

Alinta Cogeneration (Wagerup) Pty Ltd

Electricity Generation Licence (EGL6)

2022 Performance Audit

Final Report

6 October 2022



ASSURANCE
ADVISORY
GROUP

Level 11, 251 Adelaide Terrace
PERTH WA 6000

6 October 2022

Catherine Rousch
Manager WA Retail Regulation
Alinta Energy
Level 18 Raine Square, 300 Murray Street
Perth WA 6000

Dear Catherine

Electricity Generation Licence (EGL6) – 2022 Performance Audit report

We have completed the Electricity Generation Licence Performance Audit report for Alinta Cogeneration (Wagerup) Pty Ltd for the period 1 July 2017 to 30 June 2022 and are pleased to submit our report to you.

I confirm that this report is an accurate presentation of the findings and conclusions from our audit procedures.

If you have any questions or wish to discuss anything raised in the report, please contact Andrew Baldwin at abaldwin@assuranceadvisory.com.au or myself at slinden@assuranceadvisory.com.au.

Yours sincerely

Assurance Advisory Group



Stephen Linden

Director

www.assuranceadvisory.com.au

Table of Contents

1. Independent assurance practitioner's report.....	4
2. Executive Summary	6
3. Summary of Ratings.....	10
4. Detailed findings, recommendations and action plans	12
5. Status of recommendations addressing non-compliances from the previous audit	21
Appendix A – Audit Plan.....	22
Appendix B – References	23

1. Independent assurance practitioner's report

Opinion

We have undertaken a reasonable assurance engagement on Alinta Cogeneration (Wagerup) Pty Ltd's (**Alinta Wagerup**) compliance, in all material respects, with the conditions of its Electricity Generation Licence (EGL 6) (the **Licence**) and relevant legislative obligations for the period 1 July 2017 to 30 June 2022. Our evaluation was made against the licence obligations listed in the relevant versions of the Economic Regulation Authority's (the **ERA**) Electricity Compliance Reporting Manual (the **Reporting Manual**) and in accordance with the ERA's March 2019 Audit and Review Guidelines: Electricity and Gas Licences (the **Guidelines**).

In our opinion, based on the procedures we have performed and the evidence we have obtained, Alinta Wagerup has complied, in all material respects, with its licence conditions and relevant legislative obligations for the period 1 July 2017 to 30 June 2022.

Basis for opinion

We conducted our engagement in accordance with Standard on Assurance Engagements ASAE 3100 *Compliance Engagements (ASAE 3100)* issued by the Auditing and Assurance Standards Board.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Alinta Wagerup's responsibility for compliance with the conditions of the Licence

Alinta Wagerup is responsible for:

- Compliance with the Licence as evaluated against the conditions within the Licence, for the period 1 July 2017 to 30 June 2022
- Identifying risks that threaten the conditions within the Licence identified above being met
- Identifying suitable compliance requirements as specified by the ERA
- Identifying, designing and implementing controls to enable the conditions within the Licence to be met and to monitor ongoing compliance.

Our independence and quality control

We have complied with the independence and other relevant ethical requirements relating to assurance engagements, which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour. We applied Auditing Standard ASQC 1 *Quality Control for Firms that Perform Audits and Reviews of Financial Reports and Other Financial Information, and Other Assurance Engagements* in undertaking this assurance engagement.

Our responsibilities

Our responsibility is to express an opinion on Alinta Wagerup's compliance, in all material respects, with the licence obligations as evaluated against its Licence Conditions for the period 1 July 2017 to 30 June 2022. ASAE 3100 requires that we plan and perform our procedures to obtain reasonable assurance about whether Alinta Wagerup has complied, in all material respects, with the licence obligations as evaluated against its Licence Conditions for the period from 1 July 2017 to 30 June 2022.

A reasonable assurance engagement in accordance with ASAE 3100, to report on Alinta Wagerup's compliance with the licence obligations as evaluated against its Licence Conditions involves performing procedures to obtain evidence about the compliance activity and controls implemented to meet the conditions within the Licence. The procedures selected depend on our judgement, including the identification and assessment of risks of material non-compliance with the licence obligations as evaluated against its Licence Conditions.

Our procedures included:

- Utilising the Audit Guidelines and the February 2022 Reporting Manual as a guide for development of a risk assessment and document review to assess controls
- Development of an Audit Plan for approval by the ERA and an associated work program, set out in Appendix A
- Interviews with and representations from relevant Alinta Wagerup representatives to gain an understanding of process controls
- Review of documents and walkthrough of processes and controls to support the assessment of compliance and the effectiveness of the control environment in accordance with Licence obligations
- Sample testing where relevant.

Inherent Limitations

Because of the inherent limitations of an assurance engagement, together with the internal control structure, it is possible that fraud, error or non-compliance with compliance requirements may occur and not be detected. A reasonable assurance engagement relating to the period from 1 July 2017 to 30 June 2022 does not provide assurance on whether compliance with the Licence will continue in the future.

Restricted use

This report has been prepared for use by Alinta Wagerup for the purpose of satisfying its obligation under Section 13 of the Electricity Industry Act 2004. We disclaim any assumption of responsibility for any reliance on this report to any person other than Alinta Wagerup, or for any other purpose other than that for which it was prepared. We understand that a copy of the report will be provided to the ERA for the purpose of reporting on the performance audit for the Licence. We agree that a copy of this report will be given to the ERA in connection with this purpose, however we accept no responsibility to the ERA or to anyone who is provided with or obtains a copy of our report.

Assurance Advisory Group


Stephen Linden
Director

6 October 2022

2. Executive Summary

2.1 Introduction and Background

The Economic Regulation Authority (the **ERA**) has under the provisions of the Electricity Industry Act 2004 (the **Act**), issued to Alinta (Wagerup) of Australia Limited (**Alinta Wagerup**) an Electricity Generation Licence (EGL6) (the **Licence**).

The Licences relate to Alinta's operation of electricity generation works at its Wagerup cogeneration facility which provides electricity to the South West Interconnected System (**SWIS**).

The Wagerup Power Station is a 351MW (nameplate capacity) dual fuel (gas and distillate) power station in the Shire of Waroona approximately 100kms south of Perth. The electricity generated is dispatched to the SWIS during peak periods.

Section 13 of the Act requires Alinta Wagerup to provide to the ERA a performance audit (the **audit**) conducted by an independent expert acceptable to the ERA within 24 months after the commencement date, and every 24 months thereafter, unless otherwise approved by the ERA. With the ERA's approval, Assurance Advisory Group (**AAG**) has been appointed to conduct the audit for the period 1 July 2017 to 30 June 2022 (**audit period**).

The audit has been conducted in accordance with the ERA's March 2019 issue of the *Audit and Review Guidelines: Electricity and Gas Licences* (**Audit Guidelines**).

2.2 Observations

In considering Alinta Wagerup's internal control procedures, structure and environment, its compliance culture and its information systems specifically relevant to those licence obligations subject to audit, we observed that:

- As a subsidiary of Alinta Energy, Alinta Wagerup's processes and arrangements for managing its electricity generation licence obligations are provided by Alinta Energy
- Through Alinta Energy, Alinta Wagerup has implemented and maintained an appropriate compliance framework
- Through its contractual arrangements with Western Power, Alinta Wagerup has limited obligations in relation to the relevant requirements of the Metering Code.

2.3 Findings

The following tables summarise the assessments made during the audit on Alinta Wagerup's compliance and the adequacy of controls in place for Alinta Wagerup to manage its compliance with the relevant obligations or conditions of the Licence.

Table 1 sets out the rating scale defined by the ERA in the Audit Guidelines for the assessment of the level of compliance with the conditions of the Licence. For the highest possible compliance rating to be achieved, Alinta Wagerup was required to demonstrate it has maintained mature processes and controls, which facilitate compliance with relevant obligations.

Table 1: Control adequacy and compliance rating scale

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 required	3	Non-compliant – moderate impact on customers or third parties
D	No controls evident	4	Non-compliant – major impact on customers or third parties
N/P	Not performed – A controls rating was not required	N/R	Not rated – No activity took place during the audit period

Table 5 at section 3 of this report provides further detail on the controls and compliance rating scales. The above rating scale is defined by the Audit Guidelines.

Table 2: Summary of findings, by **compliance and controls ratings**

		Compliance rating					Total
		1	2	3	4	N/R	
Controls rating	A						-
	B	1					1
	C						-
	D						-
	N/P	14				21	35
	Total	15	-	-	-	21	36

Table 3: Summary of findings, by **audit priority and controls rating**

Audit Priority	Controls rating					Total
	A	B	C	D	N/P	
Priority 1						-
Priority 2						-
Priority 3		1				1
Priority 4					27	27
Priority 5					8	8
Total	-	1-	-	-	35	36

Table 4: Summary of findings, by audit priority and compliance rating

Audit Priority	Compliance rating					Total
	1	2	3	4	N/R	
Priority 1						-
Priority 2						-
Priority 3	1					1
Priority 4	12				15	27
Priority 5	2				6	8
Total	15	-	-	-	21	36

Note that, in accordance with the Audit Guidelines:

- Obligations assessed as being “not applicable” to Alinta Wagerup’s operations have not been included within this report
- A control rating is only provided
 - For those obligations with a Priority 1, 2 or 3 rating
 - Where an obligation is assessed as non-compliant
 - Where a control improvement opportunity is identified.

