



BHP NiW Pty Ltd

**2023 Performance Audit
Electricity Licences EDL2 and ERL2**

Report

**Economic Regulation Authority
May 2023**

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Limitations of this Report

This report was prepared for distribution to the Economic Regulation Authority and BHP NiW Pty Ltd ('NiW') for the purpose of fulfilling NiW's performance audit obligations under its Electricity Licences. We disclaim any assumption of responsibility for any reliance on this report to any persons or users other than the Economic Regulation Authority and NiW' or for any purpose other than that for which it was prepared.

Because of the inherent limitations of any internal control environment, it is possible that fraud, error or non-compliance may occur and not be detected. An audit is not designed to detect all instances of non-compliance with the procedures and controls over the licence obligations of the Electricity Licences, since we do not examine all evidence and every transaction. The audit and review conclusions expressed in this report have been formed on this basis.

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1. Executive Summary

Background

BHP NiW Pty Ltd ('NiW') is the licensee of the Economic Regulation Authority ('ERA') for the Electricity Distribution Licence (EDL2) and the Electricity Retail Licence (ERL2) issued by the ERA under the *Electricity Industry Act 2004*.

NiW operates a small distribution network in the mining town of Leinster – the Northern Electrical System (NES) and a small non-contiguous network to five mining customers in the Kambalda region - the Southern Electrical System (SES). The Northern distribution system is the Leinster town site with less than 300 connections to consumers. However, these connections are not considered to be customers as electricity is not retailed to the consumer.

The power is provided by Southern Cross Energy Partnership (a subsidiary of TransAlta Energy Australia Pty Ltd) which owns and operates four gas turbine power stations to provide power to NiW's operations at Mt Keith, Leinster, Kalgoorlie and Kambalda.

This audit has been conducted to assess the licensee's level of compliance with the licence. The audit covers the 4 years from the previous audit being 1 April 2019 to 31 March 2023.

Conclusion

Through the execution of the Audit Plan and assessment and testing of the control environment, the information system, control procedures and compliance attitude, the audit team members have gained reasonable assurance that NiW has fully complied with its Electricity Distribution Licence and Retail Licence obligations except for 2 minor non-compliances, during the audit period from 1 April 2019 to 31 March 2023.

Out of 158 applicable compliance obligations, the audit found:

- 82 obligations were rated compliant (17 with adequate controls and 65 with controls not reviewed).
- 2 were rated non-compliant – minor impact on customers or third parties (with controls not assessed).
- 74 were not rated for compliance, as no relevant activity took place during the audit period (and controls were not assessed).

The control environment is considered to be effective to manage compliance with the licence conditions. The audit also confirmed that NiW has complied with its information reporting obligations for the period 1 April 2019 to 31 March 2023.

There was one recommendation:

- NiW to continue to report to the ERA, the non-compliance with obligations 448A and 448C due to the absence of a metrology procedure to demonstrate compliance with the Metering Code. There is no impact on the customers.

2. Independent Auditor's Report

Scope

BHP NiW Pty Ltd ('NiW') is the licensee of the Economic Regulation Authority ('ERA') for the Electricity Distribution Licence (EDL2) and the Electricity Retail Licence (ERL2) issued by the ERA under the *Electricity Industry Act 2004*.

NiW operates a small distribution network in the mining town of Leinster – the Northern Electrical System (NES) and a small non-contiguous network to five mining customers in the Kambalda region - the Southern Electrical System (SES). The Northern distribution system is the Leinster town site with less than 300 connections to consumers. However, these connections are not considered to be customers as electricity is not retailed to the consumer.

The power is provided by Southern Cross Energy Partnership (a subsidiary of TransAlta Energy Australia Pty Ltd) (SCE) which owns and operates four gas turbine power stations to provide power to NiW's operations at Mt Keith, Leinster, Kalgoorlie and Kambalda.

We have performed a reasonable assurance engagement on NiW's compliance, in all material respects, with the conditions of EDL2 and ERL2 and the *Electricity Industry Act 2004* for the period from 1 April 2019 to 31 March 2023.

Our evaluation was made against the licence obligations listed in the Electricity Compliance Reporting Manual (February 2023 and previous versions February 2022, June 2020 and July 2018) and in accordance with the ERA's 2019 Audit and Review Guidelines: Electricity and Gas Licences (updated August 2022).

The scope of this assurance work relates to assessing NiW's systems and effectiveness of processes and regulatory controls to ensure compliance with the obligations, standards, outputs and outcomes required by the Licence issued under the Act.

Independent Opinion

In our opinion, based on the procedures performed as outlined in the Audit Plan approved by the Economic Regulation Authority and the evidence we have obtained, BHP NiW Pty Ltd has complied, in all material respects, with its licence conditions and relevant legislative obligations for the period from 1 April 2019 to 31 March 2023.

Basis for opinion

During the period from 1 April 2019 to 31 March 2023, NiW had 2 out of 158 obligations with non-compliances rated as "minor impact on customers" for the following Licence Conditions:

Reporting Manual number and Licence obligation	Issue
<p>Metering Installations <i>Rating: B2</i> <i>Electricity Industry Metering Code</i> Obligation 448A - A network operator must, as soon as practicable and in any event no later than 6 months after the date this Code applies to it, submit to the ERA for its approval the prescribed documents in subclauses 6.2(a)-(d). Obligation 448C - A network operator must publish its communication rules as soon as practicable, and in any event within 6 months after the date this Code applies to it.</p>	<p>NiW does not have a dedicated, overall metrology procedure. However, each of the individual Power Purchase Agreements (PPAs) cover meter installation and accuracy and, as such, form NiW's metrology procedures.</p> <p>However, under Clauses 1.3 and 6.2 of the Metering Code, a metrology procedure must be submitted to and approved by the ERA. As NiW has not completed the actions required by the Code, and it does not have an approved procedure, it is not compliant with any of the obligations listed above that refer to a metrology procedure.</p> <p>It is recognised that from a practical point of view, there is no real benefit for NiW to develop and submit a metrology procedure to the ERA for approval other than being able to comply with the requirements of the Metering Code.</p>

Reporting Manual number and Licence obligation	Issue
	<p><u>Recommendation</u></p> <p>NiW to continue to report to the ERA, the non-compliance with obligations 448A and 448C due to the absence of a metrology procedure to demonstrate compliance with the Metering Code. There is no impact on the customers.</p>

We conducted our engagement in accordance with Australian Standard on Assurance Engagements ASAE 3100 Compliance Engagements (ASAE 3100). We believe that the assurance evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

In accordance with ASAE 3100 we have:

- Used our professional judgement to plan our procedures and assess the risks that may cause material non-compliance with each of the compliance requirements to be concluded upon;
- Considered internal controls implemented to meet the compliance requirements; however, we do not express a conclusion on their effectiveness; and
- Ensured that the engagement team possess the appropriate knowledge, skills and professional competencies.

