Site Acceptance Test Report	Site Acceptance Test Report - Enwave (Nambeelup) Rev_1.pdf	-	0.0	19-Aug-20

Description	Document Title	Document No.	Version	Revision Date
Western Power Test Report	WP Test Report - Enwave (Nambeelup) 2.pdf	-	0.0	
Microgrid Electricity Supply Agreement	Schedule 1 - Microgrid Electricity Supply Agreement Large Customer Peel Renewable Energy	BMSDOC-18-2180	-	
Large Customer Microgrid Electricity Supply Agreement	Large Customer Microgrid Electricity Supply Agreement	BMSDOC-18-2123	3.0	28-Apr-22
Standard Terms and Conditions Peel Renewable Energy	Standard Terms and Conditions Peel Renewable Energy Pty Ltd	BMSDOC-18-1959	2.0	
Outage Summary	Copy of Peel Outage Summary Jan 2021 - May 2022.xlsx	-	-	May 2022
Licence Performance Reporting Datasheets	2021-Electricity-Retail-Licence-Performance-Reporting-Datasheets - Peel Renewable Energy.xlsx	-	-	2021
Licence Performance Reporting Datasheets	2021-Electricity-Licence-Reporting-Datasheets---Distribution Peel Renewable Energy.xlsx	-	-	2021
Licence Performance Reporting Datasheets	2021-Electricity-Licence-Reporting-Datasheets---Network-Quality-Reliability-Code Peel Renewable Energy.xlsx			2021
Master Services Deed	Master Services Deed - Embedded Network Services (ENWAVE) (1).docx			
Services Module – Infrastructure Services	2022-04-12 Synergy PRE Services Module - Infrastructure Services_3475-5848-6810v1.docx			12-Apr-22
Services Module – Supply Services	2022-04-12 Synergy PRE Services Module - Supply Services_3437-3321-6026v2.docx			12-Apr-22
	Metering Model Service Level Agreement			
	Complaint & Dispute Resolution Policy - WinConnect	C-00-PO-006	1.1	
	Confidential Information Policy - Winonnect	R-00-PO-001	1.1	28-Nov-18
	Metrology Procedure	BMSDOC-18-2414	1.0	17-Aug-21
	Registration Process for Metering Installation Providers	BMSDOC-18-2450	1.0	
Statement of Profit and Loss	Peel Consolidated Prelim Report - Apr 2022 (003).pdf			April 2022
Budget Report	31 and 32 PEEL and PEEL GENCO BUDGET2.xlsx			10-Jun-2021
Training and Competency Matrix	Training and Competency (Peel)	BMSDOC-18-2508	1.0	

Appendix B

License Performance Audit

Compliance Manual No	Obligation under Licence condition	Description	Type (1, 2 or 3)	Audit Priority (1=highest, 5=lowest)	Control rating						Compliance rating						Recommendations			
					A	B	C	D	N/P	N/A	Control observation / comment	1	2	3	4	N/R		N/A	Compliance observation / comment	
Type 1 reporting obligations for all licence types																				
127	Electricity Industry Act, section 11	A distributor must create and maintain a Priority Restoration Register.	1	5	✓							PRE has a priority restoration order (or register). The DFES customer has the priority over all customers. Evidence of this showing Lot 37 (i.e. Department of Fire and Emergency Services and identified as 'essential services' has No. 1 priority, followed by Western Engineering in Lot 36, then Bells Engine in Lot 36 etc. This register was sighted during the audit.	✓						PRE has followed through their priority restoration register during the audit period	None
128	Electricity Industry Act, section 11	The Priority Restoration Register must comply with any criteria determined by the Minister.	1	5					✓			No special criteria has been prescribed by the Minister to PRE with respect to its priority restoration						✓	No such additional criteria exists for PRE to comply	None
234	Electricity Industry Act, section 11	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.	1	5					✓			PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓	PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
235	Electricity Industry Act, section 11	If a customer provides a retailer with confirmation from an appropriately qualified medical practitioner that a person residing at the customer's supply address requires life support equipment, the retailer must comply with subclause 7.7(1).10	1	5					✓			PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓	PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
236	Electricity Industry Act, section 11	A retailer must undertake the actions specified in subclauses 7.7(2)(e)-(g), if a customer registered with a retailer under subclause 7.7(1) notifies the retailer: <input type="checkbox"/> that the person requiring life support equipment is changing supply address; <input type="checkbox"/> that the customer, but not the person requiring life support equipment, is changing supply address; <input type="checkbox"/> of a change in contact details; or <input type="checkbox"/> that the address no longer requires registration as life support equipment address.	1	5					✓			PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓	PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
237	Electricity Industry Act, section 11	The distributor must comply with subclauses 7.7(3)(a)-(b) if a distributor has been informed by a retailer under subclause 7.7(1)(c), or by a relevant government agency, that a person residing at a customer's supply address requires life support equipment, or of a change of details notified to the retailer under subclause 7.7(2).	1	5					✓			PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓	PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
238	Electricity Industry Act, section 11	If life support equipment is registered at a customer's supply address under subclause 7.7(3)(a), a distributor must comply with subclauses 7.7(4)(a) and (b).	1	5					✓			PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓	PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
Electricity Industry Customer Transfer Code – Licence conditions and obligations																				
71	Not used									✓								✓		N/A
Electricity Industry (Obligation to Connect) Regulations – Licence conditions and obligations																				
72	Electricity Industry (Obligation to Connect) Regulations, regulation 3	A distributor must attach, or connect, premises to a distribution system if a retailer seeks to arrange with, or a customer applies to, the distributor to attach or connect the premises. The circumstances described in regulation 5(1) must be met for the distributor to be required to attach or connect the premises.	2	5						✓									✓	NA because PRE does not supply to small use customers. See the Licensee qualification in the ERA Electricity Reporting Manual Section/Table 10 (i.e. for small use customer only)

Compliance Manual No	Obligation under Licence condition	Description	Type (1, 2 or 3)	Audit Priority (1=highest, 5=lowest)	Control rating						Control observation / comment	Compliance rating						Recommendations	
					A	B	C	D	N/P	N/A		1	2	3	4	N/R	N/A		Compliance observation / comment
73	Electricity Industry (Obligation to Connect) Regulations, regulation 3	A distributor that is obliged to attach, or connect, premises to the distribution system under regulation 4 must extend the distribution system to a suitable connection point.	2	5							✓						✓	NA because PRE does not supply to small use customers. See the Licensee qualification in the ERA Electricity Reporting Manual Section/Table 10 (i.e. for small use customer only)	
74	Electricity Industry (Obligation to Connect) Regulations, regulation 3	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.	2	5							✓						✓	NA because PRE does not supply to small use customers. See the Licensee qualification in the ERA Electricity Reporting Manual Section/Table 10 (i.e. for small use customer only)	
75	Electricity Industry (Obligation to Connect) Regulations, regulation 3	A distributor that is obliged to attach, or connect, premises to the distribution system under regulation 4 must do so within a defined timeframe.	2	5							✓						✓	NA because PRE does not supply to small use customers. See the Licensee qualification in the ERA Electricity Reporting Manual Section/Table 10 (i.e. for small use customer only)	
76	Electricity Industry (Obligation to Connect) Regulations, regulation 3	A distributor must energise premises in certain prescribed circumstances.	2	5							✓						✓	NA because PRE does not supply to small use customers. See the Licensee qualification in the ERA Electricity Reporting Manual Section/Table 10 (i.e. for small use customer only)	
77	Electricity Industry (Obligation to Connect) Regulations, regulation 3	A distributor that is obliged to energise premises must do so within a defined timetable.	2	5							✓						✓	NA because PRE does not supply to small use customers. See the Licensee qualification in the ERA Electricity Reporting Manual Section/Table 10 (i.e. for small use customer only)	
Electricity Industry (Customer Contracts) Regulations – Licence conditions and oblig																			
78	Not used										✓						✓	N/A	
79	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	A non-standard contract must be in a format that is easy to read and expressed in clear, simple and concise language.	2	5						✓	Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	PRE's standard contract (for small use customer), while approved by the ERA, was not executed during the audit period. PRE's non-standard contract (for large customer) was executed for 5 customers during the audit period. Review of the non-standard contract template (and also an executed copy) indicates that format and language meets the requirement. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	None
80	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	A non-standard contract must specify when it comes into effect and the period for which it has effect.	2	5						✓	Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	Review of PRE's non-standard contract template (and also an executed copy) specify the dates when it comes into effect and its end. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	None
81	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	A non-standard contract must specify certain information about the retailer.	2	5						✓	Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	Review of PRE's non-standard contract template (and also an executed copy) specify PRE's business information like ABN, addresses, contact details etc. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	None
82	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	A non-standard contract must give an exact description of the goods and services that the retailer will provide under the contract.	2	5						✓	Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	Review of PRE's non-standard contract template (and also an executed copy) provides exact description of the services that PRE is offering to its customers. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	None
83	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	A non-standard contract must require the customer to pay for electricity supplied under the contract.	2	5						✓	Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	Review of PRE's non-standard contract template (and also an executed copy) requires the customer to pay for those offered services. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	None
84	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	A non-standard contract must prohibit the customer from tampering with, or bypassing, network equipment or allowing any other person to do so.	2	5						✓	Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	Review of PRE's non-standard contract template (and also an executed copy) stipulate a list of prohibitive activities such as bypassing or tampering with meters. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	None
85	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	A non-standard contract must describe the circumstances under which a retailer has the right to disconnect supply and is required to reconnect supply.	2	5						✓	Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	Review of PRE's non-standard contract template (and also an executed copy) describe the circumstances under which PRE has the right to disconnect supply and is required to reconnect supply. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	None
86	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	A non-standard contract must require the retailer to deal with security deposits and the payment of interest in the manner that is specified.	2	5						✓	Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	Review of PRE's non-standard contract template (and also an executed copy) describe payment of interest on unpaid amounts. PRE does not collect security deposits from its customers. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	None