Specific assessments for each Licence obligation are summarised at Table 5 in the “Summary of findings” section of this report.

Detailed findings, including relevant observations, recommendations and action plans are located in section 4 “Detailed findings, recommendations and action plans”.

2.4 Alinta Wagerup’s response to previous audit recommendations

There were no unresolved non-compliances at the end of the last audit period. Although Alinta Wagerup had previously not complied with obligations 105, 124 and 448, it resolved the relevant matters during the last audit period, including improvements to its compliance monitoring and reporting arrangements.

2.5 Current audit non-compliances, recommendations and action plans

- A. Resolved during current audit period
- B. Unresolved at end of current audit period

Not applicable - there were no non-compliances during this audit period.

2.6 Scope and objectives

We have conducted a reasonable assurance audit in order to state whether, in our opinion, based on our procedures, Alinta Wagerup has complied, in all material respects, with the conditions of its Licence as outlined in the approved Audit Plan (dated July 2022) during the period 1 July 2017 to 30 June 2022.

Our engagement was conducted in accordance with Australian Standard on Assurance Engagements ASAE 3100 Compliance Engagements, issued by the Australian Auditing and Assurance Standards Board and provides reasonable assurance as defined in ASAE 3100. The procedures we performed are described in more detail in section 2.7 below.

A reasonable assurance engagement in accordance with ASAE 3100 involves performing procedures to obtain evidence about the compliance with the conditions of the Licence. The nature, timing and extent of procedures selected depend on the assurance practitioner's professional judgement, including the assessment of the risks of material misstatement in compliance with the conditions of the Licence. In making those risk assessments, we considered internal controls in relation to compliance with the conditions of the Licence.

ASAE 3100 also requires us to comply with the relevant ethical requirements of the Australian professional accounting bodies.

The ERA has summarised the requirements of the applicable legislation that it expects to be reported upon and included in the scope of this audit in its Electricity Compliance Reporting Manual.

The Audit Plan approved by the ERA for this audit sets out Alinta Wagerup's Licence obligations confirmed to be included in the scope of the audit, along with the risk assessments and audit priority assigned to each licence obligation.

2.7 Approach

Our approach for this audit involved the following activities, which were undertaken during the period July to August 2022:

- Utilising the Guidelines and Reporting Manuals as a guide, developed a risk assessment, which involved discussions with key staff and document review to assess controls
- Developed an Audit Plan (see Appendix A) for approval by the ERA and an associated work program
- Interviewed relevant Alinta Wagerup representatives to gain understanding of process controls (see Appendix B for staff involved)
- Reviewed relevant documentation and walked through processes and controls to assess overall compliance and effectiveness in accordance with Licence obligations (see Appendix B for reference listing)
- Sample tested relevant obligations where there was relevant activity to determine whether transactions complied with the requirements of the obligation
- Reported findings to Alinta Wagerup for review and response.

3. Summary of Ratings

Table 1 in section 2 above sets out the rating scale defined by the ERA in the Audit Guidelines for the assessment of the level of compliance with the conditions of the Licence. For the highest possible compliance rating to be achieved, Alinta Wagerup was required to demonstrate it has maintained effective processes and controls, which facilitate compliance with relevant obligations.

The remainder of this report provides:

- A summary of the findings for the compliance obligations (at Table 5 below)
- Detailed findings, including relevant observations and recommendations (at Section 4).

Table 5: Compliance Ratings

Refer to Detailed Findings at Section 4 and Audit Plan at Appendix A for descriptions of the obligations. Note that detailed findings are not presented for those obligations assessed to be not applicable to Alinta Wagerup's operations for the period subject to audit - refer to the Audit Plan at Appendix A for further explanation.

No	Obligation reference	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
12 Electricity Industry Act - Licence Conditions and Obligations												
101	Section 13(1)	Priority 4					N/P	1				
102	Section 14(1)(a)	Priority 4					N/P	1				
103	Section 14(1)(b)	Priority 4					N/P					N/R
104	Section 14(1)(c)	Priority 4					N/P	1				
105	Section 17(1); ERA (Licensing Funding) Regulations 2014	Priority 3		B				1				
106	Section 31(3)	Priority 5					N/P	1				
107	Section 41(6)	Priority 4					N/P					N/R
13 Electricity Licences – Licence Conditions and Obligations												
119	Licence condition 4.3.1	Priority 4					N/P	1				
120	Licence condition 5.2.4	Priority 4					N/P					N/R
121	Licence condition 5.3.2	Priority 4					N/P	1				
122	Licence condition 5.1.5	Priority 4					N/P	1				
123	Licence condition 4.4.1	Priority 4					N/P	1				
124	Licence condition 4.5.1	Priority 4					N/P	1				
125	Licence condition 3.8.1, 3.8.2	Priority 4					N/P					N/R
126	Licence condition 3.7.1	Priority 4					N/P	1				
14 Electricity Industry Metering Code – Licence Conditions and Obligations												
324	Clause 3.3B	Priority 4					N/P					N/R
339	Clause 3.11(3)	Priority 4					N/P					N/R
371	Clause 4.4(1)	Priority 5					N/P					N/R
372	Clause 4.5(1)	Priority 5					N/P					N/R
373	Clause 4.5(2)	Priority 4					N/P					N/R
388	Clause 5.4(2)	Priority 4					N/P					N/R

Summary of ratings

No	Obligation reference	Audit Priority	Controls rating					Compliance rating					
			A	B	C	D	N/P	1	2	3	4	N/R	
401	Clause 5.16	Priority 4					N/P						N/R
405	Clause 5.18	Priority 4					N/P						N/R
416	Clause 5.21(5)	Priority 4					N/P						N/R
417	Clause 5.21(6)	Priority 4					N/P						N/R
448	Clause 6.1(2)	Priority 4					N/P	1					
451	Clause 7.2(1)	Priority 5					N/P	1					
453	Clause 7.2(4)	Priority 4					N/P						N/R
454	Clause 7.2(5)	Priority 4					N/P	1					
455	Clause 7.5	Priority 4					N/P	1					
456	Clause 7.6(1)	Priority 4					N/P						N/R
457	Clause 8.1(1)	Priority 5					N/P						N/R
458	Clause 8.1(2)	Priority 5					N/P						N/R
459	Clause 8.1(3)	Priority 5					N/P						N/R
460	Clause 8.1(4)	Priority 4					N/P						N/R
461	Clause 8.3(2)	Priority 5					N/P						N/R

4. Detailed findings, recommendations and action plans

This section has been structured in subsections for the relevant Codes and Regulations against which we assessed Alinta Wagerup's compliance. The sections are:

- 4.1: Electricity Industry Act – Licence Conditions and Obligations
- 4.2 Electricity Licences – Licence Conditions and Obligations
- 4.3 Electricity Industry Metering Code – Licence Conditions and Obligations.

Each section contains:

- **Assessment of compliance and control adequacy** – the conclusions from our audit procedures and our assessment of Alinta Wagerup's compliance with the applicable obligations
- **Findings** – the auditor's understanding of the process and any issues that have been identified during the audit
- **Recommendations (if any)** – for improvement or enhancement of the process or control.

The compliance and control adequacy ratings have been summarised below for each sub-section.

Controls adequacy rating						Compliance rating					
A	B	C	D	NP	Total	1	2	3	4	NR	Total
4.1 Electricity Industry Act											
	1			6	7	5				2	7
4.2 Electricity Licences											
				8	8	6				2	8
4.3 Electricity Industry Metering Code											
				21	21	4				17	21
-	1	-	-	35	36	15	-	-	-	21	36

