



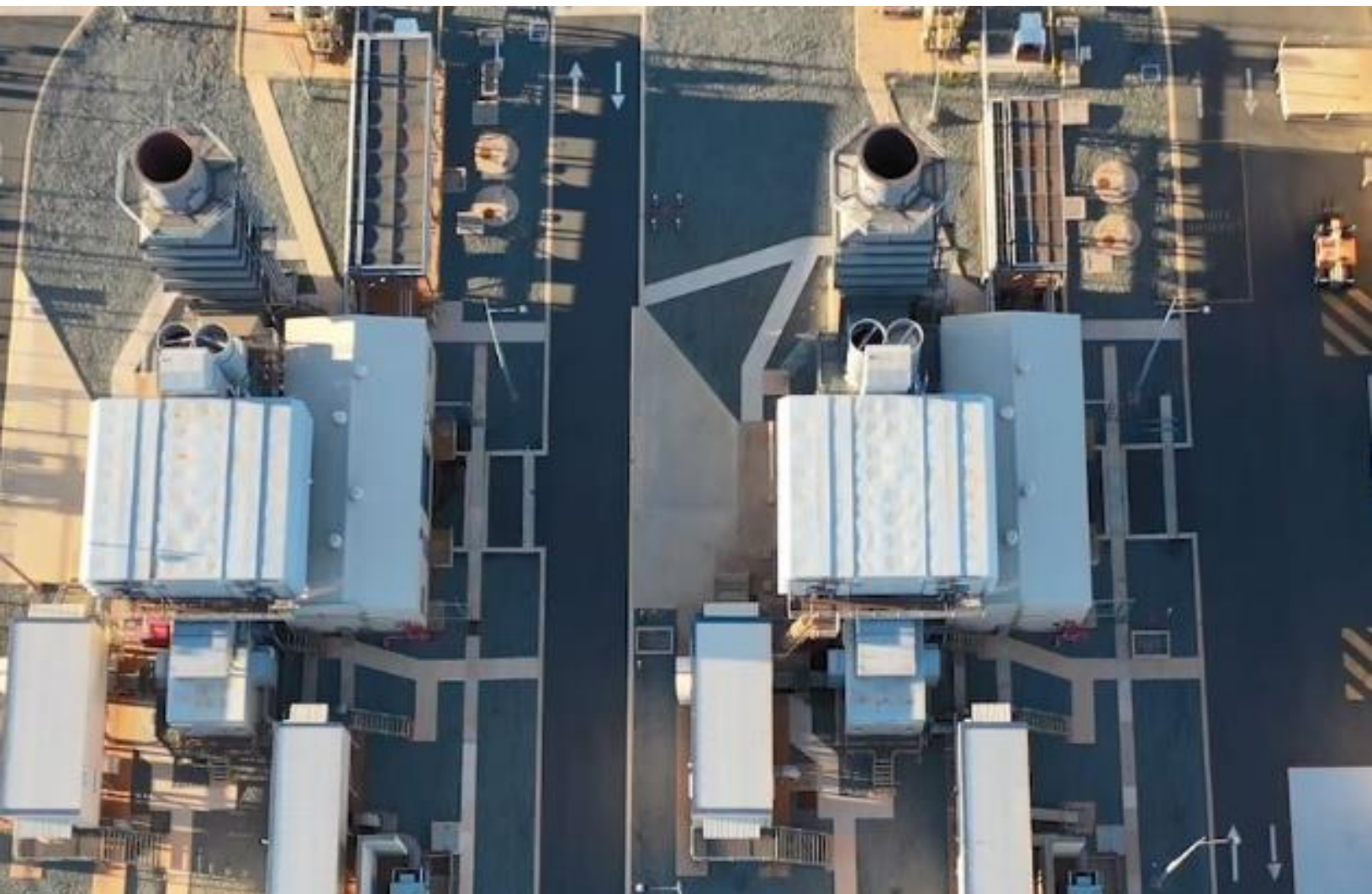
ERA License Audit

Report

ATCO Power Australia (Karratha) Pty Ltd

October 31, 2023

➔ **The Power of Commitment**



Project name		AMS Audit and Review					
Document title		ERA License Audit Report					
Project number		12618693					
File name		Audit Report					
Status Code	Revision	Author	Reviewer		Approved for issue		
			Name	Signature	Name	Signature	Date
S3	0	Raphael Ozsvath	David Seaton		Marcel Oosthuizen		
S4	1	Raphael Ozsvath	David Seaton		Marcel Oosthuizen	<i>M Oosthuizen</i>	
[Status code]							
[Status code]							
[Status code]							

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Executive Summary

ATCO Power Australia (Karratha) Pty Ltd (referred to hereafter as APAK) engaged GHD Pty Ltd (referred to hereafter as GHD) to conduct a scheduled audit of its electricity generation licence. This audit has been performed 5 years after the last audit was conducted in 2018 and covers the period 1 September 2018 to 31 August 2023.

The Economic Regulation Authority (ERA) had granted APAK an extension to the minimum required two-yearly audit period.

After approval by the ERA of the audit plan, GHD carried out a reasonable assurance engagement audit during October 2023, of 36 regulatory obligations with which and electricity generation licensee must comply. The specific obligations are listed in the report. This report provides the findings from this audit.

The audit interviews were conducted via Microsoft Teams with all required data provided via a secure data room. Of the 36 obligations applicable to electricity generation licensee, APAK was deemed to comply with 15 obligations. While 21 obligations were not rated, either because they did not apply to APAK or no event occurred over the 5 year assessment period for APAK to be assessed against.

For the 15 obligations APAK were deemed to comply with, APAK provided sufficient and timely evidence for GHD to conclude performance against those obligations were materially met for this review period.

For the 21 obligations not rated, GHD confirm that either these are not applicable to APAK or could not find evidence an event occurred that justified assessment.

No obligations were determined not to have been met for this review period.

In the previous audit report, an opportunity for improvement was identified which related to the modifications of a specific document. Though the specific document recommended to be modified, had not been amended, the objective of the regulatory obligation, relevant to this opportunity for improvement, was indeed met.

GHD found that sufficient opportunities and practices exist, between APAK and Horizon Power, to ensure up to date contact details are available for both parties.

This report is subject to, and must be read in conjunction with, the limitations set out in section 1.2 and the assumptions and qualifications contained throughout the Report.

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1. Introduction

ERA is Western Australia's independent economic regulator that is responsible for administering the licensing schemes for gas, electricity, and water services. This ensures Western Australian consumers and businesses operate in a fair, competitive, and efficient environment.

APAK holds an electricity generation licence (EGL21). This licence was issued by ERA under section 19 of the Electricity Industry Act 2004 and enables the licensee to generate electricity.