Summary of Procedures

Our procedures consisted primarily of:

- Utilising ERA's 2019 Audit and Review Guidelines: Electricity and Gas Licences ('the Guidelines') to develop a risk assessment;
- Developing an Audit and Review Plan and an associated work program, approved by the ERA on 4 April 2023;
- Interviewing relevant NiW staff to gain an understanding of process controls;
- Onsite visit to the Corporate Office in Perth and Leinster, including our Engineer.
- Conduct various meetings with stakeholders, including corporate services and plant operations management personnel, to determine the effectiveness of systems and procedures in place and to compare actual performance against the licence standards.
- Assessing documents and performing walkthroughs of processes and controls to support the assessment of compliance and the effectiveness of the control environment in accordance with Licence obligations; and
- Performing procedures and testing based on the procedures listed in the approved Audit and Review Plan.

How We Define Reasonable Assurance and Material Non-Compliance

Reasonable assurance is a high level of assurance but is not a guarantee that it will always detect a material non-compliance with the compliance requirements.

Instances of non-compliance are considered material if, individually or in the aggregate, they could reasonably be expected to influence relevant decisions of the intended users taken on the basis of the Licensee's compliance with the compliance requirements.

Inherent Limitations

Because of the inherent limitations of an assurance engagement, together with the internal control structure it is possible that fraud, error, or non-compliance with the compliance requirements may occur and not be detected.

A reasonable assurance engagement throughout the specified period does not provide assurance on whether compliance with the compliance requirements will continue in the future.

Use of this Assurance Report

This report has been prepared for NiW and the ERA for the purpose of assessing compliance with the requirements of the License and may not be suitable for another purpose.

We understand that a copy of this report will be provided to the ERA for the purpose of reporting on the reasonable assurance engagement for the Licensee. We agree that a copy of this report may be provided to the ERA in connection with this purpose, but only on the basis that we accept no duty, liability or responsibility to the ERA in relation to the report.

We disclaim any assumption of responsibility for any reliance on this report, to any person other than the Licensee and the ERA, or for any other purpose other than that for which it was prepared.

Management's responsibility

NiW's management are responsible for:

- The compliance activities undertaken to meet the requirements of the Licence;
- Identifying risks that threaten the compliance requirements identified above being met and identifying, designing and implementing controls to enable the compliance requirements to be met and, monitoring ongoing compliance;
- Ensuring that it has complied in all material respects with the requirements of the Licence;
- Establishing and maintaining an effective system of internal control over its systems designed to achieve its compliance with the Licence requirements;
- Implementing processes for assessing its compliance requirements and for reporting its level of compliance to the ERA; and
- Implementing corrective actions for instances of non-compliance (if any).

Our responsibility

Our responsibility is to perform a reasonable assurance engagement in relation to NiW's compliance with its License requirements throughout the period and to issue an assurance report that includes our conclusion.

Our Independence and Quality Control

We have complied with our independence and other relevant ethical requirements of the *Code of Ethics for Professional Accountants* issued by the Australian Professional and Ethical Standards Board and complied with the applicable requirements of Australian Standard on Quality Control 1 to maintain a comprehensive system of quality control.

We confirm that the ERA's 2019 Audit and Review Guidelines: Electricity and Gas Licenses have been complied with in the conduct of this audit/review and the preparation of the report, and that the audit findings reflect our professional opinion.

Quantum Assurance

Geoff White CA
Director

22 June 2023

3. Performance Audit

3.1 Introduction

BHP NiW Pty Ltd ('NiW') is the licensee of the Economic Regulation Authority ('ERA') for the Electricity Distribution Licence (EDL2) and the Electricity Retail Licence (ERL2) issued by the ERA under the *Electricity Industry Act 2004*.

NiW operates a small distribution network in the mining town of Leinster – the Northern Electrical System (NES) and a small non-contiguous network to five mining customers in the Kambalda region - the Southern Electrical System (SES). The total length of BHP NiW's distribution lines is limited to 72 kilometres. In the Southern system, the distribution system consists of offtakes from another licensee's distribution or transmission system and connections to customers. The Northern distribution system is the Leinster town site with less than 300 connections to consumers. However, these connections are not considered to be customers as electricity is not retailed to the consumer.

The power is provided by Southern Cross Energy Partnership (a subsidiary of TransAlta Energy Australia Pty Ltd) which owns and operates four gas turbine power stations to provide power to NiW's operations at Mt Keith, Leinster, Kalgoorlie and Kambalda.

The licences in operation during the audit period were:

Electricity Distribution Licence 2

Version	Audit Period	Description of Amendment
9	1 April 2019 to 5 May 2021	Licence renewed for 15 years
10	6 May 2021 to 21 September 2021	Minor amendment to the Southern Cross Goldfields licence area plan ERA-EL-071(b) to remove the reference to retail.
11	22 September 2021 to date	Change to licensee's name from BHP Billiton NiW Pty Ltd to BHP NiW Pty Ltd

Electricity Retail Licence 2

Version	Time Period	Description of Amendment
9	1 April 2019 to 22 December 2020	-
10	23 December 2020 to 5 May 2021	Licence renewed for 15 years
11	6 May 2021 to 21 September 2021	Licence amended to expand Southern Goldfields licence area, set out in map ERA-EL-158.
12	22 September 2021 to date	Change to licensee's name from BHP Billiton NiW Pty Ltd to BHP NiW Pty Ltd

Under the Act, electricity services' licensees are required to provide reports on a performance audit ('audit') and an effectiveness review of their asset management system ('review') once every 24 months, or another period that has been specified by the ERA. For this audit, the period was extended to four years.

NiW engaged Quantum Management Consulting and Assurance ('Quantum Assurance'), with the approval of the ERA, to perform an audit of NiW's electricity supply services, to comply with the licensing requirements of the ERA. This audit covers the period from 1 April 2019 to 31 March 2023.

The audit approach is based on the compliance obligations set out in the Licence, applicable legislation, regulatory guidelines (Electricity Compliance Reporting Manual – February 2023, February 2022 and previous versions June 2020 and July 2018) and the 2019 Audit and Review Guidelines: Electricity and Gas Licences.

3.2 Objectives and Scope

The objective was to provide the ERA with an independent assessment of the Licensee's compliance with relevant obligations under the licences.

The scope of the audit included the adequacy and effectiveness of performance against the requirements of the licences by considering the following:

Scope	Description
Control Environment	The licensee's management philosophy and operating style, organisational structure, assignment of authority and responsibilities, the use of internal audit, the use of information technology and the skills and experience of the relevant staff members.
Information Systems	The suitability of the licensee's information systems to record the information needed to comply with the licence, accuracy of data, security of data and documentation describing the information system.
Control Procedures	The presence of systems and procedures to monitor compliance with the licence or the effectiveness of the licensee's asset management system, and to detect or prevent instances of non-compliance or under-performance.
Compliance Attitude	The action taken by the licensee in response to any previous audit or review recommendations, and an assessment of the licensee's attitude towards compliance.
Outcome Compliance	The actual performance against standards prescribed in the licence throughout the audit or review period.
Integrity of Reporting	The completeness and accuracy of the compliance and performance reports provided to the ERA.
Compliance with individual licence conditions	The requirements imposed on the specific licensee by the ERA or specific issues that are advised by the ERA.

