

McGill Engineering Services Pty Ltd

Engineering, Adjudication & Arbitration Services ABN 45 106 691 169



VERVE ENERGY (ELECTRICITY GENERATION CORPORATION) GENERATION LICENCE EGL 7 PERFORMANCE AUDIT REPORT

**Prepared By Kevan McGill
Date 25 July 2010**

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McGill Engineering Services Pty Ltd



Engineering, Adjudication & Arbitration Services ABN 45 106 691 169

Wendy Ng
Manager Strategy & Regulation
Verve Energy
William Street
PERTH WA 6000

Dear Ms Ng

Performance Audit Electricity Licences

The fieldwork on the performance audit of Generation Licence EGL 7 for the audit period (1 April 2008 to 31 March 2010) is complete and I am pleased to submit the report to you. The report reflects my findings and opinions.

In my opinion, the Licensee has maintained a high level of compliance with the licence conditions while there was a non compliance it was not a significant item.

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the Generation licence (EGL 7) for the audit period on the relevant clauses referred to within the scope section of this report.

Yours sincerely

Kevan McGill
Director

Date 25 July 2010

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2 Executive Summary

This performance audit was conducted in accordance with the guidelines issued by the Economic Regulation Authority (*Authority*) for the audit period (1 April 2008 to 31 March 2010).

The Licensee is the largest generator in the SWIS and is government owned. While consistent with the independent power producers in supplying base load and peaking power, the Licensee provides mid merit power and ancillary services to support the network. This means that there is plant in the Licensee's portfolio which is not operated in the most efficient manner with the consequence that such operation for plant not designed for the purpose reduces the remaining operating life.

2.1 OVERALL CONCLUSION

In my opinion, the Licensee has maintained a high level of compliance with the licence conditions while there was a non compliance it was not a material item.

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the Generation Licence (EGL 7) for the audit period based on the relevant clauses referred to within the scope section (Page 8) of this report.

2.2 PERFORMANCE AUDIT

A summary of the findings of the performance audit is:

2.2.1 COMPLIANCE SUMMARY

The audit report will provide a table that summarises the compliance rating for each Obligation using the 7-point rating scale (5 for numerical rating score and 2 not rated/not applicable scales) described in table below and as determined by the auditor.

Compliance status	Rating	Description of compliance
COMPLIANT	5	Compliant with no further action required to maintain compliance
COMPLIANT	4	Compliant apart from minor or immaterial recommendations to improve the strength internal controls to maintain compliance
COMPLIANT	3	Compliant with major or material recommendations to improve the strength of internal controls to maintain compliance
NON-COMPLIANT	2	Does not meet minimum requirements
SIGNIFICANTLY NON-COMPLIANT	1	Significant weaknesses and/or serious action required
NOT APPLICABLE	N/A	Determined that the compliance obligation does not apply to the Licensee's business operations
NOT RATED	N/R	No relevant activity took place during the audit period,

		therefore it is not possible to assess compliance
--	--	---

The results are summarised below.

Assessment	Licence obligations	Audit priority 4	Audit priority 5
Compliant 5	18	12	6
Compliant 4			
Compliant 3			
Non-compliant 2			
Significantly non compliant 1			
Not Applicable	1	1	
Not Rated	29	19	10

2.3 COMPLIANCE ELEMENTS REQUIRING CORECTIVE MEASURES

The Licensee should follow up on the removal of the Rockingham PV system from the licence and request the Authority to remove the Wellingtons Dam Hydro plant from the licence. The Licensee has advised the Authority of Rockingham PV but has to pay the licence fee to amend the Licence. The Licensee requires a Tax Invoice to pay and has requested one but it has not been received to date. Non Payment is a breach of Licence condition 5.1 but there is no reporting manual item to cover this issue presumably as it was not regarded as significant to require reporting.

3 PERFORMANCE AUDIT

3.1 PERFORMANCE AUDIT OBJECTIVES

Under section 13 of the *Electricity Industry Act 2004* (the Act), it is a requirement that every Licensee provide the Economic Regulation Authority (*Authority*) not less than once in every period of 2 years with a performance audit conducted by an independent expert acceptable to the *Authority*.

The primary objective of the audit is to audit the effectiveness of measures taken by the Licensee to maintain quality and performance standards. The Act states a performance audit is an audit of the effectiveness of measures taken by the Licensee to meet the performance criteria specified in the licence. The licence states that performance standards are contained in applicable legislation. Performance criteria are defined in the licence as:

- (a) the terms and conditions of the licence; and
- (b) any other relevant matter in connection with the applicable legislation that the *Authority* determines should form part of the audit.