1.1 Purpose of this Report

This report provides the outcome of GHD's reasonable assurance audit assessment of APAK's 5-year generation license audit, covering the period 1 September 2018 to 31 August 2023. ERA regulatory license requirements need to be assessed every two years or longer if the ERA deem it appropriate. This audit assesses the effectiveness of measures taken by the license holder to meet the conditions of its license under its license obligations. It assessed:

- **Process compliance:** Effectiveness of systems and procedures
- **Outcome compliance:** Effectiveness of actual performance against license standards
- **Output compliance:** Effectiveness of records to indicate procedures are maintained
- **Integrity of reporting:** Assessment of the completeness and accuracy of compliance and performance documentation

1.2 Scope and Limitations

This report has been prepared by GHD for ATCO Power Australia (Karratha) Pty Ltd and may only be used and relied upon by ATCO Power Australia (Karratha) Pty Ltd for the purpose agreed between GHD and ATCO Power Australia (Karratha) Pty Ltd as set out in section 1.1 of this report.

GHD otherwise disclaims responsibility to any person other than ATCO Power Australia (Karratha) Pty Ltd arising in connection with this report. GHD also excludes implied warranties and conditions, to the extent legally permissible.

The services undertaken by GHD in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. GHD has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

The opinions, conclusions and any recommendations in this report are based on assumptions made by GHD described in this report (refer section(s) 4 of this report). GHD disclaims liability arising from any of the assumptions being incorrect.

Accessibility of documents

If this report is required to be accessible in any other format, this can be provided by GHD upon request and at an additional cost if necessary.

GHD has prepared this report on the basis of information provided by APAK and others who provided information to GHD (including Government authorities)], which GHD has not independently verified or checked beyond the agreed scope of work. GHD does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

2. Audit Details

This audit undertaken by GHD was a reasonable assurance engagement to assess the performance of APAK's generation license over the period September 2018 until August 2023.

2.1 Previous Audit/Review

The previous audit conducted over the review period between 1 September 2014 and 31 August 2018 was used as a basis for assigning priority for the audit and review. All outstanding recommendations from either the 2014 audit or the 2018 audit were reviewed.

The previous (2018) audit report identified that all non-compliances had been resolved, and no new non-compliances were identified. However, one new opportunity for improvement was made in 2018.

The opportunity for improvement related to:

- Obligation ID 451
 - Electricity Industry Metering Code clause 7.2(1) Code participants must use reasonable endeavours to ensure that they can send and receive a notice by post, facsimile and electronic communication and must notify the network operator of a telephone number for voice communication in connection with the Code.

The recommendation was for the Operating Protocol to be updated to reflect the actual communication arrangements. This document was not updated, however other controls were put in place to ensure relevant operational and management personal have updated contact details or relevant counterparts. Tri-yearly meetings are held, namely 'Opcom' meetings, that have a standing agenda item discussing and confirming communication protocols. This control is in addition to contact details published on APAK's public web site and posted at the Karratha power station. Horizon Power also sends out a yearly email to APAK before Cyclone season requesting confirmation of relevant contact details.

These actions are seen to be reasonable for ensuring relevant operational and management personal have up to date contact details.

2.2 Time Period Covered by the Audit/Review

The audit and review will cover the period from 1 September 2018 to 31 August 2023.

2.3 Time Period of the Audit Process

The audit commenced in October 2023 after ERA approved the audit plan on the 15 September 2023.

A start-up meeting and follow meetings were held with APAK via Microsoft Teams with staff responsible for the audit.

Audit interviews with APAK were conducted on the following dates:

- 26 September – Licence audit via teleconference call on Microsoft Teams
- 28 September – Licence audit via teleconference call on Microsoft Teams
- One follow-up email was sent requesting an extract from the Power Purchasing Agreement.
- One follow-up phone call requested confirmation of email details set by Horizon Power to APAK.

Secure access to APAK's data room was provided where evidence was made available that was required to be sighted for this audit.

Preparation of a draft audit report for APAK's review and comment by the 21 October was agreed.

Preparation of a draft audit report for ERA submitted by the 26 October was agreed.

Preparation of a final audit report for ERA submitted by the 24 November was agreed.

2.4 Details of the Licensee Representatives Participating in the Audit/Review

Details of representatives from APAK are tabulated below.

Table 1 Details of Licensee Attendees

Personnel	Organisation
Michael Beer	APAK
Tim Davies	APAK
Harrison Nicholls	APAK

2.5 Details of Key Documents and Other Information Sources

A list of documents made available for the audit up to 5 October is provided in Appendix B.

2.6 Details of Auditors Participating in the Audit

The audit and review teams comprised of two (2) staff members from GHD. Details of their roles in the audit/review process are summarised in Table 2.

Table 2 Details of GHD Audit Team Members

Name	Role	Summary of Task	Hours Utilised (hrs)
David Seaton	Project Manager	Project management Review of audit plan and audit report	7
Raphael Ozsvath	Lead License Auditor	Audit plan preparation Licence performance audit Preparation of report	49

3. Performance Summary

Findings of the performance audit are summarised in a table with an adequacy of control and a compliance rating.

3.1 Assessment Rating Scales

In accordance with the Audit Guidelines, an assessment of APAK’s performance was completed using a rating of adequacy of control and compliance, as summarised in Table 3.

Table 3 Audit Compliance and Control Rating Scale

Adequacy of Controls Rating		Compliance Rating	
Rating	Description	Rating	Description
A	Adequate controls - no improvement needed	1	Compliant
B	Generally adequate controls - improvement needed	2	Non-compliant – minor impact on customers or third parties
C	Inadequate controls – significant improvement 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
NP	Not Performed – A control rating was not required	NR	Not rated – No activity took place during the audit period

3.2 Licence Conditions Compliance and Control Audit Ratings Summary

In accordance with the Audit Guidelines, an assessment of APAK’s controls and compliance performance against its 36 EGL21 licence obligations, that existed during this audit period was undertaken. Table 4 lists the number of licence obligations that were given each combination of control and compliance ratings. This table allows APAK and the ERA to confirm that we have rated all relevant licence obligations and provides a simple summary of APAK’s performance during the audit period.

Table 4 Licence Conditions Compliance and Control Ratings Summary Table

Rating	Description	Compliance rating					Total
		1	2	3	4	N/R	
Controls rating	A	15					15
	B						
	C						
	D						
	N/P					21	21
	Total	15					21

The findings from the previous licence audit informed the audit priority ranking of these affected obligations and hence we assessed APAK's performance against both the control procedure and control environment criteria and compliance criteria for the Electricity Compliance Reporting Manual, 20 February 2023.