4.1 Electricity Industry Act – Licence Conditions and Obligations

No	Obligation under Condition	Findings			
101	<p><i>Electricity Industry Act Section 13(1)</i> 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.</p>	<p>Deloitte prepared the 2017 Performance Audit in December 2017. With the ERA's approval, Assurance Advisory Group (AAG) was appointed to undertake Alinta Wagerup's performance audit for the period 1 July 2017 to 30 June 2022.</p>			
	<table border="1"> <tr> <td>Priority 4</td> <td>Controls rating: N/P</td> <td>Compliance rating: 1</td> </tr> </table>	Priority 4	Controls rating: N/P	Compliance rating: 1	
Priority 4	Controls rating: N/P	Compliance rating: 1			
102	<p><i>Electricity Industry Act Section 14(1)(a)</i> A licensee must provide for an asset management system.</p>	<p>Through discussion with the Operations Manager, SWIS; and consideration of Alinta Energy's asset management framework and Alinta Wagerup's asset management plans in operation during the period, we determined that Alinta Wagerup had provided for a functioning asset management system. The EGL6 2022 Asset Management System Review report provides further detail on the effectiveness of Alinta Wagerup's asset management system during the period 1 July 2017 to 30 June 2022.</p>			
	<table border="1"> <tr> <td>Priority 4</td> <td>Controls rating: N/P</td> <td>Compliance rating: 1</td> </tr> </table>	Priority 4	Controls rating: N/P	Compliance rating: 1	
Priority 4	Controls rating: N/P	Compliance rating: 1			
103	<p><i>Electricity Industry Act Section 14(1)(b)</i> A licensee must notify details of the asset management system and any substantial changes to it to the ERA.</p>	<p>The Operations Manager, SWIS advised that there had been no substantial change to Alinta Wagerup's asset management system under the licence during the audit period. Therefore, this obligation was not relevant to Alinta Wagerup's activities during the audit period</p>			
	<table border="1"> <tr> <td>Priority 4</td> <td>Controls rating: N/P</td> <td>Compliance rating: N/R</td> </tr> </table>	Priority 4	Controls rating: N/P	Compliance rating: N/R	
Priority 4	Controls rating: N/P	Compliance rating: N/R			
104	<p><i>Electricity Industry Act Section 14(1)(c)</i> 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.</p>	<p>Deloitte prepared the 2017 Performance Audit in December 2017. With the ERA's approval, AAG was appointed to undertake Alinta Wagerup's Asset Management System Review for the period 1 July 2017 to 30 June 2022.</p>			
	<table border="1"> <tr> <td>Priority 4</td> <td>Controls rating: N/P</td> <td>Compliance rating: 1</td> </tr> </table>	Priority 4	Controls rating: N/P	Compliance rating: 1	
Priority 4	Controls rating: N/P	Compliance rating: 1			
105	<p><i>Electricity Industry Act Section 17(1); ERA (Licensing Funding) Regulations 2014</i> A licensee must pay the prescribed licence fees to the ERA within one month after the day of grant or renewal of its licence and within one month after each anniversary of that day over the term of the licence according to clauses 6, 7 and 8 of the <i>Economic Regulation Authority (Licensing Funding) Regulations 2014</i>.</p>	<p>We sighted evidence (remittance advice) that Alinta Wagerup paid its:</p> <ul style="list-style-type: none"> • 2018/19, 2019/20, 2020/21, 2021/22 and 2022/23 annual licence fee by the due date of 24 April • Quarterly standing charges for Q2 2019/20 and Q3 2019/20 (our selected sample) by the due date. <p>Alinta Energy's Regulation team maintains a compliance calendar, which includes due dates for payment of licence fees and charges. However we observed that Alinta Energy's automated payment system is designed to pay charges by the due date on the ERA invoices, rather than the due date required by the Regulations (i.e. one month after the licence anniversary date). This arrangement exposes Alinta Wagerup to the risk that payments are not made in time. <i>We discussed this matter with Alinta Wagerup staff as a potential improvement opportunity.</i></p>			
	<table border="1"> <tr> <td>Priority 3</td> <td>Controls rating: B</td> <td>Compliance rating: 1</td> </tr> </table>	Priority 3	Controls rating: B	Compliance rating: 1	
Priority 3	Controls rating: B	Compliance rating: 1			

No	Obligation under Condition	Findings			
106	<p><i>Electricity Industry Act Section 31(3)</i></p> <p>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.</p>	<p>Through discussion with the Operations Manager, SWIS, examination of Alinta Wagerup’s documented policies and procedures, and consideration of Alinta Wagerup’s contractual arrangements, we determined that:</p> <ul style="list-style-type: none"> Alinta Wagerup’s contractual arrangements mean that whilst the power station is available to operate, it is only operated when directed by the Market Operator, or the real time market conditions present an opportunity to create a return above the short run marginal cost of operation (i.e. when there is insufficient capacity in the SWIS to meet system demand), which occurred in approximately 1,100 instances during the audit period There have been a small number of forced outages (equating to 0.3% availability) where the supply of electricity by Alinta Wagerup has been interrupted, suspended or restricted during the audit period Alinta Wagerup’s availability and start-up reliability obligations means it remains exposed to accidents, emergencies, potential danger or other unavoidable causes, which have occurred during the audit period as part of the general asset operating process Throughout the audit period, Alinta Wagerup used its InControl incident management system, which is designed to minimise the extent of disruptions to assets on its premises. 			
	<table border="1"> <tr> <td data-bbox="271 778 544 826">Priority 5</td> <td data-bbox="544 778 815 826">Controls rating: N/P</td> <td data-bbox="815 778 1084 826">Compliance rating: 1</td> </tr> </table>	Priority 5	Controls rating: N/P	Compliance rating: 1	
Priority 5	Controls rating: N/P	Compliance rating: 1			
107	<p><i>Electricity Industry Act Section 41(6)</i></p> <p>A licensee must pay the costs of taking an interest in land or an easement over land.</p>	<p>The Manager, Planning and Community (Alinta Energy) confirmed that Alinta Wagerup did not acquire an interest in land or an easement over land during the audit period.</p> <p>Therefore, this obligation was not relevant to Alinta Wagerup’s activities during the audit period</p>			
	<table border="1"> <tr> <td data-bbox="271 935 544 983">Priority 4</td> <td data-bbox="544 935 815 983">Controls rating: N/P</td> <td data-bbox="815 935 1084 983">Compliance rating: N/R</td> </tr> </table>	Priority 4	Controls rating: N/P	Compliance rating: N/R	
Priority 4	Controls rating: N/P	Compliance rating: N/R			

4.2 Electricity Licences – Licence Conditions and Obligations

No	Obligation under Condition	Findings		
119	<p><i>Licence condition 4.3.1</i></p> <p>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.</p>	<p>Through our examination of the consolidated general purpose financial statements of Alinta Wagerup’s parent entity Alinta Energy Pty Ltd for the financial years ending 30 June 2020 and 30 June 2021 (our sample selection), we determined that Alinta Wagerup’s financial statements were prepared in accordance with the requirements of the Australian Accounting Standards. Those financial statements were audited by Deloitte in accordance with the Corporations Act 2001.</p> <p>For the financial period 1 June 2021 to 30 June 2022, there were no significant accounting transactions or items that could jeopardise Alinta Wagerup’s compliance with the Australian Accounting Standards.</p>		
	Priority 4	Controls rating: N/P	Compliance rating: 1	
120	<p><i>Licence condition 5.2.4</i></p> <p>A licensee must comply with any individual performance standards prescribed by the ERA.</p>	<p>The Manager WA Retail Regulation, Alinta Energy confirmed that, for the period 1 July 2017 to 30 June 2022 Alinta Wagerup was not prescribed any individual performance standards by the ERA.</p> <p>Therefore, this obligation was not relevant to Alinta Wagerup’s activities during the audit period.</p>		
	Priority 4	Controls rating: N/P	Compliance rating: N/R	
121	<p><i>Licence condition 5.3.2</i></p> <p>A licensee must comply, and require its auditor to comply, with the ERA’s standard audit guidelines for a performance audit</p>	<p><i>Obligations 121 and 122</i></p> <p>Through examination of the 2017 Performance Audit and Asset Management System Review reports, we determined that the audit and review were conducted in accordance with the prescribed Reporting Guidelines (the April 2014 Audit Guidelines: Electricity and Gas Licences) and Reporting Manuals issued by the ERA.</p>		
	Priority 4	Controls rating: N/P	Compliance rating: 1	
122	<p><i>Licence condition 5.1.5</i></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>	<p>Note that for the 2022 performance audit and asset management system review, the audit and review plans approved by the ERA in July 2022 commit Alinta Wagerup and AAG (auditor and expert) to comply with the prescribed audit and review guidelines and reporting manual issued by the ERA.</p>		
	Priority 4	Controls rating: N/P	Compliance rating: 1	

No	Obligation under Condition	Findings
123	<p><i>Licence condition 4.4.1</i></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>	<p>Licence condition 4.4.1 requires Alinta Wagerup to report to the ERA within prescribed timeframes any of the following:</p> <ul style="list-style-type: none"> (a) If Alinta Wagerup was under external administration (b) Any change in Alinta Wagerup's corporate, financial, or technical circumstances in which the Licence was granted, and if that change materially affected Alinta Wagerup's ability to meet its obligations (c) Any change in the Licensee's name, ABN or address (within 10 business days of the change occurring). <p>On 26 March 2018, Alinta Energy moved corporate premises, resulting in a change in the business address of Alinta Wagerup. On behalf of Alinta Wagerup, Alinta Energy formally notified the ERA of that change of address prior to the change occurring.</p> <p>The Manager WA Retail Regulation, Alinta Energy confirmed that during the audit period Alinta Wagerup had:</p> <ul style="list-style-type: none"> • Not been under external administration • Not undergone any significant change in its corporate, financial or technical circumstances which would affect its ability to meet its obligations • Not changed its name or ABN.
Priority 4	Controls rating: N/P	Compliance rating: 1
124	<p><i>Licence condition 4.5.1</i></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>We observed that:</p> <ul style="list-style-type: none"> • In accordance with its obligation to submit annual compliance reports to the ERA by 31 August each year, we sighted evidence that Alinta Wagerup submitted its 2017/18, 2018/19, 2019/20 and 2020/21 reports by the due date • In accordance with its obligation to submit standing charge data to the ERA by 30 September each year, we sighted evidence that Alinta Wagerup submitted its 2019, 2020 and 2021 standing charge data by the due date. <p>The Manager WA Retail Regulation, Alinta Energy confirmed that the ERA did not request any other information from Alinta Wagerup in connection with its functions under the Electricity Industry Act.</p>
Priority 4	Controls rating: N/P	Compliance rating: 1
125	<p><i>Licence condition 3.8.1 and 3.8.2</i></p> <p>A licensee must publish any information as directed by the ERA to publish, within the timeframes specified.</p>	<p>The Manager WA Retail Regulation, Alinta Energy confirmed that Alinta Wagerup was not required to publish any information by the ERA during the audit period.</p> <p>Therefore, this obligation was not relevant to Alinta Wagerup's activities during the audit period.</p>
Priority 4	Controls rating: N/P	Compliance rating: N/R
126	<p><i>Licence condition 3.7.1</i></p> <p>All notices must be in writing, unless otherwise specified.</p>	<p>Through discussion with the Manager WA Retail Regulation, Alinta Energy and examination of relevant communications, we determined that Alinta Wagerup's regulatory records management is contained within its established document management system that maintains records within its corporate network for all formal communication with the ERA.</p> <p>The Manager WA Retail Regulation, Alinta Energy confirmed that all notices to the ERA were given in writing and sent via email with attachments as required.</p>
Priority 4	Controls rating: N/P	Compliance rating: 1