Compliance Manual No	Obligation under Licence condition	Description	Type (1, 2 or 3)	Audit Priority (1=highest, 5=lowest)	Control rating						Compliance rating						Recommendations				
					A	B	C	D	N/P	N/A	Control observation / comment	1	2	3	4	N/R		N/A	Compliance observation / comment		
87	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	A non-standard contract must describe the retailer's obligations in relation to the provision of prices and tariff information.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		Review of PRE's non-standard contract template (and also an executed copy) describe the charges such as fixed per day charges and schedule of consumption rates. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	None
88	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	A non-standard contract must describe the procedures to be followed by the retailer in relation to the preparation, issue and review of customer bills.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		Review of PRE's non-standard contract template (and also an executed copy) describe the billing and payment process. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	None
89	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	A non-standard contract must describe the matters relating to the termination of the contract that are specified in the regulation.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		Review of PRE's non-standard contract template (and also an executed copy) describe the default and termination process. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	None
90	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	A non-standard contract must inform the customer that the provisions of the contract may be amended without the customer's consent and describe the process for amending the contract, including requirements for approval and the way in which the amendment will be published. The non-standard contract must require the retailer to notify the customer of any amendment to the contract.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		Review of PRE's non-standard contract template (and also an executed copy) describe the 'change event' and its impact to PRE's cost of doing business. It then describes the commercial adjustments that PRE will make (within defined boundaries) and also advance notification to customers. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	None
91	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	A non-standard contract must specify the assignment of rights and obligations, including assignment without the customer's consent.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		Review of PRE's non-standard contract template (and also an executed copy) specify the assignment of rights and obligations. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	None
92	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	A non-standard contract must describe the procedures that must be followed by the retailer in responding to a complaint made by a customer.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		Review of PRE's non-standard contract template (and also an executed copy) specify dispute resolution process. The Complaints and Dispute Resolution Policy of parent company is also hosted in ERA website. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	None
93	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	A non-standard contract must specify the process that must be taken by the retailer to ensure information held by the retailer is treated confidentially.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		Review of PRE's non-standard contract template (and also an executed copy) describe the use and disclosure of confidential information. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	None
94	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	A non-standard contract must specify the governing legislation, the effect of an invalid or unenforceable provision, the way in which notice may be given and the use of electronic communication by the retailer.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		Review of PRE's non-standard contract template (and also an executed copy) specify that the contract is governed by the Law of the State of WA, all parties submits to the non-exclusive jurisdiction of WA courts and will not object to the exercise of jurisdiction by those courts. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	None
95	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	A non-standard contract must not include a provision that excludes, restricts or modifies the Code of Conduct for the Supply of Electricity to Small Use Customers unless it is authorised by the Code.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		PRE's non-standard contract is for large customers only. This contract does not excludes, restricts or modifies the Code of Conduct for the Supply of Electricity to Small Use Customers unless it is authorised by the Code. While PRE now has an ERA approved standard contract for small-use customer, it did not have any small use customer during the audit period. It does not have any non-standard small-use customer contract. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	None
96	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	A non-standard contract must include details about the cooling off period specified in the regulation.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		Review of PRE's non-standard contract template (and also an executed copy) did not indicate inclusion of any cooling off period in its contract. PRE's non-standard contract is for large customers only and is for definite period (i.e. fixed term contract). Hence compliance to this obligation is not rated. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	None
97	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	A non-standard contract must allow the customer to terminate the contract at any time with no less than 5 days' notice.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		PRE's non-standard contract is for large customers only and is for definite period (i.e. fixed term contract). Hence compliance to this obligation is not rated. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	None

Compliance Manual No	Obligation under Licence condition	Description	Type (1, 2 or 3)	Audit Priority (1=highest, 5=lowest)	Control rating						Compliance rating						Recommendations			
					A	B	C	D	N/P	N/A	Control observation / comment	1	2	3	4	N/R		N/A	Compliance observation / comment	
98	Retail Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	A non-standard contract that is a fixed contract must describe the matters relating to the termination of the contract specified in the regulation.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	Clause 17 of PRE's non-standard contract for large customer describes its default and termination process which allows any party to terminate the contract dependent on default type, default notification and remedy period before exercising the rights by non-default party, and not upon customer's discretion by giving 20 days advance notice. Whereas, the Electricity Industry (Customer Contracts) Regulations paragraphs 33(3) and (4) requires PRE's non-standard fixed term contract to authorise the customer to terminate the contract at any time by giving 20 days notice to PRE. PRE's non-standard contract is for large customers only and is for definite period (i.e. fixed term contract). Hence compliance to this obligation is not rated. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	None
99	Integrated Regional Licence, condition 6.2.1 Distribution Licence, condition 6.2.1	The distributor must determine, from time to time, the default supplier for each connection point that connects to a distribution system operated by the licensee (distributor).	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	NA because PRE does not supply to small use customers. See the Licensee qualification in the ERA Electricity Reporting Manual Section/Table 8-17 (i.e. for small use customer only)	None
100	Retail Licence, condition 6.8.1 Integrated Regional Licence, condition 6.8.1	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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	PRE's non-standard contract is for large customers only. All their customers are large customer. While it now has an ERA approved standard contract form for small use customer, it was not executed during the audit period. Hence compliance to this obligation is not rated. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	None
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	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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	This is the very first audit conducted after PRE was granted the retailer (ERL28) and distribution (EDL007) licenses. This audit report will be provided within the 24 months of PRE commencing its operation or energisation from Aug 2020.	None
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	A licensee must provide for an asset management system.	NR	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						PRE's asset management system (AMS) was developed recently and has matured during the audit period. Given the infancy of the business its AMS had few gaps (for e.g. asset failure likelihood and consequence analysis, life-cycle cost consideration, maintaining live asset register etc.) against the Good Electricity Industry Practice (GEIP) during the audit period. If not addressed it may have moderate effect on the customers or third party. Please refer to the AMS review for details. Nevertheless, with respect to meeting this specific obligation (i.e. PRE providing for an AMS in respect to its assets), PRE is compliant.	Please refer to the AMS review for details and its recommendations
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	A licensee must notify details of the asset management system and any substantial changes to it to the ERA.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	No substantial changes to PRE's AMS occurred during the audit period. Its organisation structure, ownership, leadership, culture, management, risk appetite etc remained unchanged during the audit period. There were no changes to its quality, environmental and safety management standards and systems.	None
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	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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	Along with this audit, the very first review of PRE's asset management system (AMS) effectiveness was also conducted. The AMS review report will be provided within the 24 months of PRE commencing its operation or energisation from Aug 2020.	None

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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	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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						Evidence of payment of annual licence fees for both ERL28 and EDL007 during the audit period have been sighted. With respect to quarterly standing charge which is based on applicable quantities at the end of each financial year such as km of line (for distribution) and number of customers (for retail) for the preceding year, PRE reported 0 for both quantities for FY2020 end and hence the standing charges for FY2021 was nil. At FY2021 end PRE reported 3.3km line for distribution and 5 customers for retail and hence during the current FY2022 period the standing charges is negligible given the calculation is based on the whole standing charge divided by 25% of the applicable quantities, resulting in very small amounts.	None
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	A licensee must take reasonable steps to minimise the extent, or duration, of any interruption, suspension or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause.	NR	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						This provision was inbuilt into PRE's non-standard (large customer) contract during the audit period. Record of unplanned outage data (very few during the audit period) suggest PRE taking reasonable steps to restore its supply to its customers.	None
107	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	A licensee must pay the costs of taking an interest in land or an easement over land.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		This was not applicable for PRE during the audit period.	None
108	Integrated Regional Licence, condition 6.4.1 Retail Licence, condition 6.4.1	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).					✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
109	Integrated Regional Licence, condition 6.6.1 Retail Licence, condition 6.6.1	A licensee must comply with any direction by the ERA to amend the standard form contract and do so within the period specified.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).					✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
110	Integrated Regional Licence, 6.7.1 Retail Licence, condition 6.7.1	If a designation under section 71(1) of the Electricity Industry Act is in force, a licensee must perform the functions of a retailer of last resort and must carry out the supplier of last resort plan if it comes into operation under section 70 of the Electricity Industry Act.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		No such circumstances eventuated for PRE during the audit period.	None
111	Distribution Licence, condition 6.1.1 Integrated Regional Licence, 6.1.1 Retail Licence, condition 6.1.1	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.	2	5						✓		N/P (not performed - a control rating was not required) because PRE did not have any non-standard contract in place for small use customers during the audit period (in other words, they have an ERA approved standard contract in place for small use customer which has never been executed with customer). They also did not supply to small use customer during the audit period.						✓	NA because PRE does not supply to small use customers. See the Licensee qualification in the ERA Electricity Reporting Manual Section/Table 8-17 (i.e. for small use customer only). N/P (not performed - a control rating was not required) because PRE did not have any non-standard contract in place for small use customers during the audit period (in other words, they have an ERA approved standard contract in place for small use customer which has never been executed with customer). They also did not supply to small use customer during the audit period.	None
112	Not used											✓						✓		N/A
113	Not used											✓						✓		N/A

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114	Electricity Industry Act, section 11	A licensee must ensure that an electricity marketing agent of the licensee complies with the Code of Conduct for the Supply of Electricity to Small Use Customers 2018.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
115	Not used									✓								✓			N/A
116	Electricity Industry Act, section 11	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.	NR	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
117	Electricity Industry Act, section 11	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.	NR	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
118	Electricity Industry Act, section 11	A licensee can only amend the standard form contract with the ERA's approval.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
119	Electricity Industry Act, section 11	A licensee and any related body corporate must maintain accounting records that comply with the Australian Accounting Standards Board Standards or equivalent International Accounting Standards.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓							Review of PRE's accounting records during the audit period indicate compliance with the Australian Accounting Standards Board Standard. However during the audit period, the monetary quantum of its account did not meet the ASIC thresholds of Assets, Revenue or Employees which requires a company to have its accounts audited. Hence PRE accounts were not audited during the audit period.	None
120	Electricity Industry Act, section 11	A licensee must comply with any individual performance standards prescribed by the ERA.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		This was not applicable for PRE during the audit period. No such standards were prescribed by the ERA during the audit period	None
121	Electricity Industry Act, section 11	A licensee must comply, and require its auditor to comply, with the ERA's standard audit guidelines for a performance audit.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓							PRE is aware of the requirements contained in the ERA audit guideline and engaged us (GHD) to undertake this performance audit against its ERL28 and EDL007 licence conditions following the ERA audit guideline. The Audit Plan was vetted by the ERA and PRE prior to commencing this audit	None
122	Electricity Industry Act, section 11	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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓							PRE is aware of the requirements contained in the ERA review guideline and engaged us (GHD) to undertake the effectiveness review of its AMS following the ERA review guideline. The Audit Plan was vetted by the ERA and PRE prior to commencing this audit	None
123	Electricity Industry Act, section 11	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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		There was no such change of management, ownership structure, nor the entity was under external administration during the audit period.	None
124	Electricity Industry Act, section 11	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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓							PRE provided annual compliance and performance reports for the 2020-21 period to ERA upon request during the audit period.	NA
125	Electricity Industry Act, section 11	A licensee must publish any information as directed by the ERA to publish, within the timeframes specified.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓							PRE provided annual compliance and performance reports for the 2020-21 period to ERA upon request during the audit period. PRE also published these information in its website during the audit period	NA

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126	Electricity Industry Act, section 11	All notices must be in writing, unless otherwise specified.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓							All notice, agreement, consent, direction, representation, advice, statement or other communication required or given pursuant to, or in connection with, both licences are in writing. Some of them are hosted in PRE's website. Some of them form part of contract between PRE and its contractor, suppliers, and customers.	None	
Code of Conduct – Licence conditions and obligations																						
130	Electricity Industry Act, section 82	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).	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).							✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
131	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).							✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
132	Electricity Industry Act, section 82	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).	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).							✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
133	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).							✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
135	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).							✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
137	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).							✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
138	Electricity Industry Act, section 82	A retailer or electricity marketing agent must, on request, provide a customer with the information specified in subclause 2.5(1).	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).							✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
139	Electricity Industry Act, section 82	A retailer or electricity marketing agent who meets with a customer face to face must: <input type="checkbox"/> wear a clearly visible and legible identity card showing the information specified in subclause 2.5(2)(a); and <input type="checkbox"/> provide the written information specified in subclause 2.5(2)(b) as soon as practicable following a request by the customer.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).							✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA

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140	Electricity Industry Act, section 82	A retailer or electricity marketing agent who visits a person's premises for the purposes of marketing must comply with any clearly visible signs indicating that canvassing is not permitted at the premises, or no advertising is to be left at the premises.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
143	Electricity Industry Act, section 82	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.	NR	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
144	Electricity Industry Act, section 82	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.	NR	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
145	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
146	Electricity Industry Act, section 82	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).	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
148	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
149	Electricity Industry Act, section 82	A retailer must ensure that a shortened billing cycle is for a period of at least 10 business days.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
150	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
151	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA

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					A	B	C	D	N/P	N/A	Control observation / comment	1	2	3	4	N/R		N/A	Compliance observation / comment		
152	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
153	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
154	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
155	Electricity Industry Act, section 82	A retailer must include the minimum prescribed information in subclause 4.5(1) on a customer's bill, unless the customer agrees otherwise.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
156	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
157	Electricity Industry Act, section 82	Subject to clauses 4.3 and 4.8, a retailer must base a customer's bill on the following: <input type="checkbox"/> the distributor's or metering agent's reading of the meter at the customer's supply address; <input type="checkbox"/> the customer's reading of the meter in the circumstances specified in subclause 4.6(1)(b); or <input type="checkbox"/> 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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
158	Electricity Industry Act, section 82	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.	NR	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
159	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA

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160	Electricity Industry Act, section 82	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).	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
161	Electricity Industry Act, section 82	On request, a retailer must inform a customer of the basis and the reason for the estimation.8	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
162	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
163	Electricity Industry Act, section 82	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.	NR	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
164	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
165	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
166	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
167	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
168	Electricity Industry Act, section 82	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.	NR	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA

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					A	B	C	D	N/P	N/A	Control observation / comment	1	2	3	4	N/R		N/A	Compliance observation / comment
169	Electricity Industry Act, section 82	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.	2	5							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
170	Electricity Industry Act, section 82	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).	2	5							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
171	Electricity Industry Act, section 82	A retailer must review a customer's bill on request by the customer, subject to the customer paying: <input type="checkbox"/> that portion of the bill under review that the customer and a retailer agree is not in dispute; or <input type="checkbox"/> an amount equal to the average amount of the customer's bill over the previous 12 months (excluding the bill in dispute) and <input type="checkbox"/> any future bills that are properly due.	2	5							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
172	Electricity Industry Act, section 82	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.	2	5							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
173	Electricity Industry Act, section 82	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.	2	5							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
174	Electricity Industry Act, section 82	A retailer must inform a customer of the outcome of the review of a bill as soon as practicable.	2	5							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
175	Electricity Industry Act, section 82	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.	2	5							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA

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					A	B	C	D	N/P	N/A	Control observation / comment	1	2	3	4	N/R		N/A	Compliance observation / comment		
176	Electricity Industry Act, section 82	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.9	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
176A	Not used									✓								✓			N/A
177	Electricity Industry Act, section 82	If a customer (including a customer who has vacated the supply address) has been overcharged as a result of an error, defect, or default for which a retailer or distributor is responsible (including where a meter has been found to be defective), the retailer must: □ use its best endeavours to inform the customer within 10 business days of the retailer becoming aware of the error, defect, or default; and □ subject to subclauses 4.18(6) and 4.18(7), ask the customer for instructions for the credit or repayment of the amount.	NR	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
178	Electricity Industry Act, section 82	A retailer must pay the amount overcharged in accordance with the customer's instructions within 12 business days of receiving the instructions.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
179	Electricity Industry Act, section 82	If instructions regarding repayment of an overcharged bill are not received within 5 business days of a retailer making the request, a retailer must use reasonable endeavours to credit the amount overcharged to a customer's account.	NR	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
180	Electricity Industry Act, section 82	Where the amount overcharged is less than \$100, a retailer may proceed to deal with the matter as outlined in subclause 4.18(6).	NR	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
181	Electricity Industry Act, section 82	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.	NR	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
182	Electricity Industry Act, section 82	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).	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA

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					A	B	C	D	N/P	N/A	Control observation / comment	1	2	3	4	N/R		N/A	Compliance observation / comment
183	Electricity Industry Act, section 82	If the meter is read under either clause 4.6 or clause 4.3(2)(d), and the amount of the adjustment is an amount owing to the customer, the retailer must: □ use its best endeavours to inform the customer within 10 business days; and □ subject to subclauses 4.19(5) and 4.19(7), ask the customer for instructions about the repayment of the amount.	NR	5							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
184	Electricity Industry Act, section 82	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.	2	5							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
185	Electricity Industry Act, section 82	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.	NR	5							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
186	Electricity Industry Act, section 82	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).	NR	5							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
187	Electricity Industry Act, section 82	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.	2	5							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
188	Electricity Industry Act, section 82	Unless otherwise agreed with a customer, a retailer must offer the customer at least the payment methods prescribed in clause 5.2.	2	5							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
189	Electricity Industry Act, section 82	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.	2	5							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
190	Electricity Industry Act, section 82	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.	2	5							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA

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197	Electricity Industry Act, section 82	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).	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
198	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
199	Electricity Industry Act, section 82	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).	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
201	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
201A	Electricity Industry Act, section 82	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.	NR	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
228	Electricity Industry Act, section 82	A retailer must consider any reasonable request for alternative payment arrangements from a business customer who is experiencing payment difficulties.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
229	Electricity Industry Act, section 82	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).	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
230	Electricity Industry Act, section 82	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).	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA

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232	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
233	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
242	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
243	Electricity Industry Act, section 82	A retailer must forward the request for reconnection to the relevant distributor within the timeframes specified in subclause 8.1(2).	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
244	Electricity Industry Act, section 82	A distributor must reconnect the customer's supply address on the request of a retailer within the timeframes specified in subclause 8.2(2).	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
272	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
273	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
274	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
275	Electricity Industry Act, section 82	On request, a retailer must provide a non-contestable customer with their billing data.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA

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					A	B	C	D	N/P	N/A	Control observation / comment	1	2	3	4	N/R		N/A	Compliance observation / comment		
276	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
277	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
278	Electricity Industry Act, section 82	A retailer must keep a non-contestable customer's billing data for 7 years.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
280	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
281	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
282	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
283	Electricity Industry Act, section 82	On request and at no charge, a distributor must provide a customer with the information specified in subclause 10.6.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
284	Electricity Industry Act, section 82	On request, a distributor must provide a customer with their consumption data.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
285	Electricity Industry Act, section 82	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).	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA

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286	Electricity Industry Act, section 82	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).	2	5							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
287	Electricity Industry Act, section 82	A distributor must keep a customer's consumption data for 7 years.	2	5							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
288	Electricity Industry Act, section 82	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.	2	5							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
289	Electricity Industry Act, section 82	A distributor must publish information on distribution standards and metering arrangements on its website.	2	5							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
290	Electricity Industry Act, section 82	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.	NR	5							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
291	Electricity Industry Act, section 82	On request, a retailer and a distributor must inform a customer how to obtain a copy of the Code of Conduct.	2	5							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
292	Electricity Industry Act, section 82	A retailer and distributor must make electronic copies of the Code of Conduct available on their websites, at no charge.	2	5							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
296	Electricity Industry Act, section 82	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.	2	5							PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA

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297	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
298	Electricity Industry Act, section 82	A retailer and distributor must develop, maintain and implement an internal process for handling complaints and resolving disputes.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
299	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
300	Electricity Industry Act, section 82	A retailer or a distributor must advise the customer in accordance with subclause 12.1(3).	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
301	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
302	Electricity Industry Act, section 82	A retailer must comply with any guideline developed by the ERA to distinguish customer queries from complaints.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
303	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
304	Electricity Industry Act, section 82	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).	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
305	Electricity Industry Act, section 82	A retailer and a distributor must prepare a report in respect of each reporting year setting out the information specified by the ERA.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA

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					A	B	C	D	N/P	N/A	Control observation / comment	1	2	3	4	N/R		N/A	Compliance observation / comment		
306	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
307	Electricity Industry Act, section 82	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: <input type="checkbox"/> copies are available to the public, without cost, in places where the retailer or distributor transacts business with the public; and <input type="checkbox"/> a copy is posted on the retailer or distributor's website.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
308	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
309	Electricity Industry Act, section 82	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.	NR	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
310	Electricity Industry Act, section 82	Subject to clause 14.6, a retailer must pay the specified compensation to a customer if: <input type="checkbox"/> 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 <input type="checkbox"/> 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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
311	Electricity Industry Act, section 82	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.	NR	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
312	Electricity Industry Act, section 82	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).	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
313	Electricity Industry Act, section 82	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).	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA

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					A	B	C	D	N/P	N/A	Control observation / comment	1	2	3	4	N/R		N/A	Compliance observation / comment	
314	Electricity Industry Act, section 82	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.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).					✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
315	Electricity Industry Act, section 82	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).	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).					✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
316	Electricity Industry Act, section 82	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).	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).					✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA
Electricity Industry Metering Code – Licence conditions and obligations																				
317	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must treat all Code participants that are its associates on an arms-length basis.	NR	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						During the audit period there were no existing or potential conflict of interest with respect to PRE and its relations with its customers, contractors, suppliers and utility service providers.	None
318	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must ensure that no Code participant that is its associate receives a benefit in respect of the Code, unless the benefit is attributable to an arm's length application of the Code or is also made available to all other Code participants on the same terms and conditions.	NR	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						During the audit period there were no existing or potential conflict of interest with respect to PRE and its relations with its customers, contractors, suppliers and utility service providers. No evidence of anti-competition behaviour was noted during the audit period.	None
319	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and comply with any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						During the audit period PRE only installed and operated Type 4 meters that met the requirements specified in its metrology procedure. Details within the PRE's metrology procedure are aligned with the requirements specified by the Metering Code.	None
320	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	An accumulation meter must at least conform to the requirements specified in the applicable metrology procedure and display, or permit access to a display of the measurements that are specified in subclauses 3.2(1)(a)(b) using dials, a cyclometer, an illuminated display panel or some other visual means.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		All of PRE's meters are Type 4 interval meters.	None
321	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	An interval meter must at least have an interface to allow the interval energy data to be downloaded in the manner prescribed using an interface compatible with the requirements specified in the applicable metrology procedure.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						All of PRE's meters are Type 4 interval meters with interface to allow interval energy data to be downloaded/ remotely recorded by Synergy as per the specification in its metrology procedure.	None