When assessing if a licensee has complied with its licence obligations, the auditor must apply a level of scrutiny that corresponds to a 'reasonable assurance engagement'. A reasonable assurance engagement is:

"An assurance engagement in which the assurance practitioner reduces engagement risk to an acceptably low level in the circumstances of the engagement as the basis for the assurance practitioner's conclusion. The assurance practitioner's conclusion is expressed in a form that conveys the assurance practitioner's opinion on the outcome of the measurement or

The preparation of the Audit Plan has considered the previous audit report (July 2019) and the Annual Compliance Reports for 2019/20, 2020/21 and 2021/22 in the preliminary risk assessments. There were non-compliances reported as follows:

- *Obligations 319 320; 321, 336, 343, 415, 434, 448A* – NiW does not have a metrology procedure as NiW Power Purchase Agreements cover meter installation and accuracy.

The highest priority areas (priority 1, 2 or 3) based on inherent risk, the previous audit's assessed controls/processes and the reported non-compliances for this audit period are as follows:

Priority 2 (High Priority)

- *Obligations 127 and 128* – Priority Restoration Register (high inherent risk).

Priority 3 (Moderate Priority)

- *Obligations 319 320; 321, 336, 343, 415, 434, 448A* – NiW does not have a metrology procedure as NiW Power Purchase Agreements cover meter installation and accuracy.

The audit was designed to identify any areas where improvement was required and to recommend corrective action as necessary. The recommendations from the previous audit relate to minor non-compliances re the metering system were also reviewed in this audit. Refer section 3.5.

In accordance with the ERA Guidelines, recommendations are included in the report only for obligations rated as inadequate controls (C), no controls (D), non-compliant – minor impact (2), non-compliant – moderate impact (3) or non-compliant – major impact (4). Any other improvements identified in the audit are provided direct to the licensee. (refer Ratings Table in section 3.3).

3.3 Audit Compliance and Controls Rating Scale

The adequacy of controls and compliance with the legislative obligations was assessed using the following ratings.

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 – controls not assessed in the audit.	NR	Not rated – no activity in current period

3.4 Summary of Not Applicable Obligations

The following obligations included in the Audit Plan were found to be not applicable in this audit.

No.	Brief Description	Legislative Reference	Reason
	Electricity Industry Metering Code		
334	Electricity Industry Metering Code	Clause 3.9(7)	NIW's customer consumes more than 750MWh/a
350 to 354A	Metering requirements (SWIN only)	Clause 3.16(1A) to Clause 3.18(A)	As NiW does not operate in the Wholesale Electricity Market (WEM) in the SWIN, conditions relevant to the market rules are not applicable.
365	Electricity Industry Metering Code	Clause 3.29	The Licensee has not registered any metering installation providers and it is not obliged to.
385A, 385B	Electricity Industry Metering Code	Clause 4.5(2) to (3)	The Licensee does not operate in the SWIN.
391, 391A, 391B	Provide energy data to AEMO	Clause 5.6(3) to (5)	The NiW network is not part of the WEM and the requirements are not applicable as daily settlements with AEMO are not required.
416	Electricity Industry Metering Code	Clause 5.21(5)	The Licensee's network is not part of the WEM and so the requirement is not applicable regarding the Code participant not being the Independent Market Operator (IMO).
435	Electricity Industry Metering Code	Clause 5.27	The Licensee is the retailer and network operator and any requests would be to itself
436	Electricity Industry Metering Code	Clause 5.29	Electricity networks corporation is not the metering data agent.

3.5 Audit Ratings of Controls and Compliance

The current audit assessment of the ratings for the adequacy of controls and compliance for the 158 applicable licence obligations is shown below in the summary table and detailed obligations table.

Summary of Audit Ratings of Control and Compliance

Controls rating	Compliance Rating						
	Rating	1 Compliant	2 Non-compliant (minor impact)	3 Non-compliant (moderate impact)	4 Non-compliant (major impact)	NR Not rated	Total
	A - Adequate	17	-	-	-	-	17
	B - Generally adequate	-	2	-	-	-	2
	C - Inadequate	-	-	-	-	-	-
	D - No controls	-	-	-	-	-	-
	NP - Not performed	65	-	-	-	74	139
Total	82	2	-	-	73	158	

Detailed Audit Ratings of Control and Compliance by Obligation

No. ¹	Brief Description	Legislative Ref.	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating ²					Compliance Rating				
				A	B	C	D	NP	1	2	3	4	NR
Electricity Industry Act 2004													
101	Provide ERA with performance audit	Section 13(1)	4					✓	✓				
102	Asset management system (AMS)	Section 14(1)(a)	4	✓					✓				
103	Notify changes to AMS	Section 14(1)(b)	4					✓					✓
104	Asset Management System Review report	Section 14(1)(c)	4					✓	✓				
105	Payment of license fees to ERA	ERA (Licencing Funding) Regulations 2014	4	✓					✓				
106	Minimisation of unforeseen effects on electricity supply	Section 31(3)	4	✓					✓				
107	Payment of costs for land	Section 41(6)	4					✓	✓				
119	Maintaining accounting records	Section 11	4	✓					✓				
121	Comply with ERA's standard audit guidelines	Section 11	4					✓	✓				

¹ The number refers to the Obligation reference in the Electricity Compliance Reporting Manual February 2023, February 2022 and previous versions June 2020 and July 2018 where applicable.

² Refer Controls and Compliance Rating Scales in Section 3.3.

No. ¹	Brief Description	Legislative Ref.	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating ² (A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					Compliance Rating (1=Compliant, 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)					
				A	B	C	D	NP	1	2	3	4	NR	
122	Comply with ERA's AMS review guidelines	Section 11	4					✓	✓					
123	Notify ERA of external administration or changes in license circumstances	Section 11	4					✓						✓
124	Providing ERA with any other information	Section 11	4	✓					✓					
125	Timeframe to publish information	Section 11	4					✓						✓
126	Notices in writing	Section 11	4					✓	✓					
127	Priority Restoration Register	Section 11	2	✓					✓					
128	Priority Restoration Register criteria	Section 11	2	✓					✓					
Electricity Industry Metering Code														
Part 3 – Meters and Metering Installations														
319	Meters to comply with metrology procedure etc.	Clause 2.2(1)(b)	3	✓					✓					
320	Display of meter measurements	Clause 3.1	3	✓					✓					
320A	Metering of contestable customer (SWIN only)	Clause 3.2(2B)	4					✓						✓
321	Interval meter compliance	Clause 3.3(1)	3	✓					✓					
322	Communication link to have approved modem and isolation device	Clause 3.3(3)	4					✓						✓
323	No bi-directional flows unless separated by meter	Clause 3.3A(1)	4					✓						✓
324	User becomes aware of bi-directional electricity flow	Clause 3.3B	4					✓						✓
325	Accumulation meter to record net production and consumption	Clause 3.3C	4					✓						✓
326	Metering installation at each connection point	Clause 3.5(1) & (2)	4					✓	✓					
327	Maintain metering installation	Clause 3.5(3)	4					✓	✓					
328	Metering point to be located at connection point	Clause 3.5(4)	4					✓	✓					
329	Meter charges in accordance with service level agreement	Clause 3.5(6)	4					✓	✓					
330	Advise parties of any metering non-compliance	Clause 3.5(9)	4					✓						✓
331	All devices compatible with telecommunication	Clause 3.7	4					✓						✓