4.3 Electricity Industry Metering Code – Licence Conditions and Obligations

No	Obligation under Condition	Findings			
324	<p><i>Electricity Metering Code Clause 3.3B</i></p> <p>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> <table border="1" data-bbox="271 427 1084 475"> <tr> <td data-bbox="271 427 544 475">Priority 4</td> <td data-bbox="544 427 817 475">Controls rating: N/P</td> <td data-bbox="817 427 1084 475">Compliance rating: N/R</td> </tr> </table>	Priority 4	Controls rating: N/P	Compliance rating: N/R	<p>Western Power was responsible for installing, owning and operating meters located at the Alinta Wagerup power station.</p> <p>The Manager WA Retail Regulation, Alinta Energy confirmed that Alinta Wagerup was not aware of any meters that became bi-directional during the audit period.</p> <p>Therefore, this obligation was not relevant to Alinta Wagerup’s activities during the audit period.</p>
Priority 4	Controls rating: N/P	Compliance rating: N/R			
339	<p><i>Electricity Metering Code Clause 3.11(3)</i></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> <table border="1" data-bbox="271 587 1084 639"> <tr> <td data-bbox="271 587 544 639">Priority 4</td> <td data-bbox="544 587 817 639">Controls rating: N/P</td> <td data-bbox="817 587 1084 639">Compliance rating: N/R</td> </tr> </table>	Priority 4	Controls rating: N/P	Compliance rating: N/R	<p><i>Obligations 339 and 371</i></p> <p>The Manager WA Retail Regulation, Alinta Energy confirmed that Alinta Wagerup plays no active role in managing meters, energy data or the metering database and Alinta Wagerup was not aware of an outage or malfunction of any of metering installations during the audit period.</p> <p>Therefore, these obligations were not relevant to Alinta Wagerup’s activities during the audit period.</p>
Priority 4	Controls rating: N/P	Compliance rating: N/R			
371	<p><i>Electricity Metering Code Clause 4.4(1)</i></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> <table border="1" data-bbox="271 807 1084 855"> <tr> <td data-bbox="271 807 544 855">Priority 5</td> <td data-bbox="544 807 817 855">Controls rating: N/P</td> <td data-bbox="817 807 1084 855">Compliance rating: N/R</td> </tr> </table>	Priority 5	Controls rating: N/P	Compliance rating: N/R	
Priority 5	Controls rating: N/P	Compliance rating: N/R			
372	<p><i>Electricity Metering Code Clause 4.5(1)</i></p> <p>A Code participant must not knowingly permit the registry to be materially inaccurate.</p> <table border="1" data-bbox="271 967 1084 1019"> <tr> <td data-bbox="271 967 544 1019">Priority 5</td> <td data-bbox="544 967 817 1019">Controls rating: N/P</td> <td data-bbox="817 967 1084 1019">Compliance rating: N/R</td> </tr> </table>	Priority 5	Controls rating: N/P	Compliance rating: N/R	<p><i>Obligations 372 and 373</i></p> <p>The Manager WA Retail Regulation, Alinta Energy confirmed that during the audit period 1 July 2017 to 30 June 2022:</p> <ul style="list-style-type: none"> • Western Power was solely responsible for the management of standing data within the metering registry and/or metering database • Alinta Wagerup was not aware of any inaccuracy in standing data. <p>Therefore, these obligations were not relevant to Alinta Wagerup’s activities during the audit period.</p>
Priority 5	Controls rating: N/P	Compliance rating: N/R			
373	<p><i>Electricity Metering Code Clause 4.5(2)</i></p> <p>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</p> <table border="1" data-bbox="271 1187 1084 1235"> <tr> <td data-bbox="271 1187 544 1235">Priority 4</td> <td data-bbox="544 1187 817 1235">Controls rating: N/P</td> <td data-bbox="817 1187 1084 1235">Compliance rating: N/R</td> </tr> </table>	Priority 4	Controls rating: N/P	Compliance rating: N/R	
Priority 4	Controls rating: N/P	Compliance rating: N/R			
388	<p><i>Electricity Metering Code Clause 5.4(2)</i></p> <p>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)</p> <table border="1" data-bbox="271 1378 1084 1425"> <tr> <td data-bbox="271 1378 544 1425">Priority 4</td> <td data-bbox="544 1378 817 1425">Controls rating: N/P</td> <td data-bbox="817 1378 1084 1425">Compliance rating: N/R</td> </tr> </table>	Priority 4	Controls rating: N/P	Compliance rating: N/R	<p>The Manager WA Retail Regulation, Alinta Energy confirmed there were no accumulation meters installed at the Alinta Wagerup power station during the audit period 1 July 2017 to 30 June 2022.</p> <p>Therefore, Western Power did not require Alinta Wagerup’s assistance for meter reading and this obligation was not relevant to Alinta Wagerup’s activities during the audit period.</p>
Priority 4	Controls rating: N/P	Compliance rating: N/R			

No	Obligation under Condition	Findings				
401	<p><i>Electricity Metering Code Clause 5.16</i></p> <p>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> <table border="1" data-bbox="271 341 1084 389"> <tr> <td data-bbox="271 341 546 389">Priority 4</td> <td data-bbox="546 341 815 389">Controls rating: N/P</td> <td data-bbox="815 341 1084 389">Compliance rating: N/R</td> </tr> </table>	Priority 4	Controls rating: N/P	Compliance rating: N/R	<p><i>Obligations 401 and 405</i></p> <p>The Manager WA Retail Regulation, Alinta Energy confirmed that during the audit period 1 July 2017 to 30 June 2022:</p> <ul style="list-style-type: none"> Western Power was solely responsible for the management of energy data and standing data within the metering registry and/or metering database Alinta Wagerup played no active role in energy data collection. <p>Therefore, these obligations were not relevant to Alinta Wagerup’s activities during the audit period.</p>	
Priority 4	Controls rating: N/P	Compliance rating: N/R				
405	<p><i>Electricity Metering Code Clause 5.18</i></p> <p>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> <table border="1" data-bbox="271 560 1084 608"> <tr> <td data-bbox="271 560 546 608">Priority 4</td> <td data-bbox="546 560 815 608">Controls rating: N/P</td> <td data-bbox="815 560 1084 608">Compliance rating: N/R</td> </tr> </table>	Priority 4	Controls rating: N/P	Compliance rating: N/R		
Priority 4	Controls rating: N/P	Compliance rating: N/R				
416	<p><i>Electricity Metering Code Clause 5.21(5)</i></p> <p>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.</p> <table border="1" data-bbox="271 751 1084 799"> <tr> <td data-bbox="271 751 546 799">Priority 4</td> <td data-bbox="546 751 815 799">Controls rating: N/P</td> <td data-bbox="815 751 1084 799">Compliance rating: N/R</td> </tr> </table>	Priority 4	Controls rating: N/P	Compliance rating: N/R	<p><i>Obligations 416 and 417</i></p> <p>The Manager WA Retail Regulation, Alinta Energy confirmed that during the audit period 1 July 2017 to 30 June 2022, Alinta Wagerup did not request a test or audit of the items at clause 5.21 (1) of the Metering Code (i.e. relating to the accuracy of the metering installation, the energy data from the metering installation and the standing data for the metering installation).</p> <p>Therefore, these obligations were not relevant to Alinta Wagerup’s activities during the audit period.</p>	
Priority 4	Controls rating: N/P	Compliance rating: N/R				
417	<p><i>Electricity Metering Code Clause 5.21(6)</i></p> <p>A Code participant must not make a request under subclause 5.21(1) that is inconsistent with any access arrangement or agreement.</p> <table border="1" data-bbox="271 911 1084 959"> <tr> <td data-bbox="271 911 546 959">Priority 4</td> <td data-bbox="546 911 815 959">Controls rating: N/P</td> <td data-bbox="815 911 1084 959">Compliance rating: N/R</td> </tr> </table>	Priority 4	Controls rating: N/P	Compliance rating: N/R		
Priority 4	Controls rating: N/P	Compliance rating: N/R				
448	<p><i>Electricity Metering Code Clause 6.1(2)</i></p> <p>A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed.</p> <table border="1" data-bbox="271 1364 1084 1412"> <tr> <td data-bbox="271 1364 546 1412">Priority 4</td> <td data-bbox="546 1364 815 1412">Controls rating: N/P</td> <td data-bbox="815 1364 1084 1412">Compliance rating1</td> </tr> </table>	Priority 4	Controls rating: N/P	Compliance rating1	<p>Section 6.1(2) of the Metering Code requires Alinta Wagerup (as a user with an electricity transfer access contract with Western Power) to comply with the network operator’s Metrology procedure, Communication rules, Mandatory Link Criteria or Service Level Agreements (if any).</p> <p>Alinta Wagerup’s connection contract with Western Power (via the <i>Alinta Network Access Agreement</i> and subsequent Deed of Amendments) outlines the obligations of both parties in relation to metering equipment and activities. Alinta Wagerup’s metering obligations under the contract are limited to maintaining relevant communications with Western Power and to provide any required access to its premises. As neither of these contractual requirements relate to a specific metering service obligation, Alinta Wagerup does not have any further compliance obligations in relation to clause 6.1(2) of the Metering Code.</p> <p>We observed that Alinta Wagerup is aware of the relevant requirements prescribed within Western Power’s Metrology procedure, Communication rules and Mandatory Link Criteria and we did not observe any evidence to indicate a breach of those requirements during the audit period 1 July 2017 to 30 June 2022.</p>	
Priority 4	Controls rating: N/P	Compliance rating1				