The licence also provides for individual licence conditions namely - the *Authority* may prescribe individual performance standards in relation to the Licensee of its obligations under this *licence* or the applicable legislation (the Act and subordinate legislation).

The *Authority* has summarised the performance requirements in various legislation in its Electricity compliance reporting manual (March 2008)¹.

The Licensee appointed McGill Engineering Services Pty Ltd to conduct the audit of its Generation Licence with approval from the *Authority*. A preliminary assessment was conducted with the Licensee's management to determine the inherent risk and the state of control for each compliance element of the Licence obligation. McGill Engineering Services Pty Ltd then prioritised the audit coverage based on the risk profile of the Licensee with an emphasis on providing greater focus and depth of testing for areas of higher risk to provide reasonable assurance that the Licensee had complied with the standards, outputs and outcomes under the Licence obligations.

The audit was conducted in a manner consistent with Australian Auditing Standards (AUS) 808 "Planning Performance Audits" and AUS 806 "Performance Auditing". McGill Engineering Services Pty Ltd evaluated the adequacy and effectiveness of the controls and performance by the Licensee relative to the standards referred in the Generation Licence through a combination of enquiries, examination of documents and detailed testing for Electricity Generation Licence EGL 7 for the Licensee.

¹ Electricity compliance reporting manual, March 2008

3.2 AUDIT PERIOD

The audit period is 1 April 2008 to 31 March 2010.

3.3 SCOPE LIMITATION

The audit was undertaken by examination of documents, interviews with key persons and observations and is not a detailed inspection of physical items.

3.3.1 EXCLUDED CONDITIONS

Conditions relating to the Electricity Corporations (Electricity Networks Corporation, Electricity Retail Corporation and Regional Power Corporation) are not applicable (90-92).

3.4 INHERENT LIMITATIONS

Because of the inherent limitations of any internal control structure, it is possible that fraud, error or non-compliance with laws and regulations may occur and not be detected.

An audit is not designed to detect all weaknesses in compliance measures as an audit is not performed continuously throughout the period and the audit procedures performed on the compliance measures are undertaken on a test basis.

Any projection of the evaluation of the operating licences to future periods is subject to the risk that the compliance measures in the plans may become inadequate because of changes in conditions or circumstances, or that the degree of compliance with them may deteriorate.

The audit opinion expressed in this report has been formed on the above basis.

3.5 SCOPE OF THE AUDIT

The audit was conducted in 3 phases.

1. RISK AND MATERIALITY ASSESSMENT

With reference to AS/NZS4360 Risk Management a preliminary assessment was made of the risk and materiality of non-compliance with the required licence conditions in order to focus the audit effort on areas of higher compliance risk and identify areas for testing and analysis.

2. SYSTEM ANALYSIS, ASSERTION SETTING AND REVIEW

Through discussion, observation and review, a sample of cases or data was analysed relating to the Licensee's quality and performance systems and standards against requirements of the Licence conditions to be audited.

3. FIELDWORK: TESTING AND ANALYSIS

Using the results of the risk assessment and systems analysis, detailed testing and analysis was performed to compare those standards maintained by the Licensee with the relevant clauses of the Licence.

During this audit the Perth and Kewdale offices and Kwinana, Cockburn, Muja, Collie and Albany licence areas were visited.

The actions to follow up previous audits are detailed below.

The report to the Licensee and the *Authority* clearly expresses the opinion of the auditor in respect of the findings of the audit.

The key contacts were:

- Licensee
 - Wendy Ng Manager Strategy and Regulation
 - Karen Bateman Manager Audit and Risk
 - Konrad Lajszczak Manager Financial Planning & Analysis

- The key site contacts for Muja are
 - Hans Dopheide - Manager Muja Power Station
 - Ivan d’Rosario - Operations Superintendent
 - Michael Hill - Maintenance Superintendent
 - Ian Norminton - Engineering Superintendent

- The key site contacts for Kwinana are
 - Roy Zylstra - Manager Kwinana Power Station
 - John Rampellini - Operations Superintendent
 - Richard Corbett - Maintenance Superintendent
 - Reece Tonkin - Engineering Superintendent

- The key site contacts for Cockburn is
 - Rob Rowland - Engineering Maintenance Superintendent

- The contact for Collie is
 - Willie Venter - Contract Manager

- The contact for Albany Wind farm is
 - David Thompson - Maintenance Coordinator

- The contact for Gas Turbines and Sustainable Operations is
 - Kim Bycroft Operations Superintendent

- McGill Engineering Services Pty Ltd
 - Kevan McGill, John McLoughlin

The audit was conducted during May to July 2010. Kevan McGill took about 100 hours on the audit.