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322	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						PRE meter have SIM card, can communicate remotely, are connected to Telstra (primary path) and Optus/Vodafone (secondary path). The modem and isolation device are in accordance to the telecommunication regulation. These are standard off-the-shelf approved Type 4 meters which are programmable by Synergy as any normal Type 4 meter in the NEM.	None
323	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	Provision for bi-directional electricity flow is driven by the customers application to install their own generation system. While the PRE meters have been pre-programmed to be bi-directional however during the audit period no customer register or applied or commercial agreement took place between the customer and PRE for such usage.	None
324	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	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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	Provision for bi-directional electricity flow is driven by the customers application to install their own generation system. While the PRE meters have been pre-programmed to be bi-directional however during the audit period no customer register or applied or commercial agreement took place between the customer and PRE for such usage.	None
325	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	An accumulation meter or an interval meter that separately measures and records bi-directional electricity flows at the metering point must record: <input type="checkbox"/> the net electricity production transferred into the network that exceeds electricity consumption; and <input type="checkbox"/> the net electricity consumption transferred out of the network that exceeds electricity production.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	Provision for bi-directional electricity flow is driven by the customers application to install their own generation system. While the PRE meters have been pre-programmed to be bi-directional however during the audit period no customer register or applied or commercial agreement took place between the customer and PRE for such usage.	None
326	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						All of PRE's meters are Type 4 interval meters.	None
327	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						PRE has contracted the operation, maintenance, repair and replacement of its installed meters to Synergy (who in-turn sub-contract this function to its Spotless which is a licenced metering service provider in WA). All meters were installed in accordance to the Metering Code, following GEIP (Australian Standards), metrology procedure and model service agreement. Given the small customer base, PRE's General Manager was present on site in person at the commissioning of each metering installation. Evidence of independent safety checks prior to and in order to secure approval for metering installation commissioning were also carried out during the audit period. During the audit period no PRE meters were repaired or replaced.	None
328	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						All of PRE's meters are located within customer premises or within their switchboard (i.e. as close to the load as possible).	None
329	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						PRE's metering model service level agreement provides charges and also limits to those charges. It also identifies service types - standard service (charges of which are built into the tariff) and extended service (charges of which are optional and/or tailored to the service requested). The infrastructure service module and supply service module also detail the schedule of rates and fees for both standard service and extended service.	None

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					A	B	C	D	N/P	N/A	Control observation / comment	1	2	3	4	N/R		N/A	Compliance observation / comment	
330	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	No such instance occurred during the audit period	None
331	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	All devices that may be connected to a telecommunications network must be compatible with the telecommunications network and comply with all applicable State and Commonwealth enactments.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						All of PRE's meters are Type 4 interval meters connected to Telstra (primary path) and Optus/Vodafone (secondary path). The modem and isolation device are in accordance to the telecommunication regulation and WA and Commonwealth Acts. These are standard off-the-shelf approved Type 4 meters which are programmable by Synergy as any normal Type 4 meter in the NEM.	None
332	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						All of PRE's meters can detect fault and malfunction. For e.g. it can detect when an outage has occurred or an error in communications. These meters are installed within customer premises in their respective switchboard. Both physical and remote unauthorised access are hindered and/or detected.	None
333	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						The accuracy requirements of metering installation component (in SWIN) as specified in Table 3 in the Metering Code are met. PRE has standard off-the-shelf approved Type 4 meters which are programmable by Synergy as any normal Type 4 meter in the NEM.	None
334	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	All of PRE's meters are Type 4 interval meters.	None
335	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	If compensation is carried out within the meter, then the resultant metering system error must be as close as practicable to zero.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						The accuracy requirements or the overall error (considering the VT wiring error, CT wiring error and meter error) of metering installation component is carried out within the meter and is as close as reasonably practicable to zero. PRE has standard off-the-shelf approved Type 4 meters which are programmable by Synergy as any normal Type 4 meter in the NEM. Review of the technical specification of the metering hardware, such as for accuracy class, meets the compliance standards for NMI M6-1, AS 62052.11, AS 62053.22, AS 62053.23, AS 62052.21.	None
336	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						PRE has standard off-the-shelf approved Type 4 meters which are programmable by Synergy as any normal Type 4 meter in the NEM. It satisfy the requirements specified in PRE's metrology procedure and complies with National Measurement Act	None
337	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						PRE has contracted the operation, maintenance, repair and replacement of its installed meters to Synergy (who in-turn sub-contract this function to its Spotless which is a licenced metering service provider in WA). During the audit period PRE meters measured and recorded energy interval data and periodically messaged the information to Synergy as per the service level agreement (incorporated in the contract between PRE and Synergy). This energy data was then used to invoice tariff to PRE customers by Winconnect.	Leverage AMS review work

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					A	B	C	D	N/P	N/A	Control observation / comment	1	2	3	4	N/R		N/A	Compliance observation / comment	
338	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		No such instance occurred during the audit period	None
339	Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1	A Code participant who becomes aware of an outage or malfunction of a metering installation must advise the network operator as soon as practicable.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		The installed meters have remote monitoring functionality that can detect its own fault and malfunction. Two primary faults they detect is when an outage has occurred or an error in communications. No such event occurred during the audit period and hence not rating this compliance.	None
340	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must ensure that the meters on its network are systematically sampled and tested for accuracy in accordance with AS 1284.13.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		Given only 5 large customers were being supplied by PRE during the entire audit period, no such sampling and testing for accuracy took place during the audit period.	None
341	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Subject to clause 3.11A(3), if a "population" of meters is deemed to have failed under AS 1284.13, the network operator must ensure that all of the meters in that population are removed and replaced with new meters within 3 years of the testing of the population.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		Given only 5 large customers were being supplied by PRE during the entire audit period, no such sampling and testing for accuracy took place during the audit period.	None
342	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must ensure that each metering installation complies with at least the prescribed design requirements.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						All PRE metering installations were delivered by Synergy and constructed per the applicable Australian design standards. They were independently tested (for safety checks) by third party before commissioning or energising. A evidence of such safety check during the audit period was sighted.	None
343	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						All PRE metering installations were delivered by Synergy and constructed per the applicable Australian design standards. Section 2.2 of PRE's metrology procedure details the standards requirements met by the meters, CT, VT, connection point, display features and programmable settings.	None
344	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						Isolation facility are provided in the PRE metering installations.	Leverage AMS review work
345	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						Such asset information are available with PRE.	Leverage AMS review work
346	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must procure the user, or the user's customer, to install, or arrange for the installation of, a full check metering installation or partial check metering installation in accordance with the prescribed requirements.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		During the audit period no PRE customers annual consumption met the threshold for partial check meters. Hence there were none.	None
347	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A partial check metering installation must be physically arranged in a manner determined by the network operator, acting in accordance with good electricity industry practice.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		During the audit period no PRE customers annual consumption met the threshold for partial check meters. Hence there were none.	None

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348	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A check metering installation for a metering point must comply with the prescribed requirements.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		During the audit period no PRE customers annual consumption met the threshold for partial check meters. Hence there were none.	None
349	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		The accuracy requirements of metering installation component (in SWIN) as specified in Table 3 in the Metering Code are met. PRE has standard off-the-shelf approved Type 4 meters which are programmable by Synergy as any normal Type 4 meter in the NEM.	None
350	Distribution Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓							PRE has standard off-the-shelf approved Type 4 meters which are programmable by Synergy as any normal Type 4 meter in the NEM.	None
351	Distribution Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	The network operator must ensure that a Type 1 metering installation to Type 4 metering installation on the network includes a communications link.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓							PRE has standard off-the-shelf approved Type 4 meters which are programmable by Synergy as any normal Type 4 meter in the NEM. It includes communication link.	None
352	Distribution Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓							PRE has standard off-the-shelf approved Type 4 meters which are programmable by Synergy as any normal Type 4 meter in the NEM. It continuously captures energy data in 30 minute intervals and send this information via telecommunication (4G, 5G) networks to Synergy.	None
353	Distribution Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		PRE has standard off-the-shelf approved Type 4 meters which are programmable by Synergy as any normal Type 4 meter in the NEM. It continuously captures energy data in 30 minute intervals and send this information via telecommunication (4G, 5G) networks to Synergy. There is no need for aggregation of 30 minute energy data into wider interval duration.	None
354	Distribution Licence, condition 4.1.1 Transmission Licence, condition 4.1.1 Synergy Retail Licence, condition 4.1.1	The metering installation for the connection point must comply with the prescribed wholesale market metering installation requirements if the Electricity Retail Corporation supplies electricity to a contestable customer at a connection point under a non-regulated contract and in circumstances when, immediately before entering into the contract, the electricity retail corporation supplied electricity to the contestable customer under a regulated contract.	2								✓	Not performed because this requirement is in relation to Synergy (Retail Corporation).						✓		Not applicable because this requirement is in relation to Synergy (Retail Corporation)	N/A
355	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	If reasonably requested by a Code participant, a network operator must provide enhanced technology features in a metering installation.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		No such request was received by PRE during the audit period.	None
356	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		No such request was received by PRE during the audit period.	None
357	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Meters containing an internal real time clock must maintain time accuracy as prescribed. Time drift must be measured over a period of 1 month.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓							Review of the metering hardware technical specification shows that the internal time clock is of crystal or main-synchronised type, with main supplied power and 15 years life lithium battery as backup source. It is compliant to AS 62054.21. The installed meters are remotely read at 30 minute intervals and the energy data are provided daily from Synergy to WINconnect (PRE's billing service provider).	None

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358	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	If a metering installation includes measurement elements and an internal data logger at the same site, it must include facilities on-site for storing the interval energy data for the periods prescribed.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓							The metering device itself can store 30 minutes interval energy data for 90 days as per the infrastructure service module of the master service deed, i.e. contract between PRE and Synergy that is being currently negotiated. During the audit period this was the case with the meter internal storage capacity.	None
359	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator providing one or more metering installations with enhanced technology features must be licensed to use, and access, the metering software applicable to all devices being installed and be able to program the devices and set parameters.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓							PRE has contracted this function to Synergy which can use and access the metering software. Synergy can program and set parameters in the Type 4 meters.	None
360	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		PRE has standard off-the-shelf approved Type 4 meters which are programmable by Synergy as any normal Type 4 meter in the NEM. It continuously captures energy data in 30 minute intervals and send this information via telecommunication (4G, 5G) networks to Synergy. It does not interfere with customer signals for load management.	None
361	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		We could not find any evidence in the metrology procedure or model service level agreement on the provision of signal specification information to customer to facilitate load management and compliance with Metering Code clauses 3.23(b) and 3.23(c). We could not find the description of communication rule within the model service level agreement (as explained in the interview dated 23 May 2022). Synergy confirmed that PRE metering installation does not provide any signals to other systems for load management and hence this compliance rating is not rated.	None
364	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A person must not install a metering installation on a network unless the person is the network operator or a registered metering installation provider for the network operator doing the type of work authorised by its registration.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓							Spotless is registered entity contracted by Synergy to install meter. Both these entities are licenced metering service providers. Evidence of safety check and approval by WA regulator provided before commissioning of metering installation.	None
365	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must publish a list of registered metering installation providers, including the prescribed details, and update the list at least annually.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		In the case of PRE during the audit period, it only contracted this service to Synergy who then sub-contracted it to Spotless. Not relevant in PRE case for annual publication.	None
366	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 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.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓							PRE has contracted this function to WINconnect who are an authorised Licensed Retailer. It has established database/tool/system to house standing and energy data for all PRE metering installation points.	None
367	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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).	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓							WINconnect metering database securely stores and process the customers information confidentially. Evidence of their business policy (around information handling) and sighted and the details consistent with GEIP. Their governance is based on systems access controls, access privileges, user education and commitment, and authorised information recipients.	None