GHD did not assess APAK's control procedures and control environment for those 21 licence obligations and have accordingly labelled them as 'not performed' or N/P as they were either not applicable to APAK, or some prescribed event did not occur, or activities or decisions were not undertaken during the audit period.

4. Observations and Recommendations

4.1 Licence Conditions Compliance and Control Audit

Table 5 summarises the audit findings of APAK's performance against its Electricity Generation (EGL21) licence obligations and corresponding recommendations where non-control and/or non-compliance were identified during the audit period. This table does not provide the observation commentary against the control rating and compliance rating for the sake of brevity in the body of the report. Our assessment observations are detailed in Appendix A.

Table 5 Licence condition compliance and control audit – summary finding table and recommendations

No	Obligation under Licence conditions	Description	Control rating					Compliance rating					Recommendations
			A	B	C	D	N/P	1	2	3	4	N/R	
101	Electricity Industry Act, 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.	✓					✓					None
102	Electricity Industry Act, section 14(1)(a)	A licensee must provide for an asset management system.	✓					✓					None
103	Electricity Industry Act, section 14(1)(b)	A licensee must notify details of the asset management system and any substantial changes to it to the ERA.	✓					✓					None
104	Electricity Industry Act, 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.	✓					✓					None
105	Economic Regulation Authority (Licensing Funding) Regulations 2014	A licensee must pay the prescribed licence fees to the ERA according to clauses 6, 7 and 8 of the Economic Regulation Authority (Licensing Funding) Regulations 2014.	✓					✓					None
106	Electricity Industry Act, 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.	✓					✓					None
107	Electricity Industry Act, section 41(6)	A licensee must pay the costs of taking an interest in land or an easement over land.	✓					✓					None
119	Distribution Licence, condition 4.3.1 Generation Licence, condition 4.3.1 Integrated Regional Licence, condition 4.3.1 Retail Licence, condition	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.	✓					✓					None

No	Obligation under Licence conditions	Description	Control rating					Compliance rating					Recommendations	
			A	B	C	D	N/P	1	2	3	4	N/R		
	4.3.1 Transmission Licence, condition 4.3.1													
120	Distribution Licence, condition 5.2.4 Generation Licence, condition 5.2.4 Integrated Regional Licence, condition 5.2.4 Retail Licence, condition 5.2.4 Transmission Licence, condition 5.2.4	A licensee must comply with any individual performance standards prescribed by the ERA.					✓						✓	None
121	Distribution Licence, condition 5.3.2 Generation Licence, condition 5.3.2 Integrated Regional Licence, condition 5.3.2 Retail Licence, condition 5.3.2 Transmission 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.	✓							✓				None
122	Distribution Licence, condition 5.1.5 Generation Licence, condition 5.1.5 Integrated Regional Licence, condition 5.1.5 Transmission 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.	✓							✓				None
123	Distribution Licence, condition 4.4.1 Generation Licence, condition 4.4.1 Integrated Regional Licence, condition 4.4.1 Retail Licence, condition 4.4.1 Transmission 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.	✓							✓				None
124	Distribution Licence, condition 4.5.1 Generation Licence, condition 4.5.1 Integrated Regional Licence, condition 4.5.1 Retail Licence, condition 4.5.1 Transmission 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.	✓							✓				None

No	Obligation under Licence conditions	Description	Control rating					Compliance rating					Recommendations	
			A	B	C	D	N/P	1	2	3	4	N/R		
125	Distribution Licence, condition 3.8.1 and 3.8.2 Generation Licence, condition 3.8.1 and 3.8.2 Integrated Regional Licence, condition 3.8.1 and 3.8.2 Retail Licence, condition 3.8.1 and 3.8.2 Transmission 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.					✓						✓	None
126	Distribution Licence, condition 3.7.1 Generation Licence, condition 3.7.1 Integrated Regional Licence, condition 3.7.1 Retail Licence, condition 3.7.1 Transmission Licence, condition 3.7.1	All notices must be in writing, unless otherwise specified.					✓						✓	None
324	Electricity Industry Metering Code, clause 3.3B	If a user is aware of bi-directional electricity flows at a metering point that was not previously subject to a bi- directional flows or any changes in a customer's or user's circumstances in a metering point that will result in bi- directional flows, the user must notify the network operator within 2 business days.					✓						✓	None
339	Electricity Industry Metering Code, 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.					✓						✓	None
371	Electricity Industry Metering Code, 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.					✓						✓	None
372	Electricity Industry Metering Code, clause 4.5(1)	A Code participant must not knowingly permit the registry to be materially inaccurate.					✓						✓	None
373	Electricity Industry Metering Code, clause 4.5(2)	Subject to subclause 5.19(6), if a Code participant, other than a network operator, becomes aware of a change to, or inaccuracy in, an item of standing data in the registry, then it must notify the network operator and provide details of the change or inaccuracy within the timeframes prescribed.					✓						✓	None

No	Obligation under Licence conditions	Description	Control rating					Compliance rating					Recommendations	
			A	B	C	D	N/P	1	2	3	4	N/R		
388	Electricity Industry Metering Code, 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).					✓						✓	None
401	Electricity Industry Metering Code, 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.					✓						✓	None
405	Electricity Industry Metering Code, 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.					✓						✓	None
416	Electricity Industry Metering Code, 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 AEMO.					✓						✓	None
417	Electricity Industry Metering Code, 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.					✓						✓	None
448	Electricity Industry Metering Code, clause 6.1(2)	A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed.					✓						✓	None
451	Electricity Industry Metering Code, clause 7.2(1)	Code participants must use reasonable endeavours to ensure that they can send and receive a notice by post, facsimile and electronic communication and must notify the network operator of a telephone number for voice communication in connection with the Code.	✓					✓						None
453	Electricity Industry Metering Code, clause 7.2(4)	If requested by a network operator with whom it has entered into an access contract, the Code participant must notify its contact details to a network operator within 3 business days after the request.	✓					✓						None
454	Electricity Industry Metering Code, clause 7.2(5)	A Code participant must notify any affected network operator of any change to the contact details it notified to the network operator under subclause 7.2(4) at least 3 business days before the change takes effect.					✓						✓	None
455	Electricity Industry Metering Code, clause 7.5	A Code participant must subject to subclauses 5.17A and 7.6 not disclose, or permit the					✓						✓	None

No	Obligation under Licence conditions	Description	Control rating					Compliance rating					Recommendations
			A	B	C	D	N/P	1	2	3	4	N/R	
		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.											
456	Electricity Industry Metering Code, 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.	✓					✓					None
457	Electricity Industry Metering Code, 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.					✓					✓	None
458	Electricity Industry Metering Code, 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.					✓					✓	None
459	Electricity Industry Metering Code, 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.					✓					✓	None
460	Electricity Industry Metering Code, 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.					✓					✓	None
461	Electricity Industry Metering Code, 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).					✓					✓	None