3.6 AUDIT REQUIREMENTS

Compliance with licence conditions was examined according to the likely inherent risk and the adequacy of controls to manage that risk.

Nature of audit work conducted

The Authority guidelines for performance audits require that the audit considers:

- a) **Process compliance** - the effectiveness of systems and procedures in place throughout the audit period, including the adequacy of internal controls.
- b) **Outcome compliance** – the actual performance against standards prescribed in the licence throughout the audit period.
- c) **Output compliance** – the existence of the output from systems and procedures throughout the audit period (that is, proper records exist to provide assurance that procedures are being consistently followed and controls are being maintained).
- d) **Integrity of performance reporting** – the completeness and accuracy of the performance reporting to the Authority.
- e) **Compliance with any individual licence conditions** - the requirements imposed on the specific Licensee by the Authority or specific issues for follow-up that are advised by the Authority.

Stage	Auditor	Standard
1. Risk & Materiality Assessment Outcome - Operational/ Performance Audit Plan	K McGill	ASA 300 Planning ASA 315: Risk Assessments and Internal Controls AUS 808: Planning Performance Audits AS/NZS 4360:2004: Risk Management ERA Guidelines
2. System Analysis	K McGill	AUS 810: Special Purpose Reports on Effectiveness of Control Procedures
3. Fieldwork Assessment and testing of; <ul style="list-style-type: none"> • The control environment • Information system • Compliance procedures • Compliance attitude 	K McGill	AUS 502: Audit Evidence AUS 806: Performance Auditing
4. Reporting	K McGill	ASA 300 Planning AUS 806: Performance Auditing

3.7 STATEMENT OF INDEPENDENCE

To the best of my knowledge and belief, there is no basis for contraventions of any professional code of conduct in respect of the audit.

I have not done or contemplate undertaking any other work with the Licensee.

Here are no independence threats due to:

- self-interest – as the audit company or a member of the audit team have no financial or non-financial interests in the Licensee or a related entity;
- self-review – no circumstance has occurred where:
 - the audit company or a member of the audit team has undertaken other non-audit work for the Licensee that is being evaluated in relation to the audit/review; or
 - when a member of the audit team was previously an officer or director of the Licensee; or
 - where a member of the audit team was previously an employee of the Licensee who was in a position to exert direct influence over material that will be subject to audit during an audit/review.

There is no risk of a self-review threat as:

- no work has been
 - undertaken by the auditor, or a member of the audit/review team, for the Licensee within the previous 24 months; or
 - the auditor is currently undertaking for the Licensee; or
 - the auditor has submitted an offer, or intends to submit an offer, to undertake for the Licensee within the next 6 months; and
- familiarity – there is no close family relationship with a Licensee, its directors, officers or employees,
- and is not nor is perceived to be too sympathetic to the Licensee's interests.

3.8 LICENSEE BUSINESS

The Licensee is the largest generator in the SWIS and is government owned. While consistent with the independent power producers in supplying base load and peaking power, the Licensee provides mid merit power and ancillary services to support the network. The Licensee is the only generator providing mid merit and ancillary services in the WEM. *This means that there is plant in the Licensee's portfolio which is not operated in the most efficient manner with the consequence that such operation for plant not designed for the purpose reduces the remaining operating life.* The Licensee does not own any meters, they are owned by Western Power (in accordance with the Meter Code).

3.9 CORRECTIVE ACTION FROM LAST AUDIT

Item	Action	Recommendation	Responsible	When	Action Taken
					Further Action
103	Amend AMS on expansion or reduction	The Licensee to advise the <i>Authority</i> on the removal of the map for Rockingham PV system.	Chief Operating Officer	October 2008	<p>ERA advised that Verve no longer owns plant. The Licensee has to pay the fee to amend the licence when it receives a Tax Invoice.</p> <p>Further action. The Licensee has to pay the fee to amend the licence when it receives a Tax Invoice.</p>
103	Amend AMS on expansion or reduction	The Licensee is to develop asset disposal plans and advise the <i>Authority</i> when Wellington Dam Hydro is retired.	Chief Operating Officer	July 2009	<p>Removal of Wellington Hydro was not an option as the plant is an heritage item and accordingly handed over to National Trust.</p> <p>Further Action: ERA to be advised to remove from licence and pay fee when it receives a Tax Invoice.</p>

3.10 OVERALL CONCLUSION

In my opinion, the Licensee has maintained a high level of compliance with the licence conditions while there was a non compliance it was not a material item.