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368	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	2	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						Both Synergy and WINConnect have their respective disaster recovery plan. Synergy's business continuity plan involves retaining the energy data in its SAP platform, in addition to the meter's ability to store 395 days worth of 30 minutes interval energy data within its memory. All metering data service providers in the NEM are required to have their own Disaster Recovery Plan for them to be accredited by the AEMO. This also includes Secure. WINconnect's business continuity plan was also reviewed, the scope of which involves billing function and its monthly bill run processing is identified as business critical. WINconnect's IT disaster recovery plan involves hosting the energy data in cloud servers/data centres. The primary is located in Melbourne and Secondary located in Sydney, with both Tier 3 rates centres. Data is backed up from primary to secondary centres every 15 minutes. Reasonable IT firewalls and safeguards are in place to prevent unauthorised access.	None
369	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must ensure that its registry complies with the Code and the prescribed clause of the market rules.	2	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						PRE has contracted this function to WINconnect who holds electricity retail licence in Victoria and has retail authorisation under the National Energy Customer Framework. They are also registered as a market participant with AEMO. Its systems/tools and business processes complies with the Metering Code. It maintains a separate account/meter registry for PRE and fulfils Clause 8.3.1 of the Market Rules.	None
370	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	The standing data for a metering point must comprise at least the items specified.	2	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						Each PRE metering installation standing data includes the item or information listed in Table 2 of the Metering Code.	None
371	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	If there is a discrepancy between energy data held in a metering installation and in the metering database, the affected Code participants and the network operator must liaise to determine the most appropriate way to resolve the discrepancy.	NR	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						Review of email communication chain between Synergy and WINConnect (with PRE copied into) during the audit period demonstrate that the energy data discrepancy has been addressed. The data in the meter and the data Synergy received via remote communications was correct. The energy data that was initially delivered in the daily files sent to WINConnect for the weekends had an error. This was rectified in the bulk energy data which was delivered to WINConnect during the audit period.	None
372	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	A Code participant must not knowingly permit the registry to be materially inaccurate.	NR	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						Given only 5 large customers were being supplied by PRE during the entire audit period, all standing data are accurate.	None
373	Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1	Subject to subclause 5.19(6), if a Code participant, other than a network operator, becomes aware of a change to, or inaccuracy in, an item of standing data in the registry, then it must notify the network operator and provide details of the change or inaccuracy within the timeframes prescribed.	2	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓				✓		PRE has both retailing and distribution licences. During the audit period, no code participants, including customers identified any changes or inaccuracy in standing data. There was no notification of such changes or inaccuracies to PRE during the audit period.	None
374	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	If the network operator is notified of a change to, or inaccuracy in, an item of standing data by a Code participant that is the designated source for the item of standing data under Table 2 in clause 4.3(1) then the network operator must update the registry to address the issue.	2	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓				✓		No such instance occurred during the audit period.	None

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375	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	If a network operator is notified of a change to, or inaccuracy in, an item of standing data by a Code participant which is not the designated source for the item of standing data, or otherwise becomes aware of a change to or inaccuracy in an item of standing data, then the network operator must determine whether the registry should be updated, and update the registry as required.	2	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.							No such instance occurred during the audit period.	None
376	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	If standing data for a metering point is updated in the registry, the network operator must, within 2 business days after the update (or such other time as is specified in the applicable service level agreement) notify the update to the current user and each previous user, if the updated standing data relates to a period or periods when the previous user was the current user.	2	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.							No such instance occurred during the audit period.	None
377	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must allow a user who is a retailer or a generator to have local and, where a suitable communications link is installed, remote access to the energy data for metering points at its associated connection points, using a password provided by the network operator that provides 'read only' access.	NR	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						PRE has standard off-the-shelf approved Type 4 meters which are programmable by Synergy as any normal Type 4 meter in the NEM. It continuously captures energy data in 30 minute intervals and send this information via telecommunication (4G, 5G) networks to Synergy. This is a read only access.	None
378	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must allow a user who is a retailer or a generator to have access to data held in its metering database for metering points at its associated connection points, by the prescribed methods, using a password provided by the network operator which provides 'read only' access.	NR	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						PRE provides access to information held in WINconnect metering database, upon request, to the relevant parties.	None
379	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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	2	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						All of PRE's meters can detect fault and malfunction. For e.g. it can detect when an outage has occurred or an error in communications. These meters are installed within customer premises in their respective switchboard. Both physical and remote unauthorised access are hindered and/or detected.	None
380	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	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.	2	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						Similarly, WINConnect metering database is secured from unauthorised local and remote access. There are limited amount of privilege accounts and need authentication to access the metering database. WINconnect business system (firewalls and IT set-ups) prevents remote access.	None
381	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Without limiting subclause 4.8(4), a network operator must ensure that electronic passwords and other electronic security controls are only issued to the specified authorised personnel and otherwise keep its records of electronic passwords, and other electronic security controls, secure from unauthorised access.	2	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						Given PRE has only 5 large customers and its sub-contractual arrangement with Synergy (to read meters remotely) and WINconnect (to manage the database and billing function) during the audit period this requirement was achieved.	None
382	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must retain energy data in its metering database for each metering point on its network, including any energy data that has been replaced under subclause 5.24, for at least the periods, and with the level of accessibility, prescribed.	2	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						The metering device itself can store 30 minutes interval energy data for 90 days as per the infrastructure service module of the master service deed, i.e. contract between PRE and Synergy that is being currently negotiated. During the audit period this was the case with the meter internal storage capacity. Synergy then hold on to the energy data for 395 days (corresponds to 13 months) in a readily accessible format. WINconnect maintains this energy data for minimum of 5 years and 11 months in a format that is accessible within a reasonable timeframe.	None

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383	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must use all reasonable endeavours to accommodate another Code participant's requirement to obtain a metering service and requirements in connection with the negotiation of a service level agreement.	NR	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.							✓	No such instance occurred during the audit period.	None
384	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Without limiting subclause 5.1(1), a network operator must: □ expeditiously and diligently process all requests for a service level agreement; □ negotiate in good faith with a Code participant regarding the terms for an agreement; and □ to the extent reasonably practicable in accordance with good electricity industry practice, permit a Code participant to acquire a metering service containing only those elements of the metering service which the Code participant wishes to acquire.	NR	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓							During the audit period, PRE has acquired 5 large customers, which were all negotiated under non-standard contract. It also negotiated and contractually arrange meter installation, reading, maintenance and operation service from Synergy, metering database and billing service from WINconnect. Enquiry regarding these requirement and the evidence provided suggest PRE conducted these process in good faith.	None
385	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must, for each metering point on its network, obtain energy data from the metering installation and transfer the energy data into its metering database by no later than 2 business days after the date for the scheduled meter reading for the metering point (or such other time as is specified in the applicable service level agreement).	2	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓							PRE meter (Synergy) read energy data in 30 minutes interval remotely. Every night Synergy send the previous 24 hour energy data in secure communication file to WINconnect to store and process it further for billing purposes.	None
386	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must, for each meter on its network, at least once in every 12-month period undertake a meter reading that provides an actual value that passes the validation processes in Appendix 2.	2	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓							Synergy provide actuals 30 minute interval reading on a daily basis to WINconnect. Also, upon registration of a new meter installation the commissioning process includes a verification of the energy data. New meters which are installed with Current Transformers (CT) undergo a CT Validation test post energisation of the meter to validate and test the energy data is recorded accurately at the meter. Synergy MSLA with PRE, as an extended service upon instruction from PRE, Synergy will conduct a CT validation and data validation test at the physical meter point. Sample of few screenshots were provided that showed the meter installation details.	None
387	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	The meter reading referred to in clause 5.4(1) must not be undertaken by the customer associated with the meter, and must be undertaken by a person who is employed or appointed by the network operator and who is suitably skilled in accordance with good electricity industry practice to carry out meter readings.	2	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓							This meter reading was not performed by the respective customer themselves. It was performed by appointed and licenced contractor (Synergy, Spotless)	None
388	Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1	A user must, when reasonably requested by a network operator, assist the network operator to comply with the network operator's obligation under subclause 5.4(1).	2	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓							All of PRE's customer meters are Type 4 meter with remote communication functions. Its reading, taken at 30 minute intervals throughout the day, is deemed actual value. This reading meets the validation process prescribed in Appendix 2 of Metering Code.	None
389	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Subject to subclause 5.5(2A)(b), a network operator may impose a charge for the provision of data, but only if □ a user has requested the energy data to the extent permitted by, and in accordance with the applicable service level agreement between it and the user; and □ if a customer has given a direction under subclause 5.17A(1), in accordance with the prescribed conditions.	2	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.							✓	No such instance occurred during the audit period. Provision of such service is detailed in the standard and extended service options within the model service level agreement between PRE and its customers.	None

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390	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must not impose a charge for the provision of standing data and for the provision of energy data if another enactment prohibits it doing so.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		No such instance occurred during the audit period. Provision of such service is detailed in the standard and extended service options within the model service level agreement between PRE and its customers.	None
391	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Subject to subclause 5.6(2), a network operator must provide validated, and where necessary, substituted or estimated energy data for a metering point to the user for the metering point and the IMO within the timeframes prescribed in subclause 5.6(1)(2).	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						PRE meter (Synergy) read energy data in 30 minutes interval remotely. Every night Synergy send the previous 24 hour energy data in secure communication file to WINconnect to store and process it further for billing purposes. The billing is performed on a monthly cycle as per the model service level agreement with the customers.	None
392	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	If a replacement energy data value is inserted in a metering database for a metering point, the network operator must provide replacement energy data to the user for the metering point and the IMO within the timeframes prescribed.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		No such instance occurred during the audit period.	None
393	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must provide a user with whatever information the network operator has that is necessary to enable the user to comply with its obligations under the Code of Conduct, within the time necessary for the user to comply with the obligations.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		No such instance occurred during the audit period.	None
394	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must provide standing data, provided to or obtained by it under this Code, to users where required to do so under any enactment.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		No such instance occurred during the audit period.	None
397	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	If a user gives a network operator an energy data request for a metering point in accordance with the communication rules, and the energy data request relates only to a time or times for which the user was the current user at the metering point, then the network operator must provide a user with a complete set of energy data for the metering point within the timeframes prescribed.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		No such instance occurred during the audit period.	None
398	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	If the current user for a metering point gives the network operator a standing data request for the metering point in accordance with the communication rules then the network operator must: <input type="checkbox"/> provide the current user with a complete current set of standing data for a metering point; and <input type="checkbox"/> advise whether there is a communications link for the metering point, within 2 business days after the receipt of the request.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		No such instance occurred during the audit period.	None
399	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	If a user makes a bulk standing data request, the network operator must in accordance with the communication rules, acknowledge receipt of the request and provide the requested standing data within the timeframes prescribed.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		No such instance occurred during the audit period.	None