Appendix A

License Performance Audit

Compliance Manual No	Obligation under Licence conditions	Description	Type (1, 2 or 3)	Audit Priority (1=highest, 5=lowest)	Control rating					Compliance rating							
					A	B	C	D	N/P	Control observation					Compliance observation		
101	Electricity Industry Act, 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.	2	5	✓						The previous independent licence audit (2018) was conducted according to an approved audit plan. As well as GHD conducting the current licence audit, in line with the audit plan approved by the ERA. Demonstrates the implementation of actions needed to address this licence condition.	✓					After its last 2018 audit, APAK was granted an extension of licence audit on the 2 January 2019 by the ERA. Extending the usual 24-month cycle to 60 months. ERA stipulated the 'next' audit (i.e., this audit) to cover the period from 1 September 2018 to 31 August 2023. The letter from ERA was provided as evidence during the audit. The current audit is conducted over September and October 2023 and final report to ERA due by 30 November 2023. Performance against this obligation is deemed compliant.
102	Electricity Industry Act, section 14(1)(a)	A licensee must provide for an asset management system.	2	4	✓						The previous independent AMS review (2018) was conducted on schedule confirming APAK's AMS. Concurrent with the licence audit GHD is conducting AMS review, in line with an ERA approved audit plan. The current review confirms APAK has a valid AMS in place.	✓					APAK provided a range of relevant documents and systems demonstrating its AMS is relevant to electricity generation purpose, assets, functions or activities. These documents and systems include but are not limited to: AMP, MEX data, Work Planning, Work Scheduling. Concurrent with the licence audit, GHD conducted a review of APAK's AMS. The AMS review confirms APAK's valid AMS. Performance against this obligation is deemed compliant.
103	Electricity Industry Act, section 14(1)(b)	A licensee must notify details of the asset management system and any substantial changes to it to the ERA.	2	4	✓						Documentation relevant to the AMS has been updated since the previous review of the AMS. However, no material change occurred since the previous review.	✓					There has been changes to the management team responsible for asset management of APAK electricity generation assets pertaining to EGL21 in last 5 years. There has also been organisational restructure in last 5 years and updates to relevant documents. However, these changes did not impact the asset management activities nor were there any changes to the systems, tools, processes, or IT in the last 5 years. The assets within the AMS have also not changed. No notification was provided to ERA in last 5 years. Performance against this obligation is deemed compliant.
104	Electricity Industry Act, 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	4	✓						The current review of the AMS is being conducted by GHD within the ERA's agreed time frame. It is being run in parallel with the licence audit. The AMS review has concluded that APAK has an effective AMS.	✓					After its last 2018 review, APAK was granted an extension of AMS effectiveness review by the ERA on the 2 January 2019, extending the usual 24-month cycle to 60 months. ERA stipulated the 'next' review to cover the period from 1 September 2018 to 31 August 2023. The current AMS review is being conducted by GHD in parallel with the license audit during September and October 2023. The AMS review concluded that the AMS is effective. Further details are available in GHD's AMS review report. Performance against this obligation is deemed compliant.
105	Economic Regulation Authority (Licensing Funding) Regulations 2014	A licensee must pay the prescribed licence fees to the ERA according to clauses 6, 7 and 8 of the Economic Regulation Authority (Licensing Funding) Regulations 2014.	2	4	✓						GHD witnessed SAP entries for payment of all 5 years licence fees. However, in 2020/21 the payment was not made within the required time frame. This was due to the renewal invoice email being missed as the email was blocked in by APAK's IT system as potential SPAM.	✓					APAK pays quarterly fees to ERA for standing charges and annual fees to ERA for license charges. Evidence of these payments to ERA was extracted from APAK's SAP system and sighted during the audit. For 2020/21, the payment was not made within the required time frame. Since then, the following additional controls have been put into place: - New generic Email inbox for invoices, visible to the wider Risk and Compliance Team. - Calendar reminders for the Risk and Compliance Team one month before invoice is due. In the last two years required payments were made on time. Performance against this obligation is deemed compliant.

Compliance Manual No	Obligation under Licence conditions	Description	Type (1, 2 or 3)	Audit Priority (1=highest, 5=lowest)	Control rating					Compliance rating							
					A	B	C	D	N/P	Control observation					Compliance observation		
106	Electricity Industry Act, 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	5	✓						The license audit and AMS review are being conducted in parallel by GHD. The assessment of this obligation is pertinent to both audit and review. GHD therefore assessed the effectiveness steps used to minimise outages or interruptions once. 6 outages/ interruptions were randomly selected from the past 5 years, to assess APAK's management of these outages/ interruptions. GHD observed that these were managed in a consistent and effective manner.	✓					Examination of historic outages including both planned outages and unplanned (or forced) outages indicates the steps and processes APAK took to minimise such occurrence or duration. These steps are seen to be reasonable to minimise outages/ interruptions. Generation outages are reported to Horizon Power. Given this context, performance against this obligation is deemed compliant.
107	Electricity Industry Act, section 41(6)	A licensee must pay the costs of taking an interest in land or an easement over land.	2	4	✓						The Power Purchase Agreement (PPA) between APAK and its single customer, Horizon Power provides for the customer to lease the land on which the Karratha Power Station is situated. This fee was paid up front for the 20-year lease and not paid yearly.	✓					A nominal \$1 yearly lease payment is required under the PPA. This was fully paid upfront at the time of signing the PPA. Performance against this obligation is deemed compliant.
119	Distribution Licence, condition 4.3.1 Generation Licence, condition 4.3.1 Integrated Regional Licence, condition 4.3.1 Retail Licence, condition 4.3.1 Transmission 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	4	✓						GHD witnessed submitted financial audit reports for each of the five years. All audit reports had a declaration stating, in some form, that the financial report presents a true and fair view of the financial position and there are reasonable grounds to believe that the Group will be able to pay its debts.	✓					APAK is a publicly listed company on Toronto Stock Exchange. Its financial reporting and accounting follow Australian Accounting Standards (AAS) and rules. Financial audits were conducted by independent auditors for all 5 years. Performance against this obligation is deemed compliant.
120	Distribution Licence, condition 5.2.4 Generation Licence, condition 5.2.4 Integrated Regional Licence, condition 5.2.4 Retail Licence, condition 5.2.4 Transmission Licence, condition 5.2.4	A licensee must comply with any individual performance standards prescribed by the ERA.	2	4					✓		No individual performance standard was prescribed by the ERA over the audit period. Therefore, assessment of the established control environment and control procedure was not performed.					✓	No individual performance standard was prescribed by the ERA over the audit period. Performance against this obligation was not rated.
121	Distribution Licence, condition 5.3.2 Generation Licence, condition 5.3.2 Integrated Regional 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	4	✓						APAK selected an independent auditor, GHD. GHD compiled an Audit Plan in compliance with the ERA's guidelines. The Audit Plan for the licence audit demonstrated GHD's knowledge of the audit standard, and the audit plan was subsequently approved by the ERA on 15 September 2023.	✓					ERA requirements including the need for independent licence auditing in accordance with its guideline and compliance manual. These requirements were included in APAK's RFQ for auditor selection and engagement. ERA also reviewed and approved GHD's audit plan. Performance against this obligation is deemed compliant.

