



**Performance Audit & Asset Management
System Review Report 2022 – EGL29
Warradage Wind Farm
BEI WWF PTY LTD**

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GLOSSARY

AMA – Asset Management Agreement

AMP - Asset Management Plan

AMS – Asset Management System

Asset Manager - SynergyRED (i.e. Engaged by BEI WWF to act as Asset Manager for WWF)

Audit Guidelines - March 2019 Audit and Review Guidelines – Electricity and Gas Licences

BEI – Bright Energy Investments Pty Ltd

BEI Group – BEI and its subsidiary companies and operating trusts (including BEI WWF)

BEI WWF – BEI WWF Pty Ltd as trustee for the WWF Trust

BOP – Balance of Plant

CB – Circuit Breaker

Cbus – Construction and Building Unions Superannuation

CMMS - Computerised Maintenance Management System

Compliance Reporting Manual - Electricity Compliance Reporting Manual – February 2022

CSEP – Community and Stakeholder Engagement Plan

DSA – Development Services Agreement between SynergyRED and the BEI Group

DIF – the Dutch Infrastructure Fund

EGL29 – The Generation Licence for BEI WWF Pty Ltd

ENT – Eneabba Terminal

ERA – Economic Regulation Authority

ETAC – Electricity Transfer Access Contract

WDF - Warradarge Wind Farm

GES – Geographe Environmental Services

WWF – Warradarge Wind Farm

WWF Trust – the owner and operator of the WWF

MW – Megawatt

OEM – Original Equipment Manufacturer

O&M – Operate and Maintain

O&M Contractor - Operation and Maintenance Contractor, currently Vestas

SynergyRed – Synergy Renewable Energy Developments Pty Ltd

SWIN – Southwest Interconnected Network

SWIS – Southwest Interconnected System

Vestas – Vestas Australian Wind Technology Pty Ltd

WP – Western Power

WPN – Western Power Networks

WTGs – Wind Turbine Generators

This report was prepared by representatives of GES Pty Ltd in relation to the above named client's conformance to the nominated audit standard(s). Audits were undertaken using a sampling process and the report and its recommendations were reflective only of activities and records sighted during this audit process. GES Pty Ltd shall not be liable for loss or damage caused to or actions taken by third parties as a consequence of reliance on the information contained within this report or its accompanying documentation. The client had the opportunity for review to ensure no commercially sensitive information was disclosed.

1. EXECUTIVE SUMMARY

The Licensee is BEI WWF Pty Ltd as trustee for the WWF Trust and the asset is a 180MW Warradarge Wind Farm (**WWF** or **WDWF**) located in the Mid West Region of Western Australia, approximately 260km north of Perth in the Shire of Coorow.

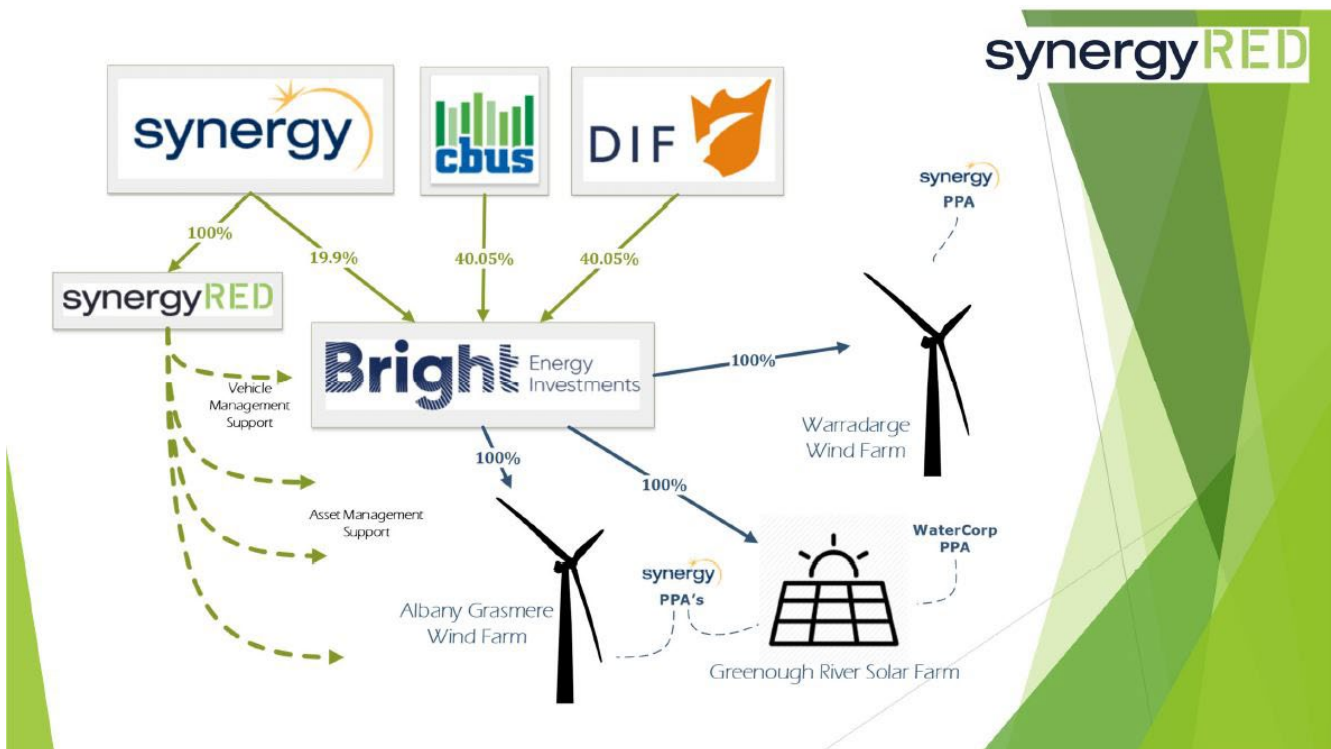
Construction of the 180MW Warradarge Wind Farm, near Eneabba in Western Australia, was completed 29 November 2021 and the wind farm is now in full production.

The owner of the WWF generation facility is BEI WWF Pty Ltd as trustee for the WWF Trust (**BEI WWF**), with the parent company of BEI WWF being Bright Energy Investments Pty Ltd as trustee for the Bright Energy Investments Trust (**BEI**).

The BEI group of companies (**BEI Group**) are owned by the joint venture partners Dutch Infrastructure Fund (**DIF**), Construction and Building Unions Superannuation (**Cbus**) and Electricity Generation and Retail Corporation trading as Synergy (**Synergy**).

Synergy Renewable Energy Developments Pty Ltd (**SynergyRED**) has been engaged by BEI WWF to act as Asset Manager for the WWF. An overview of the BEI Operational Schematic is depicted in Figure 1.

Figure 1 BEI Operational Schematic



Asset Overview

The facility consists of a total of 51 Vestas 3.6MW wind turbine generators (**WTGs**) installed at the facility. Power generated by the WDWF is exported to the South West Interconnected System (**SWIS**). The point of connection is 330 kV at the WDWF substation, with a 10 km 330 kV spur line connecting WDWF to the Eneabba Terminal (**ENT**). The 330 kV line and ENT are Western Power (**WP**) assets.

Construction of the facility also included 55km of new gravel roads around the 3,800ha site and 117km of underground 33kV electrical cabling.

Vestas has been appointed as Operations and Maintenance contractor for plant operations. Vestas uses a pool workforce, including apprentices, to maintain 3 different wind farms in the area, with an average of 6 local technicians utilised at Warradarge for most of the time. In addition, SynergyRED provides asset management services to the facility on behalf of BEI.

The Licensee has issued a Consultancy Brief to undertake its first Performance Audit and Asset Management System Review as required by the Economic Regulation Authority (**ERA/the Authority**). BEI WWF holds a Generation Licence (Licence Number **EGL29**) under the *Electricity Industry Act 2004*.

Sections 13 and 14 of the *Electricity Industry Act 2004* require as a condition of every licence that the licensee must, not less than once in every period of 24 months (or any longer period that the Authority allows) calculated from the grant of the licence, provide the Authority with a performance audit and an asset management system review report by an independent expert acceptable to the Authority. Geographe Environmental Services (**GES**) has been approved by the Authority (Ref: D247171 Date: 2/6/22) to undertake the works subject to the development of an audit and review plan.

An audit and review plan was developed and approved by the ERA (Ref: D249153 Date 15/7/33) in accordance with the process flowchart for performance audits and asset management system reviews as detailed in the March 2019 Audit and Review Guidelines – Electricity and Gas Licences (**Audit Guidelines**).

This is the first performance audit and asset management review for EGL29. The period for the audit and review is 22 May 2019 to 30 June 2022, and the report is due to be submitted to the Authority on or before 30 September 2022.

It is confirmed that the licensee facilitated the audit and review process by providing the audit team;

- Access to the facilities and business premises identified in the audit and review plan.
- Access to materials and information sources that the auditors needed to conduct the audit or review, including data, reports, records and any other relevant information that were available.
- Access to the relevant personnel at both the WWF site and the Perth Office that were visited.
- An introduction to persons, other than employees of the licensee, who are relevant to the audit and review, such as contractors.

Performance Audit and Asset Management Review Summary of Findings

The Asset Management System Review and the Performance Audit have been conducted in order to assess the effectiveness of BEI WWF's Asset Management Systems and level of compliance with the conditions of its Electricity Generation Licence EGL29.

Through the execution of the Audit Plan, field work, assessment and testing of the control environment, the information system, control procedures and compliance attitude, the audit team members have gained reasonable assurance that BEI WWF Pty Ltd had an effective asset management system with internal review processes implemented and had complied with its Generation Licence, with the exception of obligations 105 and 124. It is noted these non-compliances were as a result of issues relating to administrative oversights (refer Table 1). The Licensee demonstrated effective correction action to address the non-compliance and compliance was noted for the remainder of the audit period.

TABLE 1 Summary Non-Compliance Performance Audit

REF*	OBLIGATION DESCRIPTION	NON-COMPLIANCE & EFFECTIVENESS OF CORRECTIVE ACTION
105	<p>OBLIGATION: Generation Licence, condition 4.2.1/ Economic Regulation Authority (Licensing Funding) Regulations 2014</p> <p>A licensee must pay the prescribed licence fees to the ERA according to clauses 6, 7 and 8 of the Economic Regulation Authority (Licensing Funding) Regulations 2014.</p>	<p>Standing Charges were paid outside the requirements of the obligations on two occasions during the audit period (i.e., October-December 2020 and April-June 2021 quarters).</p> <p>The payment of Standing Charges has been well addressed by the Licensee and future payments were made within the required timeframes. Monitoring was noted through the BEI Critical Dates, AMP referenced requirement, budget costings were confirmed, and the Governance Manager monitored compliance. The Licensee demonstrated awareness to the obligation through controls and effective corrective action.</p> <p>As such, no further recommendations were made.</p>
124	<p>OBLIGATION: Generation Licence, condition 4.5.1 / Electricity Industry Act, section 11</p> <p>A licensee must provide the ERA, in the manner prescribed, with any information that the ERA requires in connection with its functions under the Electricity Industry Act.</p>	<p>The Licensee did not submit Standing data charges in the 2019 and 2020 years as there was some confusion as to the requirement to report MW generation capacity as practical completion had not yet occurred.</p> <p>The Licensee omitted reporting the minor non-compliances in the 2021 Annual Compliance Report.</p> <p>The Licensee demonstrated awareness to the obligation through the implementation of controls and effective corrective action. Following the April-June 2021 quarter, all future standing charges were paid within the prescribed timeframes and the integrity of the reporting for completeness and accuracy was confirmed for the 2022 Annual Compliance Report. Provision of standing data by the due date was confirmed for the 2021 and 2022 years. Monitoring was noted through the BEI Critical Dates, AMP referenced requirement, email communications were confirmed, and the Governance Manager monitored compliance. Self-assessment checklists and third party independent review of the obligations were completed to ensure compliance proactively. As such, no further recommendations were made.</p>

There were no recommendations made by the Audit Team to address internal compliance processes and there were no asset management system deficiencies identified during the review period. Opportunities for

improvement identified that relate to the performance audit and review findings have been provided directly to the Licensee and have not been included in this document as required by the 2019 Audit and Review Guidelines – Electricity and Gas Licences section 5.1.8.

It is the auditors' opinion that compliance and integrity of reporting by the Licensee is considered well managed and is comprehensively detailed in Appendix 1. This is the first audit and as such issues arising from the previous audit and review report are not applicable.

The site audit was conducted in the Perth office on the 25th July 2022 and at the WWF on the 26th of July 2022. This audit report is an accurate representation of the audit team's findings and opinions. The Auditors confirm that the Licensee provided assistance to the Auditors, as required by Section 4.1 of the Audit Guidelines (2019).

1.1 Performance Audit Summary of Findings

Two licence obligations reviewed were found to be non-compliant during the audit period (refer Table 1, 4 and Appendix 1). During the audit period, the organisation has established administrative controls and corrective action processes to address these non-compliances and as such, compliance requirements were met in subsequent years.

A comprehensive report of the audit findings is included in Appendix 1.

1.2 Performance Audit Excluded Conditions

During the audit period, there were some Electricity Compliance Reporting Manual obligations for EGL29 that have been excluded (Refer Table 2) as they are not applicable to WWF operations. There are no Type 1 reporting requirements applicable to EGL29. Excluded compliance obligations were detailed in the approved Audit Plan. Deviations from the Audit Plan are detailed in Section 1.3 and Table 3.

TABLE 2 Obligations Excluded from the Audit Report

REF*	OBLIGATION DESCRIPTION	REASON FOR EXCLUSION
101 [^]	Section 13(1) 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 (or any longer period that the ERA allows).	Not Applicable – this obligation only applies to the previous Audit & Review report as that is the report submitted during the current audit period. Since this is BEI WWF's first Audit & Review it is Not Applicable.
104 [^]	Section 14(1)(c) 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.	
120	Licence, condition 5.2.4 A licensee must comply with any individual performance standards prescribed by the ERA.	Not Applicable – Individual performance standards have not been prescribed by the Authority.

401	<p>Electricity Industry Metering Code, CI 5.16 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.</p>	Not Applicable – The Network Operator collects the energy data.
405	<p>Electricity Industry Metering Code, CI 5.18 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.</p>	Not Applicable – The network operator has access to their own tariff meters.
402	<p>Electricity Industry Metering Code, CI 5.17(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.</p>	Not Applicable to Generators (Obligation removed for Generation Licences in the Electricity Compliance Reporting Manual – February 2022)
406	<p>Electricity Industry Metering Code, CI 5.19(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.</p>	
407	<p>Electricity Industry Metering Code, CI 5.19(2) 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.</p>	
408	<p>Electricity Industry Metering Code, CI 5.19(3) 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.</p>	
410	<p>Electricity Industry Metering Code, CI 5.19(6) 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.</p>	
435	<p>Electricity Industry Metering Code, CI 5.27 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.</p>	

* Electricity Compliance Reporting Manual – June 2020

^ Deviation from Audit Plan see Table 3

1.3 Deviation from the Audit Plan

As required by section 5.1.4 of the Audit and Review Guidelines – 2019, Auditors must identify any licence obligations or effectiveness criteria that were assessed after the approval of the audit plan by the ERA, as ‘not applicable’ or if the auditor has revised the audit priority for one or more licence obligations, the auditor must identify this in the report. Table 3 describes the deviations from the Audit Plan and explains the revision;

TABLE 3 Deviations from the Audit Plan

REF	OBLIGATION REFERENCE	DEVIATION DESCRIPTION
101 Type [2]	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.	Audit Priority - Priority 4 Deviation – Not Applicable Explanation of Revision - This is BEI WWF’s first audit; this obligation is not applicable. The obligation only applies to the previous audit report as that is the report submitted during the current audit period.
104 Type [2]	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.	Audit Priority - Priority 4 Deviation – Not Applicable Explanation of Revision - This is BEI WWF’s first review; this obligation is not applicable. The obligation only applies to the previous review report as that is the report submitted during the current review period.

The Generation Licence compliance elements that were included in the scope of this audit are as defined in Table 5 and are further detailed in Appendix 1.

A two-dimensional rating scale (refer Section 5.1.6.1 of the Audit Guidelines and Table 4 below) was used in the Audit report to summarise the compliance rating for each licence condition. Each obligation was rated for both the adequacy of existing controls and the compliance with the relevant licence obligation. The methodology for the Audit has been clearly defined in the Audit Plan.