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the Generation (EGL 7) licence for the audit period based on the relevant clauses referred to within the scope section of this report.

3.11 FINDINGS

The conclusions of each of the elements of the licence are summarised in the following table. The audit risk as determined for each licence condition is also shown. The details of the audit can be seen in Detailed Audit Findings (Page 17)

Verve Energy Generation Licence – Audit report

Item	Licence Clause/Condition reference (C.=clause, Sch.=schedule)	Obligations under condition	Consequences		Inherent Risk	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	G = Generation	Type	Review priority	Rating									
			1=Minor, 2=Moderate, 3=Major	Likelihood (A=likely, B=Probable, C=Unlikely)						1	2	3	4	5	N ^a	N ^r			
Licence Conditions – Licence Clause – Generation																			
Obligations- Electricity Industry Act Section																			
81.	15.1	s ² 13(1)	1	C	Low	M	G	NR	5										<input checked="" type="checkbox"/>
82.	16.1	s14(1)(a)	1	C	Low	M	G	NR	5										<input checked="" type="checkbox"/>
83.	16.1 & 16.2	s14(1)(b)	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
84.	16.3	s14(1)(c)	1	C	Low	M	G	NR	5										<input checked="" type="checkbox"/>
85.	4.1	s17(1)	1	C	Low	M	G	NR	5										<input checked="" type="checkbox"/>
86.	5.1	s31(3)	1	C	Low	M	G	NR	5										<input checked="" type="checkbox"/>
87.	5.1	s41(6)	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
Licence Conditions – Electricity Industry Act Section																			
Obligations- Licence Clause – Generation																			
103.	s11	12.2	2	B	Medium	W	G	2	3										<input checked="" type="checkbox"/>
104.	s11	12.3	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
105.	s11	13.1	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
106.	s11	14.4	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
107.	s11	15.2	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
108.	s11	16.4	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
109.	s11	17.1	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
110.	s11	18.1	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
111.	s11	19.2	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
112.	s11	20.1	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
Licence Conditions – Licence clause																			
Obligations- Electricity Industry Metering Code Clause																			
309.	5.1	3.5(6)	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
319.	5.1	3.11(3)	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
331.	5.1	3.16(5)	2	C	Medium	M	G	2	4									<input checked="" type="checkbox"/>	
342.	5.1	3.27	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
349.	5.1.	4.4(1)	1	C	Low	M	G	NR	5										<input checked="" type="checkbox"/>
350.	5.1	4.5(1)	1	C	Low	M	G	NR	5										<input checked="" type="checkbox"/>
351.	5.1	4.5(1)	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
363.	5.1	5.4(2)	1	C	Low	M	G	NR	5										<input checked="" type="checkbox"/>
365.	5.1	5.5(3)	2	C	Medium	M	G	2	4									<input checked="" type="checkbox"/>	
376.	5.1	5.16	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
377.	5.1	5.17(1)	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
378.	5.1	5.18	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>
379.	5.1	5.19(1)	1	C	Low	M	G	NR	5										<input checked="" type="checkbox"/>
380.	5.1	5.19(2)	1	C	Low	M	G	NR	5										<input checked="" type="checkbox"/>
381.	5.1	5.19(3)	2	C	Medium	M	G	2	4										<input checked="" type="checkbox"/>

² s= Section of Act

3.14 DETAILED FINDINGS

3.14.1 AUDIT WORK UNDERTAKEN

We conducted interviews and enquiries and

- Understand the control environment by determining the responsibility matrix and key control points
- Obtain the policies and procedures for managing licensed areas; and
- Identify the information systems and processes employed to manage licensed areas
- Determine the level of understanding of the systems and processes for managing licensed areas
- In reviewing the procedures and protocols for managing provision of services, where applicable, we obtained flowcharts of the processes and assessed the reasonableness of the decision matrix and the adequacy of the control points implemented by the Licensee.

3.15 AUDIT EVIDENCE

The following evidence was considered.

- Generation licence
- Statement of Corporate Intent
- Risk management plan
- Sample tender documents
- Kwinana Stage B demolition tender documents
- Long term Strategic guideline discussion paper on plant reinvestment options
- Corporate strategic plan
- RWE consultants options paper
- Unit cold start procedure Kwinana
- Budget papers
- Production budget process
- Ellipse maintenance process
- Wind farm spares – Albany

- Licence fee invoices/ journal entries
- Reporting manual returns.