Compliance Manual No	Obligation under Licence conditions	Description	Type (1, 2 or 3)	Audit Priority (1=highest, 5=lowest)	Control rating					Compliance rating								
					A	B	C	D	N/P	Control observation					1	2	3	4
		must liaise to determine the most appropriate way to resolve the discrepancy.																
372	Electricity Industry Metering Code, clause 4.5(1)	A Code participant must not knowingly permit the registry to be materially inaccurate.	NR	5					✓	APAK does not own or manage the metering installations or metering database and does not have access to either. Therefore, assessment of the established control environment and control procedure was not performed.						✓	APAK does not have access to either metering installation or metering database. And in last 5 years no incident occurred where inaccurate data was knowingly registered. Performance against this obligation is not rated.	
373	Electricity Industry Metering Code, clause 4.5(2)	Subject to subclause 5.19(6), if a Code participant, other than a network operator, becomes aware of a change to, or inaccuracy in, an item of standing data in the registry, then it must notify the network operator and provide details of the change or inaccuracy within the timeframes prescribed.	2	4					✓	APAK does not own or manage the metering installations or metering database and does not have access to either. APAK was also not aware of a change to, or inaccuracy of, standing data in the registry. Therefore, assessment of the established control environment and control procedure was not performed.						✓	APAK does not have access to either metering installation or metering database. In last 5 years no incident occurred where inaccurate data was knowingly registered. Performance against this obligation is not rated.	
388	Electricity Industry Metering Code, 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	4					✓	APAK did not receive any request from Horizon Power in the last 5 years to assist with any metering obligation. Therefore, assessment of the established control environment and control procedure was not performed.						✓	There was no such related request from Horizon Power per the Electricity Industry Metering Code, clause 5.4(1) in last 5 years. Performance against this obligation is not rated.	
401	Electricity Industry Metering Code, 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	4					✓	APAK does not own or manage the metering installations or metering database and does not have access to either. Therefore, assessment of the established control environment and control procedure was not performed.						✓	APAK does not collect or receive energy data from a metering installation. Performance against this obligation is not rated.	
405	Electricity Industry Metering Code, clause 5.18	If a user collects or receives information regarding a change in the energisation status of a metering point then the user	2	4					✓	APAK does not own or manage the metering installations and APAK is not aware of any change to the energisation status of a metering point. Therefore, assessment of the established control environment and control procedure was not performed.						✓	APAK was not aware of changes in energisation status of a metering point in the past 5 years. Performance against this obligation is not rated.	

Compliance Manual No	Obligation under Licence conditions	Description	Type (1, 2 or 3)	Audit Priority (1=highest, 5=lowest)	Control rating					Compliance rating									
					A	B	C	D	N/P	Control observation					1	2	3	4	N/R
		must provide the network operator with the prescribed information, including the stated attributes, within the timeframes prescribed.																	
416	Electricity Industry Metering Code, 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 AEMO.	2	4						✓	APAK did not request any test or audit by Horizon Power during this audit period. Therefore, assessment of the established control environment and control procedure was not performed.						✓	APAK did not request any test or audit of the metering installations to Horizon Power in last 5 years. Performance against this obligation is not rated	
417	Electricity Industry Metering Code, 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	4						✓	APAK did not request any test or audit by Horizon Power during this audit period. Therefore, assessment of the established control environment and control procedure was not performed.						✓	APAK did not request any test or audit of the metering installations to Horizon Power in last 5 years. Performance against this obligation is not rated	
448	Electricity Industry Metering Code, clause 6.1(2)	A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed.	2	4						✓	APAK is not a network operator. Therefore, assessment of the established control environment and control procedure was not performed.						✓	With APAK not being a network operator, clause 6.1(2) does not apply. Performance against this obligation is not rated	
451	Electricity Industry Metering Code, clause 7.2(1)	Code participants must use reasonable endeavours to ensure that they can send and receive a notice by post, facsimile and electronic communication and must notify the network operator of a telephone number for voice communication in connection with the Code.	NR	5	✓						APAK and Horizon Power hold quarterly meetings (OpCom meetings) communication protocols are raised at these meetings. GHD sighted these meeting agendas reflecting this agenda item. Various emails to and from Horizon Power were sighted, demonstrating active communication between parties. In addition, emergency contact details are indicated to be posted at the power station. This was not sighted as the audit was carried out online. In addition, SCADA communication requirement is capture in the Power Purchasing Agreement (PPA) with Horizon Power. Clause 8.2 (j) in the PPA requires APAK to install and maintain electronic communication equipment to receive dispatch instructions.	✓							APAK and Horizon Power regularly communicate by phone and electronic communication. Examples of postal communication was not sighted (This is predominantly because postal communication is seldom used). There has been no change in land line contact details in last 5 years. Performance against this obligation is deemed compliant.
453	Electricity Industry Metering Code, clause 7.2(4)	If requested by a network operator with whom it has entered into an access contract,	2	4	✓						APAK indicated one request for contact details was received from Horizon Power.	✓						The one request sighted from Horizon Power requesting confirmation of contact details was before cyclone season in 2022. The expectation from APAK is that this may be a yearly request.	