TABLE 4 Audit Compliant and Control Rating Scales

Adequacy of Controls Rating		Compliance Rating	
Rating	Description	Rating	Description
A	Adequate controls – no improvement needed	1	Compliant
B	Generally adequate controls – improvement needed	2	Non-Compliant – minor impact on customers or third parties
C	Inadequate controls – significant improvement needed	3	Non-Compliant – moderate impact on customers or third parties
D	No controls evident	4	Non-Compliant – major impact on customers or third parties
NP	Not Performed	NR	Not rated – Determined Not Applicable during the audit period

Source: Table 6: 2019 Audit and Review Guidelines – Electricity and Gas Licences

TABLE 5 Performance Audit Compliance Summary

Compliance Obligation Reference No.	Licence Reference	Audit Priority	Adequacy of Controls Rating					Compliance Rating				
			A	B	C	D	NP	1	2	3	4	NR
SECTION 8: TYPE 1 REPORTING REQUIREMENTS												
THERE ARE NO TYPE 1 REPORTING REQUIREMENTS APPLICABLE TO EGL29												
SECTION 12: ELECTRICITY INDUSTRY ACT - LICENCE CONDITIONS AND OBLIGATIONS												
102	Electricity Industry Act section 14(1)a) Generation Licence, condition 5.1.1	4	A					1				
103	Electricity Industry Act section 14(1)(b) Generation Licence, condition 5.1.2 and 5.1.3	4	A					1				
105	Electricity Industry Act section 17(1) Generation Licence, condition 4.2.1	4	A						2			
106	Electricity Industry Act section 31(3) Generation Licence, condition 4.1.1	5	A					1				
107	Electricity Industry Act section 41(6) Generation Licence, condition 4.1.1	4									NP	
SECTION 13: ELECTRICITY LICENCES - LICENCE CONDITIONS AND OBLIGATIONS												
119	Electricity Industry Act section 11 Generation Licence, condition 4.3.1	4	A					1				
121	Electricity Industry Act section 11 Generation Licence, condition 5.3.2	4	A					1				
122	Electricity Industry Act section 11 Generation Licence, condition 5.1.5	4	A					1				
123	Electricity Industry Act section 11 Generation Licence, condition 4.4.1	4									NP	
124	Electricity Industry Act section 11 Generation Licence, condition 4.5.1	4	A						2			
125	Electricity Industry Act section 11 Generation Licence, condition 3.8.1 and 3.8.2	4									NP	
126	Electricity Industry Act section 11 Generation Licence, condition 3.7.1	4	A					1				
SECTION 14: ELECTRICITY INDUSTRY METERING CODE - LICENCE CONDITIONS AND OBLIGATIONS												
324	Electricity Industry Metering Code CI 3.3B Generation Licence, condition 4.1.1	4									NP	
339	Electricity Industry Metering Code CI 3.11(3) Generation Licence, condition 4.1.1	4									NP	
371	Electricity Industry Metering Code CI 4.4(1) Generation Licence, condition 4.1.1	5									NP	
372	Electricity Industry Metering Code CI 4.5(1) Generation Licence, condition 4.1.1	5									NP	
373	Electricity Industry Metering Code CI 4.5(2) Generation Licence, condition 4.1.1	4									NP	
388	Electricity Industry Metering Code CI 5.4(2) Generation Licence, condition 4.1.1	4									NP	
416	Electricity Industry Metering Code CI 5.21(5) Generation Licence, condition 4.1.1	4									NP	
417	Electricity Industry Metering Code CI 5.21(6) Generation Licence, condition 4.1.1	4									NP	

Compliance Obligation Reference No.	Licence Reference	Audit Priority	Adequacy of Controls Rating					Compliance Rating				
			A	B	C	D	NP	1	2	3	4	NR
448	Electricity Industry Metering Code CI 6.1(2) Generation Licence, condition 4.1.1	4	A					1				
451	Electricity Industry Metering Code CI 7.2(1) Generation Licence, condition 4.1.1	5	A					1				
453	Electricity Industry Metering Code CI 7.2(4) Generation Licence, condition 4.1.1	4										NR
454	Electricity Industry Metering Code CI 7.2(5) Generation Licence, condition 4.1.1	4										NR
455	Electricity Industry Metering Code CI 7.5 Generation Licence, condition 4.1.1	4										NR
456	Electricity Industry Metering Code CI 7.6(1) Generation Licence, condition 4.1.1	4										NR
457	Electricity Industry Metering Code CI 8.1(1) Generation Licence, condition 4.1.1	5										NR
458	Electricity Industry Metering Code CI 8.1(2) Generation Licence, condition 4.1.1	5										NR
459	Electricity Industry Metering Code CI 8.1(3) Generation Licence, condition 4.1.1	5										NR
460	Electricity Industry Metering Code CI 8.1(4) Generation Licence, condition 4.1.1	4										NR
461	Electricity Industry Metering Code CI 8.3(2) Generation Licence, condition 4.1.1	5										NR

As required by the Audit Guidelines Section 5.1.6.1, Table 6 lists the number of licence obligations that were given each combination of compliance and controls ratings. The table allows licensees and the ERA to confirm the auditor has rated all relevant licence obligations, and provides a simple summary of the licensee’s compliance during the audit period.

TABLE 6 Compliance and Controls Ratings Summary Table

		Compliance Rating						TOTAL
		1	2	3	4	N/R		
Controls Rating	A	10	2	-	-	-	12	
	B	-	-	-	-	-	-	
	C	-	-	-	-	-	-	
	D	-	-	-	-	-	-	
	N/P	-	-	-	-	20	20	
	TOTAL	10	2	-	-	20	32	

1.4 Asset Management System Review Summary

The asset management system was found to be appropriate and meets the requirements of the Audit and Review Guidelines – Electricity and Gas Licences (2019). There were no findings where the asset management review performance rating or process and policy rating required recommendations to be made (refer section 5.1.8 of the Audit and Review Guidelines).

As required by section 5.1.6.2 of the Audit & Review Guidelines (March 2019) Table 8 summarises the auditor’s assessment of both the process and policy definition rating and the performance rating for each key process in the licensee’s asset management system, using the scales described in Table 7 (refer Section 3.3, Methodology for Asset Management Review).

TABLE 7 Rating Scale Reviews - Process & Policy and Performance

Process And Policy Rating Scale		Performance Rating Scale	
Rating	Description	Rating	Description
A	Adequately defined	1	Performing effectively
B	Requires some improvement	2	Improvement required
C	Requires substantial improvement	3	Corrective action required
D	Inadequate	4	Serious action required
NR	Not rated	NR	Not rated

Source: Table 9 &10: 2019 Audit and Review Guidelines – Electricity and Gas Licences

The process and policy and asset management system adequacy ratings are summarised in Table 8.

TABLE 8 Asset Management System Effectiveness Summary

ASSET MANAGEMENT SYSTEM CRITERA	PROCESS & POLICY RATING	PERFORMANCE RATING
1. ASSET PLANNING	A	1
1.1 Asset management plan covers the processes in this table	A	1
1.2 Planning processes and objectives reflect the needs of all stakeholders and are integrated with business planning	A	1
1.3 Service levels are defined in the asset management plan	A	1
1.4 Non-asset options (e.g. demand management) are considered	A	1
1.5 Lifecycle costs of owning and operating assets are assessed	A	1
1.6 Funding options are evaluated	A	1
1.7 Costs are justified, and cost drivers identified	A	1
1.8 Likelihood and consequences of asset failure are predicted	A	1
1.9 Asset management plan is regularly reviewed and updated	A	1
2. ASSET CREATION AND ACQUISITION	A	2
2.1 Full project evaluations are undertaken for new assets, including comparative assessment of non- asset options	A	1
2.2 Evaluations include all life-cycle costs	A	1
2.3 Projects reflect sound engineering and business decisions	A	1

ASSET MANAGEMENT SYSTEM CRITERIA	PROCESS & POLICY RATING	PERFORMANCE RATING
2.4 Commissioning tests are documented and completed	A	2
2.5 Ongoing legal / environmental / safety obligations of the asset owner are assigned and understood	A	2
3. ASSET DISPOSAL	A	1
3.1 Under-utilised and under-performing assets are identified as part of a regular systematic review process	A	1
3.2 The reasons for under-utilisation or poor performance are critically examined and corrective action or disposal undertaken	A	1
3.3 Disposal alternatives are evaluated	A	1
3.4 There is a replacement strategy for assets	A	1
4. ENVIRONMENTAL ANALYSIS	A	2
4.1 Opportunities and threats in the asset management system environment are assessed	A	1
4.2 Performance standards (availability of service Capacity, continuity, emergency response, etc.) are measured and achieved	A	2
4.3 Compliance with statutory and regulatory requirements	A	1
4.4 Service standard (customer service levels etc) are measured and achieved.	A	2
5. ASSET OPERATIONS	A	1
5.1 Operational policies and procedures are documented and linked to service levels required	A	1
5.2 Risk management is applied to prioritise operations tasks	A	1
5.3 Assets are documented in an asset register including asset type, location, material, plans of components and an assessment of assets' physical/ structural condition	A	1
5.4 Accounting data is documented for assets	A	1
5.5 Operational costs are measured and monitored	A	1
5.6 Staff resources are adequate, and staff receive training commensurate with their responsibilities.	A	1
6. ASSET MAINTENANCE	A	1
6.1 Maintenance policies and procedures are documented and linked to service levels required	A	1
6.2 Regular inspections are undertaken of asset performance and condition	A	1
6.3 Maintenance plans (emergency, corrective and preventative) are documented and completed on schedule	A	1
6.4 Failures are analysed, and operational / maintenance plans adjusted where necessary	A	1
6.5 Risk management is applied to prioritise maintenance tasks	A	1
6.6 Maintenance costs are measured and monitored	A	1
7. ASSET MANAGEMENT INFORMATION SYSTEM	A	1
7.1 Adequate system documentation for users and IT operators	A	1
7.2 Input controls include suitable verification and validation of data entered into the system	A	1
7.3 Security access controls appear adequate such as passwords	A	1
7.4 Physical security access controls appear adequate	A	1
7.5 Data backup procedures appear adequate, and backups are tested	A	1
7.6 Computations for licensee performance reporting are accurate	A	1
7.7 Management reports appear adequate for the licensee to monitor licence obligations	A	1
7.8 Adequate measures to protect asset management data from unauthorised access or theft by persons outside the organisation	A	1
8. RISK MANAGEMENT	A	1
8.1 Risk management policies and procedures exist and are applied to minimise internal and external risks	A	1
8.2 Risks are documented in a risk register and treatment plans are implemented and monitored	A	1
8.3 Probability and consequences of asset failure are regularly assessed	A	1

ASSET MANAGEMENT SYSTEM CRITERIA	PROCESS & POLICY RATING	PERFORMANCE RATING
9. CONTINGENCY PLANNING	A	1
9.1 Contingency plans are documented understood and tested to confirm their operability and to cover higher	A	1
10. FINANCIAL PLANNING	A	1
10.1 The financial plan states the financial objectives and identifies strategies and actions to achieve those	A	1
10.2 The financial plan identifies the source of funds for capital expenditure and recurrent costs	A	1
10.3 The financial plan provides projections of operating statements (profit and loss) and statement of financial position (balance sheets)	A	1
10.4 The financial plan provides firm predictions on income for the next five years and reasonable predictions beyond this period	A	1
10.5 The financial plan provides for the operations and maintenance, administration and capital expenditure requirements of the services	A	1
10.6 Large variances in actual/budget income and expenses are identified and corrective action taken where necessary	A	1
11. CAPITAL EXPENDITURE PLANNING	A	1
11.1 There is a capital expenditure plan covering works to be undertaken, actions proposed, responsibilities and dates	A	1
11.2 The capital expenditure plan provides reasons for capital expenditure and timing of expenditure	A	1
11.3 The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan	A	1
11.4 There is an adequate process to ensure the capital expenditure plan is regularly updated and implemented	A	1
12. REVIEW OF AMS	A	1
12.1 A review process is in place to ensure the asset management plan and the asset management system described in it remain current	A	1
12.2 Independent reviews (e.g., internal audit) are performed of the asset management system	A	NP

2. PERFORMANCE AUDIT

2.1 Performance Audit Scope

In executing the Audit Plan and in line with the Audit & Review Guidelines (March 2019) the auditors, when assessing if the licensee has complied with its licence obligations, applied a level of scrutiny that corresponds to a “reasonable assurance engagement”. This was further detailed within the audit plan (refer Paragraph 12(a)(i)(a) of ASAE 3000, June 2014).

This was the first audit of EGL29. As such, recommendations from the previous audit, and as required by Section 11.3 of the Audit Guidelines (March 2019) were not applicable.

TABLE 9 Status of Recommendations Addressing Non-Compliances from the Previous Audit

A Resolved during current audit period				
Recommendation Reference (no./year)	Licence Obligation Reference Number Controls and Compliance Rating Legislative Obligation Details of Inadequate Controls and/or Non-Compliance	Auditors' Recommendation	Date Resolved	Further Action Required (Yes/No/Not Applicable) Details of Further Action Required (Including Current Recommendation Reference, if Applicable)
<i>This is the first audit for EGL29 as such there were no previous audit recommendations that were resolved during the current audit period</i>				
B Unresolved at end of current audit period				
Details of Inadequate Controls and/or Non-Compliance				

This is the first audit for EGL29 as such there were no previous audit recommendations that were unresolved at the end of the current audit period

2.2 Performance Audit Recommendations and Action Plans

Recommendations made within the report are detailed below (if applicable) and will be reviewed and included in the post audit implementation plan (if required) by the licensee to ensure compliance with requirements.

TABLE 10 Recommendations to Address Current Non-Compliances and Control Deficiencies

A Resolved during the current audit period				
Recommendation Reference (no./year)	Licence Obligation Reference Number	Auditors' Recommendation	Date Resolved & Action Taken by the Licensee	Auditors Comments
	Controls and Compliance Rating			
	Legislative Obligation			
	Details of Inadequate Controls and/or Non-Compliance			
1/2022	<ul style="list-style-type: none"> 105 A 2 A licensee must pay the prescribed licence fees to the ERA according to clauses 6, 7 and 8 of the Economic Regulation Authority (Licensing Funding) Regulations 2014. Standing Charges were paid outside the requirements of the obligations on two occasions during the audit period (i.e., October-December 2020 and April-June 2021 quarters). 	No further recommendations.	24 June 2019	<p>The payment of Standing Charges has been well addressed by the Licensee and future payments were made within the required timeframes. Monitoring was noted through the BEI Critical Dates, AMP referenced requirement, budget costings were confirmed, and the Governance Manager monitored compliance. The Licensee demonstrated awareness to the obligation through controls and effective corrective action.</p> <p>As such, no further recommendations were made.</p>
2/2022	<ul style="list-style-type: none"> 124 A 2 	No further recommendations.	30 Sept 2021	The Licensee demonstrated awareness to the obligation through the implementation of

- 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
- The Licensee did not submit Standing data charges in the 2019 and 2020 years within the prescribed timeframes. The Licensee omitted reporting the minor non-compliances in the Annual Compliance Report.

controls and effective corrective action. Following the April-June 2021 quarter, all future standing charges were paid within the prescribed timeframes and the integrity of the reporting for completeness and accuracy was confirmed for the 2022 Annual Compliance Report. Provision of standing data by the due date was confirmed for the 2021 and 2022 years. Monitoring was noted through the BEI Critical Dates, AMP referenced requirement, email communications were confirmed, and the Governance Manager monitored compliance. Self-assessment checklists and third party independent review of the obligations were completed to ensure compliance proactively. As such, no further recommendations were made.

B Unresolved during the current audit period

Recommendation Reference (no./year)	Licence Obligation Reference Number	Auditors' Recommendation	Auditors Comments
	Controls and Compliance Rating		
	Legislative Obligation		
	Details of Inadequate Controls and/or Non-Compliance		

All non-compliances were unresolved during the current audit period.

3. ASSET MANAGEMENT SYSTEM EFFECTIVENESS REVIEW

3.1 AMS Review Scope

The scope of the AMS review included an assessment of adequacy and effectiveness of the BEI WWF’s Asset Management System by evaluating during the review period 22nd May to 30th June 2022 the following;

1. Asset Planning
2. Asset creation/acquisition
3. Asset disposal
4. Environmental analysis
5. Asset operations
6. Asset maintenance
7. Asset management information system
8. Risk management
9. Contingency planning
10. Financial planning
11. Capital expenditure planning
12. Review of asset management system

The review was established as a requirement of the current Generation Licence issued by the Economic Regulation Authority to BEI WWF.

The asset management review followed the ERA approved audit plan and used;

- a risk based approach to auditing using the risk evaluation model set out in ISO31000:2018
- an overall effectiveness rating for an asset management process, based on a combination of the process and policy adequacy rating and the performance rating,
- the format and content of the reviewer’s report; and post- review plan as described in the Guidelines.
- the Asset Management System Review has been carried out as a ‘reasonable assurance engagement’.

TABLE 11 List of Personnel Who Participated In Audit & Review

ITEM	NAME	COMPANY	POSITION
1	Tom Froad	BEI & BEI WWF	General Manager
2	John Lorenti	SynergyRED	Asset Manager
3	Daniel Chua	SynergyRED	BEI Senior Accountant
4	Brett Manning	SynergyRED	Governance Manager

ITEM	NAME	COMPANY	POSITION
5	Nimish Trivedi	SynergyRED	Renewables Operations Manager
6	Merdad Darabi	SynergyRED	Asset Management Engineer
7	Ruth Oldert	Vestas	Site Manager (Acting)
8	Malcolm Cooper	Vestas	Site Supervisor

The Review was conducted in conjunction with the Performance Audit during July & August 2022 and included desktop review and half day in the Perth office and one day audit on site to execute the review plan, interview sessions and report writing. In total the audit and review required 70 hours of each of the Audit Team member's time.

3.2 Objective of the Asset Management System Review

The objective of the review was to examine the effectiveness of the processes used by the BEI WWF to deliver asset management, the information systems supporting asset management activities and the data and knowledge used to make decisions about asset management. These elements were examined from a life cycle perspective i.e. planning, construction, operation, maintenance, renewal, replacement and disposal using the guidelines developed by the Economic Regulation Authority.

3.3 Methodology for Asset Management System Review

The audit methodology detailed in the Audit and Review Guidelines – Electricity and Gas Licences (March 2019) was used in the execution of the Asset Management System Review and was further detailed in the Audit Plan.

3.4 Asset Management System Effectiveness Rating

The Audit and Review Guidelines – Electricity and Gas Licences (March 2019) (section 5.1.6.2) states that the asset management review report must provide a table that summarises the auditor's assessment of both the process and policy definition rating and the performance rating for each key process in the licensee's asset management system using the scales described in Table 9 and Table 10 of the Audit Guidelines. It is left to the judgement of the auditor to determine the most appropriate rating for each asset management process.

TABLE 12 Asset Management Process and Policy Definition Adequacy Ratings

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 substantial improvement	<ul style="list-style-type: none"> Processes and policies are incomplete and require substantial improvement. Processes and policies do not document the required performance of the assets. Reviews of 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 13 Asset Management Performance Ratings

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.
NP	Not Performed	<ul style="list-style-type: none"> Not Performed – A performance rating was not able to be assessed. The licensee's performance (performance rating) for the management process and effectiveness criterion was not able to be assessed as function did not occur during the review period.

3.5 Follow-Up from Previous Review Findings

This was the first Review and as such no recommendations of the previous review were applicable.

TABLE 14 Ineffective Components Recommendations, Previous Review Implementation Plan

A Resolved during current review period				
Recommendation Reference (no./year)	Rating	Auditors' Recommendation	Date Resolved	Further Action Required (Yes/No/Not Applicable)
	Asset Management Process and Effectiveness Criterion			
	Details of Deficiency Details of Inadequate Controls and/or Non-Compliance			Details of Further Action Required (Including Current Recommendation Reference, if Applicable)

This is the first review for EGL29 as such there were no previous review recommendations that were unresolved at the end of the current audit period

B Unresolved at end of current review period

This is the first review for EGL29 as such there were no previous review recommendations that were unresolved at the end of the current audit period

3.6 Asset Management System Recommendations and Action Plans

As stipulated in section 5.3 of the Audit and Review Guidelines – Electricity and Gas Licences (March 2019), the Audit Team noted that the Asset Management Review Post Implementation Plan does not form part of the Audit Opinion. There were no recommendations made from the current review that required post implementation plans.

3.7 Review Asset System Deficiencies/Recommendations

TABLE 15 Recommendations to Address Current Asset System Deficiencies

A Resolved during current review period

Recommendation Reference (no./year)	Rating	Action Taken by Licensee	Date Resolved	Auditor's Comments
	Asset Management Process and Effectiveness Criterion			
	Details of Deficiency Details of Inadequate Controls and/or Non-Compliance			

There were no recommendations from the current review that were resolved during the current review period.

B Unresolved during current review period

There were no recommendations from the current review that were unresolved during the current review period.