No. ¹	Brief Description	Legislative Ref.	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating ² (A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					Compliance Rating (1=Compliant, 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)					
				A	B	C	D	NP	1	2	3	4	NR	
	network etc.													
332	Secure meter from unauthorised access	Clause 3.8	4					✓	✓					
333	Metering installation to meet Code specifications	Clause 3.9(3)	4					✓						✓
335	Metering error as close to zero as practicable	Clause 3.9(8)	4					✓						✓
336	Programmable settings to comply with metrology procedure etc.	Clause 3.10	3	✓					✓					
337	Consistent measurement and recording of data each year	Clause 3.11(1)	4					✓	✓					
338	Outage repairs in accordance with service level agreement	Clause 3.11(2)	4					✓	✓					
339	Advise network operator of outage or malfunction	Clause 3.11(3)	4					✓	✓					
340	Meters to be sampled and tested for accuracy	Clause 3.11A(1)	4	✓					✓					
341	"Population" of failed meters to be removed	Clause 3.11A(2)	4					✓						✓
342	Metering installation to comply with prescribed design	Clause 3.12(1)	4					✓	✓					
343	Compliance of instruments transferring metering data	Clause 3.12(2)	3	✓					✓					
344	Isolation facilities to be provided	Clause 3.12(3)	4					✓	✓					
345	Maintain drawings and information	Clause 3.12(4)	4	✓					✓					
346	Procure user to install check metering installation	Clause 3.13(1)	4					✓	✓					
347	Partial check metering installation physical arrangement	Clause 3.13(3) (c)	4					✓	✓					
348	Check metering installation compliance	Clause 3.13(4)	4					✓	✓					
349	Metering installation using class CTs and VTs that do not comply with Code	Clause 3.16(1)	4					✓	✓					
355	Request for enhanced technology features	Clause 3.20(1)	4					✓						✓
356	Charges to be in accordance with service level agreement	Clause 3.20(3)	4					✓						✓
357	Accurate internal real time clock measured over 1	Clause 3.21(1)	4					✓						✓

No. ¹	Brief Description	Legislative Ref.	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating ² (A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					Compliance Rating (1=Compliant, 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)					
				A	B	C	D	NP	1	2	3	4	NR	
	month													
358	Storage onsite of internal data logger data	Clause 3.21(2)	4					✓						✓
359	Enhanced technology metering software licensed and programmable	Clause 3.22	4					✓						✓
360	Signals from meter to be isolated to prevent damage to meter	Clause 3.23(a)	4					✓	✓					
361	Signals from meter for user to be compliant	Clause 3.23(b)	4					✓	✓					
364	Metering installation only by registered operator	Clause 3.27	4					✓	✓					
Part 4 – The metering database														
366	Maintain metering database for each metering point	Clause 4.1(1)	4	✓					✓					
367	Metering database to be secure	Clause 4.1(2)	4	✓					✓					
368	Disaster Recovery Plan to rebuild metering database within 2 days	Clause 4.1(3)	4	✓					✓					
369	Compliance of metering registry	Clause 4.2(1)	4					✓	✓					
370	Standing data requirements	Clause 4.3(1)	4					✓	✓					
371	Discrepancy between data in meter and database	Clause 4.4(1)	4					✓	✓					
372	Not knowingly permit the registry to be materially inaccurate.	Clause 4.5(1)	4					✓						✓
373	Notify network operator of any inaccuracy in standing data	Clause 4.5(2)	4					✓						✓
374	Notification by Code participant of standing data change to registry	Clause 4.6(1)	4					✓						✓
375	Other notification of standing data change to registry	Clause 4.6(2)	4					✓						✓
376	Notify user within 2 business days of any update to registry	Clause 4.7(1)	4					✓						✓
377	User being retailer or generator to have remote access to energy data	Clause 4.8(3)	4					✓	✓					
378	User being retailer or generator to have remote access to metering	Clause 4.8(3A)	4					✓	✓					

No. ¹	Brief Description	Legislative Ref.	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating ² (A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					Compliance Rating (1=Compliant, 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)					
				A	B	C	D	NP	1	2	3	4	NR	
	database													
379	Energy data to be secure	Clause 4.8(4)(a)	4					✓	✓					
380	Metering database to be secure	Clause 4.8(4)((b))	4					✓	✓					
381	Security of passwords	Clause 4.8(5)	4					✓	✓					
382	Retention of energy data	Clause 4.9	4					✓	✓					
Part 5 – Metering services														
383	Code participant's requirement to obtain a metering service	Clause 5.1(1)	4					✓						✓
384	Request for service level agreement	Clause 5.1(2)	4					✓						✓
385	Transfer energy data into metering database within 2 business days	Clause 5.3(1)	4					✓	✓					
386	Validation of meter reading at least every 12 months	Clause 5.4(1)	4					✓	✓					
387	Meter reading by skilled operator	Clause 5.4(1A)	4					✓	✓					
388	Assist network operator to comply with their obligations	Clause 5.4(2)	4					✓	✓					
389	Charge for provision of energy data	Clause 5.5(2)	4					✓						✓
390	No charge if other enactment prohibits	Clause 5.5(2A)	4					✓						✓
392	Replacement energy data	Clause 5.7	4					✓	✓					
393	Provide information to the user	Clause 5.8	4					✓	✓					
397	Energy data request from user	Clause 5.12(1)	4					✓						✓
398	Standing data request from user	Clause 5.13	4					✓						✓
399	Bulk standing data request from user	Clause 5.14(3)	4					✓						✓
400	Provide date of meter reading	Clause 5.15	4					✓	✓					
401	Provide energy data to network operator within timeframe	Clause 5.16	4					✓	✓					
402	Provide standing data or energy data to customers as required	Clause 5.17(1)	4					✓	✓					
403	Provide metering data to a person associated with customer	Clause 5.17A(1)	4					✓	✓					

No. ¹	Brief Description	Legislative Ref.	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating ² (A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					Compliance Rating (1=Compliant, 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)					
				A	B	C	D	NP	1	2	3	4	NR	
404	Provide data within timeframe	Clause 5.17A(3)	4					✓	✓					
405	Change in the energisation status of a metering point	Clause 5.18	4					✓						✓
406	Act with network operator in accordance with good electricity industry practice	Clause 5.19(1)	4					✓	✓					
407	Record prescribed information in relation to the site of each connection point	Clause 5.19(2)	4					✓	✓					
408	Notify network operator of any changes within 1 day	Clause 5.19(3)	4					✓						✓
409	Notice to user of receipt of customer attributes	Clause 5.19(5)	4					✓						✓
410	Do not notify network operator if change due to information provided by network operator	Clause 5.19(6)	4					✓						✓
411	Develop Energy Data Verification Request Form	Clause 5.20(1)	4					✓	✓					
412	Form to provide prescribed information	Clause 5.20(2)	4					✓	✓					
414	Network operator to comply with any reasonable request	Clause 5.21(2)	4					✓						✓
415	Test or audit as per metrology procedure and service level agreement	Clause 5.21(4)	3					✓						✓
417	Any request must be consistent with any access arrangement or agreement.	Clause 5.21(6)	4					✓						✓
418	Meter testing or auditing charge as per service level agreement (SLA)	Clause 5.21(8)	4					✓						✓
419	SLA to include no charge for testing if non-compliance	Clause 5.21(9)	4					✓	✓					
420	Action if test shows accuracy of meter does not comply with Code	Clause 5.21(11)	4					✓						✓
421	Original stored error data must not be altered except during accuracy testing or calibration	Clause 5.21(12)	4					✓						✓
422	Validate energy data in accordance with the Code	Clause 5.22(1)	4					✓	✓					
423	Use check metering data where available	Clause 5.22(2)	4					✓						✓

