

**Post Review Implementation Plan – 2022 Performance Audit – Goldfields Power Pty Ltd**

Ref#	Licence Obligation	Auditor's recommendation	Action Proposed to be taken by the Licensee	Responsible Person(s)	Target Completion Date
1/2022	<p><b>Metrology Procedure</b>  <b>NP2</b>  <i>Obligation 319 - A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and comply with any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act.</i></p> <p>Although GPPL has demonstrated that it has maintained its meters to the satisfaction of its customer throughout the audit period, it does not have a metrology procedure to demonstrate its compliance with the specifications of the National Measurement Institute under the National Measurements Act.</p> <p><i>Obligation 422 - A network operator must validate energy data in accordance with this Code applying, as a minimum, the prescribed rules and procedures set out in Appendix 2 and must, where necessary, substitute and estimate energy data under this Code applying, as a minimum, the prescribed rules and procedures set out in Appendix 3.</i></p> <p>Although GPPL validates its energy data, it considers that the methodologies it uses do not fully comply with the prescribed validation rules and procedures set out in Appendix 2 and the prescribed substitution and estimation rules and procedures set out in Appendix 3.</p> <p>Installation of GPPL's metering pre-dates the requirements of the Code apart from one new meter which is compliant.</p> <p><i>Obligation 425 - If a network operator detects a loss of energy data or incorrect energy data from a metering installation, it must notify each affected Code participant</i></p>	<p>GPPL to continue to report to the ERA, the non-compliance with obligations 319, 422, 425, 426, 434 and 447 due to the absence of a metrology procedure to demonstrate compliance with the Metering Code. There is no impact on the customer</p>	<p>GPPL will continue to assess and report on its non-compliance with obligations 319, 422, 425, 426, 434 and 447.</p> <p>GPPL's reporting of the non-compliance will be performed through GPPL's annual compliance report.</p>	<p>Kristian Myhre</p>	<p>31 August 2023</p>

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	<p><i>of the loss or error within 24 hours after detection.</i></p> <p>GPPL is non-compliant in relation to clause 6.1(1)(c) as GPPL does not have a metrology procedure.</p> <p><i>Obligation 426 - Substitution or estimation of energy data is required when energy data is missing, unavailable or corrupted, including in the circumstances described in this subclause.</i></p> <p>Although GPPL substitutes and estimates energy data when required, it considers that the methodologies it uses do not fully comply with the prescribed substitution and estimation rules and procedures set out in Appendix 3.</p> <p><i>Obligation 434 - “A network operator must ensure the accuracy of estimated energy data in accordance with the methods in its metrology procedure and ensure that any transformation or processing of data preserves its accuracy in accordance with the metrology procedure.</i></p> <p>GPPL is non-compliant in relation to clause 6.1(1)(c) as GPPL does not have a metrology procedure.</p> <p><i>Obligation 447 - A network operator must, in relation to its network, comply with the agreements, rules, procedures, criteria and processes prescribed.</i></p> <p>GPPL is non-compliant in relation to clause 6.1(1)(c) as GPPL does not have a metrology procedure.</p> <p>The PPA was amended on 22 October 2020 and includes compliance with relevant sections of the Metering Code. The PPA does not include a metrology procedure that includes compliance with these obligations, as they are not considered relevant to the service provided to the single customer. GPPL does not intend to put in place a Metrology Procedure.</p>				

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2/2022	<p><b>Network Communication Rules</b> <b>NP2</b></p> <p><i>Obligation 448A - A network operator must, as soon as practicable and in any event no later than 6 months after the date this Code applies to it, submit to the ERA for its approval the prescribed documents in subclauses 6.2(a)-(d).</i></p> <p><i>Obligation 448C - A network operator must publish its communication rules as soon as practicable, and in any event within 6 months after the date this Code applies to it.</i></p> <p>GPPL has not submitted the prescribed documents in sub-clauses 6.2(a)-(d) to the ERA for approval being:</p> <ul style="list-style-type: none"> <li>• proposed model Service Level Agreement</li> <li>• Metrology Procedure</li> <li>• proposed mandatory link criteria under clause 3.6.</li> </ul> <p>GPPL has a PPA that sets out the Service Level Agreement with its single customer. As there is a single customer and there is no model SLA, Metrology Procedure or mandatory link criteria, the GPPL has not submitted or published any documents. This is considered a minor non-compliance with no impact on the customer.</p>	<p>GPPL to continue to report to the ERA, the non-compliance with obligation 448A and 448C re publishing certain documents to set out its network communication rules. There is no impact on the customer.</p>	<p>GPPL will continue to assess and report on its non-compliance with obligations 448A and 448C.</p> <p>GPPL's reporting of the non-compliance will be performed through GPPL's annual compliance report.</p>	Kristian Myhre	31 August 2023
3/2022  C2	<p><b>Asset Operations - Training</b></p> <p><i>Staff resources are adequate and staff receive training commensurate with their responsibilities.</i></p> <p>GPPL's training is split into compliance training directly related to work activities undertaken by each member of staff, and individual development training to improve skills and knowledge. GPPL's training requirements are very comprehensive.</p> <p>However, at the time of the review, the reviewer noted that the management of compliance training, especially mandatory and required training, needed</p>	<p>GPPL to review the overdue compliance training of network staff and take corrective action to ensure mandatory and required training is completed in a timely manner.</p>	<p>A review of the mandatory training assignments for the RCC (Regional Control Centre) has identified that "mandatory" training has been incorrectly assigned to the RCC operators.</p> <p>After reviewing this and applying the appropriate mandatory training there are only 4 outstanding training requirements. None of these outstanding training requirements are technical or associated with the ability of the individual to carry out the position's duties and should be categorized as "required" not "mandatory"</p>		