APPENDIX 1- BEI WWF PERFORMANCE AUDIT

AUGUST 2022

TABLE 16 Performance Audit

12. Electricity Industry Act – Licence conditions and obligations				
No.	2022 AUDIT REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION			
102 Type [2]	OBLIGATION: <i>Generation Licence, condition 5.1.1 / Electricity Industry Act, section 14(1)(a)</i> A licensee must provide for an asset management system	Audit Priority	Controls Rating:	Compliance Rating:
		4	A	1
	<p>Finding – The licensee provided for, developed, and implemented an effective Asset Management System for WWF. The Asset Management System (AMS) manual was comprehensive and incorporated the Asset Management Plan (AMP) developed and reviewed by SynergyRED. The AMS and AMP documentation addressed the Audit Guideline requirements. As required by the O&M Agreement, Vestas have developed an Asset Management Plan for the facility that operated under the BEI Asset Management Policy and Asset Management System.</p> <p>Documents/Evidence – [Appendix 3 Ref] – 1, 2, 3, 4, 5, 14</p> <p>Observations:</p> <ul style="list-style-type: none"> Asset Management Agreement between BEI WWF Pty Ltd and SynergyRED established for the management of the provision of operating and management services in relation to the WWF. Specific reference to AMS and AMP (Refer Schedule 2 – CI 1 (g)(6)) AMS manual comprehensive covering all requirements in the Audit Guidelines. Noted aligned with ISO 55001 Clear definition of responsibilities of stakeholders and application to the AMS The AMS and AMP clearly delineated the roles, responsibilities, business relationship and expectations between BEI WWF, SynergyRED and Vestas The AMS draws upon the policy, planning, systems and procedures of each of the three organisations shown in the structure, together with the contracts in place to manage these arrangements. This AMS has been structured to align with both the framework requirements of the Economic Regulation Authority (ERA) and the asset management standards of AS ISO 55001. The Licensee monitored compliance with regards to the AMS elements as specified in the BEI Annual Business Plan, for example performance and energy generation and contractual compliance. During the site audit the Synergy Corporate Office were undertaking a compliance audit. The findings and recommendations will form part of the next audit period. 			
	Recommendation: Nil	Action: Nil		

103 Type [2]	OBLIGATION: <i>Generation Licence, condition 5.1.2 and 5.1.3 / Electricity Industry Act, section 14(1)(b)</i>	Audit Priority	Controls Rating:	Compliance Rating:
	A licensee must notify details of the asset management system and any substantial changes to it to the ERA.	4	A	1
<p>Finding – The licensee notified the ERA of the details of the asset management system within five business days from the completion of construction. Practical completion for WWF was 29 November 2021 and notification occurred on 1 December 2021.</p> <p>Documents/Evidence – Interview with General Manager, Governance Manager, 2, 3, 4, 14.5-14.9, 15</p> <p>Observations:</p> <ul style="list-style-type: none"> • Communication with the ERA provided. • WWF AMP (refer S4.4.1 – 2021/22) specified the requirement to notify the ERA of any material changes to its corporate, financial, technical or asset management system in line with the requirements of the licence. • Compliance monitored by the Governance Manager. Communication of the requirement in the Board Minutes and AMA not evidenced. • BEI Electricity Compliance Reporting Manual has been developed as a self-assessment Performance Audit is required to be completed annually. Reviewed July 2019, August 2020 and August 2021. Note Practical Completion November 2021. At the time of the audit the 2022 self-assessment check had not been completed. • Communication with the ERA was sighted which confirmed compliance with the requirement for the ERA to receive notification of the Warradarge Wind Farm’s asset management system within the 5 business days as stipulated in clause 5.1.2(b) of licence EGL29. 				
Recommendation: Nil		Action: Nil		
105 Type [2]	OBLIGATION: <i>Generation Licence, condition 4.2.1/ Economic Regulation Authority (Licensing Funding) Regulations 2014</i>	Audit Priority	Controls Rating:	Compliance Rating:
	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.	4	A	2
<p>Finding – The Licensee paid the Annual Licence charges within one month after the day on which the licence was Granted (i.e. 22 May 2019) and within one month after each anniversary of that day during the audit period (i.e. 21 June).</p> <p>Standing Charges were paid outside the requirement of <i>Economic Regulation Authority (Licensing Funding) Regulations 2014 clause 8(2)</i> on two occasions (refer table below). It was understood there was some internal review as to the requirement to pay standing charges as the practical completion did not occur until 29 November 2021. Clarification was provided in relation to the MW being “megawatts of generation capacity” as opposed to MW generated (Refer <i>Economic Regulation Authority (Licensing Funding) Regulations 2014 clause 7(4).</i>)</p>				

It was noted that the 2019 Annual Compliance Report did not report the late payment of the Quarter Oct-Dec 2020 Standing Charges. The reporting of the late payment for Quarter April-June 2021 was outside the scope of the audit period as it was due 8/10/21 and reportable in the 2022 Annual Compliance Report due 31 Aug 2022.

Documents/Evidence – 2, 4.1, 4.2, 5.7, 13, 14, 15

Observations:

- Standing Data Charges were included in the Critical Dates Register sighted during the audit
- Provision for licence payments in the budget sighted during the site visit.
- SynergyRED WWF AMP specifically referred to the Standing Data Charges (Section 4.4.1)
- Compliance was specified in the BEI Annual Business Plan and referenced as monitored under the AMA for the assets
- It was noted the Governance Manager circulated BEI Critical Dates Register to relevant personnel, sample communication was reviewed.

During the Audit period (22 May 2019 to 30 June 2022) the annual licence charge for EGL29 paid;

LICENCE PERIOD	ERA INV REF	DATE PAID	DUE DATE	COMPLIANT	COMMENTS
On grant of licence 22 May 2019 to 21 May 2020	101963	30/05/2019	21st June 2019	YES	CI 6(3)(a) payable to the Authority within one month after the day on which the licence was granted.
22 May 2020 to 21 May 2021	102435	22/05/2020	21st June 2020	YES	
22 May 2021 to 21 May 2022	1000500	24/05/2021	21st June 2021	YES	
22 May 2022 to 21 May 2023	1001768	20/06/2022	21st June 2022	YES	

During the Audit period (22 May 2019 to 30 June 2022) the standing data charges for EGL29 were paid;

CHARGE PERIOD	ERA INVOICE REF	DATE PAID	DUE DATE	COMPLIANT	COMMENTS
Quarter July-Sept 2020	1000070	22/01/2021	06/02/2021	YES	
Quarter Oct-Dec 2020	1000343	26/07/2021	07/05/2021	NO	Type 2 required to be reported as a Non-Compliance in the 2021 Annual Compliance Report
Quarter Jan-Mar 2021	1000585	22/06/2021	30/06/2021	YES	

	Quarter April-June 2021	1000858	15/10/2021	08/10/2021	NO	Type 2 required to be reported as a Non-Compliance in the Non-Compliance 2022 Annual Compliance Report (Note: outside audit scope)		
	Quarter July-Sept 2021	1001300	17/12/2021	23/12/2021	YES			
	Quarter Oct-Dec 2021	1001532	21/03/2022	30/03/2022	YES			
	Quarter Jan-Mar 2022	1001795	20/06/2022	23/06/2022	YES			
	Recommendation:					Action:		
	<p>1/2022 – The payment of Standing Charges has been well addressed by the Licensee and future payments were made within the required timeframes. Monitoring was noted through the BEI Critical Dates, AMP referenced requirement, budget costings were confirmed, and the Governance Manager monitored compliance. The Licensee demonstrated awareness to the obligation through controls and effective corrective action. As such, no further recommendations were made.</p>					<ul style="list-style-type: none"> No further recommendation. 		
106 Type [NR]	OBLIGATION: <i>Generation Licence, condition 4.1.1 / Electricity Industry Act, section 31(3)</i>					Audit Priority	Controls Rating:	Compliance Rating:
	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.					5	A	1
	<p>Finding – The Licensee and its contractor had undertaken risk assessment and the Licensee had taken significant measures to ensure the plant performance both contractually and operationally. Well established accident and emergency procedures were developed and implemented by both the Licensee and Vestas.</p>							
	<p>Evidence – Site Interviews Vestas and BEI, 2, 3, 4, 14.5-14.9, 15</p>							
	<p>Observations:</p> <ul style="list-style-type: none"> Vestas has contractual incentives to ensure availability of the WWF. Well established Health & Safety processes evidenced during the site visit, for example induction and compulsory fit for work assessment. Limited impact experienced from Covid-19 driven supply chain issues. Asset failure risks were covered by first Vestas and evident in site risk registers Under EPC for maintenance during the audit period. SynergyRED monitored availability of spares as evidenced in the WDWF Tracker. Cyclone Seroja in April 2021 had limited impact on the operations. The Wind Farm was located in private land and was remote to local traffic. 							

	<ul style="list-style-type: none"> Well-developed cyber security protocols and briefing to the board noted. 			
	Recommendation: Nil	Action: Nil		
107 Type [2]	OBLIGATION: <i>Generation Licence, condition 4.1.1 / Electricity Industry Act, section 41(6)</i> A licensee must pay the costs of taking an interest in land or an easement over land.	Audit Priority	Controls Rating:	Compliance Rating:
		4	NP	NR
	<p>Finding – The Governance Manager confirmed that WWF did not take an interest or an easement over land at the recommendation or direction of the Minister under the Licence during the audit period, as defined by Part 9 the <i>Land Administration Act 1997</i>. Land access arrangements have been established. The WWF was located on private adjoining lots. BEI WWF leased land from the owners of these farms. The lease agreements were provided for review. The Licensee confirmed lease payments were made and access to lease holders land was readily available during the site visit.</p> <p>Evidence – 1, 2, 3, 4, 5.10, 12.2, 13</p> <p>Observations:</p> <ul style="list-style-type: none"> Obligation specific to the requirements of the <i>Land Administration Act 1997</i> Noted Leasing arrangements relevant to obligation 106 Licensee provided for lease payments in budget viewed on site in the Financial Models. Confirmed the terms of the lease are in excess of the expiry terms of EGL29. Lease obligations were noted in the Critical Dates Register for WDWF. 			
	Recommendation: Nil	Action: Nil		
13 Electricity Licences – Licence Conditions and Obligations				
119 Type [2]	OBLIGATION: <i>Generation Licence, condition 4.3.1 / Electricity Industry Act, section 11</i> 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.	Audit Priority	Controls Rating:	Compliance Rating:
		4	A	1
	<p>Finding – The WWF consolidated special purpose financial statements for the financial years ending 30 June were audited by independent third party accountants and assessed compliance with Australian financial reporting standards. The Financial Reports referenced statement of compliance that the financial statements were prepared in accordance with the relevant Australian Accounting Standards and Interpretations as related to the Licensee. The Licensee had robust control processes established to ensure compliance with this requirement, as per the Boards financial responsibilities.</p>			

	<p>Evidence – 2, 4.19, 5.7, 5.12, XERO.</p> <p>Observations:</p> <ul style="list-style-type: none"> • WWF Hold Trust Groups audited financial statements FY2019-2021 • General purpose financial statements of the BEI Group were prepared annually for auditing by an external auditor as soon as practical after the end of the financial year. • Accounting records maintained for the audit period and regular measures were established to ensure backup processes. • Audited financial statements for the FY2022 were not available for review during the audit period or site visit. • Monthly VMA Reports were issued by SynergyRED • SynergyRED also issued quarterly AMA reports for the operational assets 	Action: Nil		
	Recommendation: Nil	Action: Nil		
121 Type [2]	<p>OBLIGATION: Generation Licence, condition 5.3.2 / Electricity Industry Act, section 11</p> <p>A licensee must comply, and require its auditor to comply, with the ERA's standard audit guidelines for a performance audit</p>	Audit Priority	Controls Rating:	Compliance Rating:
		4	A	1
	<p>Finding – The Licensee engaged the Auditor with a Request for Proposal for WDWF that requested the Auditor to comply with the Economic Regulation Authority's 2019 Audit and Review Guidelines.</p> <p>Documents/Evidence – ERA and Licensee communication, 14.1, 14.2, 14.24, 17</p> <p>Observations:</p> <ul style="list-style-type: none"> • Copies of communications received from the Authority relating to audit requirements were sent by Licensee through to Auditor to convey requirements specifically the undertaking of audits in compliance with the 2019 Audit and Review Guidelines – Electricity and Gas Licences. 			
	Recommendation: Nil	Action: Nil		
122 Type [2]	<p>OBLIGATION: Generation Licence, condition 5.1.5 / Electricity Industry Act, section 11</p> <p>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.</p>	Audit Priority	Controls Rating:	Compliance Rating:
		4	A	1
	<p>Finding – The Licensee engaged the Auditor with a Request for Proposal that requested the Auditor to comply with the Economic Regulation Authority's 2019 Audit and Review Guidelines.</p>			

	<p>Documents/Evidence – ERA and Licensee communication, 14.1, 14.2, 14.24, 17</p> <p>Observations:</p> <ul style="list-style-type: none"> Copies of communications received from the Authority relating to audit requirements were sent by Licensee through to Auditor to convey requirements specifically the undertaking of audits in compliance with the 2019 Audit and Review Guidelines – Electricity and Gas Licences. 			
	Recommendation: Nil	Action: Nil		
123 Type [2]	<p>OBLIGATION: Generation Licence, condition 4.4.1 / Electricity Industry Act, section 11</p> <p>In the manner prescribed, a licensee must notify the ERA, if it is under external administration or if there is a significant change in the circumstances that the licence was granted which may affect the licensee's ability to meet its obligations.</p>	Audit Priority	Controls Rating:	Compliance Rating:
		4	NP	NR
	<p>Finding – The Licensee confirmed there were no significant changes in the circumstances that EGL29 was granted. The AMP specifically referenced the requirement (refer Section 4.1.1),</p> <p>Documents/Evidence – Interview with the Governance Manager, 2, 4.20, 5.11, 5.12, 14.13</p> <p>Observations –</p> <ul style="list-style-type: none"> VMA Meetings and Board Meetings monitor compliance Noted the Licensee undertook yearly self-assessment of obligations and commissioned a third party independent review of the obligations although this was in July/August 2022 which was outside the audit period 			
	Recommendation: Nil	Action: Nil		
124 Type [2]	<p>OBLIGATION: Generation Licence, condition 4.5.1 / Electricity Industry Act, section 11</p> <p>A licensee must provide the ERA, in the manner prescribed, with any information that the ERA requires in connection with its functions under the Electricity Industry Act.</p>	Audit Priority	Controls Rating:	Compliance Rating:
		4	A	2
	<p>Finding – During the Audit Period the Licensee provided the Authority with the following information as required in connection with its functions under the Act.</p> <ul style="list-style-type: none"> The 2019-2021 Annual Compliance Reports were submitted by the 31st August annually. Provision of information for the calculation of standing data charges was due 30th September annually and compliance was sighted for 2021 and 2022 (although outside the scope of the audit period.) <p>It was noted that the Licensee did not submit Standing data charges in the 2019 and 2020 years as practical completion had not occurred. Standing data charges commenced in the July-September quarter of 2020 and practical completion of the wind farm was 29 November 2021. The Licensee omitted reporting the minor non-compliances relating to payment of the October to</p>			

	<p>December 2020 quarter for standing charges in the 2021 Annual Compliance Report. It was noted the late payment of the Standing Charges for the Quarter April-June 2021 was included in 2022 Annual Compliance Report which was outside the scope of the audit period. It was understood there was some misunderstanding as the requirement to pay standing charges prior to practical and this was attributed to the delay in payment of these invoices. Standing charges applicable following practical completion were paid in accordance with the obligations.</p> <p>The Licensee has established effective controls for compliance such as the BEI Critical dates register, the AMP included the requirements, monitoring by the Governance Manager and monthly emails to relevant personnel in relation to the Critical Dates.</p> <p>Evidence – Annual Compliance Reports 2019-2021, email communications with ERA, Interview with Governance Manger, ERA Licence Payment Report</p> <p>Observations:</p> <ul style="list-style-type: none"> • 2021 Licence Standing Charge Data for WWF (EGL29) emails were sighted • Submission of Standing data for 2022 outside the audit scope but it was sighted and confirmed • Note Standing data charges commenced in Quarter July-Sep 2020 practical completion of the wind farm was 29 November 2021. • All Annual Compliance Reports were submitted on time • Payment of annual licence fees compliant for the duration of the audit period. • Governance Manager monitored compliance. • Awareness to the requirement was demonstrated by the Licensee with the amendment of the BEI Critical Dates Register and the AMP to reference the obligations. • Noted the Licensee undertook yearly self-assessment of obligations and commissioned a third party independent review of the obligations although this was in July/August 2022 which was outside the audit period 			
	<p>Recommendation:</p> <p>2/2022 - The Licensee demonstrated awareness to the obligation through the implementation of controls and effective corrective action. Following the April-June 2021 quarter, all future standing charges were paid within the prescribed timeframes and the integrity of the reporting for completeness and accuracy was confirmed for the 2022 Annual Compliance Report. Provision of standing data by the due date was confirmed for the 2021 and 2022 years. Monitoring was noted through the BEI Critical Dates, AMP referenced requirement, email communications were confirmed, and the Governance Manager monitored compliance. Self-assessment checklists and third party independent review of the obligations were completed to ensure compliance proactively. As such, no further recommendations were made.</p>	<p>Action:</p> <ul style="list-style-type: none"> • No further Recommendations were made. 		
<p>125 Type</p>	<p>OBLIGATION: Generation Licence, condition 3.8.1 and 3.8.2 / Electricity Industry Act, section 11</p> <p>A licensee must publish any information as directed by the ERA to publish, within the timeframes specified.</p>	<p>Audit Priority</p> <p>4</p>	<p>Controls Rating:</p> <p>NP</p>	<p>Compliance Rating:</p> <p>NR</p>

[2]	<p>Finding – The ERA did not direct the Licensee to publish any information within the audit period.</p> <p>Evidence – Review of ERA website and confirmation during interview with SynergyRED management.</p> <p>Observations:</p> <ul style="list-style-type: none"> • Nil 			
Recommendation: Nil		Action: Nil		
126 Type [2]	<p>OBLIGATION: Generation Licence, condition 3.7.1 / Electricity Industry Act, section 11 <i>All notices must be in writing, unless otherwise specified.</i></p>	Audit Priority	Controls Rating:	Compliance Rating:
	<p>Finding – During the audit period the Licensee maintained records of communication with the Authority, primarily via mail or email communication. All responses were in writing and specific notices in relation to the Generation Licence were reviewed as part of the audit.</p> <p>Evidence – Communications with ERA, Interview with Governance Manager, 14.1-14.27</p> <p>Observations:</p> <ul style="list-style-type: none"> • Examples of communications provided refer Appendix 3, for example confirmation of compliance with reporting obligations, submission of compliance reports, etc. 		4	A
Recommendation: Nil		Action: Nil		
15 Electricity Industry Metering Code – Licence Conditions and Obligations				
324 Type [2]	<p>OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 3.3B If a user is aware of bi-directional electricity flows at a metering point that was not previously subject to a bi-directional flows or any changes in a customer’s or user’s circumstances in a metering point that will result in bi-directional flows, the user must notify the network operator within 2 business days.</p>	Audit Priority	Controls Rating:	Compliance Rating:
	<p>Finding – Meters at the WWF were subject to bi-directional flows. There was no change with respect to bi-directional flows during the audit period. The Licensee continued to import power from Synergy as required. Normal operating conditions required this only occurs when the plant is not generating sufficient electricity for site consumption.</p>		4	NP