No. ¹	Brief Description	Legislative Ref.	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating ² (A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					Compliance Rating (1=Compliant, 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)					
				A	B	C	D	NP	1	2	3	4	NR	
424	If check metering data not available or energy data cannot be recovered	Clause 5.22(3)	4					✓	✓					
425	Notify participants within 24 hours of loss of or error in data	Clause 5.22(4)	4					✓						✓
426	Substitution or estimation of energy data	Clause 5.22(5)	4					✓						✓
427	Review validation failures before substitution	Clause 5.22(6)	4					✓	✓					
428	If actual value cannot be determined	Clause 5.23(1)	4					✓						✓
429	Repair or replace meter or component if actual value deemed	Clause 5.23(3)	4					✓						✓
430	Replace actual value with better quality actual or deemed value if available	Clause 5.24(1)	4					✓						✓
431	Replace deemed value with better quality actual or deemed value if available	Clause 5.24(2)	4					✓						✓
432	Replace estimated value with better quality actual, deemed or estimated value if available	Clause 5.24(3)	4					✓						✓
433	Request for estimated or substituted value	Clause 5.24(4)	4					✓						✓
434	Accuracy of estimated energy data	Clause 5.25	3					✓						✓
439	Notification of non-compliant meter	Clause 5.31(2)	4					✓						✓
440	Costs recovered may not exceed amount prescribed	Clause 5.34(2)	4					✓						✓
Part 6 – Documentation														
447	Network operator compliance with agreements, rules, etc.	Clause 6.1(1)	4					✓	✓					
448	User with access contract must comply with rules, procedures, agreements.	Clause 6.1(2)	4					✓	✓					
448A	Submit prescribed documents to ERA	Clause 6.2	3		✓					✓				
448B	Publish document within 10 business days of approval by ERA	Clause 6.18	4					✓						✓
448C	Publish communication rules	Clause 6.19A(1)	4		✓					✓				
448D	Amendment of communication rules	Clause 6.19B(1)	4					✓						✓

No. ¹	Brief Description	Legislative Ref.	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating ² (A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					Compliance Rating (1=Compliant, 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)					
				A	B	C	D	NP	1	2	3	4	NR	
449	Amend document in accordance with ERA's final recommendation	Clause 6.20(4)	4					✓						✓
450	Publish amended document.	Clause 6.20(5)	4					✓						✓
Part 7 – Notes and confidential information														
451	Ensure Code participant can send and receive a notice by post, facsimile and electronic communication and must notify the network operator of a telephone number.	Clause 7.2(1)	4					✓	✓					
453	Notify contact details to a network operator within 3 business days after the request.	Clause 7.2(4)	4					✓						✓
454	Notify network operator of any change to the contact details at least 3 business days before the change.	Clause 7.2(5)	4					✓						✓
455	Protection of confidential information	Clause 7.5	4					✓	✓					
456	Comply with any disclosure required by the Code.	Clause 7.6(1)	4					✓						✓
Part 8 – Dispute resolution														
457	Aim to resolve any dispute with Code Participants within 5 business days.	Clause 8.1(1)	4					✓						✓
458	If a dispute is not resolved within 10 business days, refer dispute to senior management to meet and resolve	Clause 8.1(2)	4					✓						✓
459	If the dispute is not resolved within a further 10 business days, refer to senior executive officer of each party to meet and resolve.	Clause 8.1(3)	4					✓						✓
460	If resolved, prepare a written and signed record of the resolution and adhere to the resolution.	Clause 8.1(4)	4					✓						✓
461	The disputing parties must at all times conduct themselves in a manner	Clause 8.3(2)	4					✓						✓

No. ¹	Brief Description	Legislative Ref.	Audit Priority applied (rated 1 = High to 5 = Low)	Adequacy of Controls Rating ² (A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					Compliance Rating (1=Compliant, 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)				
				A	B	C	D	NP	1	2	3	4	NR
Electricity Industry Network Quality and Reliability of Supply Code													
462	Electrical supply to customer complies with standards	Clause 5(1)	4					✓	✓				
463	Disconnection of supply	Clause 8	4					✓	✓				
464	Maintain supply and minimise interruptions	Clause 9	4					✓	✓				
465	Reduce effect of interruption on customer	Clause 10(1)	4					✓	✓				
466	Alternative means of supply	Clause 10(2)	4					✓	✓				
468	Average length of interruptions	Clause 13(2)	4					✓	✓				
469	Calculation of average length of interruptions	Clause 13(3)	4					✓	✓				
470	Provide affected customer free copy of any instrument issued by Minister or under the Code	Clause 14(8)	4					✓				✓	
471	Modification of customer agreement	Clause 15(2)	4					✓	✓				
477	Monitor operation of network to ensure compliance	Clause 23(1)	4					✓	✓				
478	Keep records of compliance information	Clause 23(2)	4					✓	✓				
479	Complete quality investigation requested by customer	Clause 24(3)	4					✓				✓	
480	Report results of investigation to customer	Clause 24(4)	4					✓				✓	

3.6 Status of Previous Audit Recommendations

The previous audit covered the period from 1 April 2016 to 31 March 2019 and was reported in July 2019. The status of the previous recommendations is provided below.

Reference (no./year)	Previously Assessed Non-Compliance/Controls Improvement	Previous Auditor's Recommendation and Action Taken	Date Resolved	Further action required
A. Resolved before end of previous audit				
	Nil			
B. Resolved during current audit period				
1/2019	<p>Metering Installations <i>Electricity Industry Metering Code</i></p> <p>Obligation 319 - A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and also comply with any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act.</p> <p>Obligation 320 - An accumulation meter must at least conform to the requirements specified in the applicable metrology procedure and display or permit access to a display of the measurements specified in subclauses 3.2(1)(a)(b) using dials, a cyclometer, an illuminated display panel or some other visual means.</p> <p>Obligation 321 - An interval meter must at least have an interface to allow the interval energy data to be downloaded in the manner prescribed using an interface compatible with the requirements specified in the applicable metrology procedure.</p> <p>Obligation 336 - A network operator must ensure that any programmable settings within any of its metering installations, data loggers or peripheral devices, that may affect the resolution of displayed or stored data, meet the relevant requirements specified in the applicable metrology procedure and comply with any applicable specifications or guidelines specified by the National Measurement Institute under the National Measurement Act.</p>	<p>NiW may wish to consider submitting a metrology procedure to the ERA for approval but it is accepted that the information included in the PPAs adequately covers the metering of NiW's customers' usage. As a result, there is no mandatory recommendation for this obligation although NiW will continue to be technically non-compliant against the requirements of these obligations.</p> <p>Status: Closed</p> <p>The ERA accepts that the information included in the PPAs adequately covers these metering obligations with customers.</p>	March 2023	No further action required.