Compliance Manual No	Obligation under Licence conditions	Description	Type (1, 2 or 3)	Audit Priority (1=highest, 5=lowest)	Control rating					Compliance rating							
					A	B	C	D	N/P	Control observation					Compliance observation		
		the Code participant must notify its contact details to a network operator within 3 business days after the request.									GHD sighted the response email, which demonstrated a quick response time to Horizon Power						Performance against this obligation is deemed compliant.
454	Electricity Industry Metering Code, clause 7.2(5)	A Code participant must notify any affected network operator of any change to the contact details it notified to the network operator under subclause 7.2(4) at least 3 business days before the change takes effect.	2	4					✓		APAK indicated no change in land line or web site contact details occurred in the past 5 years. Therefore, assessment of the established control environment and control procedure was not performed.					✓	There had been no change to APAK's land line or web site contact details in last 5 years and hence no need to inform Horizon Power. Performance against this obligation is not rated.
455	Electricity Industry Metering Code, 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	4					✓		APAK does not store or have access to customer information. GHD did audit whether cyber security breaches occurred over the past 5 years that impacted the release of internal confidential information. APAK compiles compliance reports every 4 months. GHD sighted one report in each year and no cyber security breaches were reported to senior leadership. Therefore, assessment of the established control environment and control procedure was not performed.					✓	APAK does not have any customers and does not maintain any metering database, load data or standing data for anyone. Hence it cannot disclose confidential information pertaining to metering. Performance against this obligation is not rated.
456	Electricity Industry Metering Code, 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	4	✓						Over the last 5-year period Horizon Power regularly requested one set of confidential information, on an ad-hoc bases. Namely Station Technical Parameters. This information is not customer or metering information, but confidential to APAK. This information was supplied to Horizon Power. GHD sighted an email in which this information was provided to Horizon Power in a timely manner.	✓					APAK does not have any customers and does not maintain any metering database, load data or standing data for anyone else. Hence it cannot disclose any confidential information pertaining to metering. GHD did review APAK's policies on information security. These are up to date and describe how it manages, receives, and stores data while undertaking its business. Performance against this obligation is deemed compliant.
457	Electricity Industry Metering Code, 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	NR	5					✓		No dispute arose in the past 5 years. Therefore, assessment of the established control environment and control procedure was not performed.					✓	There has been no instance of dispute between APAK and Horizon Power in past 5 years. Performance against this obligation is not rated.

Compliance Manual No	Obligation under Licence conditions	Description	Type (1, 2 or 3)	Audit Priority (1=highest, 5=lowest)	Control rating					Compliance rating															
					A	B	C	D	N/P	Control observation					Compliance observation										
		the other disputing parties and attempt to resolve the dispute by negotiations in good faith.																							
458	Electricity Industry Metering Code, 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	5						✓	No dispute arose in the past 5 years. Therefore, assessment of the established control environment and control procedure was not performed.										✓	There has been no instance of dispute between APAK and Horizon Power in past 5 years. Performance against this obligation is not rated.			
459	Electricity Industry Metering Code, 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	5						✓	No dispute arose in the past 5 years. Therefore, assessment of the established control environment and control procedure was not performed.										✓	There has been no instance of dispute between APAK and Horizon Power in past 5 years. Performance against this obligation is not rated.			
460	Electricity Industry Metering Code, 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	4						✓	No dispute arose in the past 5 years. Therefore, assessment of the established control environment and control procedure was not performed.										✓	There has been no instance of dispute between APAK and Horizon Power in past 5 years. Performance against this obligation is not rated.			
461	Electricity Industry Metering Code, clause 8.3(2)	The disputing parties must at all times conduct themselves in a manner which is	NR	5						✓	No dispute arose in the past 5 years. Therefore, assessment of the established control environment and control procedure was not performed.										✓	There has been no instance of dispute between APAK and Horizon Power in past 5 years. Performance against this obligation is not rated.			

Appendix B

List Of Documents Provided

Filenames:

01. First Reminder from the ERA - Annual Electricity Licence Compliance Report for 1 July 2018 to 30 June 2019.msg
02. Compliance Report Template - Electricity - 2018-19.DOCX
03. APAK Compliance Report 2018-19 - due diligence report 2018-19.docx.pdf
04. ERA Invoice Dec18.pdf
05. 1150 APAK Payment Proposal 04.01.19.pdf
- 06 Westpac Statement - License Fee to the ERA - confirmation .msg
- 07 APALP Annual Financial Report 31 Dec 2018 signed.pdf
- Confirmation of payment of ERA Standing Charges 2018_19.msg
- ERA101511.pdf
- ERA101576.pdf
- ERA101692.pdf
- ERA101794.pdf
- ERA101885.pdf
- ERA101986.pdf
- ERAC10038.pdf
09. FINAL License Compliance Report 2018_19.pdf
10. Email to ERA Providing Electronic Copy fo the Compliance Report 2018_19 - Sent 30_07_19.msg
11. Cover letter to ERA - APAK Annual Compliance Report 2018-19.docx
12. ERA acknowledgement of ATCO Power Australia (Karratha) Pty Ltd - Annual electricity licence compliance reporting - 2018 19 reporting year 31_07_19.msg
- ATCO Power Australia (Karratha) Pty Ltd - Annual electricity licence compliance reporting - 2018_19 reporting year - Beets, Anton - 30_07_2019 03 42 PM.msg
- Annual electricity licence compliance reporting obligations (generation, transmission, distribution and retail (large use customers only)) - 2018_19 reporting year - Caroline Coutts-Kleijer - 01_05_2019 11 18 AM.msg
- Completed Induction and Training Program - Jeffries, Chris - 02_11_2018 12 35 PM.msg
- Confirmation of online registration - records@erawa.com.au - 01_11_2018 03 52 PM.msg
- ERA - Annual Compliance Report - Due Diligence checks - Beets, Anton - 19_07_2019 03 48 PM.msg
- ERA acknowledgement ATCO Power Australia (Karratha) Pty Ltd - Annual electricity licence compliance reporting - 2018_19 reporting year - Caroline Coutts-Kleijer - 31_07_2019 09 53 AM.msg
- FW Annual electricity licence compliance reporting obligations (generation, transmission, distribution and retail (large use customers only)) - 2018_19 reporting year - Jeffries, Chris - 08_05_2019 09 26 AM.msg
- FW ERA acknowledgement ATCO Power Australia (Karratha) Pty Ltd - Annual electricity licence compliance reporting - 2018_19 reporting year - Yiu, Tony - 31_07_2019 09 53 AM.msg
- FW HPECM RE Proposed minor amendments to EGL21 - ATCO Power Australia (Karratha) Pty Ltd - Beets, Anton - 05_11_2018 02 06 PM.msg
- FW HPECM RE Proposed minor amendments to EGL21 - ATCO Power Australia (Karratha) Pty Ltd - Yiu, Tony - 05_11_2018 01 27 PM.msg
- FW Invitation - Information session on draft report into reform of state government business licensing in WA - Yiu, Tony - 01_11_2018 09 02 AM.msg
- License Fee to the ERA - confirmation - Beets, Anton - 17_07_2019 04 58 PM.msg
- Proposed minor amendments to EGL21 - ATCO Power Australia (Karratha) Pty Ltd - Berina Causevic - 30_10_2018 09 28 AM.msg
- RE Changes to the asset Management Plan - Requires Notification to the ERA - Davies, Tim - 22_07_2019 09 08 AM.msg
- RE ERA acknowledgement ATCO Power Australia (Karratha) Pty Ltd - Annual electricity licence compliance reporting - 2018_19 reporting year - Toufan, Mehdi - 31_07_2019 12 46 PM.msg
- RE HPECM RE Proposed minor amendments to EGL21 - ATCO Power Australia (Karratha) Pty Ltd - Beets, Anton - 05_11_2018 02 07 PM.msg
- RE HPECM RE Proposed minor amendments to EGL21 - ATCO Power Australia (Karratha) Pty Ltd - Berina Causevic - 05_11_2018 01 27 PM.msg
- RE License Fee to the ERA - confirmation - Ng, Hui-Lin - 18_07_2019 08 55 AM.msg
- RE License Fee to the ERA - confirmation - Ng, Hui-Lin - 19_07_2019 01 32 PM.msg
- RE License Fee to the ERA - confirmation - Ng, Hui-Lin - 22_07_2019 09 12 AM.msg