	<p>Evidence –Interview with SynergyRED Engineer & the Vestas Site Manager, 2,14.13</p> <p>Observations:</p> <ul style="list-style-type: none"> • Bi-directional meter was installed by the Network Operator and the Licensee was informed. • Noted in the BEI Electricity Compliance Reporting Manual self assessment checklist for the years 2019-2021. 			
	Recommendation: Nil	Action: Nil		
339 Type [NR]	<p>OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 3.11(3)</p> <p>A Code participant who becomes aware of an outage or malfunction of a metering installation must advise the network operator as soon as practicable.</p>	Audit Priority	Controls Rating:	Compliance Rating:
		4	NP	NR
	<p>Finding – WPN had primary responsibility for the management and monitoring of meters. There were no outages or malfunctions identified during the audit period. Routine meter data checks were undertaken for Asset Management reporting, invoicing and to monitor usage through production calculations which could generally identify an error if any.</p> <p>Evidence – Site Inspection & Interview with SynergyRED Engineer and Vestas Personnel, 4, 6, 6.1, 6.2</p> <p>Observations:</p> <ul style="list-style-type: none"> • Asset Management Agreement (Document Ref 4) referenced compliance with Wholesale Electricity Market Rules and the Metering Code It was noted that Western Power were responsible for installing and operating all meters located at WDWF. • The AMP referenced the obligation specifically (refer Section 4.4.1) • Operating Protocol and the Vestas O&M • ETAC specified the requirement. 			
	Recommendation: Nil	Action: Nil		
371 Type [NR]	<p>OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 4.4(1)</p> <p>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.</p>	Audit Priority	Controls Rating:	Compliance Rating:
		5	NP	NR
	<p>Finding – There were no discrepancies between energy data held in metering installation and in the metering database. As such compliance with this requirement cannot be made.</p> <p>Evidence – Site Inspection & Interview with SynergyRED Engineer and Vestas Personnel, 4, 6, 6.1, 6.2</p>			

	Observations: <ul style="list-style-type: none"> Nil 			
	Recommendation: Nil	Action: Nil		
372 Type [NR]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 4.5(1) A Code participant must not knowingly permit the registry to be materially inaccurate.	Audit Priority	Controls Rating:	Compliance Rating:
		5	NP	NR
	Finding – The Licensee did not maintain any standing data or energy data in relation to the metering installations captured under the Metering Code. These activities were managed by the Network Operator and were outside the control of the Licensee. The Network operator maintained sole responsibility for the management of standing data within the registry and/or metering database of these obligations for the period 22 May 2019 to 30 June 2022. <ul style="list-style-type: none"> Maintenance and operation of the meters Energy Data maintained in the metering database Standing Data in the metering registry All obligations defined in the Metering Code and the Wholesale Electricity Market Rules. 			
	Evidence – Site Inspection & Interview with SynergyRED Engineer and Vestas Personnel, 4, 6, 6.1, 6.2			
	Observations: <ul style="list-style-type: none"> Contractual documentation addressed the requirements in relation to the Metering Code. Model Service Level Agreement and ETAC established. 			
	Recommendation: Nil	Action: Nil		
373 Type [NR]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 4.5(2) 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.	Audit Priority	Controls Rating:	Compliance Rating:
		4	NP	NR
	As per finding against obligation 372			
	Recommendation: Nil	Action: Nil		

388 Type [2]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 5.4(2)	Audit Priority	Controls Rating:	Compliance Rating:
	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).	4	NP	NR
<p>Finding – The network operator did not requested the assistance of the Licensee with respect to their metering installation during the audit period.</p> <p>Note: The Licensee has no access to meters and the Western Power meters located at the WDWF were noted to secured and accessible only to Western Power Personnel.</p> <p>Evidence – Site Inspection & Interview with SynergyRED Engineer</p> <p>Observations:</p> <ul style="list-style-type: none"> Nil 				
Recommendation: Nil		Action: Nil		
416 Type [2]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 5.21(5)	Audit Priority	Controls Rating:	Compliance Rating:
	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.	4	NP	NR
<p>Finding – No tests were requested during the audit period 22 May 2019 to 30 June 2022.</p> <p>Evidence – Interview with Governance Manager, site visit</p> <p>Observations:</p> <ul style="list-style-type: none"> Nil 				
Recommendation: Nil		Action: Nil		
417 Type	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 5.21(6)	Audit Priority	Controls Rating:	Compliance Rating:
	A Code participant must not make a request under subclause 5.21(1) that is inconsistent with any access arrangement or agreement.	4	NP	NR

[2]	As per finding against obligation 416			
	Recommendation: Nil	Action: Nil		
448 Type [2]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 6.1(2) A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed.	Audit Priority 4	Controls Rating: A	Compliance Rating: 1
	<p>Finding – During the Audit Period, the Licensee had an ETAC and complied with the communication rules, metrology procedures, model service level agreement (to the extent to which it applies to WWF and Western Power) and mandatory link criteria prescribed.</p> <p>WWF had an ETAC with Western Power which outlined the obligations of both parties in relation to metering equipment and activities. The metering obligations applicable to WWF under the ETAC were limited to maintaining relevant communications with Western Power and to provide any required access to its premises. Compliance with the requirement was confirmed by the Governance Manager and is noted in the BEI AMP section 4.4.1.</p> <p>Communications in relation to the registration of a Generator Performance Standards (GPS) Monitoring Plan were reviewed. It was noted an extension was provided within the audit period and compliance with the WEM rules demonstrated.</p> <p>Evidence – Interview with SynergyRED Engineer, Governance Manager, 2, 4, 6, 6.1, 6.2, 18, 19, 20</p> <p>Observations:</p> <ul style="list-style-type: none"> • Evidence of compliance with this requirement provided and confirmed in discussions with management. • The O&M Agreement specifically referenced this requirement. • Generator Monitoring Plan provided. • GPS Registration extensions applied for within the requirements of the WEM Rules clauses 1.39.4 and 1.39.5 			
	Recommendation: Nil	Action: Nil		
451 Type [NR]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 7.2(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.	Audit Priority 5	Controls Rating: A	Compliance Rating: 1
	<p>Finding – The WWF site had well established communication processes such as a main telephone line & facsimile, mobile telephone coverage, remote system monitoring, and wireless internet access. Further operating arrangements defined in the ETAC with Western Power and the Western Power Portal ensure these obligations were met. During the audit period there were no communication issues occurred.</p>			

	<p>Evidence – Interview with Governance Manager, site visit</p> <p>Observations:</p> <ul style="list-style-type: none"> Electronic communications were available and evidenced. 			
	Recommendation: Nil	Action: Nil		
453 Type [2]	<p>OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 7.2(4) 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.</p>	Audit Priority	Controls Rating:	Compliance Rating:
		4	NP	NR
	<p>Finding – During the period 22 May 2019 to 30 June 2022 the network operator did not request the licensee to provide its contact details. There were no changes made to Licensee’s contact details.</p> <p>Evidence – 14.3</p> <p>Observations:</p> <ul style="list-style-type: none"> Email communications from BEI to Western Power confirming contact details were noted. However, these were not requested by the Network Operator they were initiated by the Licensee as part of internal compliance checks. 			
	Recommendation: Nil	Action: Nil		
454 Type [2]	<p>OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 7.2(5) 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.</p>	Audit Priority	Controls Rating:	Compliance Rating:
		4	NP	NR
	<p>Finding – There were no changes in contact details for the Licensee during the audit period 22 May 2019 to 30 June 2022.</p> <p>Evidence – Interview with BEI General Manager, SynergyRED Governance Manager, 14.3</p> <p>Observations:</p> <ul style="list-style-type: none"> The WWF AMP defines this requirement (refer Section 4.4.1) 			

	<ul style="list-style-type: none"> Email communications from BEI to Western Power confirming contact details were noted. However, these were not requested by the Network Operator they were initiated by the Licensee as part of internal compliance checks. 	Recommendation: Nil			Action: Nil		
455 Type [2]	<p>OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 7.5</p> <p>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</p>	Audit Priority	Controls Rating:	Compliance Rating:			
		4	NP	NR			
	<p>Finding – During the period 22 May 2019 to 30 June 2022 the Licensee was not required to disclose or permit the disclosure of confidential information in connection to the Code.</p> <p>Evidence – Nil</p> <p>Observations:</p> <ul style="list-style-type: none"> Nil 						
	Recommendation: Nil			Action: Nil			
456 Type [2]	<p>OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 7.6(1)</p> <p>A Code participant must disclose or permit the disclosure of confidential information that is required to be disclosed by the Code.</p>	Audit Priority	Controls Rating:	Compliance Rating:			
		4	NP	NR			
	As per finding against obligation 455						
	Recommendation: Nil			Action: Nil			
457 Type [NR]	<p>OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 8.1(1)</p> <p>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.</p>	Audit Priority	Controls Rating:	Compliance Rating:			
		5	NP	NR			
	<p>Finding – There were no disputes arising during the audit period with Western Power or any other applicable <i>Code Participants</i>.</p>						

	<p>Evidence – 19, 19.1</p> <p>Observations:</p> <ul style="list-style-type: none"> The Licensee complied with GPS Registration Extension requirements. It was noted failure to meet these WEM Rule requirements could result in Western Power commencing the Dispute Resolution Mechanism. 			
	Recommendation: Nil	Action: Nil		
458 Type [NR]	<p>OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 8.1(2)</p> <p>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.</p>	Audit Priority	Controls Rating:	Compliance Rating:
		5	NP	NR
	As per finding against obligation 457			
	Recommendation: Nil	Action: Nil		
459 Type [NR]	<p>OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 8.1(3)</p> <p>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.</p>	Audit Priority	Controls Rating:	Compliance Rating:
		5	NP	NR
	As per finding against obligation 457			
	Recommendation: Nil	Action: Nil		
460 Type [NR]	<p>OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 8.1(4)</p> <p>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.</p>	Audit Priority	Controls Rating:	Compliance Rating:
		4	NP	NR
	As per finding against obligation 457			
	Recommendation: Nil	Action: Nil		
461	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 8.3(2)	Audit Priority	Controls Rating:	Compliance Rating:

Type [NR]	The disputing parties must at all times conduct themselves in a manner which is directed towards achieving the objective in subclause 8.3(1).	5	NP	NR
	As per finding against obligation 457			
	Recommendation: Nil	Action: Nil		

Note:

NP - not possible to provide a controls rating because no activity has taken place to exercise the obligation during the audit period

NR - Not applicable to audit period and as such compliance was not assessed

APPENDIX 2 – BEI WWF ASSET MANAGEMENT REVIEW

AUGUST 2022

TABLE 17 Audit Review Ratings and Recommendations

1. ASSET PLANNING		OVERALL EFFECTIVENESS RATING		
		PROCESS & POLICY RATING*	PERFORMANCE RATING	
<p><input type="checkbox"/> Assess the adequacy of the asset planning process</p> <p><input type="checkbox"/> Assess the adequacy of the asset management plan</p> <p><input type="checkbox"/> Assess whether the asset management plan is up-to-date and implemented in practice</p> <p><input type="checkbox"/> Assess whether the asset management plan clearly assigns responsibilities and whether these have been applied in practice</p> <p>Key Process – <i>Asset planning strategies focuses on meeting customer needs in the most effective and efficient manner (delivering the right service at the right price).</i></p> <p>Outcome – <i>Asset planning is integrated into operational or business plans, providing a framework for existing and new assets to be effectively utilised and their service optimised.</i></p>		A	1	
No.	2022 REVIEW REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION			
1.1	OBLIGATION: Asset management plan covers the processes in this table		Review Priority 5	P&P* Rating: A
<p>Findings – The Asset Management System (AMS) manual was comprehensive and addressed the ERA Guidelines and adopted the principles outlined in AS ISO 55001, The Asset Management Standards. It was developed and reviewed by SynergyRED. The AMS and AMP documentation, including BEI WWF AMS, SynergyRED AMP, and Vestas AMP and WHSEMP addressed the Audit Guideline requirements. Vestas was certified to ISO 55001:2014 from March 31 2021 to 21 March 2024.</p> <p>Documents/Evidence – Appendix 3 – Ref 1, 2 ,3, 4, 5, 6, 7, 8, 9, 11, 12 Corporate Office, and Site Interviews.</p> <p>Observations:</p> <ul style="list-style-type: none"> • AMS manual addressed all requirements in the Audit Guidelines • The AMS and AMP clearly delineated the roles, responsibilities, and business relationship between BEI WWF, SynergyRED and Vestas • THE AMS and AMP clearly articulated the expectations of all parties. • Although outside the review period it was noted, SynergyRED’s internal audit team were also conducting a parallel audit of its AMS and AMP. • Vestas WHSEMP was also reviewed during this period and specifically addressed the WDFW site. • The SynergyRED AMP also articulated the relationship with the O&M Contractor Vestas and PPA Synergy. • During the construction phase SynergyRED produced Construction Monthly reports which then phased into Asset management reports as of October 2021. 				
Recommendation: None			Action: Nil	

1.2	OBLIGATION: Planning processes and objectives reflect the needs of all stakeholders and are integrated with business planning	Review Priority 4	P&P* Rating: A	Performance Rating: 1
<p>Findings – Asset Planning was incorporated into operational and business planning processes. There was comprehensive engagement with stakeholders from the operations on the ground to the Board level. Communication between SynergyRED, BEI WWF and Vestas was frequent and extensive. Engagement with Synergy and WPC was regularly maintained.</p> <p>Documents/Evidence – 1, 2,3, 4, 5, 6, 7, 8, 9, 11, 12 Corporate Office, and Site Interviews.</p> <p>Observations:</p> <ul style="list-style-type: none"> Stakeholders including ERA, WPC, Investors, Financiers, landowners, power purchaser and sub-contractors were all included BEI WWF AMS was Board endorsed, inclusive of the Asset Management Policy The Wind farm was first year into its 30-year design life. During the audit it was noted that SynergyRED were in the process of identifying OPEX and CAPEX projects to identify further opportunities for the Warradarge Wind Farm. 				
Recommendation: None			Action: Nil	
1.3	OBLIGATION: Service levels are defined in the Asset Management Plan	Review Priority 5	P&P* Rating: A	Performance Rating: 1
<p>Findings – Service levels were defined in the BEI Group Business Plans, BEI WWF AMS, SynergyRED AMP and Vestas AMP. Regular comprehensive reporting protocols to SynergyRED and the Board were established.</p> <p>Documents/Evidence – 1, 2,3, 4, 5, 6, 7, 8, 9, 11, 12 Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> Service levels were well defined in the contracts and reported on in monthly AMA reports. Prior to AMA monthly reports, SynergyRED had in place monthly comprehensive Construction reports covering HSE, Program Schedule and costs, Contracts and Procurement, Engineering and Construction Quality. BEI WWF entered into a long-term PPA with Synergy for the supply of all the energy generated by Warradarge Wind Farm together with the associated Large-scale Generation Certificates (LGCs) and capacity credits Vestas, as O&M Operator had service level obligations to BEI WWF around plant availability and generation performance that were specified in the O&M Agreements and subsequently the Vestas AMP. Vestas provided detailed Monthly reports to SynergyRED. The SynergyRED AMP defined service levels required by the Asset Management Agreement including in respect of electricity market services and WDFW facility performance reporting. 				
Recommendation: None			Action: Nil	

1.4	OBLIGATION: Non-asset options (e.g. demand management) are considered	Review Priority 5	P&P* Rating: A	Performance Rating: 1
<p>Findings – PPA was in place with Synergy. WPC and AEMO controls the input to SWIS. There were agreements in place between Synergy in terms of meeting the contractual requirements for the 180MW supply. These were reported monthly from Vestas to SynergyRED to BEI WWF and onto Synergy. WPC and BEI WWF had in place a Western Power Operating Control that controls input to SWIS. Any non - asset options were considered by the BEI WWF in its yearly OPEX/CAPEX Work Planner as per the process outlined in the AMP.</p> <p>Documents/Evidence –1, 2 ,3, 4, 5, 6, 7, 8, 9, 11, 12 Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> • Runback protocols were in place with WPC. • SynergyRED as the Asset Manager regularly considered business improvement opportunities and evaluated business cases. • SynergyRED and the BEI Group entered into a Development Services Agreement (DSA). The DSA identified market opportunities for new renewable generation assets or the expansion of existing assets and evaluated them against criteria determined by the BEI Group investors. • Noted the licensee developed the Asset Management framework on the requirements of ISO 55000 • Comprehensive processes established for asset planning were evidenced, responsibilities were well defined, • Business Plans reinforced mission statement objectives with respect to customer needs. • AMPs reinforced the need to monitor operation of the wind farm and work closely with Vestas to optimize its operational capacity. <p>Recommendation: None</p> <p>Action: Nil</p>				
1.5	OBLIGATION: Lifecycle costs of owning and operating assets are assessed	Review Priority 5	P&P* Rating: A	Performance Rating: 1
<p>Findings – Life cycle costs of Warradarge Wind farm were developed by SynergyRED and is utilised for planning and projecting costs until 2051. This was monitored on a monthly basis and presented to the Board. Via VMA report. Annually SynergyRED developed OPEX and CAPEX budgets, using the Life cycle financial costs and presented to the BEI WWF Board for approval. These were also submitted to Financiers.</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 6, 7, 8, 9, 11, 12 Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> • O&M had comprehensive maintenance schedules. Operators carried the maintenance and operating costs. These were monitored monthly by SynergyRED. • Maintenance contracts ensured equipment was kept in good operating condition. • VMA reported to BEI WWF monitors the O&M costs and liquidity on a monthly and annual basis 				