No	Obligation under Condition	Findings				
451	<p><i>Electricity Metering Code Clause 7.2(1)</i></p> <p>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.</p>	<p>Through consideration of Alinta Wagerup’s business practices and communication methods, we determined that during the audit period 1 July 2017 to 30 June 2022:</p> <ul style="list-style-type: none"> Alinta Wagerup maintained electronic and voice communications channels, commensurate with the expectations of a major business. Western Power had access to Alinta Wagerup’s telephone number for voice communication in connection with the Code. 				
	<table border="1"> <tr> <td data-bbox="271 427 546 587">Priority 5</td> <td data-bbox="546 427 815 587">Controls rating: N/P</td> <td data-bbox="815 427 1084 587">Compliance rating 1</td> </tr> </table>	Priority 5	Controls rating: N/P	Compliance rating 1		
Priority 5	Controls rating: N/P	Compliance rating 1				
453	<p><i>Electricity Metering Code Clause 7.2(4)</i></p> <p>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>	<p>Through the process of and subsequent to the drafting and approving the access agreement between Alinta Wagerup and Western Power in 2006, Alinta Wagerup had satisfied the requirement of notifying Western Power of its site contact details.</p> <p>The Manager WA Retail Regulation, Alinta Energy confirmed that during the audit period 1 July 2017 to 30 June 2022, there had been no further request by Western Power for Alinta Wagerup’s site contact details.</p>				
	<table border="1"> <tr> <td data-bbox="271 639 546 858">Priority 4</td> <td data-bbox="546 639 815 858">Controls rating: N/P</td> <td data-bbox="815 639 1084 858">Compliance rating: N/R</td> </tr> </table>	Priority 4	Controls rating: N/P	Compliance rating: N/R		
Priority 4	Controls rating: N/P	Compliance rating: N/R				
454	<p><i>Electricity Metering Code Clause 7.2(5)</i></p> <p>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>	<p>The Manager WA Retail Regulation confirmed that Alinta Wagerup’s site contact details had not changed during the audit period 1 July 2017 to 30 June 2022. However, as Alinta Energy moved into its new Perth office premises on 26 March 2018, we also considered whether Western Power was appropriately notified of the change in Alinta Wagerup’s corporate address.</p> <p>We determined that for several weeks prior to the move, all outgoing emails (including to Western Power representatives) included a notification of that move. We are satisfied that Alinta Wagerup had appropriately notified Western Power of its new corporate address at least 3 business days prior to that change.</p>				
	<table border="1"> <tr> <td data-bbox="271 906 546 1236">Priority 4</td> <td data-bbox="546 906 815 1236">Controls rating: N/P</td> <td data-bbox="815 906 1084 1236">Compliance rating 1</td> </tr> </table>	Priority 4	Controls rating: N/P	Compliance rating 1		
Priority 4	Controls rating: N/P	Compliance rating 1				
455	<p><i>Electricity Metering Code Clause 7.5</i></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>	<p>Through discussion with the Manager WA Retail Regulation, Alinta Energy and consideration of Alinta Wagerup’s business practices, we determined that</p> <ul style="list-style-type: none"> Alinta Wagerup treats metering data as confidential Staff and contractors are bound by general confidentiality agreements in their terms of employment. Alinta Wagerup does not hold metering database information or other confidential information provided under or in connection with the Metering Code <p>The Manager WA Retail Regulation, Alinta Energy confirmed that no confidential information under or in connections with the Metering Code has been disclosed during the audit period.</p>				
	<table border="1"> <tr> <td data-bbox="271 1342 546 1396">Priority 4</td> <td data-bbox="546 1342 815 1396">Controls rating: N/P</td> <td data-bbox="815 1342 1084 1396">Compliance rating: 1</td> </tr> </table>	Priority 4	Controls rating: N/P	Compliance rating: 1		
Priority 4	Controls rating: N/P	Compliance rating: 1				
456	<p><i>Electricity Metering Code Clause 7.6(1)</i></p> <p>A Code participant must disclose or permit the disclosure of confidential information that is required to be disclosed by the Code.</p>	<p>The Manager WA Retail Regulation, Alinta Energy confirmed that Alinta Wagerup was not requested to disclose or permit the disclosure of confidential information (under clause 7.6(1)) during the audit period.</p> <p>Therefore this obligation was not relevant to Alinta Wagerup’s activities during the audit period.</p>				
	<table border="1"> <tr> <td data-bbox="271 1465 546 1396">Priority 4</td> <td data-bbox="546 1465 815 1396">Controls rating: N/P</td> <td data-bbox="815 1465 1084 1396">Compliance rating: N/R</td> </tr> </table>	Priority 4	Controls rating: N/P	Compliance rating: N/R		
Priority 4	Controls rating: N/P	Compliance rating: N/R				

No	Obligation under Condition	Findings					
457	<p><i>Electricity Metering Code Clause 8.1(1)</i></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>	<p><i>Obligations 457 to 461</i></p> <p>For the purposes of the Metering Code, ‘disputes’ refers to metering disputes between Alinta Wagerup as a code participant and a retailer, another generator, the network operator (Western Power), a user or the AEMO.</p> <p>The Manager WA Retail Regulation, Alinta Energy confirmed that during the audit period 1 July 2017 to 30 June 2022, there were no formal metering disputes between Alinta Wagerup and Western Power or any other relevant Code Participants.</p> <p>Therefore, these obligations were not relevant to Alinta Wagerup’s activities during the audit period.</p>					
	Priority 5				Controls rating: N/P	Compliance rating: N/R	
458	<p><i>Electricity Metering Code Clause 8.1(2)</i></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>						
	Priority 5				Controls rating: N/P	Compliance rating: N/R	
459	<p><i>Electricity Metering Code Clause 8.1(3)</i></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>						
	Priority 5	Controls rating: N/P	Compliance rating: N/R				
460	<p><i>Electricity Metering Code Clause 8.1(4)</i></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>						
	Priority 4	Controls rating: N/P	Compliance rating: N/R				
461	<p><i>Electricity Metering Code Clause 8.3(2)</i></p> <p>The disputing parties must at all times conduct themselves in a manner which is directed towards achieving the objective in subclause 8.3(1)</p>						
	Priority 5	Controls rating: N/P	Compliance rating: N/R				

5. Status of recommendations addressing non-compliances from the previous audit

Reference (no./year)	Non-compliance / Controls improvement Rating / Licence obligation reference number and licence obligation / Details of noncompliance or inadequacy of controls)	Auditor's recommendation or action planned	Further action required (Yes/No/Not Applicable) Details of further action required (including current recommendation reference, if applicable)
A. Resolved during current audit period			
B. Unresolved at end of current audit period			
Not applicable – there were no recommendations in the 2017 audit			

Appendix A – Audit Plan

**Alinta Cogeneration (Wagerup) Pty Ltd
and
Alinta Cogeneration (Pinjarra) Pty Ltd**

Electricity Generation Licences (EGL6 & EGL10)

2022 Performance Audit

Audit Plan

July 2022

Table of Contents

Introduction 3

Approach..... 6

Resources and team..... 10

Appendix 1 - Risk assessment key..... 11

Appendix 2 - Risk assessment 12

Introduction

Overview

The Economic Regulation Authority (the **ERA**) has under the provisions of the Electricity Industry Act 2004 (the **Act**), issued to Alinta Cogeneration (Wagerup) Pty Ltd (Alinta Wagerup) and Alinta Cogeneration (Pinjarra) Pty Ltd (Alinta Pinjarra) (hereinafter together **Alinta**) Electricity Generation Licences EGL6 and EGL10 respectively (the **Licences**).

Section 13 of the Act requires Alinta to provide to the ERA a performance audit (the **audit**), conducted by an independent expert acceptable to the ERA within 24 months after the commencement date, and every 24 months thereafter, unless otherwise approved by the ERA. With the ERA's approval, Assurance Advisory Group (**AAG**) has been appointed to conduct the 2022 audits for the Licences for the five-year period 1 July 2017 to 30 June 2022 (**audit period**).

