

**EIRL6 Alinta Energy Transmission (Roy Hill) Pty Ltd – 2022 Post-Audit and Post-Review Implementation Plan – Performance Audit**

Recommendation reference	Non compliance/controls improvement	Recommendation	Action proposed to be taken by licensee	Responsible person	Target Completion date
1/2022	<p><b>B2</b>  <i>Obligations 319, 320, 326, 327, 357, 448A, 448C</i>  <i>Metering Code clauses 3.1, 3.2(1), 3.5(1) and (2), 3.5(3), 3.21(1), 6.2 and 6.19A(1)</i></p> <p>The 2019 AETRH audit rated Metering Code Obligations 319, 320, 326, 327, 336, 337, 340, 342, 343, 344, 357, 422, 447, 448A as non-compliant and recommended each item be addressed in a Metering Management Plan once the EPWA regulatory framework design paper for the NWIS is formalised.</p> <p>AETRH's most recent advice to the ERA in February 2022 was that a new compliance team, recently established within the Alinta Merchant Energy business pillar, would assess AETRH's obligations under the Metering Code and oversee the development of a metering management plan.</p> <p>AETRH has not yet developed a Metering Management Plan as it had planned to take guidance from the release of the regulatory framework design for the NWIS (i.e. the Pilbara Network Rules), which may take account of the nature of AETRH's network arrangements and purpose,</p>	<p>AETRH:</p> <p>a) Establish a plan and procedure for demonstrating how it will meet the Metering Code and the relevant clauses of its Interconnection Agreements.</p> <p>Consideration should be given to:</p> <ul style="list-style-type: none"> <li>• Establishing a Metering Management Plan (which has the benefit of capturing all relevant obligations in one place); and/or</li> <li>• Building on the Interconnection Agreement mechanism to be clearer on the agreed approach for managing meters and metering data to adequately meet the intent of the Metering Code, within the practicalities of AETC's operating circumstances.</li> </ul>	<p>AETRH will:</p> <p>a) Establish a plan and procedure for demonstrating how it will meet the Metering Code and the relevant clauses of its PPA and Interconnection Agreement. Consideration will be given to:</p> <ul style="list-style-type: none"> <li>• Establishing a Metering Management Plan (which has the benefit of capturing all relevant obligations in one place); and/or</li> <li>• Building on the PPA and Interconnection Agreement mechanism to be clearer on the agreed approach for managing meters and metering data to adequately meet the intent of the Metering Code, within the practicalities of AETRH's operating circumstances.</li> </ul> <p>b) Will take a clear position on those Metering Code obligations where AETRH accepts that it will continue to be non-compliant on the</p>	General Manager, Regulatory Affairs and Compliance (with input from Head of Operations, Power Generation)	31 Mar 2024

	<p>including the use of formal agreements with the small number of interested parties (i.e. related licence holders and customers).</p> <p>The auditors concluded that where required, AETRH has adequately addressed obligations 336, 337, 340, 342, 343, 344, 422 and 447, which are now assessed as compliant or non-rateable.</p> <p>Obligations <b>319, 320, 326, 327, 357 and 448A</b> remain non-compliant, with minor (little to no) impact on AETRH's customers. This audit also concluded that obligation <b>448C</b> (similar to obligation 448A, but specific to the requirement to establish communication rules) is non-compliant.</p>	<p>b) Take a clear position on those Metering Code obligations where AETC accepts that it will continue to be non-compliant on the basis that it is not practical or useful to establish formal metrology procedures etc.</p>	<p>basis that it is not practical or useful to establish formal metrology procedures etc.</p>		
2/2022	<p><b>B2</b> <i>Obligation 366 Metering Code Clause 4.1(1)</i> AETRH's CT and VT meters installed at the AETRH/AETC connection point had not been included on the AETRH metering database.</p>	<p>AETRH update the metering database with standing data for its CT/VT meters installed at the AETRH/AETC connection point.</p>	<p>AETRH will update the metering database with standing data for its CT/VT meters installed at the AETRH/AETC connection point.</p>	<p>General Manager, Regulatory Affairs and Compliance (with input from Head of Operations, Power Generation)</p>	31 Mar 2024

3/2022	<p><b>B2</b>  <i>Obligation 369 Metering Code Clause 4.2(1)</i>  <i>Obligation 370 Metering Code Clause 4.3(1)</i>  Obligation 370 - clause 4.3(1) of the Metering Code requires AETRH's metering database to contain the 30 specified standing data items. AETRH's metering database contained the prerequisite standing data item headings, but had not provided data or commentary on items: (4) Voltage at metering point, (5) Distribution loss factor, (14) NMI meter, (20) Summation scheme values and multipliers, (21) Data register coding details, (27) Algorithms. Obligation 369 is non-compliant as a result of the metering registry not complying with the Code, per Obligation 370.</p>	AETRH complete, or provide commentary on, the standing data omitted from its metering database.	AERTH will complete and provide commentary on the standing data omitted from its metering database.	General Manager, Regulatory Affairs and Compliance (with input from Head of Operations, Power Generation)	
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**EIRL6 Alinta Energy Transmission (Roy Hill) Pty Ltd – 2022 Post-Audit and Post-Review Implementation Plan – Asset Management System Review**

Recommendation reference	Non compliance/controls improvement	Recommendation	Action proposed to be taken by licensee	Responsible person	Target Completion date
1/2022	<p><b>A3</b>                      4. Environmental Analysis                      4.2 Performance standards (availability of service, capacity, continuity, emergency response, etc.) are measured and achieved</p> <p><b>B3</b>                      5. Asset Operations                      5.6 Staff resources are adequate and staff receive training commensurate with their responsibilities                      At the time of our site visit, AETRH' training matrix showed some overdue training dating back as far as 2018. Of particular note, a significant risk to AETRH's operations relates to the biannual training requirements for site emergency response (per the requirements of AETRH's Emergency Response Plan Version 2.8 dated March 2022), which was recorded as overdue for all staff assigned to operations managed from the Newman Power Station. We consider this issue reflects a lack of dedicated effort to ensure training requirements are maintained. Corrective action is required to improve AETRH's performance against the requirements outlined in its Emergency Response Plan.</p>	<p>AETRH:                      a) Schedule staff training to clear all overdue requirements with special emphasis given to site-specific emergency response drills.</p> <p>b) Ensure sufficient resources are allocated to maintaining key training requirements and emergency response drills.</p>	<p>AETRH:                      Employs a dedicated HSE Manager, Power Generation &amp; Development and has confirmed that:                      (a) The relevant staff training has been scheduled and completed; and                      (b) resources are allocated to maintaining key training requirements.</p> <p>However, the root cause of the non compliance is that Alinta Energy has two separate HSE systems (Activate and Lungella) managing and reporting staff training. Alinta Energy has identified that processes are required to better integrate the information between the two HSE systems to provide evidence the recommendations have been addressed.</p> <p>Systems and processes are currently being implemented to streamline processes to integrate the Activate and Lungella information and confirm implementation and completion of the recommendations (a) and (b).</p>	HSE Manager, Power Generation & Development	31 Dec 2023