	Recommendation: None	Action: Nil		
1.6	OBLIGATION: Funding options are evaluated	Review Priority 4	P&P* Rating: A	Performance Rating: 1
	<p>Findings – The AMP clearly articulated the financial models and shareholders. Funding was agreed with APRA approved financial institution. Funding can be readily arranged and negotiated with Board and Shareholders. The AMP and BEI WWF Business Plan set out the financial justification model and process by which any new assets were to be evaluated and was presented to the Board. The Board ultimately makes the decision.</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 6, 7, 8, 9, 11, 12 Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> • The WDFW AMP and the BEI WWF Business Plan were reviewed. • The base case financial model for the windfarm projected revenue, operational costs, and EBITDA. • Annual financial audited statements and notes provided transparency to the funding within BEI Group • The base case financial model for the Warradarge allowed for funding for known major financial expenditure items such as compliance costs, O&M costs, adequate funding for the Asset Manager, sustaining capital expenditure, decommissioning and site rehabilitation. • In addition to the base case financial modelling, there was an annual budget update and business plan review that was approved by the BEI WWF Board. • Specific details were commercial in confidence 			
	Recommendation: None	Action: Nil		
1.7	OBLIGATION: Costs are justified, and cost drivers identified	Review Priority 4	P&P* Rating: A	Performance Rating: 1
	<p>Findings - Costs were well identified and justified. Costs and cost drivers were monitored vigilantly and reported all the way to the Board.</p> <p>Documents/Evidence –1, 2 ,3, 4, 5, 6, 7, 8, 9, 11, 12 Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> • The plant was new, and contracts structured with the costs clearly articulated. Contract performance incentives were established. AMA and VMA reports provided detailed financial monitoring. 			
	Recommendation: None	Action: Nil		

1.8	OBLIGATION: Likelihood and consequences of asset failure are predicted	Review Priority 4	P&P* Rating: A	Performance Rating: 1
<p>Findings – Asset failure risks were covered by Vestas and evident in their WHSEMP Asset Criticality processes and site risk registers. Risk registers were maintained at overall and project level and contingency plans were considered in planning and annually reviewed. During the construction phase a major lightning strike and a mechanical issue delayed practical completion. Vestas’ capacity to rectify failures and to work with BEI WWF to implement system improvements was noted and reflected in documentation provided.</p> <p>Documents/Evidence – 1, 2,3, 4, 5, 6, 7, 8, 9, 11, 12 Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> • WTG and balance of plant spares readily available at Vestas warehouses and at similar sites and on site. SynergyRED has installed two transformers enabling 100% redundancy in its generation to the SWIS. • Due to a comprehensive lightning protection upgrade to the wind turbine blades, Vestas had not yet met the performance targets. From the AMA reports it was noted the projected performance targets were within reach. On completion of the program (scheduled August 2022), the O&M contractors should meet performance targets as established in their contracts. SynergyRED, in conjunction with its Engineers were monitoring this program. • Any faulty plant was replaced under warranty and in future the risk lies mainly with the operators, as per the O&M contract. • Availability of spares was well monitored through Vestas SAP Planning Board. Covid-19 had minimum effect on delivery of the project. 				
Recommendation: None			Action: Nil	
1.9	OBLIGATION: Asset management plan is regularly reviewed and updated	Review Priority 4	P&P* Rating: A	Performance Rating: 1
<p>Findings – SynergyRED AMP was developed during the review period and finalised in May 2022. It was understood the draft SynergyRED AMP was established throughout the review period. The Vestas AMP was developed in 2020, reviewed regularly and submitted to BEI WWF for approval.</p> <p>Documents/Evidence – 1, 2,3, 4, 5, 6, 7, 8, 9, 11, 12 Corporate Office, and Site Interviews.</p> <p>Observations:</p> <ul style="list-style-type: none"> • SynergyRED AMP was scheduled to be reviewed every year and internal audits carried out by Synergy Corporate. • During the review period and on commencement of electricity generation, SynergyRED developed their first AMP. As practical completion was 29 November 21, the SynergyRED AMP was not due for review. It was noted the BEI AMS required annual review in the asset planning cycle and the SynergyRED AMP specified annual review. Scheduling of the review process was captured in the BEI Critical Dates register. SynergyRED tracked improvements to its AMP on an annual basis. • Vestas had completed it second review of WHSEMP which also included site specifics applicable to WDWF. 				
Recommendation: None			Action: Nil	

2. ASSET CREATION AND ACQUISITION			OVERALL EFFECTIVENESS RATING	
			PROCESS & POLICY RATING*	PERFORMANCE RATING
<input type="checkbox"/> Assess the adequacy of policies and procedures covering the creation and acquisition of assets <input type="checkbox"/> Select a sample of asset creations/ acquisitions over the review period and confirm adequate procedures have been followed and actual costs are as predicted Key Process – <i>Asset creation/acquisition is the provision or improvement of assets.</i> Outcome – <i>The asset acquisition framework is economic, efficient and cost-effective; it reduces demand for new assets, lowers service costs and improves service delivery.</i>			A	2
No.	2022 REVIEW REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION			
2.1	OBLIGATION: Full project evaluations are undertaken for new assets, including comparative assessment of non-asset options	Review Priority 4	P&P* Rating: A	Performance Rating: 1
<p>Findings – Warradarge Wind Farm’s full project evaluation to end of life, including CAPEX, OPEX, EBITDA and provision for Asset Disposal was developed and approved by the Board.</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 8, 9, 11, 12 Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> BEI WWF had in place a full project evaluation financial model for a 180MW Wind Farm which had been presented to Board for approval. SynergyRED had commenced a full project feasibility and life cycle financial model for an expansion of the wind farm at the same location to be submitted to BEI WWF. At the time of the audit and review these opportunities remained under consideration. 				
Recommendation: None			Action: Nil	
2.2	OBLIGATION: Evaluations include all life-cycle costs	Review Priority 4	P&P* Rating: A	Performance Rating: 1
<p>Findings – The Warradarge Wind Farm was built and commissioned during the audit period. A detailed life–cycle cost model was developed prior to the construction and utilised as a basis of its O&M contract with Vestas. The evaluation included the wind turbines and balance of plant.</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 8, 9, 11, 12 Corporate Office, and Site Interviews.</p> <p>Observations:</p> <ul style="list-style-type: none"> BEI WWF, together with SynergyRED had conducted a comprehensive due diligence for the wind farm. 				

	<ul style="list-style-type: none"> Detailed life cycle costs formed the basis of comprehensive financial planning, reporting and monitoring. Detailed life cycle costs were projected to 2051 			Action: Nil	
	Recommendation: None				
2.3	OBLIGATION: Projects reflect sound engineering and business decisions	Review Priority 4	P&P* Rating: A	Performance Rating: 1	
	<p>Findings – SynergyRed and Vestas contracts, for AMS and O&M services respectively were performance based and decision making process took into consideration engineering, business and risk aspects of the projects to each party.</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 8, 9, 11, 12 Corporate Office, and Site Interviews.</p> <p>Observations:</p> <ul style="list-style-type: none"> SynergyRed and Vestas had very good asset management, business and engineering experience which was utilized to ensure decisions made for the facility are thoroughly researched and resourced Vestas had in place established processes whereby they had access to Vestas Global Services. This was evident in the planning of engineering solutions to the lightning protection program to the WTG blades. 				
	Recommendation: None	Action: Nil			
2.4	OBLIGATION: Commissioning tests are documented and completed	Review Priority 4	P&P* Rating: A	Performance Rating: 2	
	<p>Findings – Warradarge Wind Farm was established and under operation for nearly a year. SynergyRED had engaged GHD as the owners' engineers and were in the process of collating as – built and commissioning documentation.</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 8, 9, 11, 12 Corporate Office, and Site Interviews.</p> <p>Observations:</p> <ul style="list-style-type: none"> During the construction phase, Vestas EPC Group documented the drawings and commissioning tests. These were supported by GHD and will be transferred to SynergyRED / BEI WWF. On Site Vestas through its on-line SAP Planning Board had electronic access to PID. Vestas Global documented the technical drawings of the wind turbines and associated equipment. Through its O&M Agreement BEI WWF had access to these drawings and all associated technical information. 				
	Recommendation: None	Action: Nil			

2.5	OBLIGATION: Ongoing legal / environmental / safety obligations of the asset owner are assigned and understood	Review Priority 4	P&P* Rating: A	Performance Rating: 2
<p>Findings – O&M agreements, Vehicle Management Agreements, Development Agreements and Asset Management Plans addressed obligations and these were reflected in procedures and comprehensive reporting. The Licensee was aware of legal/environmental and safety obligations and proactively managed these requirements.</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 8, 9, 11, 12 Corporate Office, and Site Interviews.</p> <p>Observations:</p> <ul style="list-style-type: none"> • SynergyRED and Vestas had established protocols for annual reviews of their respective obligations as outlined in their AMPs. • Vestas also utilised its Australia -Wide Vestas legal team to ensure compliance with applicable on-going Australian legislation. Likewise, SynergyRED utilised Corporate Synergy. • Beginning of 2022, BEI Group and its directors and officers had undertaken training on recently introduced WA Work Health and Safety (General) Regulations) 2022. Since then these had been gradually rolled out to all its Contractors through O&M Agreements. • In May 2022 BEI conducted an Environmental Audit as per the O&M Agreement of Vestas. The internal audit clearly stated Non- Compliances on Site. The report was issued in July 2022 and SynergyRED and Vestas have commenced implementation of findings and recommendations. An example was the inclusion of HSE in Toolbox Meetings. This was the first item on the agenda. • The audit findings found that Vestas WHSEMP did not address WDWF site specific issues and inconsistencies between what was practised on site and procedures. In June 2022 Vestas reviewed and updated the WHSEMP to address the findings and made it more site specific. • As per the O&M Agreement SynergyRED / BEI were obligated to annual environmental, legal and safety audits. • Vestas had in place a legal register, specific to WA which primarily focussed on health and Safety legislation. 				
Recommendation: None			Action: Nil	

3. ASSET DISPOSAL <input type="checkbox"/> Assess the adequacy of policies and procedures covering the identification of under-performing assets, disposal of assets and replacement strategy <input type="checkbox"/> Determine whether a regular review of the performance of assets is undertaken <input type="checkbox"/> Select a sample of disposals over the review period and confirm adequate procedures have been followed Key Process – <i>Asset disposal is the consideration of alternatives for the disposal of surplus, obsolete, under-performing or unserviceable assets.</i> Outcome – <i>The asset management framework minimises holdings of surplus and underperforming assets and lowers service costs. The cost-benefits of disposal options are evaluated.</i>		OVERALL EFFECTIVENESS RATING PROCESS & POLICY RATING* A		PERFORMANCE RATING 1
No.	2022 REVIEW REPORT EVIDENCE/ /VERIFICATION/FINDING/ACTION			
3.1	OBLIGATION: Under-utilised and under-performing assets are identified as part of a regular systematic review process	Review Priority 4	P&P* Rating: A	Performance Rating: 1
<p>Findings – Vestas in its monthly report to SynergyRED presents a systematic performance and maintenance review of all the wind turbines and balance of plant. The report identifies any underperforming or underutilised plants and the ratification actions taken by Vestas. This monthly report is summarised and presented to the Board.</p> <p>Documents/Evidence – 1, 2, 3, 4 ,5, 8, 9,11,12, Corporate Office and Site Interviews.</p> <p>Observations:</p> <ul style="list-style-type: none"> • WDWF has moved out of construction into full operation. • Given that the performance-based O&M contract between Vestas and BEI WWF and the 5 year defects liability period, it was incumbent on Vestas to undertake any plant replacement/refurbishment to ensure that WDWF performed as per O&M contract. • It was also observed that if there was any evidence of similar or same type of wind turbine underperforming elsewhere in the world, Vestas Global issued rectification activities that were then executed and monitored, both at site and global level. This was done utilising SAP Planning Board. 				
Recommendation: None			Action: Nil	
3.2	OBLIGATION: The reasons for under-utilisation or poor performance are critically examined and corrective action or disposal undertaken	Review Priority 4	P&P* Rating: A	Performance Rating: 1
<p>Findings – Monthly reports document performance and actions of individual WTGs and a wind farm as a whole. Faulty plants were replaced/refurbished/upgraded, under warranty. SynergyRED also had on-line access to Vestas On-Line portal which gave them real time access to monitor the performance of the wind farm.</p>				

	<p>Documents/Evidence – 1, 2, 3, 4 ,5, 8, 9,11,12, Corporate Office, and Site Interviews.</p> <p>Observations:</p> <ul style="list-style-type: none"> The monthly reports from Vestas provided performance details of each wind turbine and if the turbine was not performing or not operating, explanations as to why were provided. For example, Vestas were undertaking the upgrade of lightning protection on the wind blades and details of the progress of the program was provided in the monthly reports. This was also monitored by Vestas Global. As part of SynergyRED’s asset management, their operations team visited sites to carry out visual inspections of the wind farm’s performance. 			
	Recommendation: None		Action: Nil	
3.3	OBLIGATION: Disposal alternatives are evaluated	Review Priority 4	P&P* Rating: A	Performance Rating: 1
	<p>Findings –. The Technical and Environmental Due Diligence report prepared by Jacobs and the Financial base Model considered disposal and allowed for site clearing of all above ground works, disposal of blades and rehabilitation earthworks. Given that Warradarge had just completed construction and is in very early stages of operation, disposal was not a consideration during the audit period.</p> <p>Documents/Evidence – 1, 2, 3, 4 ,5, 8, 9,11,12, Corporate Office, and Site Interviews.</p> <p>Observations:</p> <ul style="list-style-type: none"> The Due Diligence report recommended that the BEI Group and SynergyRED revisit disposal alternatives into its 25th year of operation. During the audit period BEI WWF (after an IT audit) replaced the IT system “Shrew” with “Cisco” to enhance cyber security. IT system “Shrew” was no longer supported and subsequently held no value and was made redundant. This was as per BEI Group Policy. In June and July 2022, BEI had developed its first Decommissioning Management Plan (DMP) for WDFW to be reviewed annually. The DMP identified resources required, both in terms of logistics and costs. 			
	Recommendation: None		Action: Nil	
3.4	OBLIGATION: There is a replacement strategy for assets	Review Priority 4	P&P* Rating: A	Performance Rating: 1
	<p>Findings –. BEI WWF developed a comprehensive life cycle financial model and have made provisions for OPEX and CAPEX expenditure during the wind farms operational life. Under the O&M contract Vestas has been engaged to execute such activities as instructed by SynergyRED.</p> <p>Documents/Evidence – 1, 2, 3, 4 ,5, 8, 9,11,12, Corporate Office, and Site Interviews.</p>			

	Observations: <ul style="list-style-type: none">• Vestas has developed comprehensive maintenance schedules of the wind farm• Operation and maintenance of the wind farms and any replacement of plant was reported to SynergyRED (with performance targets clearly defined) monthly.• During the Defect Liability period, majority of the plant replacement was the responsibility of the O&M Contractor.• Vestas as Independent Service provider was responsible for consumable spares, and replaced assets as agreed to with SynergyRED.
	Recommendation: None

4. ENVIRONMENTAL ANALYSIS <input type="checkbox"/> Review achievement of performance and service standards over the review period <input type="checkbox"/> Investigate any statutory or regulatory breaches and assess corrective action taken <input type="checkbox"/> Review the adequacy of reporting and monitoring tools Key Process – <i>Environmental analysis examines the asset management system environment and assesses all external factors affecting the asset management system.</i> Outcome – <i>The asset management system regularly assesses external opportunities and threats and identifies corrective action to maintain performance requirements.</i>		OVERALL EFFECTIVENESS RATING		
		PROCESS & POLICY RATING*	PERFORMANCE RATING	
		A	2	
No.	2022 REVIEW REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION			
4.1	OBLIGATION: Opportunities and threats in the asset management system environment are assessed	Review Priority 4	P&P* Rating: A	Performance Rating: 1
<p>Findings – BEI WWF, SynergyRED and Vestas identified risk management approach in their respective AMPs. Risk Management Policy, Procedures and Risks Summary documentation was developed, established, and monitored.</p> <p>Documents/Evidence – 1, 2, 3, 4, 5, 6, 7, 8, 9, 11, 12 Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> • Sales and O&M contracts were well defined and implemented. • Good response to equipment failures by Vestas and SynergyRED Contractors. • Good use of computerised risk management system, EMPOWER by SynergyRED and CR360 by Vestas. • SynergyRED had developed “WDWF tracker” that recorded relevant opportunities and treats and they were monitored monthly and through audits. 				
Recommendation: None			Action: Nil	
4.2	OBLIGATION: Performance standards (availability of service, capacity, continuity, emergency response, etc.) are measured and achieved	Review Priority 4	P&P* Rating: A	Performance Rating: 2
<p>Findings.- Performance standards were monitored and reported in O&M monthly reports. This was also complimented with the online tracker on the Vestas On-line Portal.</p>				

	Documents/Evidence – 1, 2, 3, 4, 5, 6, 7, 8, 9, 11, 12 Corporate Office, and Site Interviews			
	Observations: <ul style="list-style-type: none"> • SynergyRED and Vestas had in place contracts plans and systems in place to ensure performance standards were achieved, measured, monitored and any disruptions to the continuity of performance minimised. Due to the upgrade of the lightning protection of the blades, WDFW had not achieved any of the contracted performance KPIs. However monthly performance reports of the wind farm to SynergyRED demonstrated increasing performance levels in line to achieve its performance contractual targets. • Services Agreement contractual incentives in relation to performance standards were established. • Vestas had also recently carried out an ERP drill and there were no significant adverse findings. • WHS statistics were included in the Vestas Monthly report to BEI. These statistics were then aggregated with SynergyRED and BEI statistics in the monthly AMA reports. These were then reported to the Board, together with reports on any incidents and (when applicable) WHS audits report findings and actions. • The Environmental audit conducted clearly identified the need for Vestas to include environmental emergencies in its ERP and address inconsistencies between its OH&S manual and WHSEMP. 			
	Recommendation: None			Action: Nil
4.3	OBLIGATION: Compliance with statutory and regulatory requirements	Review Priority 4	P&P* Rating: A	Performance Rating: 1
	Findings - Compliance with Legal, statutory, and regulatory was monitored and reported to BEI-WWF board. The Licensee had a well-established compliance system and culture and organisational controls were established to ensure compliance.			
	Documents/Evidence – 1, 2, 3, 4, 5, 6, 7, 8, 9, 11, 12 Corporate Office, and Site Interviews			
	Observations: <ul style="list-style-type: none"> • O&M Contractor reports to SynergyRED were always on time. • The O&M contractor had access to Vestas Australia Wide legal register which provided updates and actions to be taken. This was primarily focussed on health and safety. • SynergyRED had also in place a Critical Register Dates spreadsheet which was monitored monthly. SynergyRED envisioned to incorporate this into their Risk management Tool “EMPOWER” • The Licensee confirmed good relations with customers and regulatory authorities. • During the construction period, SynergyRED informed local, State and Federal authorities of the progress of the Warradarge Wind Farm project. • No late penalties or infringe notices observed during the audit period. 			
	Recommendation: None			Action: Nil