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400	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	If a network operator provides energy data to a user or the IMO it must also provide the date of the meter reading in accordance with the requirements specified.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						PRE meter (Synergy) read energy data in 30 minutes interval remotely. Every night Synergy send the previous 24 hour energy data in secure communication file to WINconnect to store and process it further for billing purposes. The billing is performed on a monthly cycle as per the model service level agreement with the customers. During the audit period no energy data was provided to AEMO.	None
401	Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1	If a user collects or receives energy data from a metering installation then the user must provide the network operator with the energy data (in accordance with the communication rules) within the timeframes prescribed.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						Synergy which remotely 'reads' and collect energy data from all of PRE's metering installation provide this information to PRE's billing agent WINconnect on daily basis.	within 2 business days after collecting and receiving data. It is provided every night (24 hourly cycle)
402	Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1	A user must provide standing data and validated, and where necessary substituted or estimated, energy data to the user's customer to which that information relates where the user is required by an enactment or an agreement to do so for billing purposes or for the purpose of providing metering services to the customer.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						PRE invoicing to its customer is on monthly basis which also involves provision of standing data and consumed energy data.	
403	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must provide data for a metering point from its metering database to a person if (and to the extent that) the customer associated with the metering point gives the network operator a direction to do so that complies with subclause 5.17A(2).	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		No such instance occurred during the audit period.	None
404	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must comply with a direction under subclause 5.17A(1) within the timeframes prescribed.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		No such instance occurred during the audit period.	None
405	Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1	If a user collects or receives information regarding a change in the energisation status of a metering point then the user must provide the network operator with the prescribed information, including the stated attributes, within the timeframes prescribed.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						During the audit period, PRE has acquired 5 large customers and their metering installation were energised and commissioned. During all these commissioning activity, PRE's General Manager was present in person on site. Apart of commissioning of these customers installation, there has been no changes to energisation status of PRE's customer during the audit period.	
406	Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1	A user must, when requested by the network operator acting in accordance with good electricity industry practice, use reasonable endeavours to collect information from customers, if any, that assists the network operator in meeting its obligations described in the Code and elsewhere, and provide that information to the network operator.	NR	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						PRE has both retailing and distribution licences. During the audit period, PRE and its contracting parties (Synergy and WINconnect) met this obligation by collecting information from customers to assist PRE meeting its obligations described in the metering Code.	
407	Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1	A user must, to the extent that it is able, collect and maintain a record of the prescribed information in relation to the site of each connection point with which the user is associated.	NR	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						PRE has both retailing and distribution licences. During the audit period, PRE and its contracting parties (Synergy and WINconnect) met this obligation by collecting information from customers and maintaining them to assist PRE in meeting its obligations described in the metering Code.	
408	Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1	Subject to subclauses 5.19(3A) and 5.19(6), the user must, within 1 business day after becoming aware of any change in an attribute described in subclause 5.19(2), notify the network operator of the change.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						PRE has both retailing and distribution licences. During the audit period, PRE and its contracting parties (Synergy and WINconnect) met this obligation. Also, only 5 customers were commissioned by PRE in its microgrid during the audit period with PRE having complete knowledge of their customers at each stage of their application or change to their status.	

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409	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must give notice to a user, or (if there is a different current user) the current user, acknowledging receipt of any customer, site or address attributes from the user within the timeframes prescribed.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		No such instance occurred during the audit period.	None
410	Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1	The user must use reasonable endeavours to ensure that it does not notify the network operator of a change in an attribute described in subclause 5.19(2) that results from the provision of standing data by the network operator to the user.	NR	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						PRE has both retailing and distribution licences. Also, only 5 customers were commissioned by PRE in its microgrid during the audit period with PRE having complete knowledge of any change of attribute. Also there are no other retailer within the PRE microgrid network.	{(Note: This is to prevent a loop situation occurring)}
411	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must, by not later than 6 months after the date this Code applies to the network operator, develop, in accordance with the communication rules, an Energy Data Verification Request Form.	2	5		✓						The general control environment and control procedures within PRE business during the audit period was observed to be adequate given its business context, its code participants (only Synergy and WINConnect, and no 3rd party retailers or generators) and customer base (only 5 large customers), all of whom could easily contact PRE. However given the compliance observation, the control for this specific obligation was obviously missing during the audit period. The absence of this particular form denotes small improvement needed to control procedures, rather than to control environment.		✓					We could not sight any evidence of Energy Data Verification Request Form within PRE documentation and in its website. The impact of this non-compliance is considered minor given the context of code participants within the Peel Business Park during the audit period and possibility of contacting PRE (and/or Synergy) with relative ease.	PRE to develop Energy Data Verification Request Form to facilitate its customer to request verification of energy data in accordance to Metering Code clause 5.20. PRE may need to work together with WINconnect to develop this or delegate it to them.
412	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	An Energy Data Verification Request Form must require a Code participant to provide the information prescribed.	2	5		✓						The general control environment and control procedures within PRE business during the audit period was observed to be adequate given its business context, its code participants (only Synergy and WINConnect, and no 3rd party retailers or generators) and customer base (only 5 large customers), all of whom could easily contact PRE. However given the compliance observation, the control for this specific obligation was obviously missing during the audit period. The absence of this particular form containing specific information request denotes small improvement needed to control procedures, rather than to control environment.		✓					We could not sight any evidence of Energy Data Verification Request Form within PRE documentation and in its website. The impact of this non-compliance is considered minor given the context of code participants within the Peel Business Park during the audit period and possibility of contacting PRE (and/or Synergy) with relative ease.	PRE to develop Energy Data Verification Request Form to facilitate its customer to request verification of energy data in accordance to Metering Code clause 5.20. The Form must request NMI, checksum for the connection point, reason for the request, time period for interval meter and any relevant information.
413	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	If a Code participant requests verification of energy data under subclause 5.20(3), the network operator must, in accordance with the metrology procedure: □ subject to subclause 5.20(5), use reasonable endeavours to verify energy data; and □ inform the requesting Code participant of the result of the verification and provide the verified energy data to that Code participant within the timeframes prescribed.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						We sighted evidence of WINConnect requesting verification of energy data (via email and not via Energy Data Verification Form) from Synergy during the audit period. Synergy in response used reasonable endeavour to verify the energy data and inform WINConnect of the result of verification and provided verified or corrected energy data within the time prescribed/agreed.	None
414	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must comply with any reasonable request under subclause 5.21(1).	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		No such instance of test or audit request occurred to assess the accuracy, energy data and standing data of the metering installation during the audit period.	None
415	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A test or audit under subclause 5.21(1) is to be conducted in accordance with the metrology procedure and the applicable service level agreement.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		No such instance of test or audit request occurred to assess the accuracy, energy data and standing data of the metering installation during the audit period.	None
416	Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1	A Code participant must not request a test or audit under subclause 5.21(1) unless the Code participant is a user and the test or audit relates to a time or times at which the user was the current user or the Code participant is the IMO.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		No test of audit were requested no conducted during the audit period.	

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417	Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1	A Code participant must not make a request under subclause 5.21(1) that is inconsistent with any access arrangement or agreement.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		No test of audit were requested no conducted during the audit period.	
418	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator may only impose a charge for the testing of the metering installations, or auditing of information from the meters associated with the metering installations, or both, in accordance with the applicable service level agreement between it and the user.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		No such instance occurred during the audit period. Provision of such service is detailed in the extended metering service within the model service level agreement between PRE and its customers.	None
419	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Any written service level agreement entered into under subclause 5.21(7) must include a provision that no charge is to be imposed if the test or audit reveals a non-compliance with this Code.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						PRE's model service level agreement include the provision of PRE performing metering installation repair (SMS-3) following a test, audit or investigation identifying non-compliant metering installation, or upon notification of an outage or malfunction to a metering installation. However, no such instance occurred during the audit period.	None
420	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	If a test or audit shows that the accuracy of the metering installation or information from the meter associated with the metering installation does not comply with the requirements under this Code, the network operator must: □ advise the affected parties as soon as practicable of errors detected under a test or audit, the possible duration of the errors; and □ must restore the accuracy of the metering installation in accordance with the applicable service level agreement.12	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		No such instance occurred during the audit period.	None
421	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	The original stored error correction data in a meter must not be altered except during accuracy testing and calibration of a metering installation.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		No such instance occurred during the audit period.	None
422	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must validate energy data in accordance with this Code applying, as a minimum, the prescribed rules and procedures set out in Appendix 2 and must, where necessary, substitute and estimate energy data under this Code applying, as a minimum, the prescribed rules and procedures set out in Appendix 3.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						PRE's model service level agreement refers to its metrology procedure for substitution, estimation and validation of energy data, which in turn states that it is in accordance to the Metering Code. PRE's meter is remotely read in 30 minute interval and this energy consumption data is sent to WINconnect on a daily basis. Given this, there is no data substitution or estimation involved.	None
423	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	The network operator must use check metering data, where available, to validate energy data provided that the check metering data has been appropriately adjusted for differences in metering installation accuracy in accordance with subclause 3.13.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		The annual energy consumption of PRE customers do not meet the threshold of requiring partial check meter.	None
424	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	If a check meter is not available or energy data cannot be recovered from the metering installation within the time required under this Code, then the network operator must prepare substitute values using a method contained in Appendix 3 and agreed where necessary with the relevant Code participants.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		The annual energy throughput of PRE customers at their respective metering point do not meet the threshold for requiring partial check meter.	None