3.16 DETAILED AUDIT FINDINGS

The following sets out the audit findings

3.16.1 ELECTRICITY INDUSTRY ACT – LICENCE CONDITIONS AND OBLIGATIONS

Item 81	Generation Licence condition 15.1	Compliance rating Compliant 5
Licence: Generation		
<i>Electricity Industry Act section 13(1)</i> A Licensee must, not less than once every 24 months, provide the Authority with a performance audit conducted by an independent expert acceptable to the Authority.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: The Licensee has provided documentation to ERA for approval of auditor.		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The Licensee has contracted with the auditor to meet the requirements. The previous audit also met the requirements.		
Issues		
None		
Recommendations		
None		
Management Actions		
Not applicable		

Item 82	Generation Licence condition 16.1	Compliance rating Compliant 5
Licence: Generation		
<i>Electricity Industry Act section 13(1)</i> A Licensee must provide for an asset management system.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: The Licensee has provided documentation of its AMS.		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The Licensee has an asset management system and the review will examine the efficacy of the asset management system.		
Issues		
None		
Recommendations		
None		
Management Actions		
Not applicable		

Verve Energy Generation Licence – Audit report

Item 83	Generation Licence condition 16.1 & 16.2	Compliance rating Compliant 5
Licence: Generation		
<i>Electricity Industry Act section 13(1)</i> A Licensee must notify details of the asset management system and any substantial changes to it to the Authority.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: The Licensee has provided documentation of its AMS.		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The Licensee advised the Authority of their asset management system with the licence application and has evolved since with no substantial changes requiring notification. The asset management suite of plans is generic with no specific reference to plant such as Wellington Hydro. Consequently the handing over to the National Trust was not required to be reported to the Authority as a change to the asset management system (but to advise to remove from licence). Similarly to pay fee on Tax Invoice to amend licence for the Rockingham PV system.		
Issues		
None		
Recommendations		
None		
Management Actions		
Not applicable		

Item 84	Generation Licence condition 16.3	Compliance rating Compliant 5
Licence: Generation		
<i>Electricity Industry Act section 14(1)(c)</i> A Licensee must provide the Authority with a report by an independent expert as to the effectiveness of its asset management system every 24 months, or such longer period as determined by the Authority.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: The Licensee has provided the contract document to the Authority for approval of the auditor.		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The Licensee has contracted the reviewer to meet the requirement. The previous review also met the requirements.		
Issues		
None		
Recommendations		
None		
Management Actions		
Not applicable		

Item 85	Generation Licence condition 4.1	Compliance rating Compliant 5
Licence: Generation		
<i>Electricity Industry Act section 17(1)</i> A Licensee must pay to the Authority the prescribed licence fee within one month after the day of grant or renewal of the licence and within one month after each anniversary of that day during the		

term of the licence.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: The Licensee has provided receipts.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The Licensee paid the fees on time.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 86								Compliance rating	
Generation Licence condition 5.1								Compliant 5	
Licence: <i>Generation</i>									
<i>Electricity Industry Act section 31(3)</i>									
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.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: The Licensee has provided outage logs.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The Licensee's forced outage times have been reduced. The available time has improved over the review period and capacity refund payments to the IMO are less than budgeted. There is strong commercial and public pressure to maintain outages to a minimum in accordance with this obligation. The Licensee is actively pursuing strategies (such as with UK consultants RWE) to improve reliability and extend plant life.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 87								Compliance rating	
Generation Licence condition 5.1								Not Rated	
Licence: <i>Generation</i>									
<i>Electricity Industry Act section 41(6)</i>									
A Licensee must pay the costs of taking an interest in land or an easement over land.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not applicable.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no interests/easements in land taken in the audit period.									
Issues									
None									