4.4	OBLIGATION: Service standard (customer service levels etc.) are measured and achieved.	Review Priority 4	P&P* Rating: A	Performance Rating: 2
<p>Findings – SCADA system recorded performance, as does WPC. Issues such as curtailment was identified. Customer services levels were well defined and had not been met by the Licensee as an unscheduled generator. Customer service levels were measured and documented in the monthly AMA Reports and annual reports.</p> <p>Documents/Evidence – 1, 2, 3, 4, 5, 6, 7, 8, 9, 11, 12 Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> • Customers have raised no issues or concerns even though they have not received the contracted generation. The contractual relationship between Synergy and BEI WWF has been well managed through respective contracts in place. • Service levels were well defined in the contracts and reported on in monthly reports • BEI WWF entered into a long-term PPA with Synergy for the supply of all the energy generated by the wind farm together with the associated Large-scale Generation Certificates (LGCs) and capacity credits • Vestas, as O&M Operator had service level obligations to BEI WWF around plant availability and generation performance that were specified in the O&M Agreements. • The SynergyRED AMP defined service levels required by the Asset Management Agreement including in respect of electricity market services and Warradarge Wind Farm facility performance reporting. • BEI WWF monitored changes in the market (both commercial and regulatory) to determine when service levels needed to be updated. • SynergyRED utilised its “WDWF” tracker to address any operational / network issues identified by SCADA. 				
Recommendation: None			Action: Nil	

5. ASSET OPERATIONS		OVERALL EFFECTIVENESS RATING		
		PROCESS & POLICY RATING*	PERFORMANCE RATING	
<input type="checkbox"/> Assess the adequacy of policies and procedures covering operations functions <input type="checkbox"/> Assess the adequacy of staff resourcing and training <input type="checkbox"/> Confirm the policies and procedures have been followed during the review period by examining the asset register, observing operational procedures, analysing costs, etc. <input type="checkbox"/> Assess the significance of exceptions identified and whether adequate corrective action has been taken Key Process – <i>Asset operations is the day-to-day running of assets (where the asset is used for its intended purpose).</i> Outcome – <i>The asset operation plans adequately document the processes and knowledge of staff in the operation of assets so service levels can be consistently achieved.</i>		A	1	
No.	2022 REVIEW REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION			
5.1	OBLIGATION: Operational policies and procedures are documented and linked to service levels required	Review Priority 4	P&P* Rating: A	Performance Rating: 1
Findings – Operational Policies and procedures for both BEI and Vestas were well documented, easily accessed and reviewed. Documents/Evidence – 1, 2 ,3, 4, 5, 7, 8, 9, 11, 12 Corporate Office, and Site Interviews Observations: <ul style="list-style-type: none"> The requirement of maintaining and documenting operational policies were linked to the O&M agreement KPIs. Vestas utilised its SAP Planning Board to schedule operational tasks and procedures, primarily for wind turbines and associated plant. The Balance of Plant was scheduled in JOLT. Vestas operational policies were clearly defined in it WHSEMP which also incorporated WDWF site specific operational protocols. Operational and Maintenance manuals for the turbines were accessed via TECHDOCS (an on-line CMMS) BEI Group had its own policies and relevant policies were applicable to Vestas as per the O&M agreement, for example procurement policies beyond Vestas's delegation of authority as per the O&M Contract. 				
Recommendation: None			Action: Nil	
5.2	OBLIGATION: Risk management is applied to prioritise operations tasks	Review Priority 4	P&P* Rating: A	Performance Rating: 1

	<p>Findings – Operational tasks on site were minimum. Risk management was applied comprehensively and demonstrated at the operational, maintenance and management levels.</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 7, 8, 9, 11, 12 Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> • Vestas used its SAP Planning board to prioritise tasks. These were categorised from Priority 1 (High) to Priority 5 (least). • BEI WWF / SynergyRED and Vestas had risk management policies in place and applied • Through the SCADA exported operational report, Vestas could carry out prioritised operational tasks. 			
	Recommendation: None		Action: Nil	
5.3	<p>OBLIGATION: Assets are documented in an asset register including asset type, location, material, plans of components, and an assessment of assets’ physical/structural condition</p>	<p>Review Priority 4</p>	<p>P&P* Rating: A</p>	<p>Performance Rating: 1</p>
	<p>Findings – The asset register for the Licensee was defined by two components. The Licensee’s documented Asset Register was primarily financially focussed, recorded all the financial information, location and asset type. This system was reviewed during the site visit. The CMMS: JOLT and SAP systems, detailed asset components, included an assessment of the assets physical/structural condition and location. This system was then linked to Final Practical Completion Plans and as-built drawings. In the SAP system, the wind turbine assets were also given a unique Vesta Global Identifier Number. This system was reviewed during the site visit.</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 7, 8, 9, 11, 12 Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> • Financial Register kept in SynergyRED office. Data located in Xero • SAP/JOLT information was kept on site • BEI WWF had in place a Fixed Asset register which had full depreciation schedules. 			
	Recommendation: None		Action: Nil	
5.4	<p>OBLIGATION: Accounting data is documented for assets</p>	<p>Review Priority 4</p>	<p>P&P* Rating: A</p>	<p>Performance Rating: 1</p>
	<p>Findings - Assets were well documented in the accounts and financial reports summarised monthly to Boards</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 7, 8, 9, 11, 12 Corporate Office, and Site Interviews</p>			

	<p>Observations:</p> <ul style="list-style-type: none"> Financial information well recorded by SynergyRED and reported to Board. Vestas recorded their operational and maintenance costs within their SAP systems as per the O&M contract. Annual audited accounts and accompanying notes detailed accounting information and explanations BEI WWF had in place a Fixed Asset register which had full depreciation schedules. 			
	Recommendation: None	Action: Nil		
5.5	OBLIGATION: Operational costs are measured and monitored	Review Priority 4	P&P* Rating: A	Performance Rating: 1
	<p>Findings – Operational costs were measured, recorded, monitored and reported on a monthly basis.</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 7, 8, 9, 11, 12 Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> O&M costs were incorporated in the O&M Contracts as a set sum with exceptions allowed for. Unscheduled O&M costs were monitored and reported in monthly and annual reports Initial capital investment costs were financed and well monitored by SynergyRED and shareholders Small workforce required for operational and maintenance purposes. Most operational reporting by Vestas was in performance terms rather than dollars. Financials were reported and budgeted in financial reports by SynergyRED to BEI WWF. These reports were also compared to the Base Financial Model and monitored for (if any) variations. 			
	Recommendation: None	Action: Nil		
5.6	OBLIGATION: Staff resources are adequate, and staff receive training commensurate with their responsibilities	Review Priority 4	P&P* Rating: A	Performance Rating: 1
	<p>Findings – Employees and Contractors were competent and familiar with the operations and plant requirements. Training and resourcing considerations were evident. Training records were reviewed on “Altora” on site. Training and resourcing needs were confirmed by the Site Manager and Areas Services Manager of Vestas.</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 7, 8, 9, 11, 12 Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> Training and refresher trainings closely monitored by Vestas. For example, Vestas provided driver training for their staff on site. 			

	<ul style="list-style-type: none"> • O&M Agreements stipulated the level of competency and training for staff on site. Vestas had access to staff globally for additional knowledge. • Vestas utilised "Altora", which was implemented in August 2021 which carried out the following functions: New Induction system, Site Inductions, Corporate Inductions, training requirements of personnel (within 30 days of being due) and tracked personnel training qualification certifications. Site manager was responsible for ensuring that staff were trained appropriately for the assigned tasks. • Toolbox talks were presented and minuted by Vestas. • SynergyRED did not conduct works at WDWF, however they must provide 'competent' personnel with all the base line training and skills necessary to perform their roles. • SynergyRED provided its own baseline training for its personnel and maintained its own training registers to ensure appropriate currency for site skills. • Training was discussed at Site Toolbox meetings. 	
	<p>Recommendation: None</p>	<p>Action: Nil</p>

6. ASSET MAINTENANCE		OVERALL EFFECTIVENESS RATING		
		PROCESS & POLICY RATING*	PERFORMANCE RATING	
<p><input type="checkbox"/> Assess the adequacy of policies and procedures covering maintenance functions</p> <p><input type="checkbox"/> Confirm the policies and procedures have been followed during the review period by examining maintenance schedules, analysing costs, etc.</p> <p><input type="checkbox"/> Assess the significance of exceptions identified and whether adequate corrective action has been taken</p> <p>Key Process – <i>Asset maintenance is the upkeep of assets.</i></p> <p>Outcome – <i>The asset maintenance plans cover the scheduling and resourcing of the maintenance tasks so work can be done on time and on cost.</i></p>		A	1	
No.	2022 REVIEW REPORT EVIDENCE/ /VERIFICATION/FINDING/ACTION			
6.1	OBLIGATION: Maintenance policies and procedures are documented and linked to service levels required	Review Priority 4	P&P* Rating: A	Performance Rating: 1
<p>Findings – Maintenance policies and procedures were well documented, Comprehensive monthly reports provided to SynergyRED.</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 7, 8, 9, 11, 12 Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> • O&M contractor utilised its experience on similar facilities, was backed up by global databases and had the support of reputable OEM suppliers to ensure comprehensive maintenance procedures and practices in place. • Good control of maintenance documentation was noted. • The maintenance and repair/upgrade strategy were focused on minimising generation losses. This was achieved by planning scheduled maintenance at times of low or no generation. • O&M contractor utilised its experience on similar facilities, was backed up by global databases and had the support of Vestas Global to ensure comprehensive maintenance procedures and practices in place. • Maintenance strategy was designed for the life of the wind turbines in its O&M Contract Schedules. • Vestas utilised SAP Planning Board for scheduled and breakdown services which was linked to the resources and spares required. • Procedures were uploaded on “Tech Docs” which was easily accessed by maintenance personnel using iPad, mobile phone or laptops. All work instructions were updated by data-controlled management systems (DCMS) 				
Recommendation: None			Action: Nil	
6.2	OBLIGATION: Regular inspections are undertaken of asset performance and condition	Review Priority	P&P* Rating:	Performance Rating:

		4	A	1
	<p>Findings – Although recently completed, regular inspections were undertaken, and performance reported on in monthly reports. Warradarge Wind farm was manned during working hours and inspected and maintained on an ongoing process. These were recorded in SAP. Asset performance was monitored with SCADA and reported upon in monthly reports.</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 7, 8, 9, 11, 12 Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> • Regular on-site inspections and continuous condition and performance monitoring ensured performance. • Maintenance activities rescheduled to maximise generation capacity. • Maintenance schedules for inspections were scheduled to 2051 • SCADA provided communication interface with the Power Plant Controllers and all critical equipment within the wind farm • WDWF was on schedule to complete its all its 3-month inspection of the wind turbines under warranty from practical completion. 			
	Recommendation: None		Action: Nil	
6.3	OBLIGATION: Maintenance plans (emergency, corrective and preventative) are documented and completed on schedule	Review Priority 4	P&P* Rating: A	Performance Rating: 1
	<p>Findings - – Maintenance was well documented and processes for the continuous review of maintenance practices were established. Maintenance activities were reported weekly, monthly to SynergyRED incorporating future maintenance activities and resources. SAP was used to ensure maintenance plans were executed in a timely manner.</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 7, 8, 9, 11, 12 Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> • Monthly meetings were held between SynergyRED on-site and off-site personnel of O&M contractor. These were minuted and actions items tracked through “WDWF Tracker” by both parties. • Detailed maintenance schedules developed annually and reviewed on an on-going basis. • Vestas Maintenance Planners team provided in advance 12 monthly and weekly plans, including pre-start weekly maintenance plans which was followed through with face-to-face meetings. Pre-start meetings detailed work tasks for the day as per the SAP Planning Board and these were recorded in SAP. These included CIMS (Continuous Improvement Management Services work tasks), Scheduled and breakdown activities. • SAP was utilised for maintenance planning and SAP inventory module was used to register, monitor and maintain safety, consignment and consumables spares. • Technicians then accessed TECHDOCS and used SAP Easy Document Search facility to obtain maintenance procedures and all relevant technical diagrams/ PIDs. 			
	Recommendation: None		Action: Nil	

6.4	OBLIGATION: Failures are analysed, and operational/maintenance plans adjusted where necessary	Review Priority 4	P&P* Rating: A	Performance Rating: 1
<p>Findings – Lightning protection upgrades were carried under warranty. Monthly Reports contained detailed history of failures and amendments to operational and or maintenance plans. Vestas had access to information globally. Corrective actions were implemented promptly and monitored by Vestas and reported to BEI WWF.</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 7, 8, 9, 11, 12 Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> • Vestas utilised Continuous Improvement Management Services (CIMS) a SAP Planning Board, to record failures and carry out root cause analysis. CIMS work orders were then tracked and reported monthly to SynergyRED. • A separate monthly meeting was also held between SynergyRED and Vestas to follow up progress on any outstanding WHS or Environmental matters that have been identified during any other reviews and audits. These were also tracked in the “WDWF tracker” under the categories of WHSEMP and EMP. Health, Safety, Environmental and Operational Audits and review were carried out at least every 4 months • Vestas presented asset management on Vestas Online Customers portal and provided completed service and monthly reports. • Scheduled works aligned with WPC outages times as agreed by BEI WWF and Vestas. <p>Recommendation: None</p> <p>Action: Nil</p>				
6.5	OBLIGATION: Risk management is applied to prioritise maintenance tasks	Review Priority 4	P&P* Rating: A	Performance Rating: 1
<p>Findings – Risk management processes for the prioritisation of maintenance tasks were applied comprehensively</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 7, 8, 9, 11, 12 Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> • The SAP maintenance system used by Maintenance Planners Team and on site to prioritises the maintenance tasks accordingly. SAP Planning Board prioritises tasks from Priority 1 (high) to Priority 5 (Least) for every work service order that was issued. • Vestas Maintenance Planners Team utilised risk management to prioritise maintenance tasks when entered in SAP: Turbine breakdowns, scheduled maintenance. CIMS, Contract schedule maintenance as per O&M and technical and engineering expertise tasks (in that order) • Pre-start meetings detailed work tasks for the day as per the SAP Planning Board and these were recorded in SAP <p>Recommendation: None</p> <p>Action: Nil</p>				

6.6	OBLIGATION: Maintenance costs are measured and monitored	Review Priority	P&P* Rating:	Performance Rating:
		4	A	1
<p>Findings – Maintenance costs were measured, recorded, monitored, and reported on a monthly basis.</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 7, 8, 9, 11, 12 Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> • O&M costs were incorporated in the O&M Contracts • Unscheduled O&M costs were monitored and reported in monthly and annual reports • Small workforce required for operational and maintenance purposes. • Most maintenance reporting by Vestas was in performance terms rather than dollars. • Financials were reported and budgeted in financial reports and audited annually O&M costs were incorporated in the O&M Contracts • Maintenance costs and budgets recorded monthly for first 12 months with an additional year forecast. • Vestas on-site had implemented a ‘Lean Implementation’ program with the focus on increasing efficiency and reducing costs as part of continuous improvement initiative across Vestas global sites. 				
Recommendation: None			Action: Nil	

7. ASSET MANAGEMENT INFORMATION SYSTEM		OVERALL EFFECTIVENESS RATING		
		PROCESS & POLICY RATING*	PERFORMANCE RATING	
<p><input type="checkbox"/> Assess the adequacy of policies and procedures covering the general control and security of the computer systems used to provide management information on compliance with service standards / licence obligations</p> <p><input type="checkbox"/> Confirm management reports on service standards / licence obligations are reviewed and substantial exceptions to service standards / licence obligations are promptly followed up and implemented</p> <p>Key Process – An asset management information system is a combination of processes, data and software supporting the asset management functions.</p> <p>Outcome – The asset management information system provides authorised, complete and accurate information for the day-to-day running of the asset management system. The focus of the review is the accuracy of performance information used by the licensee to monitor and report on service standards.</p>		A		1
No.	2022 REVIEW REPORT EVIDENCE/ /VERIFICATION/FINDING/ACTION			
7.1	OBLIGATION: Adequate system documentation for users and IT operators	Review Priority 4	P&P* Rating: A	Performance Rating: 1
<p>Findings – Both the Licensee and the O&M Contractors had detailed well understood IT systems in place.</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 7, 8, 9, 11, Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> • Staff were conversant with systems in place and refresher training and e-learning were scheduled timely. • SCADA was automated • Reporting detailing system data and performance was well prepared, brief with adequate information. Reporting and was evidenced from the O&M operators monthly, AMA reports from SynergyRED to BEI WWF monthly. In addition, SynergyRED submitted VMA reports to BEI WWF monthly. • O&M Agreement clearly identified the need for the O&M Contractor to have established CMMS in place. These included Vestas On-Line Portal, SCADA and SAP. • BEI WWF also upgraded the site computer system from “Shrew” to “Cisco” 				
Recommendation: None			Action: Nil	
7.2	OBLIGATION: Input controls include suitable verification and validation of data entered into the system	Review Priority 4	P&P* Rating: A	Performance Rating: 1

	<p>Findings – Data entry, acquisition and reporting was automated and cross checked by other parties</p> <p>Documents/Evidence – 1, 2, 3, 4, 5, 7, 8, 9, 11, Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> Reporting based on outputs from SCADA systems O&M statistical reports automated and Vestas on line on Portal available to SynergyRED to cross check performance data reported monthly by Vestas to them. Financial reporting automated. The protection relays provided electrical protection functions, local control intelligence, monitoring abilities and communications to the SCADA System. 			
	Recommendation: None		Action: Nil	
7.3	OBLIGATION: Security access controls appear adequate, such as passwords	Review Priority 4	P&P* Rating: A	Performance Rating: 1
	<p>Findings – Security controls were adequate</p> <p>Documents/Evidence – 1, 2, 3, 4, 5, 7, 8, 9, 11, Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> Firewall and password protections in place. This was made evident on October/November 2021 when Vestas Global site in Denmark was hacked and had no adverse impact at the WDWF Site. Vestas had also in place a cyber security response plan. This was also a requirement of the O&M agreement. In addition, Vestas carried out an Asset Criticality Workshop where the site firewall issues were addressed. BEI WWF has developed and implemented a Cyber Security Policy and procedures as per Australian Energy Sector Cyber Security Framework (AESCSF). Subsequently the all-user level and system level passwords must conform to the Password Protection Standards as per AESCSF practices. Demonstrated effective resilience analysis and contingency planning with the aim of preventing disruption from cyber-attacks to the business-as-usual. 			
	Recommendation: None		Action: Nil	
7.4	OBLIGATION: Physical security access controls appear adequate	Review Priority 4	P&P* Rating: A	Performance Rating: 1