RE License Fee to the ERA - confirmation - Ng, Hui-Lin - 23_07_2019 03 32 PM.msg
RE License Fee to the ERA - confirmation - Sims, Tom - 18_07_2019 09 11 AM.msg
RE License Fee to the ERA - confirmation - Sims, Tom - 18_07_2019 09 52 AM.msg
RE License Fee to the ERA - confirmation - Sims, Tom - 18_07_2019 10 16 AM.msg
Re APAK Annual License Compliance Report for the period 1 July 2018 to 30 June 2019 (To be submitted to the ERA by 2 September 2018.) - Creaghan, Patrick - 27_07_2019 09 39 AM.msg
01. APAK ERA Compliance Reporting 2020.xlsx
02. Compliance Report_ATCO Power Karratha_2019-20.docx
03._APAK_Compliance_Report_2018-19_-_due_diligence_report_2019-20.docx
APAK ERA Due Diligence Signoff 2020.docx
ATCO Power Australia (Karratha) Pty Ltd - 2020 Annual Compliance Report .msg
ATCO Power Karratha_2020 Compliance Report_signed.pdf
Acknowledgement - 2020 Annual Compliance Report - EGL21 - ATCO Power Australia (Karratha) Pty Ltd.msg
DueDiligenceSummary_APAK Compliance 2020_signed.pdf
EGL105_ATCO_Power_Aus_Karratha_EFT_Remittance_Advice.pdf
EGL119 APALP Annual FS 31 Dec 2019 Final signed.pdf
Electricity-Compliance-Reporting-Manual-2020---Clean-version.PDF
ERA 1 Apr 19.pdf
ERA 1 Jan 20.pdf
ERA 1 Jul 19.pdf
ERA 1 Oct 19.pdf
ERA Annual Licence 2020.pdf
ERA.XLSX
RE Annual APAK compliance checks.msg
01. APAK ERA Compliance Reporting 2021.xlsx
02. Compliance Report_ATCO Power Karratha_2020-21-signed.pdf
02. Compliance Report_ATCO Power Karratha_2020-21.docx
03._APAK_Compliance_Report_due_diligence_report_2020-21.docx
03._APAK_Compliance_Report_due_diligence_report_2020-21.pdf
APAK ERA Due Diligence Signoff 2021.docx
ATCO Power 2021 Compliance Report EGL21.msg
ATCO Power Australia (Karratha) Pty Ltd - 2020 Annual Compliance Report .msg
Electricity-Compliance-Reporting-Manual-2020---Clean-version.PDF
FW ATCO Power 2021 Compliance Report EGL21.msg
RE ERA Compliance Report.msg
RE ERA Compliance Report.msg
R008463.pdf
R011001.pdf
R015034.pdf
01. APAK ERA Compliance Reporting 2022.xlsx
2022 Electricity Compliance Report Template.docx
APAK ERA Due Diligence Signoff 2022.docx
APAK ERA Due Diligence Signoff 2022.docx.pdf - signed.pdf
APAK_Compliance_Report_due_diligence_report_2021-22.docx
Amended-Electricity-Compliance-Reporting-Manual-2022---Clean.PDF

Compliance Report ATCO Power Karratha_2021-22.docx
2021 - 2022 APAK ERA Compliance report.msg
Completed Please DocuSign APAK ERA Due Diligence Signoff 2022 docx - MQ.msg
Completed Please DocuSign APAK ERA Due Diligence Signoff 2022 docx pdf CJ MT.msg
Completed Please DocuSign Compliance Report ATCO Power Karratha_2021-22 docx.msg
Downtime summary.msg
ERA Compliance Report - APAK.msg
FW 2021 - 2022 APAK ERA Compliance report.msg
Karen Nielsen viewed Please DocuSign Compliance Report ATCO Power Karratha_2021-22 docx.msg
RE ERA Compliance Report - APAK.msg
ATCO Power 2022 Compliance Report EGL21.msg
Fwd Annual electricity generation and transmission licence compliance reporting obligations - 2021 22 reporting year.msg
HPECM RE ATCO Power 2022 Compliance Report EGL21.msg
RE ATCO Power 2022 Compliance Report EGL21.msg
23-08 - ATCO Electricity Monthly Report - Aug 2023.docx
23-09 - Report HP-ATCO OpCom (20 September 2023).docx
01. APAK ERA Compliance Reporting 2023.xlsx
APAK ERA Due Diligence Signoff 2023.docx
APAK ERA Due Diligence Signoff 2023.pdf
APAK_Compliance_Report_due_diligence_report_2022-2023.docx
APAK_Compliance_Report_due_diligence_report_2022-2023.pdf
Amended-Electricity-Compliance-Reporting-Manual-2022---Clean.PDF
Complete_with_DocuSign_Compliance_Report_ATC.zip
Compliance Report ATCO Power Karratha_2022-2023.docx
Compliance_Report_ATCO_Power_Karratha_2022-2023 - signed.pdf
2022 - 2023 APAK ERA Compliance report.msg
2022 - 2023 APAK ERA Compliance reportKN.msg
APAK ERA Due Diligence Signoff 2023.pdf
APAK_Compliance_Report_due_diligence_report_2022-2023.pdf
Completed_ Complete with DocuSign_ APAK ERA Due Diligence Signoff 2023_pdf.msg
Completed_ Complete with DocuSign_ Compliance Report ATCO Power Karratha_2022-2023_pdf.msg
Compliance Report ATCO Power Karratha_2022-2023.pdf
ERA Compliance Report - APAK.msg
FW_ 2022 - 2023 APAK ERA Compliance report.msg
Karen Nielsen viewed Complete with DocuSign_ Compliance Report ATCO Power Karratha_2022-2023_pdf.msg
RE ERA Compliance Report - APAK - Downtime summary for 22 23 second.msg
RE ERA Compliance Report - APAK - Downtime summary for 22 23.msg
RE ERA Compliance Report - APAK.msg
RE ERA Compliance Report - APAK2.msg
RE ERA Compliance Reporting 2022 2023.msg
RE_ 2022 - 2023 APAK ERA Compliance report.msg
RE_ 2022 - 2023 APAK ERA Compliance reportTD.msg
RE_ ERA Compliance Report - APAK - Downtime summary for 22_23.msg
Tim Davies viewed Complete with DocuSign_ APAK ERA Due Diligence Signoff 2023_pdf.msg