The Licences relate to Alinta's operation of electricity generation works at its Wagerup and Pinjarra cogeneration facilities which provide electricity to the South West Interconnected System (**SWIS**).

The Wagerup Power Station is a 351MW (nameplate capacity) dual fuel (gas and distillate) power station in the Shire of Waroona approximately 100kms south of Perth. The electricity generated is dispatched to the SWIS during peak periods.

The Pinjarra Power Station is a 280MW (nameplate capacity) gas fuelled cogeneration plant located at Alcoa's Pinjarra refinery in the Shire of Murray, approximately 70 kms south of Perth. The Pinjarra Power Station operates as a base load power station and supplies electricity and steam to Alcoa under commercial agreements. Alinta has established an Operations and Maintenance Agreement with Alcoa for Alcoa to manage, operate and maintain the Pinjarra Power Station on Alinta's behalf.

The audits will be conducted in accordance with the ERA's March 2019 issue of the *Audit and Review Guidelines: Electricity and Gas Licences* (**Audit Guidelines**). In accordance with the Audit Guidelines this document represents the Audit Plan (the **Plan**) that is to be agreed upon by AAG and Alinta and presented to the ERA for approval.

This Plan has been prepared in relation to both performance audits (i.e. for the EGL6 and EGL10 Licences) and represents the audit approach to assessing both Licences concurrently. All references to 'audit' assumes applicability to both performance audits. Two separate audit reports will be prepared, outlining the obligations and findings relevant to each Licence.

Objective

A performance audit is defined as an examination of the measures taken by Alinta to meet the performance criteria specified in its Licences. The purpose of the audit is to assess the effectiveness of measures taken by Alinta to meet the conditions of its Licences.

The audit will specifically consider the following:

- *Process compliance* - the effectiveness of systems and procedures in place throughout the audit period, including the adequacy of internal controls
- *Outcome compliance* - the actual performance against standards prescribed in the Licences throughout the audit period
- *Output compliance* - the existence of the output from systems and procedures throughout the audit period (specifically, proper records which provide assurance that procedures are consistently followed and controls are maintained)
- *Integrity of performance* - the completeness and accuracy of the compliance and performance reports provided to the ERA
- *Compliance with any individual licence conditions* – the actual performance against the requirements imposed on Alinta by the ERA or specific matters raised by the ERA.

Scope

The ERA provides guidance on those aspects of the Licences and Alinta's performance criteria, which it expects to be reported upon and included in the scope of the performance audit in its *Electricity Compliance Reporting Manual (Reporting Manual)*.

The audit approach applies the singular audit priority assessment approach to identify all applicable licence obligations. Each of the compliance requirements identified in the Reporting Manual have been evaluated for applicability to Alinta's operations and used as the basis for determining the performance criteria to be considered for the audit. All applicable compliance requirements are listed at **Appendix 2**.

The audit period is 1 July 2017 to 30 June 2022. The Reporting Manual has undergone four revisions during the audit period to reflect changes in electricity licensees' obligations. The revised versions of the Reporting Manual were issued in July 2017, July 2018, June 2020 and February 2022.

The audit will address all relevant obligations contained in each of the July 2017, July 2018, June 2020 and February 2022 versions of the Reporting Manual. As there were no significant changes to generation licence obligations throughout the period subject to audit, this audit will use the current February 2022 version of the Reporting Manual as the primary audit reference.

Table 1 below outlines the compliance requirements that apply to Alinta's electricity generation operations during the period subject to audit. Where necessary, further explanation is provided to describe the obligation application.

Note that due to Alinta's current operating arrangements, a number of those obligations are not likely to be triggered during the period subject to audit. In such instances, the obligation remains applicable to the scope of this audit, with the audit report to identify and describe instances where an obligation cannot be assessed and rated.

Table 1 – Application of legislative elements to Alinta's electricity generation operations

Legislative element	Application to Alinta's electricity operations
Electricity Industry Act 2004	Seven of the 11 Electricity Industry Act obligations are applicable to Alinta's electricity generation operations.
Electricity Licences	Eight of the 14 Electricity Licence obligations are applicable to Alinta's electricity generation operations.
Electricity Industry Metering Code	21 of the 159 Metering Code obligations are applicable to Alinta's electricity generation operations. Note that in February 2022 the ERA amended the Reporting Manual to recognise that obligations 402, 406, 407, 408, 410 and 435 are not applicable to electricity generation licences. For the purpose of this audit, these six obligations are considered to be not applicable for the duration of the audit period.

Alinta's responsibility for compliance with the conditions of the Licence

Alinta is responsible for:

- Compliance with the Licences
- Identifying risks that threaten the conditions within the Licences being met
- Identifying suitable compliance requirements as specified by the ERA
- Identifying, designing and implementing controls to enable the conditions within the Licences to be met and to monitor ongoing compliance
- Implementing corrective actions for any instances of non-compliance.

AAG's responsibility

Our responsibility is to express an opinion on Alinta's compliance, in all material respects, with the licence obligations as evaluated against its Licence Conditions for the period from 1 July 2017 to 30 June 2022. We will conduct our engagement in accordance with the Audit Guidelines and the Standard on Assurance Engagements ASAE 3100 Compliance Engagements (**ASAE 3100**) issued by the Auditing and Assurance Standards Board.

ASAE 3100 requires that we plan and perform our procedures to obtain reasonable assurance about whether Alinta has complied, in all material respects, with the licence obligations as evaluated against its Licence Conditions. This assurance engagement will involve performing procedures to obtain evidence about the compliance activity and controls implemented to meet the conditions within the Licences. The procedures selected depend on our judgement, including the identification and assessment of risks of material noncompliance with the relevant licence conditions.

Limitations of use

Our reports will be produced solely for the information and internal use of Alinta and are not intended to be and should not be used by any other person or entity. No other person or entity is entitled to rely, in any manner or for any purpose, on our reports.

We understand that a copy of our reports will be provided to the ERA for the purpose of meeting Alinta's reporting requirements of section 13 of the Act. We agree that a copy of our reports may be provided to the ERA for its information in connection with this purpose, however we accept no responsibility to the ERA or to anyone who is provided with or obtains a copy of our reports.

Inherent limitations

Reasonable assurance means a high but not absolute level of assurance. Absolute assurance is very rarely attainable as a result of factors such as: the use of selective testing, the inherent limitations of internal control, the fact that much of the evidence available to us is persuasive rather than conclusive and the use of judgement in gathering and evaluating evidence and forming conclusions based on that evidence.

We cannot, in practice, examine every activity and procedure, nor can we be a substitute for management's responsibility to maintain adequate controls over all levels of operations and their responsibility to prevent and detect irregularities, including fraud.

Accordingly, readers of our report should not rely on the reports to identify all potential instances of non-compliance which may occur.

An assurance engagement relating to the period from 1 July 2017 to 30 June 2022 will not provide assurance on whether compliance with the Licence will continue in the future.

Independence

In conducting our engagement, we will comply with the independence requirements of the Australian professional accounting bodies.

Approach

The audit will be conducted in three distinct phases, being a risk assessment, system analysis/walkthrough and testing and review. From the audit results, reports will be produced to outline findings, overall compliance assessments and recommendations for improvement in line with the Audit Guidelines. Each step of the audit is discussed in detail below.

Risk assessment

The audit will focus on identifying or assessing those activities and management control systems to be examined and the matters subject to audit. Therefore, the purpose of conducting the risk assessment as a preliminary phase enables the auditor to focus on pertinent/high risk areas of Alinta’s licence obligations. The risk assessment considers any changes to Alinta’s systems and processes and any matters of significance raised by the ERA and/or Alinta. The levels of risk and materiality of the process determine the level of audit required, i.e. the greater the materiality and the higher the risk, the more audit effort to be applied.

The first step of the risk assessment is the rating of the potential consequences of Alinta not complying with its licence obligations, in the absence of mitigating controls.

As the Reporting Manual is prescriptive in its criteria for classifying the consequences of non-compliance (refer to Appendix 1-1) the risk assessment applies the Reporting Manual’s classifications for each obligation subject to audit.

Once the consequence has been determined, the likelihood of Alinta not complying with its obligations is assessed using the likelihood rating listed at Table 17 of the Audit Guidelines (refer to Appendix 1-2). The assessment of likelihood is based on the expected frequency of Alinta’s non-compliance with the relevant licence obligation over a period of time.

Table 2 below (sourced from the Audit Guidelines) outlines the combination of consequence and likelihood ratings to determine the level of inherent risk associated with each individual obligation.

Table 2: Inherent risk rating

	Consequence		
Likelihood	Minor	Moderate	Major
Likely	Medium	High	High
Probable	Low	Medium	High
Unlikely	Low	Medium	High

Once the level of inherent risk has been determined, the adequacy of existing controls is assessed in order to determine the level of control risk. Controls are assessed and prioritised as weak, moderate or strong dependant on their suitability to mitigate the risks identified. The control adequacy ratings used by this risk assessment are aligned to the ratings specified in the Audit Guidelines (refer to Appendix 1-3). Once inherent risks and control risks are established, the audit priority can then be determined using the matrix specified in the Audit Guidelines (refer to Table 3 below). Essentially, the higher the level of risk the more substantive testing is required.