Recommendations
None
Management Actions
Not applicable

3.16.2 ELECTRICITY LICENCES – LICENCE CONDITIONS AND OBLIGATIONS

Item 103	Compliance rating
Electricity Industry Act section 11	Compliant 5
Licence: <i>Generation</i>	
<i>Generation Licence condition 12.2</i> A Licensee must amend the asset management system before an expansion or reduction in generating works, distribution systems and transmission systems and notify the Authority in the manner prescribed, if the expansion or reduction is not provided for in the asset management system.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not applicable.	
Process	<input checked="" type="checkbox"/> Outcome
	<input checked="" type="checkbox"/> Output
	<input checked="" type="checkbox"/> Reporting
	<input checked="" type="checkbox"/> Compliance
There have been no expansions in the audit period and Stage B of Kwinana Power station has been decommissioned. This capacity decommissioning is allowed in the asset management system as has the planned replacement by 2 Open Cycle Gas Turbines. The operating capacity is within that shown on the licence. The Wellington Hydro system has not been operational in the audit period and handed over to the National Trust. The asset management suite of plans are generic and do not deal with specific generation plant and accordingly there is no need to advise of any change to the asset management plan with the transfer of ownership of Wellington Hydro.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 104	Compliance rating
Electricity Industry Act section 11	Compliant 5
Licence: <i>Generation</i>	
<i>Generation Licence condition 12.3</i> A Licensee must not expand the generating works, distribution systems or transmission systems outside the licence area.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not applicable.	
Process	<input checked="" type="checkbox"/> Outcome
	<input checked="" type="checkbox"/> Output
	<input checked="" type="checkbox"/> Reporting
	<input checked="" type="checkbox"/> Compliance
There has been no expansion let alone outside the licence area.	
Issues	
None	

Verve Energy Generation Licence – Audit report

Recommendations
None
Management Actions
Not applicable

Item 105 Electricity Industry Act section 11.	Compliance rating Compliant 5
Licence: <i>Generation</i>	
<i>Generation Licence condition 13.1.1</i> A Licensee and any related body corporate must maintain accounting records that comply with the Australian Accounting Standards Board Standards or equivalent International Accounting Standards.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: The Licensee has provided the annual reports.	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The financial auditors (Auditor General) confirm compliance with accounting standards.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 106 Electricity Industry Act section 11	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Generation Licence condition 14.4</i> A Licensee must comply with any individual performance standards prescribed by the Authority.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not applicable.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There are no individual performance standards.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 107 Electricity Industry Act section 11	Compliance rating Compliant 5
Licence: <i>Generation</i>	
<i>Generation Licence condition 15.2</i> A Licensee must comply, and require its auditor to comply, with the Authority's standard audit guidelines dealing with the performance audit.	

Verve Energy Generation Licence – Audit report

Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: The Licensee has provided the contract to the Authority for the approval of the auditor.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The Licensee has contracted with the auditor to meet the requirements. The previous audit satisfied the obligation.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 108							Compliance rating		
Electricity Industry Act section 11							Compliant 5		
Licence: Generation									
<i>Generation Licence condition 16.4</i>									
A Licensee must comply, and must require the Licensee's expert to comply, with the relevant aspects of the Authority's standard guidelines dealing with the asset management system.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: The Licensee has provided the contract to the Authority for the approval of the auditor..									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The Licensee has contracted with the reviewer to meet the requirements. The previous review satisfied the obligation.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 109							Compliance rating		
Electricity Industry Act section 11							Not Rated		
Licence: Generation									
<i>Generation Licence condition 17.1</i>									
A Licensee must report to the Authority, in the manner prescribed, if a Licensee is under external administration or there is a significant change in the circumstances upon which the licence was granted which may affect a Licensee's ability to meet its obligations.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not applicable.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The Licensee is not under external administration.									
Issues									
None									
Recommendations									

Verve Energy Generation Licence – Audit report

None
Management Actions
Not applicable

Item 110	Compliance rating
Electricity Industry Act section 11	Compliant 5
Licence: Generation	
<i>Generation Licence condition 18.1</i> A Licensee must provide the Authority, in the manner prescribed, any information the Authority requires in connection with its functions under the Electricity Industry Act.	
Observations	
Documents <input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: The Licensee has provided the annual returns.	
Process <input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/>
Output <input checked="" type="checkbox"/>	Reporting <input checked="" type="checkbox"/>
Compliance <input checked="" type="checkbox"/>	
The Licensee has provided the annual reports to the Authority.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 111	Compliance rating
Electricity Industry Act section 11	Not Rated
Licence: Generation	
<i>Generation Licence condition 19.2</i> A Licensee must publish any information it is directed by the Authority to publish, within the timeframes specified.	
Observations	
Documents <input type="checkbox"/>	Compliance <input type="checkbox"/>
Not applicable.	
Process <input type="checkbox"/>	Outcome <input type="checkbox"/>
Output <input type="checkbox"/>	Reporting <input type="checkbox"/>
Compliance <input type="checkbox"/>	
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: The Licensee was not required to publish any information.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 112	Compliance rating
Electricity Industry Act section 11	Not Rated
Licence: Generation	
<i>Generation Licence condition 20.1</i> Unless otherwise specified, all notices must be in writing.	

Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Sample communication with ERA.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
All material communication with the Authority is in writing.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

3.16.3 ELECTRICITY INDUSTRY METERING CODE – LICENCE CONDITIONS AND OBLIGATIONS (ALL LICENCE CONDITION LICENCE CLAUSE 5.1)

Item 309	Compliance rating
Licence condition 5.1	Not Rated
Licence: Generation	
<i>Electricity Industry Metering Code clause 3.5(6)</i> A network operator may only impose a charge for providing, installing, operating or maintaining a metering installation in accordance with the applicable service level agreement between it and the user.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not Applicable.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
This is an obligation on Western Power (or Horizon). There have been no metering installations in the audit period. The meters are Western Power's and they operate and maintain their meters. Most metering information is provided from Western Power's SCADA for no charge. Where there is a charge for metering it is according to a published tariff.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 319	Compliance rating
Licence condition 5.1	Not Rated
Licence: Generation	
<i>Electricity Industry Metering Code clause 3.11(3)</i> A Code participant who becomes aware of an outage or malfunction of a metering installation must advise the network operator as soon as practicable.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not applicable.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no meter malfunctions.	

Verve Energy Generation Licence – Audit report

Issues
None
Recommendations
None
Management Actions
Not applicable

Item 331	Compliance rating
Licence condition 5.1	Not Applicable
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 3.16(5)</i> A network operator or a user may require the other to negotiate and enter into a written service level agreement in respect of the matters in the metrology procedure dealt with under clause 3.16(4) of the Code.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not applicable.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
The obligation for 3.16(4) is about how a network operator converts accumulation data to interval data. This is how the small consumers' data is modelled into interval data and it is an issue for the retailer and distributor principally. The obligation is on the network operator and not the Licensee for 3.16(4). The Licensee has no meters and certainly no accumulation meters. As there is no obligation on the Licensee for 3.16(4) there is no obligation on 3.16(5) which is for the purposes of 3.16(4).	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 342	Compliance rating
Licence condition 5.1	Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 3.27</i> A person must not install a metering installation on a network unless the person is the network operator or a registered metering installation provider for the network operator doing the type of work authorised by its registration.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not Applicable.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
No meters have been installed in the audit period.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 349 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 4.4(1)</i> A network operator and affected Code participants must liaise together to determine the most appropriate way to resolve a discrepancy between energy data held in a metering installation and data held in the metering database.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not Applicable.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no discrepancies as meter data is not held by the Licensee. There has been no discrepancy on Western Power's meters.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 350 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 4.5(1)</i> A Code participant must not knowingly permit the registry to be materially inaccurate.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not Applicable.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no issues with Western Power about registry data.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 351 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 4.5(2)</i> If a Code participant (other than a network operator) becomes aware of a change to or an 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.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not Applicable.	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
There been no issues with Western Power about standing data.	

Issues
None
Recommendations
None
Management Actions
Not applicable

Item 363 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 5.4(2)</i> A user must, when reasonably requested by a network operator, use reasonable endeavours to assist the network operator to comply with the network operator's obligation.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not Applicable.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
No requests were made of users.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 365 Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 5.5(3)</i> A user must not impose any charge for the provision of the data under this Code unless it is permitted to do so under another enactment.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not Applicable.	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
There have been no charges.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 376 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 5.16</i> A user that collects or receives energy data from a metering installation must provide the network operator with the energy data (in accordance with the communication rules) within the timeframes prescribed.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not Applicable.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
The Licensee has not collected any data for Western Power.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 377 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 5.17(1)</i> 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.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not Applicable	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There has been no request to provide data.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 378 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 5.18</i> A user that collects or receives information regarding a change in the energisation status of a metering point must provide the network operator with the prescribed information, including the stated attributes, within the timeframes prescribed.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>

Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not Applicable									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The Licensee has not been aware of any change in energisation status.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 379 Licence condition 5.1							Compliance rating Not Rated		
Licence: <i>Generation</i>									
<i>Electricity Industry Metering Code clause 5.19(1)</i> 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.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not Applicable									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There has been no request.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 380 Licence condition 5.1							Compliance rating Not Rated		
Licence: <i>Generation</i>									
<i>Electricity Industry Metering Code clause 5.19(2)</i> A user must, to the extent that it is able, collect and maintain a record of the address, site and customer attributes, prescribed in relation to the site of each connection point, with which the user is associated.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not Applicable.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There has been no request (5.19(1)). The customer is Synergy and Western Power has the connection points.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 381 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 5.19(3)</i> A user must, after becoming aware of any change in a site's prescribed attributes, notify the network operator of the change within the timeframes prescribed.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not Applicable.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no changes in site attributes.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 382 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 5.19(4)</i> A user that becomes aware that there is a sensitive load at a customer's site must immediately notify the network operator's Network Operations Control Centre of the fact.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not Applicable	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
The Licensee is not aware of any sensitive loads.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 384 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 5.19(6)</i> A user must use reasonable endeavours to ensure that it does notify the network operator of a change in an attribute that results from the provision of standing data by the network operator to the user.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not Applicable	