Reference (no./year)	Previously Assessed Non-Compliance/Controls Improvement	Previous Auditor's Recommendation and Action Taken	Date Resolved	Further action required
	<p>Obligation 343 - A network operator must ensure that instrument transformers in its metering installations comply with the relevant requirements of any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act and any requirements specified in the applicable metrology procedure.</p> <p>Obligation 415 - A test or audit under subclause 5.21(1) is to be conducted in accordance with the metrology procedure and the applicable service level agreement.</p> <p>Obligation 434 - A network operator must ensure the accuracy of estimated energy data in accordance with the methods in its metrology procedure and ensure that any transformation or processing of data preserves its accuracy in accordance with the metrology procedure.</p> <p>NiW does not have a dedicated, overall metrology procedure. However, each of the individual Power Purchase Agreements (PPAs) cover meter installation and accuracy and, as such, form NiW's metrology procedures.</p> <p>However, under Clauses 1.3 and 6.2 of the Metering Code, a metrology procedure must be submitted to and approved by the ERA. As NiW has not completed the actions required by the Code, and it does not have an approved procedure, it is not compliant with any of the obligations listed above that refer to a metrology procedure.</p> <p>It is recognised that from a practical point of view, there is no real benefit for NiW to develop and submit a metrology procedure to the ERA for approval other than being able to comply with the requirements of the Metering Code.</p>			

Reference (no./year)	Previously Assessed Non-Compliance/Controls Improvement	Previous Auditor's Recommendation and Action Taken	Date Resolved	Further action required
C. Unresolved during current audit period				
1/2019	<p>Metering Installations <i>Electricity Industry Metering Code</i> Obligation 448A -A network operator must, as soon as practicable and in any event no later than 6 months after the date this Code applies to it, submit to the ERA for its approval the prescribed documents in subclauses 6.2(a)-(d).</p> <p>NiW does not have a dedicated, overall metrology procedure. However, each of the individual Power Purchase Agreements (PPAs) cover meter installation and accuracy and, as such, form NiW's metrology procedures.</p> <p>However, under Clauses 1.3 and 6.2 of the Metering Code, a metrology procedure must be submitted to and approved by the ERA. As NiW has not completed the actions required by the Code, and it does not have an approved procedure, it is not compliant with any of the obligations listed above that refer to a metrology procedure.</p> <p>It is recognised that from a practical point of view, there is no real benefit for NiW to develop and submit a metrology procedure to the ERA for approval other than being able to comply with the requirements of the Metering Code.</p>	<p>NiW may wish to consider submitting a metrology procedure to the ERA for approval but it is accepted that the information included in the PPAs adequately covers the metering of NiW's customers' usage. As a result, there is no mandatory recommendation for this obligation although NiW will continue to be technically non-compliant against the requirements of these obligations.</p> <p>NiW may wish to consider submitting a metrology procedure to the ERA for approval but it is accepted that in practice the information included in the PPAs adequately covers the metering of NiW's customers' usage.</p> <p>Status: Ongoing</p> <p>NiW acknowledges the recommendation and will consider this when PPA's are renewed or created whether to include it in the PPA's or create a separate metrology document. Based on the current customer base, NiW confirms that this is all addressed in the current PPA's.</p> <p>There was one new PPA in June 2020 covering existing supply and metering in the Northern Electrical Distribution System. As this covers existing metering, it is accepted that a separate metrology document has not been created.</p>	Unresolved	<p>Noted as a minor non-compliance in this audit report.</p> <p><i>Refer recommendation 1/2023.</i></p>

3.7 Detailed Audit Observations

No. ³	Licence Condition	Obligation Under Licence Condition	Description	Consequences (1=minor, 2=moderate, 3=major)	Likelihood (A=unlikely, B=probable, C=unlikely)	Inherent Risk (Low, Medium, High)	Adequacy of existing controls (S=strong, M=moderate, W=weak)	Audit Priority (1=highest, 5=lowest)	A brief description of the tests that will be undertaken to assess compliance with the licence condition
SUMMARY OF COMPLIANCE OBLIGATIONS									
LEGISLATION:									
ELECTRICITY INDUSTRY ACT 2004				Refer Compliance Obligations 101 to 128 as applicable.					
REGULATIONS:									
ELECTRICITY INDUSTRY (OBLIGATION TO CONNECT) REGULATIONS				<i>Compliance Obligations 72 to 77 not applicable</i>					
ENERGY COORDINATION ACT (CUSTOMER CONTRACTS) REGULATIONS				<i>Compliance Obligations 78 to 100 not applicable</i>					
CODES:									
CODE OF CONDUCT FOR THE SUPPLY OF ELECTRICITY TO SMALL-USE CUSTOMERS				<i>Compliance Obligations 129 to 316 not applicable.</i>					
ELECTRICITY INDUSTRY (METERING CODE)				Refer Compliance Obligations 317 to 461 as applicable.					
ELECTRICITY INDUSTRY NETWORK QUALITY AND RELIABILITY OF SUPPLY CODE				Refer Compliance Obligations 462 to 485 as applicable.					

³ Number refers to the item reference in the Electricity Compliance Reporting Manual, ERA (February 2023 and previous versions February 2022, June 2020 and July 2018)

No ⁴	Licence Condition	Legislative Reference	Description	Audit Priority ⁵	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
ELECTRICITY INDUSTRY ACT 2004							
101	EDL2 & ERL2 Condition 5.3.1	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.	4	The auditor confirmed the previous performance audit report has been provided to the ERA in July 2019. This audit report will also be provided to the ERA.	NP	1
102	EDL2 Condition 5.1.1	Section 14(1)(a)	A licensee must provide for an asset management system.	4	This audit confirmed the licensee has an asset management system. This obligation is documented in the Electrical Distribution Licence Asset Management System Manual. The Manual was reviewed and updated in July 2022.	A	1
103	EDL2 Condition 5.1.2 and 5.1.3	Section 14(1)(b)	A licensee must notify details of the asset management system and any substantial changes to it to the ERA.	4	The auditor confirmed with the Principal Energy & Production Integration and field observations that no substantial changes have been made to the Asset Management System during the audit period.	NP	NR
104	EDL2 Condition 5.1.4	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.	4	The auditor confirmed the previous asset management system review report has been provided to the ERA in July 2019. This review report will also be provided to the ERA.	NP	1
105	EDL2 & ERL2 Condition	ERA (Licensing Funding) Regulation	A licensee must pay the prescribed licence fees to the ERA according to clauses 6, 7 and 8 of the <i>Economic Regulation Authority (Licensing</i>	4	The audit confirmed the fees due to the ERA for the audit period have been paid. This obligation is included in the Compliance and Breach	A	1

⁴ The number refers to the item reference in the Electricity Compliance Reporting Manual ERA – February 2023, February 2022 (and previous versions July 2020 and June 2018).

⁵ The highest priority areas (priority 1, 2 or 3) based on inherent risk and expected controls/processes are highlighted in **RED**.

⁶ Controls Rating Scale: A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed.

⁷ Compliance Rating Scale: 1=Compliant, 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated.