Table 3: Assessment of Audit Priority

		Preliminary adequacy of existing controls		
Inherent Risk	Weak	Moderate	Strong	
High	Audit priority 1	Audit Priority 2		
Medium	Audit priority 3	Audit Priority 4		
Low	Audit Priority 5			

The following table outlines the audit requirement for each level of audit priority. Testing can range from extensive substantive testing around the controls and activities of processes to confirming the existence of controls through discussions with relevant staff.

Table 4: Audit Priority Table

Priority rating	Audit requirement
Audit Priority 1	<ul style="list-style-type: none"> • Via interview and walkthrough, understand relevant processes and controls • Examine relevant documents, including compliance registers and reports • Obtain evidence of policies, procedures and controls being in place and working effectively • Extensive substantive testing of activities and/or transactions • Follow-up and if necessary, re-test matters previously reported.
Audit Priority 2	<ul style="list-style-type: none"> • Via interview and walkthrough, understand relevant processes and controls • Examine relevant documents, including compliance registers and reports • Obtain evidence of policies, procedures and controls being in place and working effectively • Moderate substantive testing of activities and/or transactions • Follow-up and if necessary, re-test matters previously reported.
Audit Priority 3	<ul style="list-style-type: none"> • Via interview and walkthrough, understand relevant processes and controls • Examine relevant documents, including compliance registers and reports • Limited controls testing (moderate sample size) to assess whether policies, procedures and controls are in place and working effectively • Follow-up of matters previously reported.
Audit Priority 4	<ul style="list-style-type: none"> • Confirmation of existing controls via walk through of key processes and examination of key documents including policies and procedures, compliance/breach registers and reports • Follow-up of matters previously reported.
Audit Priority 5	<ul style="list-style-type: none"> • Confirmation of existing controls via observation, discussions with key staff and/or reliance on key references including policies and procedures, compliance/breach registers and reports (“desktop review”).

The risk assessment has been discussed with Alinta representatives to gain their input as to the appropriateness and factual accuracy of risk and control ratings and associated explanations. The key sources considered in reaching our preliminary assessment of the risk and control ratings were based on:

- Review of annual compliance reports lodged by Alinta for each of the years 2018 to 2021
- Our understanding of Alinta's regulatory environment
- Any other factors that may influence the level or strength of controls
- Consideration of relevant circumstances and activity that trigger specific compliance obligations.

Note that the previous audits did not make any recommendations for improvement or corrective action.

At this stage, the risk assessment can only be a preliminary assessment based on reading of documentation and interviews by the auditors. It is possible that the ratings and risk assessment comments may be revised as we conduct our work and new evidence comes to light. The performance audit risk assessment is attached at Appendix 2.

System analysis / walkthrough

The systems analysis required will be determined utilising the audit priority scale outlined above. Once the priority level has been defined, the testing component will take place by way of interviewing key operational and administrative staff who will outline information that displays compliance with the Licence requirements.

In performing this analysis/walkthrough, we will consider the following:

- The control environment: Alinta's management philosophy and operating style, organisational structure, assignment of authority and responsibilities, the use of internal audit, the use of information technology and the skills and experience of key staff members
- Information systems: The appropriateness of Alinta's information systems to record the information needed to comply with the Licence, the accuracy of data, the security of data and documentation describing the information system
- Control procedures: The presence of systems and procedures to ensure compliance with the Licence, effectiveness of Alinta's internal control structure to detect and correct non-compliance. Specific consideration will be given to significant changes in relevant systems and procedures implemented during the period subject to audit
- Compliance attitude: Action taken by Alinta in response to any previous non-compliances. Consideration will be given to the timing of action taken during the period subject to audit and whether the action has a permanent impact on Alinta's level of compliance
- Outcome compliance: Actual performance against standards prescribed in the Licences throughout the audit period.

Where required, an observation of processes, procedures and operations and review of key documents will occur to assist in the determination of Alinta's compliance with Licence obligations. Key documents, which may be subject to audit, are not specifically disclosed in this plan. A list of documents examined will be included in the audit reports.

Testing/review

Using the results of the risk assessment and systems analysis, detailed testing and analysis will be performed to compare those standards maintained by Alinta with the relevant sections and schedules of the Licences.

Control testing is performed for those licence obligations with an audit priority 3 and above, and where there is relevant activity. This method of testing will involve:

- Understanding the population of transactions
- Selecting a sample of transactions to examine compliance with relevant sections of applicable legislation, codes and regulations
- Comparing the sample selected to expected requirements as mandated by relevant sections of applicable legislation, codes and regulations.

A full work program will be completed to record the specific aspects of our testing and analyses for each licence obligation. This work program will be based on:

- The audit priority determined by the risk assessment applicable to each licence obligation
- The results of the systems analysis performed, as described above
- AAG's sampling methodology, which is in accordance with ASA 530 (Audit Sampling) and takes account of the volume and frequency (e.g. daily, weekly, monthly, annual) of relevant transactions. Sample sizes typically range from 1 to 30, increasing with the volume and frequency of transactions
- The location of personnel and transactions to be tested.

Audit fieldwork will include meetings with staff at Alinta Energy's office in the Perth CBD, plus a visit to facilities at Wagerup and Pinjarra in relation to metering activities.

Reporting

The performance audit reports will also be structured to address all of the minimum contents specified in section 5 of the Audit Guidelines.

In accordance with the Audit Guidelines, all aspects of compliance with the Licences will be assessed according to the rating scale based on the work performed. Refer to **Table 5** below for the compliance levels that will be used for the performance audit.

Table 5: Compliance and control rating scales

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 required	3	Non-compliant – moderate impact on customers or third parties
D	No controls evident	4	Non-compliant – major impact on customers or third parties
N/P	Not performed – A controls rating was not required	N/R	Not rated – No activity took place during the audit period

Alinta is responsible for providing a separate post audit implementation plan, if required.

Resources and team

Key Alinta contacts

The key contacts for this audit are:

- Joshua Wozniuk Operations Manager, SWIS
- Paul Grey Head of Operations
- Catherine Rousch Manager, WA Retail Regulation

AAG Staff

AAG staff who will be involved with this assignment are:

- Margaret-Mary Gauci Senior Consultant
- Andrew Baldwin Executive Director
- Stephen Linden Director (QA review).

Resumes for key AAG staff are outlined in the proposal accepted by Alinta and subsequently presented to the ERA.

Timing

The initial risk assessment phase was completed on 12 July 2022, after which the draft audit plan and risk assessment were presented to Alinta for comment prior to submission to the ERA for review and approval.

The remainder of the fieldwork phase is scheduled to be performed over the period mid-July to early August 2022, enabling draft and final reports to be submitted to the ERA by the due dates of 31 August 2022 and 30 September 2022 respectively.

AAG time and staff commitment to the completion of the audit is outlined in the proposal accepted by Alinta. In summary, the estimated time allocated to each performance audit activity is as follows:

- Planning (including risk assessment): 10 hours
- Fieldwork (including system analysis/walkthrough and testing/review): 55 hours
- Reporting: 25 hours.

Appendix 1 - Risk assessment key

1-1 Criteria for classification of compliance obligations

Source: Electricity Compliance Reporting Manual February 2022

Rating (type)	Classification of Non-Compliance	Criteria for classification
1	Major	Classified on the bases that: <ul style="list-style-type: none"> The consequences of non-compliance would cause major damage, loss or disruption to customers; or The consequences of non-compliance would endanger or threaten to endanger the safety or health of a person.
2	Moderate	Classified on the basis that: <ul style="list-style-type: none"> The consequences of non-compliance will affect the efficiency and effectiveness of the licensee's operations or service provision, but will not cause major damage, loss or disruption to customers, or The regulatory obligation is not otherwise classified as Type 1 or Type NR non-compliance. Reclassification of Type 2 to Type 1 may occur in circumstances of systemic non-compliance.
NR (not reportable)	Minor	Classified on the basis that: <ul style="list-style-type: none"> The consequences of non-compliance are relatively minor – i.e. non-compliance will have minimal effect on the licensee's operations or service provision and do not cause damage, loss or disruption to customers; Compliance with the obligation is immeasurable; The non-compliance is required to be reported to the ERA under another instrument, guideline or code; The non-compliance is identified by a party other than the licensee; or The licensee only needs to use its reasonable or best endeavours to achieve compliance, or where the obligation does not otherwise impose a firm obligation on the licensee. Reclassification of Type NR to Type 2 may occur in circumstances of: <ul style="list-style-type: none"> Systemic non-compliance, or A failure to resolved non-compliance promptly.

1-2 Likelihood ratings

Source: Audit Guidelines: Electricity and Gas Licences March 2019

	Level	Criteria
A	Likely	Non-compliance is expected to occur at least once or twice a year
B	Probable	Non-compliance is expected to occur every three years
C	Unlikely	Non-compliance is expected to occur at least once every 10 years or longer

1-3 Preliminary adequacy ratings for existing controls

Source: Audit Guidelines: Electricity and Gas Licences March 2019

Level	Description
Strong	Controls mitigate the identified risks to a suitable level
Moderate	Controls only cover significant risks; improvement required
Weak	Controls are weak or non-existent and do little to mitigate the risks

Appendix 2 - Risk assessment

Obligation numbers and references listed below are sourced from the February 2022 version of the Reporting Manual.