ATCO Power 2023 Compliance Report EGL21.msg
FW Annual electricity generation and transmission licence compliance reporting obligations - 2022 23 reporting year.msg
Electricity Generation Licence Reporting Toolkit.docx
APA-APAK-HSE-REG-005 APAK Hazard and Risk Register 20 July 2023.xlsx
APA-WHS-TEM-014 WHSE Monthly Report.xls
APAK-WHS-REG-001 APAK TRAINING MATRIX.xlsx
Asset Register.xlsx
Horizon Power Supply Constraint Register.xlsm
KPS Rolling O&M Forecast - Updated Functionality.xlsx
Karratha Power Station - O&M Budget.xlsm
Karratha Power Station - O&M Forecast.xlsx
MEX - Preventive Maintenance Policies.xlsx
MEX - Work Order History (22-09 - 23-09).xlsx
23-09 - Report HP-ATCO OpCom (20 September 2023).docx
Meeting Agenda - Horizon Power and ATCO OpCom meeting (20 September 2023).docx
Meeting Minutes - Horizon and Atco OPCOM meeting (20 September 2023).docx
01. ERA request for data to calculate 2018 Electricity Licence Standing Charges 020818.msg
02. Management Confirmation - Data used to calculate 2018 Electricity Licence Standing Charges 030818.msg
03. Response to ERA on Data to calculate 2018 Electricity Licence Standing Charges ATCO Power Karratha - electricity generation licence EGL21 - 100818.msg
ERA Acknowledgement - 2018 Licence Standing Charges Data - EGL21 - ATCO Power Australia (Karratha) Pty Ltd 130818.msg
01. FW Request - Data used to calculate 2019 Electricity Licence Standing Charges.msg
02. FW Final Reminder - Data used to calculate 2019 Electricity Licence Standing Charges.msg
03. RE Final Reminder - Data used to calculate 2019 Electricity Licence Standing Charges.msg
04. Acknowledgement - 2019 Licence Standing Charges Data - EGL21 - ATCO Power Australia (Karratha) Pty Ltd .msg
Acknowledgement - 2020 Licence Standing Charges Data - EGL21 - ATCO Power Australia (Karratha) Pty Ltd.msg
CJConfirmation_RE Request - Data used to calculate 2020 Electricity Licence Standing Charges.msg
RE Request - Data used to calculate 2020 Electricity Licence Standing Charges.msg
FW Acknowledgement - 2021 Licence Standing Charges Data - EGL21 - ATCO Power Australia (Karratha) Pty Ltd.msg
20190102_-_Notice_-_ATCO_Power_Australia_(Karratha)_Pty_Ltd_-_Audit_and_Review_2018....pdf
FW Request - Data used to calculate 2022 Electricity Licence Standing Charges 1.msg
FW Request - Data used to calculate 2022 Electricity Licence Standing Charges.msg
RE Request - Data used to calculate 2022 Electricity Licence Standing Charges.msg
RE Request - Data used to calculate 2022 Electricity Licence Standing Charges2.msg
RE__APAK_Standing_Charge_payment_for_Q1_2022 (4).msg
FW Request - Data used to calculate 2023 Electricity Licence Standing Charges.msg
RE Request - Data used to calculate 2023 Electricity Licence Standing Charges.msg
RE Request - Data used to calculate 2023 Electricity Licence Standing Charges3.msg
20190102 - Letter to Licensee - ATCO Power Australia (Karratha) Pty Ltd - Audit and....pdf
07 APALP Annual Financial Report 31 Dec 2018 signed - APAK financial 2019.pdf
EGL119 APALP Annual FS 31 Dec 2019 Final signed - APAK financial 2020.pdf
RE ERA Compliance Report - APAK - APAK Accounts 2022.msg
RE_ERA_Compliance_Report - APAK financials 2021 included.msg
RE__ERA_Compliance_Report_-_APAK (3) - APAK Accounts 2023.msg
06. Cybersecurity (1).pdf

AA-IT-PC04 Backup and Retention Practice (3).pdf
AA-IT-PC05 Information Security Practice.docx.pdf
SAP - invoice payments.png
(1) AA-HSE-PC04 Health Safety and Environment Practice.pdf
AA-GOV-FWK-01 Information Management Governance Framework - Signed.pdf
AA-GRC-GL08 Environmental Practice Appendix.docx.pdf
AA-GRC-GL19 Marketing and Communications Practice Appendix.docx.pdf
AA-HSE-PC04 Health Safety and Environment Practice (Signed).pdf
AA-HSE-PR42 HSE Risk Management Procedure.pdf
AA-MC-PR01 Social Media Procedure.pdf
APA-AMS-GL01 Scope of the Integrated Management System.docx.pdf
APA-AMS-PO01 Asset Management Practice.pdf
APA-AMS-PR01 Working Identification.pdf
APA-AMS-PR02 - Work Planning.pdf
APA-AMS-PR03 - Work Scheduling.pdf
APA-APAK-AMS-PL01_Asset_Management_Plan_-_APAK.pdf
APA-APAK-AMS-PL02 Asset Lifecycle Strategy - Turbines And Generators – Karratha Power Station.pdf
APA-APAK-GRC-PL01 - Emergency Management Plan Brief – APAK.pdf
APA-APAK-HSE-PL01 Emergency Response Plan.pdf
APA-APAK-HSE-PL01-FM01 Cyclone Preparedness Checklist.docx
APA-HSE-MA03 Integrated Management System Manual.docx.pdf
APAK-ENV-PLA-002 Environmental Management System Manual.docx.pdf
APAK-ENV-PLA-006 Environmental Management Plan.pdf
APAK-SEC-PRO-001 Security Key & Access Devices.docx.pdf
APAK-WHS-PLA-007 Work Health & Safety Management Plan.pdf
PLACEHOLDER FOR - APA-HSE-PR29 Environmental Management and Control Procedure.docx