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	<p>improvement. At the date of the audit visit, for GPPL and Southern Cross Energy staff, there were approximately 20 overdue training requirements for mainly four staff dating from March 2022.</p> <p>This indicates that GPPL may need to improve their method to identify and categorise the training requirements of their staff and/or if the escalation process of overdue training needs improvement to drive appropriate outcomes.</p>		<p>Action: GPPL to review and update the Learning Management System to ensure accuracy of “mandatory” and “required” training assignments.</p>	<p>May Sullivan</p>	<p>30 June 2023</p>
<p><b>4/2022</b>  <b>C3</b></p>	<p><b>Asset Maintenance</b> <i>Maintenance plans (emergency, corrective and preventative) are documented and completed on schedule.</i></p> <p>There is a weekly maintenance meeting to discuss the maintenance work coming up in the next three weeks. Maintenance staff visit the site every day and conduct inspection rounds. However, GPPL does not have a dedicated Maintenance Planner to schedule the work based on the priority of the required maintenance work and available resources.</p> <p>The reviewer also raised concerns around the adequacy of staff resources based on the increasing number of open work orders unchanged for more than 180 days being consistently above target. Maintenance metrics showing outstanding work dating back up to 19 months for Parkeston Power Station. This could be due to multiple reasons:</p> <ul style="list-style-type: none"> <li>o Understaffing</li> <li>o Lack of a site-based maintenance planner</li> <li>o Poor work order prioritisation</li> <li>o Service levels of assets may require to be reassessed</li> <li>o Targets may be over-aggressive.</li> </ul>	<p>a) TransAlta to review the accuracy of the maintenance metrics dashboard and update any incorrect or outdated metrics</p> <p>b) TransAlta to review the overdue work orders at Parkeston Power Station to reassess priorities and review the adequacy of staffing levels to close out open work orders.</p> <p>c) TransAlta to perform a root cause analysis and implement corrective action to achieve appropriate work order completion outcomes and to take control of the maintenance metrics possibly with a dedicated on-site Maintenance Planner.</p> <p>d) Planned Maintenance checklists to be signed by the operator for completion, and a copy archived in the system as evidence of completion, besides marking the work order as completed in SAP.</p>	<p>For contextualizing the actions, it is worth noting that GPPL has a progressive work management process in place (GAS.06.1324) which the auditor reviewed. Key points to note are:</p> <ul style="list-style-type: none"> <li>• GAS.06.1324 provides a process for resource allocation against upcoming planned and unplanned works (work schedule). The final work schedule is approved by the Plant Manager, who has a budget allocation suitable to manage the annually scheduled works</li> <li>• An initial review of the outstanding work orders indicates that “close out” after work completion needs focus to reduce what appears in the backlog.</li> <li>• GPPL are of the opinion that the budgeted staffing levels are adequate. However, with Covid-19 and general skill shortages in the resources sector staff recruitment and retention has been problematic. This has contributed to the quantity of backlogged work orders.</li> </ul> <p>Actions:</p>		

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	<p>Also, the maintenance metrics for various other criteria seem to be incorrect such as Alarm Equipment Work Outstanding by 1,800 months. This indicates that the maintenance metrics dashboard is not being maintained.</p> <p>Upon reviewing the Black Start Procedure GAS.06.0937 PPS DEG PM TEST RUN and the associated checklists in GAS.06.0929 for Parkeston Power Station during the site visit, the reviewer observed that Planned Maintenance work orders were scheduled ones in every 4-weeks cycle and work was completed by the control room operators regularly. However, there were no completed checklists with operator signatures maintained.</p>		<p>a) GPPL to review and manage the maintenance metrics dashboard inline with GAS.06.1324.</p> <p>b) Review the backlog of work orders and manage as per GAS.06.1324.</p> <p>c) GPPL performing a staffing review and concurrently reviewing retention and attraction strategies with human resources.</p> <p>Resource has been approved for a maintenance planner for 2023.</p> <p>d) Upon review, this single finding was not consistent with general practise. It has been confirmed that the latest PPS DEG PM TEST RUN does have a signed check sheet attached which is evidenced in SAP Notification 11695786 &amp; Work Order 91018666, completed on the 4th of November 2022.</p> <p>This appears to be a once-off human error issue. GPPL does not propose to take any further action.</p>	<p>a) Peter Murray</p> <p>b) Peter Murray</p> <p>c) Keith Adams</p> <p>d) No action</p>	<p>a) 31 March 2023</p> <p>b) 31 March 2023</p> <p>c) 31 December 2022</p> <p>d) No action</p>