No ⁴	Licence Condition	Legislative Reference	Description	Audit Priority ⁵	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
	4.2.1	s 2014	<i>Funding) Regulations 2014.</i>		Management Register.		
106	EDL2 & ERL2 Condition 4.1.1	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.	4	Through review of NiW's Security, Crisis and Emergency Management and Business Continuity Plans – Our Requirements and site interviews, the auditor confirmed that NiW maintains emergency response, incident response and business continuity management systems, which support its commitment to its customers to maintain continuity of supply and safe and secure operations. The Maintenance Superintendent confirmed that NiW managers are notified of significant disruptions as and when they occur. This obligation is documented in the above Plans.	A	1
107	EDL2 & ERL2 Condition 4.1.1	Section 41(6)	A licensee must pay the costs of taking an interest in land or an easement over land.	4	The Principal Energy & Production Integration confirmed NiW has complied with this obligation and met all costs associated with interests in land and easements over land.	NP	1
119	EDL2 & ERL2 Condition 4.3.1	Section 11	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.	4	The auditor reviewed BHP's Financial Statements for 2020/21 and 2021/22 audited by external accountants that confirmed the accounting records comply with accounting standards.	A	1
121	EDL2 Condition 5.1.5	Section 11	A licensee must comply, and require its auditor to comply, with the ERA's standard audit guidelines for a performance audit.	4	Quantum was appointed with the ERA's approval to complete the performance audit for NiW for the period 1 April 2019 to 31 March 2023.	NP	1

No ⁴	Licence Condition	Legislative Reference	Description	Audit Priority ⁵	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
122	EDL2 & ERL2 Condition 4.4.1	Section 11	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.	4	Quantum was appointed with the ERA's approval to complete the asset management system review for NiW for the period 1 April 2019 to 31 March 2023.	NP	1
123	EDL2 & ERL2 Condition 4.5.1	Section 11	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.	4	The auditor confirmed by interview and review of BHP's Financial Reports for the audit period that it was not under external administration during the audit period.	NP	NR
124	EDL2 & ERL2 Conditions 3.8.1 and 3.8.2	Section 11	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.	4	In accordance with the Electricity Compliance Manual, NiW is required to submit to the ERA: <ul style="list-style-type: none"> Annual performance reports no later than 31 August for the reporting year ending 30 June; and Annual compliance reports by 31 August for the year ending 30 June. <p>The auditor reviewed NiW's correspondence with the ERA and the Compliance and Performance Reports for 2019/20, 2020/21 and 2021/22 and confirmed the reports had been submitted by the due dates.</p> <p>This obligation is included in the Compliance and Breach Management Register.</p>	A	1
125	EDL2 & ERL2 Condition 5.3.2	Section 11	A licensee must publish any information as directed by the ERA to publish, within the timeframes specified.	4	The Principal Energy & Production Integration confirmed that NiW was not required by the ERA to publish any information during the audit period.	NP	NR

No ⁴	Licence Condition	Legislative Reference	Description	Audit Priority ⁵	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
126	EDL2 & ERL2 Condition 3.7.1	Section 11	All notices must be in writing, unless otherwise specified.	4	The auditor reviewed NiW's correspondence with the ERA in the audit period and confirmed compliance. All correspondence observed was in hardcopy letter or email.	NP	1
127	EDL2 Condition 6.9.1	Section 11	A distributor must create and maintain a Priority Restoration Register.	2	<p>This obligation does not apply to NiW's northern distribution system and some lines in the southern system that supply only single customers.</p> <p>There are some lines in the southern system that supply more than one customer. The priority of restorations after an unplanned outage is set out in the Power Purchase Agreements. NiW also has a Priority Restoration Register memo (2013) that takes into account health and safety issues associated with the customers it supplies. This is considered adequate to comply with this obligation.</p> <p>The priorities for restoration after an unplanned outage at each generator are also stated in the Electrical Distribution Licence Asset Management System Manual.</p> <p>This obligation is included in the Compliance and Breach Management Register.</p>	A	1
128	EDL2 Condition 6.9.3	Section 11	The Priority Restoration Register must comply with any criteria determined by the Minister.	2	<p>The Minister has not advised any criteria that NiW's Priority Restoration Register has to comply with during the audit period.</p> <p>This obligation is included in the Compliance and Breach Management Register.</p>	A	NR

No ⁴	Licence Condition	Legislative Reference	Description	Audit Priority ⁵	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
ELECTRICITY INDUSTRY METERING CODE							
		Part 3	Meters and metering installations				
319	EDL2 Condition 4.1.1	Clause 3.1	A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and comply with any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act.	3	Through discussion with the Principal Energy & Production Integration, the site visit and review of NiW's metering processes, the audit confirmed that NiW has meters installed at all connection points to its customers in accordance with the Power Purchase Agreements (PPA) that complies with the National Measurement Act. NiW has demonstrated that it has maintained its meters to the satisfaction of its customer throughout the audit period.	A	1
320	EDL2 Condition 4.1.1	Clause 3.2(1)	An accumulation meter must at least conform to the requirements specified in the applicable metrology procedure and display or permit access to a display of the measurements that are specified in subclauses 3.2(1)(a)(b) using dials, a cyclometer, an illuminated display panel or some other visual means.	3	NiW has accumulation meters with display panels. NiW has a metering database which includes relevant technical metering information. The information relevant to the meters is captured in the metering database and monthly generation database. The metrology procedure is documented in the PPPA with the customer.	A	1
320A	EDL2 Condition 4.1.1	Clause 3.3(1)	If a meter declared to be an accumulation meter is in a metering installation for a connection point that becomes associated with a contestable customer: <ul style="list-style-type: none"> the declaration of that meter as an accumulation meter will be deemed to have ceased at the time the relevant connection point became associated with a 	4	NiW does not use accumulation meters so this is not rated.	NP	NR

No ⁴	Licence Condition	Legislative Reference	Description	Audit Priority ⁵	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			<p>contestable customer; and</p> <ul style="list-style-type: none"> the network operator must promptly remove the meter from any declared accumulation meter list and record the meter as an interval meter in the registry. 				
321	EDL2 Condition 4.1.1	Clause 3.3(1)	An interval meter must at least have an interface to allow the interval energy data to be downloaded in the manner prescribed using an interface compatible with the requirements specified in the applicable metrology procedure.	3	<p>The meters have interfaces to download data at 30 minutes intervals.</p> <p>NiW does not have a metrology procedure. Each of the Power Purchase Agreements (PPA) with customers set out the meter installation and accuracy and as such form NiW's metrology procedures.</p> <p>This obligation is not applicable to existing meters due to the transitional provisions in the <i>Electricity Industry (Metering) Code 2012</i>, which provide exemptions for meters installed prior to the commencement of the <i>Electricity Industry (Metering) Code 2005</i> from the majority of testing and accuracy requirements specified in Part 3 of the 2012 Metering Code.</p>	A	1
322	EDL2 Condition 4.1.1	Clause 3.3(3)	If a metering installation is required to include a communications link, the link must, where necessary, include a modem and isolation device approved under the relevant telecommunications regulations that allows the interval energy data to be downloaded in the manner prescribed.	4	The Principal Energy & Production Integration confirmed that NiW's customers have no requirement for a communication link to download interval energy data.	NP	NR
323	EDL2 Condition	Clause 3.3A(1)	A network operator must ensure that bi-directional electricity flows do not occur at a metering point unless the metering	4	The Principal Energy & Production Integration confirmed that there is no generation behind NiW's meters that could cause a bi-directional flow, so this	NP	NR

