

Post Audit and Post Review Implementation Plans

These plans are prepared in response to the Audit Report produced by GHD on 27th June 2022

1. Licence Conditions - Compliance and Control Audit - Post- Audit Implentation Plan

Audit Report Reference	Non Compliance / Controls Improvement	Auditors Recommendation	Action Proposed to be taken by Licensee	Responsible Person	Target Completion Date
9/2022 (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.	PRE has prepared an Energy Data Verification Request Form.	General Manager	8/07/2022
10/2022 (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.	PRE has prepared an Energy Data Verification Request Form.	General Manager	8/07/2022
(11/2022) 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.	PRE has published its ERA approved Model Service Level Agreement and its Metrology Procedure.	General Manager	7/06/2022

2. Asset Management System Review - Post Review Implementation Plan

Audit Report Reference	Non Compliance / Controls Improvement	Auditors Recommendation	Action Proposed to be taken by Licensee	Responsible Person	Target Completion Date
1/2022	<p>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:</p> <ul style="list-style-type: none"> •Asset failure risk •Operational risk •Maintenance risk •Asset environment risk •Asset management system risk <p>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.</p>	<p>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:</p> <ul style="list-style-type: none"> •Asset failure risk •Operational risk •Maintenance risk •Asset environment risk •Asset management system risk <p>The outcome and ongoing treatment of these assessments should inform the asset replacement strategy, operational and maintenance priorities, contingency planning, emergency management plan etc.</p>	<p>PRE acknowledges the recommendation and will take it into account when it conducts its next risk management review</p>	<p>General Manager</p>	<p>31/05/2023</p>
2/2022	<p>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.</p>	<p>PRE to review the adequacy of document review process and workflow to ensure plans and documents are reviewed by the due date.</p>	<p>PRE acknowledges the recommendation and will conduct a review of the document review process and work flow to ensure documents are reviewed by their due date</p>	<p>General Manager</p>	<p>31/05/2023</p>
3/2022	<p>Asset disposal/replacement strategies – Disposal alternatives and/or replacement strategies for key assets have not been considered as part of the asset management process.</p>	<p>PRE to review business case development procedure to determine and document life cycle costs for new assets</p>	<p>PRE acknowledges the recommendation and will take it into account when it conducts its next review of the Asset Management Plan which is due in May 2023</p>	<p>General Manager Operations and Engineering</p>	<p>31/05/2023</p>
4/2022		<p>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: • Disposal alternative evaluation process • Replacement strategy for key electrical assets. • An asset register of all assets</p>	<p>PRE acknowledges the recommendation and will take it into account when it conducts its next review of the Asset Management Plan which is due in May 2023</p>	<p>General Manager Operations and Engineering</p>	<p>31/05/2023</p>
5/2022		<p>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.</p>	<p>PRE acknowledges the recommendation and will take it into account when it conducts its next review of the Asset Management Plan which is due in May 2023</p>	<p>General Manager Operations and Engineering</p>	<p>31/05/2023</p>

6/2022	<p>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).</p>	<p>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).</p>	<p>PRE acknowledges the recommendation and will evaluate the viability and feasibility of consolidating the existing asset registers</p>	<p>General Manager Operations and Engineering</p>	<p>31/05/2023</p>
7/2022		<p>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</p>	<p>PRE acknowledges the recommendation and will evaluate the viability and feasibility of replicating the risk register currently held within the Jarrah owned Trunk system.</p>	<p>General Manager Operations and Engineering</p>	<p>31/05/2023</p>
8/2022		<p>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.</p>	<p>PRE acknowledges the recommendation and will evaluate the viability and feasibility of consistent numbering of the assets to across the relevant contractors databases.</p>	<p>General Manager Operations and Engineering</p>	<p>31/05/2023</p>