	<p>Findings – Access was restricted and locked when unattended.</p> <p>Documents/Evidence – 1, 2,3, 4, 5, 7, 8, 9, 11, Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> • Entry to site was well hidden and gate controlled. The site was off the main transport route. • Employees, Contractors and landowners were routinely present • Comprehensive induction training on site entry. • Local landowners were aware of normal activity and report unusual activity if observed. 			
	Recommendation: None		Action: Nil	
7.5	OBLIGATION: Data backup procedures appear adequate, and backups are tested	Review Priority 4	P&P* Rating: A	Performance Rating: 1
	<p>Findings – – Back-ups were carried out on site and at Corporate Offices.</p> <p>Documents/Evidence – 1, 2,3, 4, 5, 7, 8, 9, 11, Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> • Corporate server tested on monthly basis • Reference in AMPs, Business Plan and WHSEMP to risks in relation to general control and security of the computer systems used to provide management information on compliance with service standards / licence obligations. In particular backup processes and access to required resources. • Vestas had in place an Information Security and Risk Management Policy which included Compliance Control 14: Information backup procedure. • Vestas backed up information on i-cloud systems, including Vestas) n-Line portal and had a system of 2 mirror hard drive backs up on site. • SynergyRED had implemented Duplicate HMI Backup with a virtual Desktop, being a third HMI which it can log onto temporarily. • SynergyRED also backed up its systems on Corporate Synergy and in addition was also backing up the same information on an independent and separate BEI Group server. 			
	Recommendation: None		Action: Nil	
7.6	OBLIGATION: Computations for licensee performance reporting are accurate	Review Priority 4	P&P* Rating: A	Performance Rating: 1

	<p>Findings – Computations for licensee performance reporting were mainly automated and proven</p> <p>Documents/Evidence – 1, 2, 3, 4, 5, 7, 8, 9, 11, Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> O&M contractor provided the licensee with performance reporting as per O&M contract. SCADA monthly reports from Vestas and discussed at monthly meetings. SynergyRED also had access to Vestas On-Line Portal to verify performance reporting. 			
	Recommendation: None		Action: Nil	
7.7	OBLIGATION: Management reports appear adequate for the licensee to monitor licence obligations	Review Priority 4	P&P* Rating: A	Performance Rating: 1
	<p>Findings – Reporting was adequate with monthly contractor and Board reports for management. Exception reports are alarmed and investigated via SCADA</p> <p>Documents/Evidence – 1, 2, 3, 4, 5, 7, 8, 9, 11, Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> The reporting requirements were clearly detailed in the Licensee's Business Plans. These were Vestas issued monthly and quarterly reports as per the O&M to SynergyRED as the Asset manager. SynergyRED then provided AMA and VMA reports on a monthly and quarterly reports to BEI GM, who then provided monthly summary reports to Board. This report included performance and any legal obligations. 			
	Recommendation: None		Action: Nil	
7.8	OBLIGATION: Adequate measures to protect asset management data from unauthorised access or theft by persons outside the organisation	Review Priority 4	P&P* Rating: A	Performance Rating: 1
	<p>Findings – SynergyRED and Vestas corporate system had a high level of security measures to protect asset management data from external threats.</p> <p>Documents/Evidence – 1, 2, 3, 4, 5, 7, 8, 9, 11, Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> Firewalls were in place to prevent external access to computers 			

	<ul style="list-style-type: none">• BEI Group and Board had adopted Australian Energy Sector Cyber Security Framework and subsequently have developed and implemented Cyber Security Policy.• Cyber Security review established and audits have been carried out and improvements actioned as opportunities identified, for example the replacement of “Shrew” I T with “Cisco” IT.• Review evidenced in BEI WWF monthly meetings, VMA Reports and Board Minutes• Vestas has developed and implemented Vestas Information Security and Risk Management and Information Security Policy.	
	Recommendation: None	Action: Nil

8. RISK MANAGEMENT			OVERALL EFFECTIVENESS RATING	
<input type="checkbox"/> Assess whether the risks that most affect the management and performance of the assets have been identified <input type="checkbox"/> Assess the adequacy of policies and procedures covering risk management <input type="checkbox"/> Assess whether the risk management policies and procedures have been applied in practice <input type="checkbox"/> Assess the adequacy of staff understanding and training on risk management				
Key Process – Risk management involves the identification of risks and their management within an acceptable level of risk.				
Outcome – The risk management framework effectively manages the risk that the licensee does not maintain effective service standards			A	1
No.	2022 REVIEW REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION			
8.1	OBLIGATION: Risk management policies and procedures exist and are applied to minimise internal and external risks	Review Priority 4	P&P* Rating: A	Performance Rating: 1
Findings — Risk management policies and procedures were established by the Licensee and Contractors. Risk management systems utilised by parties were evident.				
Documents/Evidence – 1, 2 ,3, 4, 5, 7, 8, 9, 11, 12, 13, Corporate Office, and Site Interviews				
Observations: <ul style="list-style-type: none"> • Risk management was well used by all parties. SynergyRED utilised the “EMPOWER” e-platform and Vestas utilised CR360. • Annual reviews of risk policies and procedures evident • BEI WWF Board signed off on BEI Group Risk Policy and Risk management Framework which followed the ISO31000:2018 principles. • Internal audits also scheduled and evidenced. For example, Environmental audits carried out by BEI WWF. 				
Recommendation: None			Action: Nil	
8.2	OBLIGATION: Risks are documented in a risk register and treatment plans are implemented and monitored	Review Priority 4	P&P* Rating: A	Performance Rating: 1
Findings – Risk registers and treatment plans viewed on site. Effectively used to identify and mitigate risks. In addition, Vestas WDWF risk register from CR360 was extracted and included in SynergyRED’s WDWF tracker.				
Documents/Evidence – 1, 2 ,3, 4, 5, 7, 8, 9, 11, 12, 13, Corporate Office, and Site Interviews				

	<p>Observations:</p> <ul style="list-style-type: none"> Global experience of similar wind farm operations available to assess risks. CR360 platform utilised to share information. WTGs and BoP backed by reputable global manufacturers with extensive experience. Risks were reported monthly, and corrective actions implemented. No significant safety incidents experienced The BEI Business Plan also identified opportunities and key enterprise level risks that were considered by the Board for WDWF and incorporated into EMPOWER for implementation and monitored. Separate monthly meetings were held between SynergyRED and Vestas to follow up on any outstanding WHS or Environmental matters that were identified during reviews and audits. SynergyRED held quarterly Risk review meetings with BEI WWF. 			
	Recommendation: None		Action: Nil	
8.3	OBLIGATION: Probability and consequences of asset failure are regularly assessed	Review Priority 4	P&P* Rating: A	Performance Rating: 1
	<p>Findings – Licensee and O&M Contractor established annual internal audits and risk registers</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 7, 8, 9, 11, 12, 13, Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> Risk registers were reviewed annually and through bi-monthly internal audits between SynergyRED and Vestas. Vestas also carried out its own internal audits Critical spares were identified and well sourced and accessible. COVID 19 did not interrupt the supply chain of spares. SAP was utilised to ensure that safety stocks were maintained at the required inventory levels. 			
	Recommendation: None		Action: Nil	

9. CONTINGENCY PLANNING		OVERALL EFFECTIVENESS RATING		
		PROCESS & POLICY RATING*	PERFORMANCE RATING	
<input type="checkbox"/> Determine whether contingency plans have been developed and are current <input type="checkbox"/> Determine whether contingency plans have been tested. If so, review the results to confirm any improvements identified have been implemented. Key Process – Contingency plans document the steps to deal with the unexpected failure of an asset. Outcome – Contingency plans have been developed and tested to minimise any major disruptions to service standards.		A	1	
No.	2022 REVIEW REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION			
9.1	OBLIGATION: Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks	Review Priority 4	P&P* Rating: A	Performance Rating: 1
Findings – Plans were in place for emergencies, reinstatement and business continuity. Documents/Evidence – 1, 2 ,3, 4, 5, 7, 8, 9, 11, 12, 13, Corporate Office, and Site Interviews Observations: <ul style="list-style-type: none"> • Curtailment by WPC or weather conditions was beyond WWF control • Within Vestas global experience readily available to remotely operate and maintain the site. • Critical spares were well identified, accessible and monitored. • BEI Business Continuity plan and Vestas Corporate Crisis management plan was viewed. • Vestas ERP for WDFW was in place and had been tested with no significant adverse findings. 				
Recommendation: None			Action: Nil	

10. FINANCIAL PLANNING		OVERALL EFFECTIVENESS RATING		
		PROCESS & POLICY RATING*	PERFORMANCE RATING	
<input type="checkbox"/> Obtain a copy of the financial planning, budgeting and reporting process and assess its effectiveness <input type="checkbox"/> Obtain a copy of the current financial plan (including budget/actual) and assess whether the process is followed Key Process – Financial brings together the financial elements of the service delivery to ensure its financial viability over the long term. Outcome – The financial plan is reliable and provides for the long-term financial viability of the services.		A	1	
No.	2022 REVIEW REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION			
10.1	OBLIGATION: The financial plan states the financial objectives and identifies strategies and actions to achieve those	Review Priority 4	P&P* Rating: A	Performance Rating: 1
Findings – BEI Group had established mature financial planning, budgeting and reporting processes. CAPEX and OPEX budgets for the WDWF were reviewed and objectives confirmed as completed or indicated to be in process for following years. Financial planning was carried out on life of the assets. The BEI Group financial management was supported by SynergyRED via the VMA (Vehicle Management Agreement). Documents/Evidence – 1, 2, 3, 4, 5, 7, 8, 9, 11, 12, 13, Corporate Office, and Site Interviews Observations: <ul style="list-style-type: none"> • Confidential information but performance to date has proved satisfactory. • During the construction period there were strict financial mechanisms in place to record, monitor and control overall project costs. • Financial plans were prepared each year and set budgets for future cash flow. • Project was underwritten by the sales contract and approved by the Board after scrutiny • Annually Financiers were provided with annual CAPEX and OPEX budgets. • Diligent financial reports prepared for the Board monthly 				
Recommendation: None			Action: Nil	
10.2	OBLIGATION: The financial plan identifies the source of funds for capital expenditure and recurrent costs	Review Priority 4	P&P* Rating: A	Performance Rating: 1

	<p>Findings – AMP defined the financial relationships between the financiers and BEI Group. Revenue, O&M costs, recurrent OPEX, CAPEX, EBITDA and disposal costs were well defined in the Financial Base Model.</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 7, 8, 9, 11, 12, 13, Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> Financial plans and financial reports detail funding sources. Commercial in confidence As of the date of audit CAPEX was approved for FY23. 			
	Recommendation: None		Action: Nil	
10.3	OBLIGATION: The financial plan provides projections of operating statements (profit and loss) and statement of financial position (balance sheets)	Review Priority 4	P&P* Rating: A	Performance Rating: 1
	<p>Findings – P&L and Balance reported annually and budget forecast for life of assets. Detailed Financial Modelling had been undertaken by the licensee.</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 7, 8, 9, 11, 12, 13, Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> Confirmed by Licensee that the financial plan budgeted for life of assets, financial information was commercial in confidence. Annual Financial Reports audited and prepared by independent third party. Audited reports were on unqualified basis. P&L, Balance Sheets, audited financial statements were presented to Financiers and the Shareholders. The depreciation schedule utilised in the balance sheets incorporated Decommissioning costs. 			
	Recommendation: None		Action: Nil	
10.4	OBLIGATION: The financial plan provides firm predictions on income for the next five years and reasonable predictions beyond this period	Review Priority 4	P&P* Rating: A	Performance Rating: 1
	<p>Findings – The Financial Base model demonstrated income for the wind farm reported annually and budget forecast for life cycle of assets. Detailed Financial Modelling was undertaken by the licensee to 2051.</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 7, 8, 9, 11, 12, 13, Corporate Office, and Site Interviews</p>			

	<p>Observations:</p> <ul style="list-style-type: none"> PPA and BEI Group's marketing strategy was utilised to forecast income generation stream. Asset life cycle financial modelling until 2051. Commercial in confidence. 			
	Recommendation: None	Action: Nil		
10.5	OBLIGATION: The financial plan provides for the operations and maintenance, administration and capital expenditure requirements of the services	Review Priority 4	P&P* Rating: A	Performance Rating: 1
	<p>Findings – Detailed Financial Modelling has been undertaken by the licensee, including all costs associated with operating, maintaining the assets, administration, and CAPEX to 2051.</p> <p>Documents/Evidence – 1, 2, 3, 4, 5, 7, 8, 9, 11, 12, 13, Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> As of the date of audit the Financial Business Plan and Budget was approved for FY23 The annual forecasts followed the Base Financial Model and with strict Delegation authority was in place, adjustments made and approved by the Board. Comprehensive financial modelling, monitoring and reporting O&M contract clearly defined the cost responsibilities of the O&M contractor and those of BEI WWF BEI WWF via VMA was responsible for meeting CAPEX requirements. Subsequently BEI WWF made allowance for certain CAPEX expenditure. Any large CAPEX will be justified on a case-by-case basis to the Board. This was not envisioned for the first 5 years of the O&M contract. 			
	Recommendation: None	Action: Nil		
10.6	OBLIGATION: Large variances in actual/budget income and expenses are identified and corrective action taken where necessary	Review Priority 4	P&P* Rating: A	Performance Rating: 1
	<p>Findings – Financials identified variances and comparisons were made against budget only as the wind farm had just commenced operations (<12 months).</p> <p>Documents/Evidence – 1, 2, 3, 4, 5, 7, 8, 9, 11, 12, 13, Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> Warradarge Wind Farm transitioned from a construction budget financial reporting to operation budget financial reporting basis. Comprehensive financial reporting via VMA reports to the Board on a monthly basis. 			

	<ul style="list-style-type: none">• For WDWF the budget was based on the investment financial model. The original budgets were reviewed and updated annually. All budgets were reviewed monthly against factual spend as part of the monthly reporting process.• An operational model was also developed for WDWF. This allowed assets to be tracked against the annual budgets and against the baseline of the financial close financial model.	
	Recommendation: None	Action: Nil

11. CAPITAL EXPENDITURE PLANNING			OVERALL EFFECTIVENESS RATING	
			PROCESS & POLICY RATING*	PERFORMANCE RATING
<p><input type="checkbox"/> Understand the capital expenditure planning process and assess its effectiveness</p> <p><input type="checkbox"/> Obtain a copy of the capital expenditure plan for the current year and assess whether the process is being followed</p> <p>Key Process – The capital expenditure plan provides a schedule of new works, rehabilitation and replacement works, together with estimated annual expenditure for these works over the next five or more years. Since capital investments tend to be large and lumpy, projections would normally be expected to cover at least 10 years, preferably longer. Projections over the next five years would usually be based on firm estimates.</p> <p>Outcome – The capital expenditure plan provides reliable forward estimates of capital expenditure and asset disposal income. Reasons for the decisions and for the evaluation of alternatives and options are documented.</p>			A	1
No.	2022 REVIEW REPORT EVIDENCE/ /VERIFICATION/FINDING/ACTION			
11.1	<p>OBLIGATION: There is a capital expenditure plan covering works to be undertaken, actions proposed, responsibilities and dates</p>	<p>Review Priority</p> <p>4</p>	<p>P&P* Rating:</p> <p>A</p>	<p>Performance Rating:</p> <p>1</p>
<p>Findings – Licensee had carried out extensive and diligent financial modelling of assets to its asset life, inclusive of capital expenditure., i.e., 2051.</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 7, 8, 9, 11, 12, 13, Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> Financial projections have been carried out to 2051. BEI WWF had made allowance for some capital expenditure for the first 5 years even though Vestas were primarily responsible for majority of the CAPEX during this period as per the O&M. BEI WWF had in place a board endorsed budgeting cycle and inclusion of CAPEX projection on an annual basis as part of its budget process 				
Recommendation: None			Action: Nil	
11.2	<p>OBLIGATION: The capital expenditure plan provides reasons for capital expenditure and timing of expenditure</p>	<p>Review Priority</p> <p>4</p>	<p>P&P* Rating:</p> <p>A</p>	<p>Performance Rating:</p> <p>1</p>
<p>Findings – The Financial Modelling detailed the CAPEX priorities and the monthly VMA reports were used to monitored progress and implementation. No further capital spending planned for WDWf at the time of the review.</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 7, 8, 9, 11, 12, 13, Corporate Office, and Site Interviews</p>				

	<p>Observations:</p> <ul style="list-style-type: none"> O&M contractor may propose capital expenditure to ensure performance of the wind farm. As per the VMA, all CAPEX presented to the Board for approval. 			
	Recommendation: None	Action: Nil		
11.3	OBLIGATION: The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan	Review Priority 4	P&P* Rating: A	Performance Rating: 1
	<p>Findings - The Financial Plan primarily focussed on the Revenue, OPEX and EBITDA. Moderate allowances were made for annual CAPEX expenditure beyond Year 5. All CAPEX and OPEX was in line with the assets detailed financial modelling to its asset life end date.</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 7, 8, 9, 11, 12, 13, Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> AMPs were reviewed annually, and financial plan was updated accordingly. AMPs and financial budgets were approved by Board. Approved financial budgets were provided to Financiers and Shareholders. 			
	Recommendation: None	Action: Nil		
11.4	OBLIGATION: There is an adequate process to ensure the capital expenditure plan is regularly updated and implemented	Review Priority 5	P&P* Rating: A	Performance Rating: 1
	<p>Findings – Capital expenditure processes were detailed in the AMP and updated in the year plans and monitored via the monthly VMA reports. These were then reported monthly to the Board.</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 7, 8, 9, 11, 12, 13, Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> Given that WDWF had recently commenced operations, the Licensee indicated no further significant CAPEX was anticipated at the time of the review. There was a comprehensive OPEX and CAPEX cost reporting system in place. These were also outlined in BEI WWF Business Plan. 			
	Recommendation: None	Action: Nil		

12. REVIEW OF AMS		OVERALL EFFECTIVENESS RATING		
		PROCESS & POLICY RATING*	PERFORMANCE RATING	
<input type="checkbox"/> Determine when the asset management plan was last updated and assess whether any substantial changes have occurred <input type="checkbox"/> Determine whether any independent reviews have been performed. If so, review the results and action taken <input type="checkbox"/> Consider the need to update the asset management plan based on the results of this review <input type="checkbox"/> Determine when the asset management system was last reviewed.		A	2	
<p>Key Process – <i>The asset management system is regularly reviewed and updated.</i></p> <p>Outcome – <i>The asset management system is regularly reviewed and updated.</i></p>				
No.	2022 REVIEW REPORT EVIDENCE/ /VERIFICATION/FINDING/ACTION			
12.1	<p>OBLIGATION: A review process is in place to ensure the asset management plan and the asset management system described in it remain current</p>	<p>Review Priority</p> <p>4</p>	<p>P&P* Rating:</p> <p>A</p>	<p>Performance Rating:</p> <p>1</p>
	<p>Findings – New project and new AMP prepared. It was noted That SynergyRED had developed an AMS documentation for WDWF.</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 7, 8, 9, 11, 12, 13, Corporate Office, and Site Interviews</p> <p>Observations:</p> <ul style="list-style-type: none"> • O&M Contractor reviewed their AMP annually and submitted to Licensee for approval as per the O&M Agreement. • At the time of audit Vestas was commencing review of its AMP. • SynergyRED’s AMP for the WDWF and subsequent improvement recommendations was tracked through monthly meetings. 			
	Recommendation: None		Action: Nil	
12.2	<p>OBLIGATION: Independent reviews (e.g., internal audit) are performed of the asset management system</p>	<p>Review Priority</p> <p>4</p>	<p>P&P* Rating:</p> <p>A</p>	<p>Performance Rating:</p> <p>NP</p>
	<p>Findings – Given it is a new project, no independent reviews of the asset management system had taken place. At the time of the audit, BEI WWF had just engaged Corporate Synergy to conduct an internal audit of its asset management systems. However, this was outside the scope of the review period. It was noted AMS review for BEI was specified within the asset management planning cycle (refer Section 4.1 BEI AMS).</p> <p>Documents/Evidence – 1, 2 ,3, 4, 5, 7, 8, 9, 11, 12, 13, Corporate Office, and Site Interviews</p>			