* Note that obligation 105 is assigned a Priority 3 due to breaches reported by Alinta Pinjarra during the audit period. The same control assessment (Weak) applies to both Licences.

* Note that in February 2022 the ERA amended the Reporting Manual to recognise that obligations 402, 406, 407, 408, 410 and 435 are not applicable to electricity generation licences. For the purpose of this audit, these six obligations are considered to be not applicable for the duration of the audit period.

No	Obligation reference	Obligation description	Type	Consequence	Likelihood	Inherent Risk Rating	Control Assessment	Audit Priority
12 Electricity Industry Act - Licence Conditions and Obligations								
101	Section 13(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).	2	Moderate	Unlikely	Medium	Strong	Priority 4
102	Section 14(1)(a)	A licensee must provide for an asset management system.	2	Moderate	Probable	Medium	Strong	Priority 4
103	Section 14(1)(b)	A licensee must notify details of the asset management system and any substantial changes to it to the ERA.	2	Moderate	Probable	Medium	Strong	Priority 4
104	Section 14(1)(c)	A licensee must provide the ERA with a report by an independent expert about the effectiveness of its asset management system every 24 months, or such longer period as determined by the ERA.	2	Moderate	Unlikely	Medium	Strong	Priority 4
105 ⁺	ERA (Licensing Funding) Regulations 2014	A licensee must pay the prescribed licence fees to the ERA according to clauses 6, 7 and 8 of the <i>Economic Regulation Authority (Licensing Funding) Regulations 2014</i> .	2	Moderate	Probable	Medium	Weak	Priority 3
106	Section 31(3)	A licensee must take reasonable steps to minimise the extent, or duration, of any interruption, suspension or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause.	NR	Minor	Probable	Low	Strong	Priority 5
107	Section 41(6)	A licensee must pay the costs of taking an interest in land or an easement over land.	2	Moderate	Probable	Medium	Strong	Priority 4
13. Electricity Licences – Licence Conditions and Obligations								
119	Licence condition 4.3.1	A licensee and any related body corporate must maintain accounting records that comply with the Australian Accounting Standards Board Standards or equivalent International Accounting Standards.	2	Moderate	Probable	Medium	Strong	Priority 4
120	Licence condition 5.2.4	A licensee must comply with any individual performance standards prescribed by the ERA.	2	Moderate	Unlikely	Medium	Moderate	Priority 4

No	Obligation reference	Obligation description	Type	Consequence	Likelihood	Inherent Risk Rating	Control Assessment	Audit Priority
121	Licence condition 5.3.2	A licensee must comply, and require its auditor to comply, with the ERA's standard audit guidelines for a performance audit.	2	Moderate	Unlikely	Medium	Strong	Priority 4
122	Licence condition 5.1.5	A licensee must comply, and must require the licensee's expert to comply, with the relevant aspects of the ERA's standard audit guidelines for an asset management system review.	2	Moderate	Unlikely	Medium	Strong	Priority 4
123	Licence condition 4.4.1	In the manner prescribed, a licensee must notify the ERA, if it is under external administration or if there is a significant change in the circumstances that the licence was granted which may affect the licensee's ability to meet its obligations.	2	Moderate	Probable	Medium	Strong	Priority 4
124	Licence condition 4.5.1	A licensee must provide the ERA, in the manner prescribed, with any information that the ERA requires in connection with its functions under the Electricity Industry Act.	2	Moderate	Probable	Medium	Strong	Priority 4
125	Licence condition 3.8.1 and 3.8.2	A licensee must publish any information as directed by the ERA to publish, within the timeframes specified.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
126	Licence condition 3.7.1	All notices must be in writing, unless otherwise specified.	2	Moderate	Unlikely	Medium	Strong	Priority 4
14 Electricity Industry Metering Code – Licence Conditions and Obligations								
324	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
339	Clause 3.11(3)	A Code participant who becomes aware of an outage or malfunction of a metering installation must advise the network operator as soon as practicable.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
371	Clause 4.4(1)	If there is a discrepancy between energy data held in a metering installation and in the metering database, the affected Code participants and the network operator must liaise to determine the most appropriate way to resolve the discrepancy.	NR	Minor	Unlikely	Low	Moderate	Priority 5
372	Clause 4.5(1)	A Code participant must not knowingly permit the registry to be materially inaccurate.	NR	Minor	Unlikely	Low	Moderate	Priority 5
373	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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
388	Clause 5.4(2)	A user must, when reasonably requested by a network operator, assist the network operator to comply with the network operator's obligation under subclause 5.4(1)	2	Moderate	Unlikely	Medium	Moderate	Priority 4

No	Obligation reference	Obligation description	Type	Consequence	Likelihood	Inherent Risk Rating	Control Assessment	Audit Priority
401	Clause 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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
402*	Clause 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. No longer generation obligation Jan 2022	2	Not applicable Clause 5.17(1) of the Metering Code does not place an obligation on an electricity generation licensee				
405	Clause 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.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
406*	Clause 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. No longer generation obligation Jan 2022	NR	Not applicable Clause 5.19 of the Metering Code does not place an obligation on an electricity generation licensee				
407*	Clause 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. No longer generation obligation Jan 2022	NR					
408*	Clause 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. No longer generation obligation Jan 2022	2					
410*	Clause 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. No longer generation obligation Jan 2022	NR					
416	Clause 5.21(5)	A Code participant must not request a test or audit under subclause 5.21(1) unless the Code participant is a user and the test or audit relates to a time or times at which the user was the current user or the Code participant is the IMO.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
417	Clause 5.21(6)	A Code participant must not make a request under subclause 5.21(1) that is inconsistent with any access arrangement or agreement.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
435*	Clause 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.	2	Not applicable - Clause 5.27 of the Metering Code does not place an obligation on an electricity generation licensee				

No	Obligation reference	Obligation description	Type	Consequence	Likelihood	Inherent Risk Rating	Control Assessment	Audit Priority
448	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.	2	Moderate	Probable	Medium	Moderate	Priority 4
451	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.	NR	Minor	Probable	Low	Moderate	Priority 5
453	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.	2	Moderate	Probable	Medium	Moderate	Priority 4
454	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.	2	Moderate	Probable	Medium	Moderate	Priority 4
455	Clause 7.5	A Code participant must subject to subclauses 5.17A and 7.6 not disclose, or permit the disclosure of, confidential information provided to it under or in connection with the Code and may only use or reproduce confidential information for the purpose for which it was disclosed or another purpose contemplated by the Code.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
456	Clause 7.6(1)	A Code participant must disclose or permit the disclosure of confidential information that is required to be disclosed by the Code.	2	Moderate	Unlikely	Medium	Moderate	Priority 4
457	Clause 8.1(1)	If any dispute arises between any Code participants then (subject to subclause 8.2(3)) representatives of disputing parties must meet within 5 business days after a notice given by a disputing party to the other disputing parties and attempt to resolve the dispute by negotiations in good faith.	NR	Minor	Unlikely	Low	Strong	Priority 5
458	Clause 8.1(2)	If a dispute is not resolved within 10 business days after the dispute is referred to representative negotiations, the disputing parties must refer the dispute to a senior management officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.	NR	Minor	Unlikely	Low	Strong	Priority 5
459	Clause 8.1(3)	If the dispute is not resolved within 10 business days after the dispute is referred to senior management negotiations, the disputing parties must refer the dispute to the senior executive officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.	NR	Minor	Unlikely	Low	Strong	Priority 5
460	Clause 8.1(4)	If the dispute is resolved by representative negotiations, senior management negotiations or CEO negotiations, the disputing parties must prepare a written and signed record of the resolution and adhere to the resolution.	2	Moderate	Unlikely	Medium	Strong	Priority 4
461	Clause 8.3(2)	The disputing parties must at all times conduct themselves in a manner which is directed towards achieving the objective in subclause 8.3(1).	NR	Minor	Unlikely	Low	Strong	Priority 5

Appendix B – References

Alinta Wagerup representatives participating in the audit

- Manager Planning and Community (Alinta Energy)
- Manager WA Retail Regulation (Alinta Energy)
- Operations Manager, SWIS (Alinta Energy)

AAG staff participating in the audit

Hrs

- | | | |
|-----------------------|----------------------|----|
| • Margaret-Mary Gauci | Senior Consultant | 24 |
| • Andrew Baldwin | Executive Director | 16 |
| • Stephen Linden | Director (QA review) | 1 |

Key documents and other information sources examined

- 2017/18, 2018/19, 2019/20 and 2020/21 Alinta Wagerup Annual Compliance Reports
- Alinta Energy Asset Management Framework
- Alinta Wagerup asset management plans
- Wagerup Emergency Response Plan
- Annual Wagerup Station Performance reports
- Alinta Energy Pty Ltd Group Financial Statements for the periods ending 30 June 2020 and 30 June 2021
- Alinta Network Access Agreement and subsequent Deeds of Amendment relevant to Alinta Wagerup
- Records of email correspondence relating to change of Alinta Energy address
- Evidence of payment of licence fees and a sample of quarterly standing charges
- Email correspondence with the ERA, including notifications relating to audit requirements
- Representations from the Manager WA Retail Regulation, Manager Planning and Community, Finance Manager, Merchant Energy Accounting and Operations Manager, SWIS.