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425	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	If a network operator detects a loss of energy data or incorrect energy data from a metering installation, it must notify each affected Code participant of the loss or error within 24 hours after detection.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		No such instance occurred during the audit period.	None
426	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Substitution or estimation of energy data is required when energy data is missing, unavailable or corrupted, including in the circumstances described in this subclause.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		No such instance occurred during the audit period.	None
427	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must review all validation failures before undertaking any substitution.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		No such instance occurred during the audit period.	None
428	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	If a network operator determines that there is no possibility of determining an actual value for a metering point, then the network operator must designate an estimated or substituted value for the metering point to be a deemed actual value for the metering point.	2	5	✓							PRE's metrology procedure (in Sections 4.2.1 and 7) describes the substitution rule and various types consistent with the metering Code requirements.	✓						PRE has followed through their metrology procedure which is consistent with the Metering Code when no actual value were available during the audit period. Given that the PRE meters collect 30 minute interval energy data and has only experienced very few outages, its billing agent (WINconnect) nominate the substitute value aligned with the metrology procedure.	None
429	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	If a network operator has designated a deemed actual value for a metering point then the network operator must: <input type="checkbox"/> repair or replace the meter or one or more of components of metering equipment (as appropriate) at the metering point; and <input type="checkbox"/> subclauses 5.24(3(c) and 5.24(4) apply in respect of the estimated or substituted value which was designated to be the deemed actual value.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		No such instance occurred during the audit period.	None
430	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	If a network operator uses an actual value (first value) for energy data for a metering point, and a better quality actual or deemed actual value is available (second value), the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		No such instance occurred during the audit period.	None
431	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	If a network operator uses a deemed actual value (first value) for energy data for a metering point, and a better quality deemed actual value is available (second value), then the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		No such instance occurred during the audit period.	None
432	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	If a network operator uses an estimated or substituted value (first value) for energy data for a metering point, and a better quality actual, deemed, estimated or substituted value is available (second value), then the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice or the user and its customer jointly request it to do so.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.					✓		No such instance occurred during the audit period.	None

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433	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator (acting in accordance with good electricity industry practice) must consider any reasonable request from a Code participant for an estimated or substituted value to be replaced under subclause 5.24.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		No such instance occurred during the audit period.	None
434	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must ensure the accuracy of estimated energy data in accordance with the methods in its metrology procedure and ensure that any transformation or processing of data preserves its accuracy in accordance with the metrology procedure.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		No such instance occurred during the audit period.	None
435	Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1	Upon request from a network operator, the current user for a connection point must provide the network operator with customer attribute information that it reasonably believes are missing or incorrect within the timeframes prescribed.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓							PRE has both retailing and distribution licences. Also, only 5 customers were commissioned by PRE in its microgrid during the audit period with PRE having complete knowledge of all their customer attributes. Also there are no other retailer within the PRE microgrid network.	
436	Distribution Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	If a network operator makes an election under subclause 5.28 in respect of a network, then, (unless the election is terminated under the meter data agency agreement) the parties must undertake the activities prescribed, as applicable.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		PRE has appointed Synergy as its metering data agent, and not Western Power	None
437	Distribution Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	If a network operator makes an election under subclause 5.28 in relation to the network, then the parties must enter into an agreement in relation to the network, which must deal with at least the matters prescribed.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		PRE has appointed Synergy as its metering data agent, and not Western Power	None
438	Western Power Distribution Licence, condition 4.1.1 Western Power Transmission Licence, condition 4.1.1	If a network operator makes an election under subclause 5.28 in relation to a network, the electricity networks corporation must assess the compliance of each metering installation in the network with this Code and notify the electing network operator of each non-compliant metering installation.	2	5							✓							✓			This is meant for Western Power only
439	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	For each non-compliant metering installation notified under subclause 5.31(1)(b), the electing network operator may, by notice to the electricity networks corporation, require the electricity networks corporation to upgrade a non-compliant metering installation, in which case the electricity networks corporation must undertake the upgrade in accordance with the metering data agency agreement and good electricity industry practice.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		PRE has appointed Synergy as its metering data agent, and not Western Power	None
440	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Except to the extent that the metering data agency agreement provides otherwise, the costs which may be recovered by the electricity networks corporation under subclause 5.34(1) must not exceed the amounts prescribed.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		PRE has appointed Synergy as its metering data agent, and not Western Power	None

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441	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must for the year ending on each 30 June, prepare a report setting out the information listed in subclause 5.37(2) for each metering service it was requested during the year to provide or scheduled during the year to carry out.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer registered with life support equipment at their premise during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).					✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA	
442	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must provide a copy of the report described in subclause 5.37(1)(a) to the Minister and the ERA not less than 5 business days before it is published under subclause 5.37(3).	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer registered with life support equipment at their premise during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).					✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA	
443	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must publish the report described in subclause 5.37(1) within 3 months after the year ends.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer registered with life support equipment at their premise during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).					✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA	
444	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	The report prepared by the network operator must include the information prescribed.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer registered with life support equipment at their premise during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).					✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA	
445	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	For each relevant metering service, the information in subclause 5.37(2) must be reported separately for the specified classes of connection point.	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer registered with life support equipment at their premise during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).					✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA	
446	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	network operator must keep such records of information as are required for the purposes of subclause 5.37, and must retain the information (in a format that is accessible within a reasonable period of time) for at least 7 years after the day on which a report containing the information is published under subclause 5.37(1)(c)	2	5						✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer registered with life support equipment at their premise during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).					✓		PRE did not have any non-standard contract in place for small use customers during the audit period. While it had an ERA approved standard contract in place for small use customer it was never executed during the audit period. They also did not supply to any small use customer during the audit period. See the licensee qualification in the ERA Electricity Reporting Manual Table 8-17 (i.e. for small use customer only).	NA	
447	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 5.1	A network operator must, in relation to its network, comply with the agreements, rules, procedures, criteria and processes prescribed.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓							PRE complied with its model service level agreement, metrology procedure, mandatory link criteria (standard Type 4 metering solution) and registration process during the audit period. In lieu of established communication rules, it followed through using the agreed mode of communication via email, FTP service, NEM12 file format etc. during the audit period.	None
448	Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1	A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		PRE has both retailing and distribution licences. Presently, PRE does not have Communication Rules as explained earlier, and hence (as a user or retailer) cannot comply with the network Communication Rules. Once developed, PRE, an entity, is expected to comply with its own rules. The compliance to this obligation is hence not rated.	

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448A	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must, as soon as practicable and in any event no later than 6 months after the date this Code applies to it, submit to the ERA for its approval the prescribed documents in subclauses 6.2(a)-(d).	NR	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						PRE has had its model service level agreement and the metrology procedure submitted and approved by the ERA within 6 months of obtaining the EDL007 licence, or during the audit period. The mandatory link criteria is addressed due to the design and inbuilt characteristics of Type 4 metering installation which is an approved off-the-shelf product, constructed according to Australian standards and continues to remotely communicate with Synergy.	None
448B	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must publish the document within 10 business days after notification of the ERA's approval under subclauses 6.13(1)(a)(i), 6.16 or 6.17.	NR	5		✓						The general control environment and control procedures within PRE business during the audit period was observed to be adequate given its business context, its code participants (only Synergy and WINConnect, and no 3rd party retailers or generators) and customer base (only 5 large customers), all of whom could easily contact PRE. However given the compliance observation, the control for this specific obligation was obviously missing during the audit period. This was promptly addressed (reactively) post audit questioning and PRE's website now hosts its model service level agreement and metrology procedure. The existence of document denotes relatively mature control environment vs. non-publication of those document denoting small improvement needed to control procedures.		✓					Model service level agreement, metrology procedure, communication rules and reference that the mandatory link criteria is addressed due to the design and inbuilt characteristics of Type 4 metering installation which is an approved off-the-shelf product, constructed according to Australian standards and continues to remotely communicate with Synergy, could not be found in PRE's website during the audit. There is no evidence that these documents were available in its website during the audit period. There is also no evidence that they were made available in hardcopy (either for reference or for removal) in its office in WA during the audit period. Post audit questioning, we note that PRE has now uploaded its model service level agreement and metrology procedure in its website (i.e. post audit period). Given the context of code participants (only Synergy and WINConnect, and no 3rd party retailers or generators) and customer base (only 5 large customers) at Peel Business Park during the audit period, all of whom could easily contact PRE, this non-compliance is considered to have only minor effect on code participants and customers.	Publish the documents as per the Metering Code clause 6.18. Refer to the definition and interpretation of words 'documents' and 'publish' in the Metering Code.
448C	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must publish its communication rules as soon as practicable, and in any event within 6 months after the date this Code applies to it.	NR	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	PRE did not have communication rules which largely comprises of 'build packs' during the audit period. The communication rules could not be located within the provided documentation during the audit process. We note that the communication rules is meant to govern the communication of information and data between the metering code participants (for e.g. 3rd party retailer or generator or Western Power acting as MDA, all of which Peel Business Park does not have or were not applicable during the audit period). We appreciate the reason of commercial unviability for not establishing such communication rules given the context of code participants (limited parties) and customer base (only 5 large customers) at Peel Business Park during the audit period, and the use of electronic mail, established FTP server, and NEM12 file formats meeting the principles under Metering Code Clause 6.4. We also understand that PRE initially drafted the communication rules during the audit period but it was not finalised because of commercial reasons and to continue with a simple and agreed email method of communication with its code participants. Due to there being only one retailer on the network, and PRE essentially being an integrated provider, and the lack of a need for PRE to have communication rules, the compliance to this obligation is not rated.	None
448D	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	Once communication rules have been published for a network under clause 6.19A, or amended under clause 6.21(3), the communication rules may only be amended thereafter in accordance with the communication rules made under subclause 6.7(1)(k) or clause 6.19C.	NR	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	PRE did not have communication rules which largely comprises of 'build packs' during the audit period. The communication rules could not be located within the provided documentation during the audit process. There is no evidence of communication rules being published during the audit period. Consequently, there was no amendment to communication rules during the audit period. Hence the compliance is not rated against this obligation.	None
449	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must amend any document in accordance with the ERA's final recommendation.	NR	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						ERA's review and approval were sought by PRE during the audit period, for e.g. standard terms and conditions (for small-use customer, which has not been executed yet), metrology procedure, model service level agreement etc. Evidence in the form of email communication between PRE and ERA officials during the audit period showing ERA's review and notification of changes needed to the model service level agreement and metrology procedure, followed by PRE amending those code document, and finally ERA granting approval was sighted.	None
450	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	The network operator must publish any document that has been amended under subclause 6.20(4).	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						ERA's review and approval were sought by PRE during the audit period for standard terms and conditions (for small-use customer, which has not been executed yet). After ERA's review and approval, PRE published this document in its website during the audit period.	None