Verve Energy Generation Licence – Audit report

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There were no changes in attributes in the audit period.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 390 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 5.21(5)</i> A Code participant must not request a test or audit 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.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not Applicable	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no tests.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 391 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 5.21(6)</i> A Code participant must not make a test or audit request that is inconsistent with any access arrangement or agreement.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not Applicable	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There were no requests in the audit period.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 409 Licence condition 5.1	Compliance rating Not Rated			
Licence: <i>Generation</i>				
<i>Electricity Industry Metering Code clause 5.27</i> Upon request, a current user must provide the network operator with customer attribute information that it reasonably believes are missing or incorrect within the timeframes prescribed.				
Observations				
Documents <input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>			
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not Applicable				
Process <input type="checkbox"/>	Outcome <input type="checkbox"/>	Output <input type="checkbox"/>	Reporting <input type="checkbox"/>	Compliance <input type="checkbox"/>
There have been no requests.				
Issues				
None				
Recommendations				
None				
Management Actions				
Not applicable				

Item 416 Licence condition 5.1	Compliance rating Compliant 5			
Licence: <i>Generation</i>				
<i>Electricity Industry Metering Code clause 6.1(2)</i> A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed.				
Observations				
Documents <input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>			
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not Applicable				
Process <input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/>	Output <input checked="" type="checkbox"/>	Reporting <input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
There have been no issues with Western Power.				
Issues				
None				
Recommendations				
None				
Management Actions				
Not applicable				

Item 418 Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 7.2(1)</i> 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.	
Observations	
Documents <input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not Applicable	

Verve Energy Generation Licence – Audit report

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The Licensee has all the facilities and the network operator the addresses.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 420 Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 7.2(4)</i> A Code participant must notify its contact details to a network operator with whom it has entered into an access contract within 3 business days after the network operator's request.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not Applicable	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no new access contracts in the audit period.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 421 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 7.2(5)</i> A Code participant must notify any affected network operator of any change to the contact details it notified to the network operator at least 3 business days before the change takes effect.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not Applicable	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There has been no change of address in the audit period.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 422 Licence condition 5.1	Compliance rating Compliant 5			
Licence: <i>Generation</i>				
<i>Electricity Industry Metering Code clause 7.5</i> A Code participant must 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.				
Observations				
Documents <input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>			
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not Applicable				
Process <input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/>	Output <input checked="" type="checkbox"/>	Reporting <input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
There has been no disclosure of confidential information. No complaints have been received.				
Issues				
None				
Recommendations				
None				
Management Actions				
Not applicable				

Item 423 Licence condition 5.1	Compliance rating Compliant 5			
Licence: <i>Generation</i>				
<i>Electricity Industry Metering Code clause 7.6(1)</i> A Code participant must disclose or permit the disclosure of confidential information that is required to be disclosed by the Code.				
Observations				
Documents <input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>			
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not Applicable				
Process <input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/>	Output <input checked="" type="checkbox"/>	Reporting <input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
There has been no disclosure of confidential information. No complaints have been received.				
Issues				
None				
Recommendations				
None				
Management Actions				
Not applicable				

Item 424 Licence condition 5.1	Compliance rating Not Rated			
Licence: <i>Generation</i>				
<i>Electricity Industry Metering Code clause 8.1(1)</i> 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 under or in connection with the Electricity Industry Metering Code by negotiations in good faith.				
Observations				
Documents <input type="checkbox"/>	Compliance <input type="checkbox"/>			
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not Applicable				
Process <input type="checkbox"/>	Outcome <input type="checkbox"/>	Output <input type="checkbox"/>	Reporting <input type="checkbox"/>	Compliance <input type="checkbox"/>

There have been no metering disputes.
Issues
None
Recommendations
None
Management Actions
Not applicable

Item 425 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<i>Electricity Industry Metering Code clause 8.1(2)</i> 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.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: Interviewed Wendy Ng, listed staff of sites. Documents: Not Applicable	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no metering disputes.	
Issues	
None	
Recommendations	
None	
Management Actions	
Not applicable	

Item 426
Lice