

EIRL10 Alinta Energy Transmission (Chichester) Pty Ltd – 2022 Post-Audit and Post-Review Implementation Plan – Performance Audit

Recommendation reference	Non compliance/controls improvement	Recommendation	Action proposed to be taken by licensee	Responsible person	Target Completion date
1/2022	<p>B2 <i>Obligations 319, 357, 448A, 448C</i> <i>Metering Code clauses 3.1, 3.21(1), 6.2 and 6.19A(1)</i></p> <p>AETC maintains six meters on its electricity transmission network for measuring and recording energy data relating to electricity transferred into and out of its network. AETC's Interconnection Agreements with AETRH and AEC specify AETC's obligations for installing, operating and maintaining metering equipment, including references to the requirements of <i>Good Engineering and Operating Practices</i> and the Metering Code.</p> <p>All energy data from these meters is captured within Alinta's Honeywell Experion system.</p> <p>Although AETC has demonstrated that it has operated its meters and recorded related energy data to the satisfaction of AETRH and AEC throughout the period subject to this audit, it has not complied with the following obligations:</p> <ul style="list-style-type: none"> Installation and maintenance of meters in accordance with an applicable metrology procedure, the specifications of the National Measurement Institute 	<p>AETC:</p> <p>a) Establish a plan and procedure for demonstrating how it will meet the Metering Code and the relevant clauses of its Interconnection Agreements.</p> <p>Consideration should be given to:</p> <ul style="list-style-type: none"> Establishing a Metering Management Plan (which has the benefit of capturing all relevant obligations in one place); and/or Building on the Interconnection Agreement mechanism to be clearer on the agreed approach for managing meters and metering data to adequately meet the intent of the Metering Code, within the practicalities of AETC's operating circumstances. 	<p>AETC will:</p> <p>Establish a plan and procedure for demonstrating how it will meet the Metering Code and the relevant clauses of its PPA and Interconnection Agreement.</p> <p>Consideration will be given to:</p> <ul style="list-style-type: none"> Establishing a Metering Management Plan (which has the benefit of capturing all relevant obligations in one place); and/or Building on the PPA and Interconnection Agreement mechanism to be clearer on the agreed approach for managing meters and metering data to adequately meet the intent of the Metering Code, within the practicalities of AETRH's operating circumstances. 	General Manager, Regulatory Affairs and Compliance (with input from Head of Operations, Power Generation)	31 Mar 2024

	<p>under the National Measurements Act; and the functionality and testing requirements outlined in Part 3 of the Metering Code (obligations 319 and 357).</p> <ul style="list-style-type: none"> • Submission of a proposed model service level agreement, metrology procedure and mandatory link criteria to the ERA for its approval (obligation 448A). • Establishment of communication rules (obligation 448C). <p>These non-compliances have minor (little to no) impact on customers related to AETC's operations.</p>	<p>b) Take a clear position on those Metering Code obligations where AETC accepts that it will continue to be non-compliant on the basis that it is not practical or useful to establish formal metrology procedures etc.</p>	<p>Will take a clear position on those Metering Code obligations where AETRH accepts that it will continue to be non-compliant on the basis that it is not practical or useful to establish formal metrology procedures etc.</p>		
2/2022	<p>B2 <i>Obligation 369 Metering Code Clause 4.2(1)</i> <i>Obligation 370 Metering Code Clause 4.3(1)</i> Obligation 370 - clause 4.3(1) of the Metering Code requires AETC's metering database to contain the 30 specified standing data items.</p> <p>AETC's metering database contained the prerequisite standing data item headings, but had not provided data or commentary on items: (5) Distribution loss factor, (14) NMI meter, (20) Summation scheme values and multipliers, (21) Data register coding details, (27) Algorithms.</p> <p>Obligation 369 is non-compliant as a result of the metering registry not complying with the Code, per Obligation 370.</p>	<p>AETC complete, or provide commentary on, the standing data omitted from its metering database.</p>	<p>AETC will complete, or provide commentary on, the standing data omitted from its metering database.</p>	<p>General Manager, Regulatory Affairs and Compliance (with input from Head of Operations, Power Generation</p>	31 Mar 2024

EIRL10 Alinta Energy Transmission (Chichester) Pty Ltd – 2022 Post-Audit and Post-Review Implementation Plan – Asset Management System Review

Recommendation reference	Non compliance/controls improvement	Recommendation	Action proposed to be taken by licensee	Responsible person	Target Completion date
1/2022	<p>B3 4. Environmental Analysis 4.2 Performance standards (availability of service, capacity, continuity, emergency response, etc.) are measured and achieved</p> <p>B3 5. Asset Operations 5.6 Staff resources are adequate and staff receive training commensurate with their responsibilities At the time of our site visit, AETC's training matrix showed some overdue training. Of particular note, a significant risk to AETC's operations relates to the training requirements for site emergency response, which was recorded as overdue for all staff assigned to operations managed from the Newman Power Station (which includes the Chichester Transmission Network). We consider this issue reflects a lack of dedicated effort to ensure training requirements are maintained. Corrective action is required to improve AETC's performance against the requirements of its emergency response procedures.</p>	<p>AETC: a) Schedule staff training to clear all overdue requirements with special emphasis given to site-specific emergency response drills b) Ensure sufficient resources are allocated to maintaining key training requirements and emergency response drills.</p>	<p>AETC: Employs a dedicated HSE Manager, Power Generation & Development and has confirmed that: a) The relevant staff training has been scheduled and completed; and b)resources are allocated to maintaining key training requirements.</p> <p>However, the root cause of the non compliance is that Alinta Energy has two separate HSE systems (Activate and Lungella) managing and reporting staff training. Alinta Energy has identified that processes are required to better integrate the information between the two HSE systems to provide evidence the recommendations have been addressed. Systems and processes are currently being implemented to streamline processes to integrate the Activate and Lungella information and confirm implementation and completion of the recommendations (a) and (b).</p>	HSE Manager, Power Generation & Development	31 Dec 2023