	<p>Observations:</p> <ul style="list-style-type: none">• During monthly meetings, the Licensee and the O&M contractor carried out reviews of the AMS and AMP and identified on going improvement opportunities.• The opportunities identified were aimed at improving the AMP/AMS process.• Assessment of the performance rating was not applicable as the independent review cycle was not complete during the review period.	
	<p>Recommendation: None</p>	<p>Action: Nil</p>

APPENDIX 3 – AUDIT & REVIEW DOCUMENT LISTING

Documents Reviewed

TABLE 18 Documents Reviewed and Assessment of Effectiveness

Number	Warradage Wind Farm Electricity Generation Licence – EGL29	ASSET PLANNING	ASSET CREATION & ACQUISITION	ASSET DISPOSAL	ENVIRONMENTAL ANALYSIS	ASSET OPERATIONS	ASSET MAINTENANCE	A M INFORMATION SYSTEM	RISK MANAGEMENT	CONTINGENCY PLANNING	FINANCIAL PLANNING	CAPITAL EXPENDITURE PLANNING	REVIEW OF AMS	PERFORMANCE AUDIT
1	BEI Operational Schematic	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
1.1	Schematic of the Contracts supporting BEI facility	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
1.2	WWF Trust ABN Report	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
1.3	Warradage (WWF) Electricity Generation Licence - Licence - BEI WWF Pty Ltd as trustee for the WWF Trust - EGL029	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
1.4	Structure Diagram of BEI Group Entities	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
1.5	ASIC Report - BEI WWF Pty Ltd 20Jun22	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
1.6	SynergyRED Org Structure - 2022-04-20	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
2	BEI Policy Manual - 24Feb22	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
2.1	BEI Asset Management Policy	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
2.2	BEI WDWF Asset Management System (Rev 1) 29Nov21	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
2.3	SynergyRED WDWF AMP (Rev 2)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
3	Vestas ANZ Warradage Asset Management Plan v3	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
3.1	Vestas Org Structure WDWF - 24.05.22	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
4	Asset Management Agreement with SynergyRED (Some redacted schedules)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
4.1	BEI Annual Business Plan FY2122 (Approved)_Redacted	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
4.2	BEI Annual Business Plan FY2223 (Approved)_Redacted	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
4.3	BEI Asset Outage Procedure WDWF v2 [DRAFT]					✓	✓							✓
4.4	BEI Business Continuity Plan									✓				✓
4.5	BEI Procurement Procedure (Rev 1) 5Mar21	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
4.6	BEI Risk Management Procedure (Rev B) Final		✓			✓								✓
4.7	BEI WDWF Enterprise Risk Report - Top 14 Extract from Empower	✓												✓
4.8	BEI WHSE System - Ver 3.2	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
4.9	Development Agreement	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
4.10	Investors Agreement (Redacted except TOC)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
4.11	Operation and Maintenance Agreement (Some Scheds Redacted)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
4.12	Operation and Maintenance Agreement Deed of Variation	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
4.13	Vehicle Management Agreement (Some redacted schedules)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
4.14	WDWF FY23 Budget (Redacted)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
4.15	WDWF Power Purchase Agreement (Variation Deed)_Redacted	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
4.16	WDWF Power Purchase Agreement_(Heavily Redacted)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
4.17	Environmental Approvals		✓											✓

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4.17.1	Development Approval For Warradage Wind Farm From Carnamah (1)		✓											✓
4.17.2	Development Approval For Warradage Wind Farm From Coorow		✓											✓
4.17.3	Discharge of Conditions - Shire of Coorow		✓											✓
4.17.4	EPA Advice - Development Approval		✓											✓
4.17.5	Warradage Wind Farm Development Application Report	✓	✓											✓
4.17.20	20220704 WDFW Environmental Audit Report May	✓	✓											✓
4.17.21	Draft Decommissioning Management Plan – Warradage Wind Farm (WWF- PLN-DMP-0001) – 14/7/2022 – Outside scope of Audit & Review			✓										✓
4.18	Vestas Documentation					✓	✓	✓	✓					✓
4.18.1	Vestas - Service Quality Plan V02					✓	✓	✓	✓					✓
4.18.2	Vestas Incident Report - Recent Example					✓	✓	✓	✓					✓
4.18.3	Vestas Information Security Management Systems Compliance Controls					✓	✓	✓	✓					✓
4.18.4	Vestas Information Security Policy					✓	✓	✓	✓					✓
4.18.5	Vestas Organogram 24.05					✓	✓	✓	✓					✓
4.18.6	Vestas Warradage Emergency Response Plan V05 11.2021					✓	✓	✓	✓	✓				✓
4.18.7	Vestas Warradage Sustainability Risk Register					✓	✓	✓	✓	✓				✓
4.18.8	Vestas Warradage WHSEMP Rev1.5	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
4.18.8.1	0089-8380 Australia Service WHSEMP V02 – excl site specific annex	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
4.18.9	Vestas WDFW 2 Year Maintenance Schedule	✓	✓			✓	✓		✓	✓	✓	✓	✓	✓
4.18.10	0092-0315V00 - Vestas Wind Systems A S_Documents_ANZ Vestas Legal Register (2020)	✓	✓			✓	✓		✓	✓	✓	✓	✓	✓
4.18.11	2022-04 Warradage Wind Farm – Vestas Monthly Report	✓	✓			✓	✓		✓	✓	✓	✓	✓	✓
4.18.12	2022-05 Warradage Wind Farm - Vestas Monthly Report	✓	✓			✓	✓		✓	✓	✓	✓	✓	✓
4.18.13	Corporate Crisis Management Plan	✓	✓			✓	✓		✓	✓	✓	✓	✓	✓
4.19	Audited WWF Accounts	✓	✓			✓	✓		✓	✓	✓	✓	✓	✓
4.19.1	WWF - Financial Statements FY2019 (Audited)	✓	✓			✓	✓		✓	✓	✓	✓	✓	✓
4.19.2	WWF - Financial Statements FY2020 (Audited)	✓	✓			✓	✓		✓	✓	✓	✓	✓	✓
4.19.3	WWF - Financial Statements FY2021 (Audited)	✓	✓			✓	✓		✓	✓	✓	✓	✓	✓
4.20	20220328 BEI Board Development Update_Redacted	✓	✓			✓	✓		✓	✓	✓	✓	✓	✓
4.21	Examples Daily Site Diary Construction (GHD)	✓	✓			✓	✓		✓	✓	✓	✓	✓	
4.21.1	Daily Site Report 2019-02-05	✓	✓			✓	✓		✓	✓	✓	✓	✓	
4.21.1	Daily Site Report 2019-10-17	✓	✓			✓	✓		✓	✓	✓	✓	✓	
4.21.1	Daily Site Report 2020-07-13	✓	✓			✓	✓		✓	✓	✓	✓	✓	
5	Directors WHS Continuation Training				✓				✓					

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5.1	Example Vestas - Change management form from WDWF	✓				✓	✓	✓	✓	✓	✓			
5.2	WDWF Punch list 24.06.22	✓	✓			✓	✓							
5.3	WDWF Quarterly Risk Review Minutes - 7Oct21	✓				✓	✓	✓	✓					
5.4	WDWF Quarterly Risk Review Minutes - 14Mar22	✓				✓	✓	✓	✓					
5.5	WDWF_Tracker	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
5.6	Previously Redacted SCADA Sheet from WDWF_Tracker	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
5.7	AMA Reports	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
5.7.1	2019CY	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
5.7.1.1	2019-05 WDWF - BEI Monthly Report 05 - Construction v1	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
5.7.1.2	2019-06 WDWF - BEI Monthly Report 06 - Construction V0 (1)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
5.7.1.3	2019-07 WDWF - BEI Monthly Report 07 - Construction V1	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.1.4	2019-08 WDWF -Monthly Construction Report 08 - Construction v1	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.1.5	2019-09 WDWF - Monthly Construction Report 09 - v0	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.1.6	2019-10 WDWF - Monthly Construction Report 10	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.1.7	2019-11 WDWF - Monthly Construction Report 11	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.1.8	2019-12 WDWF - Monthly Construction Report 12 - v1	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.2	2020CY	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.2.1	2020-01 WDWF -Monthly Construction Report 13 - v0	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.2.2	2020-02 WDWF - Monthly Construction Report 14	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.2.3	2020-03 WDWF -Monthly Construction Report 15	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.2.4	2020-04 WDWF - Monthly Construction Report 16 - v0	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.2.5	2020-05 WDWF - Monthly Construction Report 17 - v1	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.2.6	2020-06 WDWF - Monthly Construction Report 18	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.2.7	2020-07 WDWF - Monthly Construction Report 19 - v0	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.2.8	2020-08 WDWF - Monthly Construction Report 20 -v3	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.2.9	2020-09 WDWF - Monthly Construction Report 21	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.2.10	2020-10 WDWF - Monthly Construction Report 22	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.2.11	2020-11 WDWF - Monthly Construction Report 24	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.2.12	2020-12 WDWF - Monthly Construction Report 25	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.3	2021CY	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.3.1	2021-02 WDWF - Monthly Construction Report 26	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.3.2	2021-03 WDWF - Monthly Construction Report 27 - v1	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓

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5.7.3.3	2021-04 WDWF - Monthly Construction Report 28	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.3.4	2021-05 WDWF - Monthly Construction Report 29	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.3.5	2021-06 WDWF - Monthly Construction Report 30	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.3.6	2021-07 WDWF - Monthly Construction Report 31	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.3.7	2021-08 WDWF - Monthly Construction Report 32	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.3.8	2021-09 WDWF - Monthly Construction Report 33	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.3.9	2021-10 WDWF - Monthly Construction Report 34	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.3.10	2021-11 WDWF - Monthly Construction Report 35	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.3.11	2021-11 WDWF AMA Monthly Report	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.3.12	2021-12 WDWF AMA Monthly Report	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.4	2022CY	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.4.1	2022-01 WDWF AMA Monthly Report	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.4.2	2022-02 WDWF AMA Monthly Report	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.4.3	2022-03 WDWF AMA Monthly Report	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.4.4	2022-04 WDWF AMA Monthly Report	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.4.5	2022-05 WDWF AMA Monthly Report	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.7.4.6	2202-06 WDWF AMA Monthly Report	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.8	Certificates		✓											
5.8.1	Transmission generator approval certificates - Warradage Wind Farm - Interim Approval to Operate v10		✓											
5.8.2	Warradage IWC - Certificate of Practical Completion		✓											
5.8.3	Warradage Wind Farm Practical Completion Part A & Part B		✓											
5.8.4	WDW preliminary assessment of R2 compliance tests for IATO		✓											
5.8.5	WDWF-EPC-LTR-103- Notice of Facility Practical Completion Part A		✓											✓
5.9	Electrical Safety Certificates (53 Provided)		✓						✓					✓
5.10	Landholder Agreements (7 Provided – Confidential not referenced)	✓	✓		✓				✓					✓
5.11	Redacted Board Minutes (June 2019 to June 2022) – Excluding Aug 2019/Dec 2019 /Feb2020 /Jan2021 /June202 /Sept2021 /Dec2021)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.12	Redacted VMA Reports (May 2019 to June 2022)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
5.13	QSE Toolbox Construction	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5.13.1	Toolbox Meeting Minutes 11th May 2022	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5.13.2	Toolbox Meeting Minutes 14th April 2022	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5.14	Construction Updates - Owners	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
5.14.1	WDWF Daily Updates-26-05-2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		

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5.14.2	WDWF Daily Updates-31-03-2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
6	Market Operating Protocol WARRADARGE_WF1	✓									✓	✓		✓
6.1	Network Operating Protocol WARRADARGE_WF1	✓									✓	✓		✓
6.2	WDWF Executed ETAC Redacted	✓									✓	✓		✓
7	Cyber Security	✓						✓	✓					✓
7.1	AESCSF Lodgement Confirmation for 2022 year 1Jul22	✓						✓	✓					✓
7.2	BEI - Cyber Security Training	✓						✓	✓					✓
7.3	BEI Cyber Security Manual for OT (Draft - Rev 0)	✓						✓	✓					✓
7.4	BEI Cyber Security Refresher Training - December 2021	✓						✓	✓					✓
7.5	BEI Privacy Policy Refresher Briefing - December 2021	✓						✓	✓					✓
7.6	Vestas - Information Security Management Systems Compliance Controls	✓				✓	✓	✓	✓					✓
7.7	Vestas - Information Security Policy	✓				✓	✓	✓	✓					✓
7.8	Vestas - Response to BEI Cyber Security Questionnaire	✓				✓	✓	✓	✓					✓
7.9	ASP Cyber Incident Response Plan	✓				✓	✓	✓	✓					✓
8	Vestas WDWF Risk Register	✓	✓	✓		✓	✓	✓	✓					✓
9	BEI Business Plan	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
10	Vestas Emergency Response Plan					✓	✓	✓	✓	✓				✓
11	Business Continuity Plan	✓		✓		✓	✓	✓	✓	✓				✓
12	BEI WWF Pty Ltd ATF WWF Trust - Depreciation Schedule [192]	✓	✓								✓	✓		✓
12.1	WWF Depreciation and Amortisation Schedules V6 (Fixed Asset Register)										✓	✓		✓
12.2	WDWF Baseline Financial Model (Redacted) - v8	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
12.3	WDWF-REG-ASM-0001 - OPEX_CAPEX Works Planner	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
11	BEI Board Development Update - WDWF Expansion (Redacted)	✓	✓		✓	✓	✓		✓		✓	✓		✓
11.1	Warradage 2 Wind Farm Expansion - Indicative Estimate 12th April 2022 (Redacted)	✓	✓		✓	✓	✓		✓		✓	✓		
12	WDWF Due-Diligence Report - Jacobs (for Decommissioning)	✓	✓	✓	✓	✓	✓		✓		✓	✓		
13	BEI Critical Dates Register 2022 (Redacted)		✓		✓			✓	✓					✓
13.1	ERA INVOICE PAYMENTS													✓
13.1.1	ERA Invoice List													✓
13.1.2	ERA_INVOICE_1001768 (Annual Licence Charge)													✓
13.1.3	ERA_INVOICE_1001795 (Standing Charges)													✓
14	ERA/GOVERNMENT CORRESPONDENCE													✓
14.1	Approval of 2022 audit and review plan - EGL029 - BEI WWF Pty Ltd as Trustee for the WWF Trust													✓

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14.2	Approval Extension - 2021 performance audit and asset management system review - EGL29													✓
14.3	Confirmation of Contact Details with Western Power (WP) 16Aug21													✓
14.4	WDWF Drainage Issue Letter - Primary Industry 3Jun22													✓
14.5	Delivery of Notice to ERA of PC at WDWF EGL029 1Dec21													✓
14.6	Delivery of Notice to ERA of the AMS for WDWF EGL029 1Dec21													✓
14.7	ERA acknowledgement of notification of WDWF completion - 14Dec21													✓
14.8	WDWF-032-LTR - Lodgement of AMS with ERA - 1Dec21													✓
14.9	ERA acknowledgement of WDWF AMS lodgement - 14Dec21													✓
14.10	ERA Confirmation of Standing Charges Notification 14Sep21													✓
14.11	ERA Confirmation of Receipt of WDWF 2021 Compliance Report (EGL29) 27Aug21													✓
14.12	Delivery of 2021 WDWF ERA Compliance Report to the ERA - EGL29 25Aug21													✓
14.13	WDWF Electricity Compliance Reporting Manual 2019 - 2020 – 2021													✓
14.14	WDWF-020-LTR - ERA - Annual Electricity Licence Compliance Reporting Obligations 2018-19 - BEI WWF ATF WWF Trust - Issued - 2019-09													✓
14.15	WDWF-025-LTR - ERA - Compliance Report Letter FY20 - BEI WWF ATF WWF Trust - Issued - 2020-08-26 (pdf)													✓
14.16	WDWF-030-LTR - ERA - Compliance Report Letter FY21 - BEI WWF ATF WWF Trust													✓
14.17	WDWF-031-LTR - Standing Charges Report for 2021 - BEI WWF ATF WWF Trust													✓
14.18	RE_Vestas Cyber Security Incident Impacts - WARRADARGE_WF1 22Nov21 WDWF-032-LTR - Lodgement of AMS with ERA - 1Dec21 22Nov21													✓
14.19	WDWF-033-LTR - Notification of WDWF PC to the ERA - 1Dec21													✓
14.20	Confirmation from ERA of lodgement of the 2022 Annual Compliance Report for WDWF 17Aug22													✓
14.21	Confirmation from ERA of lodgement of the 2022 Annual Standing Data Report for WDWF 17Aug22													✓
14.22	Delivery of the EGL29 Annual Compliance Report 16Aug22													✓
14.23	Delivery of the EGL29 Standing Charges Report 16Aug22													✓
14.24	Approval of audit and review plan – 2022 performance audit and asset management system review													✓
14.25	FY22 Reporting Year- BEI WWF - Electricity Compliance Reporting Manual													✓
14.26	WDWF-040-LTR - ERA - Compliance Report Letter FY22 - BEI WWF ATF WWF Trust													✓
14.27	WDWF-041-LTR - Standing Charges Report for 2022 - BEI WWF ATF WWF Trust													✓
15	BEI Electricity Compliance Reporting Manual - WDWF 2021 Submission													✓

Number	Warradarge Wind Farm Electricity Generation Licence – EGL29	ASSET PLANNING	ASSET CREATION & ACQUISITION	ASSET DISPOSAL	ENVIRONMENTAL ANALYSIS	ASSET OPERATIONS	ASSET MAINTENANCE	A M INFORMATION SYSTEM	RISK MANAGEMENT	CONTINGENCY PLANNING	FINANCIAL PLANNING	CAPITAL EXPENDITURE PLANNING	REVIEW OF AMS	PERFORMANCE AUDIT
16	Audit Schedule - Board Extract 9 July 2021_Redacted													✓
17	Request for Proposal WDWF													✓
18	SynergyRED Service Obligations And Contractual Compliance Dashboard June 2022				✓	✓	✓							✓
19	Warradarge Wind Farm: Generator Monitoring Plan 28/6/2021				✓	✓								✓
19.1	RE: GPS Registration Extension - Warradarge				✓	✓								✓
20	Email Monthly Circulation of BEI Critical Dates													✓