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451	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	Code participants must use reasonable endeavours to ensure that they can send and receive a notice by post, facsimile and electronic communication and must notify the network operator of a telephone number for voice communication in connection with the Code.	NR	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						PRE's contact details are known to its customers and vice-versa given the limited amount of large customers it had during the audit period.	None
452	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A network operator must notify each Code participant of its initial contact details and of any change to its contact details at least 3 business days before the change takes effect.	2	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	PRE's contact details are known to its customers and vice-versa given the limited amount of large customers it had during the audit period. No such change to PRE contact details occurred during the audit period (except the re-direction of email of its General Manager due to change in domain name). All other contact details remained the same during the audit period.	None
453	Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1	If requested by a network operator with whom it has entered into an access contract, the Code participant must notify its contact details to a network operator within 3 business days after the request.	2	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						PRE's contact details are known to its customers and vice-versa given the limited amount of large customers it had during the audit period. All contact information were notified within 3 days.	None
454	Generation Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Retail Licence, condition 4.1.1	A Code participant must notify any affected network operator of any change to the contact details it notified to the network operator under subclause 7.2(4) at least 3 business days before the change takes effect.	2	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						PRE has both retailing and distribution licences. During the audit period PRE microgrid did not have any other retailer and only 5 customers in its portfolio.	None
455	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	A Code participant must subject to subclauses 5.17A and 7.6 not disclose, or permit the disclosure of, confidential information provided to it under or in connection with the Code and may only use or reproduce confidential information for the purpose for which it was disclosed or another purpose contemplated by the Code.	2	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						Confidential information were handled appropriately in accordance with PRE's (parent company's), Synergy's and WINconnect's respective confidential information and privacy policies. It adheres to National Electricity Rules also relevant Australian privacy laws.	None
456	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	A Code participant must disclose or permit the disclosure of confidential information that is required to be disclosed by the Code.	2	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						Confidential information (standing data, energy data, commercially sensitive data) were disclosed as required by PRE's business and regulation such as to related body corporate (parent company), legal advisors, auditors, consultants/contractor during the course of doing its business during the audit period.	None
457	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	If any dispute arises between any Code participants, then (subject to subclause 8.2(3)) representatives of disputing parties must meet within 5 business days after a notice given by a disputing party to the other disputing parties and attempt to resolve the dispute by negotiations in good faith.	NR	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	PRE's non-standard (for large customer) terms and condition agreement contains dispute resolution clauses. It is generally consistent with the intent of the Metering Code. PRE's non-standard (for large customer) terms and condition agreement stipulates step-by-step dispute escalation point and durations which is generally aligned with the Metering Code, but uses slightly different escalation points and duration. However, no dispute occurred during the audit period. PRE's standard (for small use customer) model service level agreement which was not executed during the audit period also has dispute resolution clause that directly reference to this obligations from Metering Code.	None
458	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	If a dispute is not resolved within 10 business days after the dispute is referred to representative negotiations, the disputing parties must refer the dispute to a senior management officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.	NR	5							Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	PRE's non-standard (for large customer) terms and condition agreement contains dispute resolution clauses. It is generally consistent with the intent of the Metering Code. PRE's non-standard (for large customer) terms and condition agreement stipulates step-by-step dispute escalation point and durations which is generally aligned with the Metering Code, but uses slightly different escalation points and duration. However, no dispute occurred during the audit period. PRE's standard (for small use customer) model service level agreement which was not executed during the audit period also has dispute resolution clause that directly reference to this obligations from Metering Code.	None

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459	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	If the dispute is not resolved within 10 business days after the dispute is referred to senior management negotiations, the disputing parties must refer the dispute to the senior executive officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.	NR	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	PRE's non-standard (for large customer) terms and condition agreement contains dispute resolution clauses. It is generally consistent with the intent of the Metering Code. PRE's non-standard (for large customer) terms and condition agreement stipulates step-by-step dispute escalation point and durations which is generally aligned with the Metering Code, but uses slightly different escalation points and duration. However, no dispute occurred during the audit period. PRE's standard (for small use customer) model service level agreement which was not executed during the audit period also has dispute resolution clause that directly reference to this obligations from Metering Code.	None
460	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	If the dispute is resolved by representative negotiations, senior management negotiations or CEO negotiations, the disputing parties must prepare a written and signed record of the resolution and adhere to the resolution.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	PRE's non-standard (for large customer) terms and condition agreement contains dispute resolution clauses. It is generally consistent with the intent of the Metering Code. PRE's non-standard (for large customer) terms and condition agreement stipulates step-by-step dispute escalation point and durations which is generally aligned with the Metering Code, but uses slightly different escalation points and duration. However, no dispute occurred during the audit period. PRE's standard (for small use customer) model service level agreement which was not executed during the audit period also has dispute resolution clause that directly reference to this obligations from Metering Code.	None
461	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	The disputing parties must at all times conduct themselves in a manner which is directed towards achieving the objective in subclause 8.3(1).	NR	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	PRE's non-standard (for large customer) terms and condition agreement contains dispute resolution clauses. It is generally consistent with the intent of the Metering Code. PRE's non-standard (for large customer) terms and condition agreement stipulates step-by-step dispute escalation point and durations which is generally aligned with the Metering Code, but uses slightly different escalation points and duration. However, no dispute occurred during the audit period. PRE's standard (for small use customer) model service level agreement which was not executed during the audit period also has dispute resolution clause that directly reference to this obligations from Metering Code.	None
Electricity Industry (Network Quality and Reliability of Supply) Code – Licence condition																				
462	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A distributor or transmitter must, as far as reasonably practicable, ensure that electricity supply to a customer's electrical installations complies with prescribed standards.	NR	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						PRE network is designed, installed, operated and maintained to supply electricity adhering to voltage requirements set out in AS 60038; voltage fluctuations limits as set out AS/NZS 61000 Parts 3.3, 3.5 and 3.7; harmonic distortion limits outlined in AS/NZS 61000 Parts 3.2 and 3.6. This is detailed in PRE's service and technical installation rules. It is also stipulated in its network performance and planning criteria manual.	None
463	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A distributor or transmitter must, so far as reasonably practicable, disconnect the supply of electricity to installations or property in specified circumstances, unless it is in the interest of the customer to maintain the supply.	NR	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	No such instance occurred during the audit period. However, PRE's service and technical installation rules details the provision of disconnection under certain circumstances to avoid damages and failure to adhere to harmonics and voltage fluctuation bands.	None
464	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A distributor or transmitter must, as far as reasonably practicable, ensure that the supply of electricity is maintained and the occurrence and duration of interruptions is kept to a minimum.	NR	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						This obligation is provisioned within various documents such as PRE's non-standard (large customer) terms and condition agreement, standard (small-use customer) terms and condition agreement which has not been used, and also in its service and technical installation rules. Review of sample of historic planned and unplanned outages during the audit period indicates an effort to restore the supply to customer soon.	None
465	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A distributor or transmitter must, so far as reasonably practicable, reduce the effect of any interruption on a customer.	NR	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						This obligation is provisioned within various documents such as PRE's non-standard (large customer) terms and condition agreement, standard (small-use customer) terms and condition agreement which has not been used, and also in its service and technical installation rules. Review of sample of historic planned and unplanned outages during the audit period indicates an effort to restore the supply to customer soon. Also, the planned outages were performed after consultation with and notification to customers. In one instance, the outage activity was re-scheduled to reduce effect to its customer up customer request.	None

Compliance Manual No	Obligation under Licence condition	Description	Type (1, 2 or 3)	Audit Priority (1=highest, 5=lowest)	Control rating						Compliance rating						Recommendations			
					A	B	C	D	N/P	N/A	Control observation / comment	1	2	3	4	N/R		N/A	Compliance observation / comment	
466	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A distributor or transmitter must consider whether, in specified circumstances, it should supply electricity by alternative means to a customer who will be affected by a proposed interruption.	NR	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	No such instance occurred during the audit period. All planned outages were performed after consultation with and notification to customers. In one instance, the outage activity was re-scheduled to reduce effect to its customer up customer request. There was no need for alternate arrangements to be arranged by PRE. Alternate supply is considered in PRE's service and technical installation rules.	
467	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	A distributor must take prescribed action in the event of a significant interruption to a small use customer.	2	5							✓							✓		ERA Electricity Compliance Reporting Manual Section/Table 8-17 qualifies this for "small use only"
468	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A distributor or transmitter must, so far as reasonably practicable, ensure that customers in specified areas do not have average total lengths of interruptions of supply greater than specified durations.	NR	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						Review of sample of historic planned and unplanned outages duration during the audit period indicates that all outages were well within the duration limit of 160 minutes prescribed for 'the urban areas other than the Perth CBD'.	
469	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	The average total length of interruptions of supply is to be calculated using the specified method.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓						Review of sample of historic planned and unplanned outages duration during the audit period indicates that all outages were well within the duration limit of 160 minutes prescribed for 'the urban areas other than the Perth CBD'. PRE performance cannot be measured using the formula given in the Code because of lack of historic (4 years) trend.	
470	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A distributor or transmitter must, on request, provide to an affected customer a free copy of an instrument issued by the Minister and of any notice given under section 14(7) of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	This is not applicable to PRE as it has not received any instrument from Minister or exemption during the audit period.	
471	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A distributor or transmitter that agrees with a customer to exclude or modify certain provisions must set out the advantages and disadvantages to the customer of doing so in their agreement.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	This is not applicable to PRE during the audit period as neither discussed, negotiated nor agreed to exclude or modify certain provisions. Hence there are no outlining of pros and cons of such actions.	
472	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	A distributor operating a relevant distribution system must, in specified circumstances, make a payment to a customer within a specific timeframe for a failure to give required notice of planned interruption.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	All planned outages were adequately notified to affected customers in advance during the audit period. Also, PRE is not a corporation	
473	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	A distributor operating a relevant distribution system must, in specified circumstances, make a payment to a customer within a specific timeframe if a supply interruption exceeds 12 hours.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	No such instance occurred as all outages during the audit period were less than 12 hours. Also, PRE is not a corporation.	
474	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	A distributor operating a relevant distribution system must provide eligible customers with information about applying for payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	Not rated because PRE is not a corporation and hence not applicable.	
475	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	A distributor operating a relevant distribution system must provide written notice to customers about payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓	Not rated because PRE is not a corporation and hence not applicable.	

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476	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1	A distributor operating a relevant distribution system must provide written notice to eligible customers about payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005 not less than once in each financial year.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		Not rated because PRE is not a corporation and hence not applicable.	
477	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A distributor or transmitter must take all such steps as are reasonably necessary to monitor the operation of its network to ensure compliance with specified requirements.	NR	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓							PRE monitors its operation to adhere to provisions outlined in various documents such as PRE's non-standard (large customer) terms and condition agreement, standard (small-use customer) terms and condition agreement which has not been used, and also in its service and technical installation rules in relation to minimising the effect of interruption to customers. Review of sample of historic planned and unplanned outages during the audit period indicates recording of its network operation. Review of a separate investigation report (by an independent third party) indicates analysis of an outage to determine the cause and recommended actions.	
478	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A distributor or transmitter must keep records of information regarding its compliance with specific requirements for the period specified.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.	✓							PRE has been operational for less than 2 years now and during this time it has kept its operational record. It has also annually reported its performance against its licence conditions (EDL007 and ERL28) datasheet to the ERA. These information are available in its website.	
479	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A distributor or transmitter must complete a quality investigation requested by a customer in accordance with specified requirements.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		No such quality investigation was requested by PRE customer during the audit period.	
480	Distribution Licence, condition 4.1.1 Integrated Regional Licence, condition 4.1.1 Transmission Licence, condition 4.1.1	A distributor or transmitter must report the results of an investigation to the customer concerned.	2	5						✓		Not performed because the audit priority is >3 as per the ERA's 2019 Audit and Review Guidelines Section 5.1.6.						✓		No such quality investigation was requested by PRE customer during the audit period.	



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