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	4.1.1		installation for the metering point is capable of separately measuring and recording electricity flows in each direction.		obligation is not rated.		
324	EDL2 Condition 4.1.1	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.	4	The Principal Energy & Production Integration confirmed that NiW has not become aware of a metering point which was not previously subject to bi-directional electricity flow becoming subject to bi-direction flow over the audit period.	NP	NR
325	EDL2 Condition 4.1.1	Clause 3.3C (Updated Feb.2022)	An accumulation meter or an interval meter that separately measures and records bi-directional electricity flows at the metering point must record: <ul style="list-style-type: none"> the net electricity production transferred into the network. the net electricity consumption transferred out of the network. 	4	The Principal Energy & Production Integration confirmed that there is no generation behind NiW's meters that could cause a bi-directional flow, so this obligation is not rated.	NP	NR
326	EDL2 Condition 4.1.1	Clause 3.5(1) and (2) (Updated Feb.2022)	A network operator must ensure that there is a metering installation at every connection point on its network that is not an unmetered connection point. Unless it is a Type 7 metering installation, the metering installation must meet the functionality requirements prescribed.	4	The Principal Energy & Production Integration and the site visit confirmed that all NiW's connections are metered. NiW does not have any Type 7 connections (i.e. not directly metered). NiW's metering arrangements meet the functionality requirements and these are specified in the PPA with each customer.	NP	1
327	EDL2 Condition 4.1.1	Clause 3.5(3)	For each metering installation on its network, a network operator must provide, install, operate and, subject to subclause 3.7(5), maintain the metering	4	NiW has in place Power Purchase Agreements with its customer specifying requirements for maintaining meter installations and connections per Good Engineering and Operating Practices, e.g. testing	NP	1

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			installation in the manner prescribed, unless otherwise agreed.		metering accuracy, remedying any faults, etc., which are more onerous than the requirements of this clause. All meters were tested in July 2022 by an external electrical contractor and met the prescribed standards.		
328	EDL2 Condition 4.1.1	Clause 3.5(4)	Except for a Type 7 metering installation, a network operator must ensure that the metering point for a revenue metering installation is located as close as practicable to the connection point in accordance with good electricity industry practice.	4	Several meters were replaced in the audit period with the same type of meter. The meters are installed as close to the connection points as possible. A few exceptions exist due to the topology of the network and the customers have agreed to these arrangements. All customers are metered.	NP	1
329	EDL2 Condition 4.1.1	Clause 3.5(6)	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 that it has with the user.	4	NiW has a Power Purchase Agreement with its customers and as per the PPAs, there is no charge for metering installations. The site visit and interviews confirmed that if maintenance is required, this cost is borne by NiW.	NP	1
330	EDL2 Condition 4.1.1	Clause 3.5(9)	If a network operator becomes aware that a metering installation does not comply with the Code, it must advise affected parties of the non-compliance and arrange for the non-compliance to be corrected as soon as practicable.	4	A small number of NiW's meters do not have the capability to be able to have password protection as they cannot accept a password. However, Meter Code 3.14(1) does not require installations that predate the Code to be updated. All meters are, therefore, considered compliant with the code. The process for testing the meters for accuracy is set out in each of the PPAs including at least 2 yearly meter calibrations. The latest report from Hahn Electrical was in June 2022. The EMG End of Month Procedure includes a procedure for notifying customers as soon as practicable if any metering non-compliance issues occur. However, no non-compliances have been	NP	NR

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					recorded.		
331	EDL2 Condition 4.1.1	Clause 3.7	All devices that may be connected to a telecommunications network must be compatible with the telecommunications network and comply with all applicable State and Commonwealth enactments.	4	The Principal Energy & Production Integration confirmed that NiW does not have "devices" connected to a telecommunications network. The devices are connected to their internal mine communications network.	NP	NR
332	EDL2 Condition 4.1.1	Clause 3.8	Subject to clause 3.27, a network operator must ensure that, consistent with the standards of good electricity industry practice, each metering installation on its network is secured by devices or methods that hinder unauthorized access and enable unauthorized access to be detected.	4	The site visit and interviews confirmed that NiW maintains its meter installations securely. Unauthorized access is prevented and restricted through control of metering installations. The meters are remotely monitored and any unauthorized changes will be detected.	NP	1
333	EDL2 Condition 4.1.1	Clause 3.9(3) (Updated Feb.2022)	Subject to subclauses 3.9(4), 3.9(5) and 3.9(7), each metering installation must meet at least the requirements for that type of metering installation as specified in Table 3 in Appendix 1 of the Code for metering installations on the SWIN or in Table 3A in Appendix 1 for metering installations on a network other than the SWIN.	4	NiW does not have a metrology procedure. NiW Interval accumulation is carried out in the control system. This obligation is not applicable to existing meters due to the transitional provisions in the <i>Electricity Industry (Metering) Code 2012</i> , which provide exemptions for meters installed prior to the commencement of the <i>Electricity Industry (Metering) Code 2005</i> from the majority of testing and accuracy requirements specified in Part 3 of the 2012 Metering Code. In this audit period, several new meters were installed that comply with the requirements of the Metering Code and the PPAs.	NP	NR
335	EDL2 Condition 4.1.1	Clause 3.9(9)	If compensation is carried out within the meter, then the resultant metering system error must be as close as practicable to zero.	4	NiW does not have a metrology procedure. However, individual loads on NiW's network are derived in the control system. There is no compensation carried out within the meters.	NP	NR

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336	EDL2 Condition 4.1.1	Clause 3.10	A network operator must ensure that any programmable settings in any of its metering installations, data loggers or peripheral devices, which may affect the resolution of displayed or stored data, satisfy the relevant requirements specified in the applicable metrology procedure and comply with any applicable instructions by the National Measurement Institute under the National Measurement Act.	3	NiW has appropriate measures in place concerning programmable settings if they affect data resolution and accuracy. NiW relies on the provisions in its PPAs with its customers that set out requirements in relation to metering, including calibration and estimation where necessary.	A	1
337	EDL2 Condition 4.1.1	Clause 3.11(1)	A network operator must ensure that a metering installation on its network is operating consistently with good electricity industry practice to measure and record data and permits the collection of data within the time specified in the applicable service level agreement, for at least the percentages of the year specified.	4	NiW as a network operator operates in accordance with good engineering operating practice and has a PPA with each customer detailing the information provision requirements. The metering procedures are set out in the EMG - Electrical End of Month Procedure (EMG Pro 008) reviewed in November 2022.	A	1
338	EDL2 Condition 4.1.1	Clause 3.11(2)	If an outage or malfunction occurs to a metering installation, the network operator must repair the metering installation in accordance with the applicable service level agreement.	4	From review of the Electricity Industry Network Quality and Reliability of Supply Code – Reporting Register and the interviews at the site visit, there have been on average 6 outages per year over the audit period, and the outages have been minimised. The average up time exceeds 99.5% for each year of the audit period. The metering repairs are carried out in accordance with the PPAs. These form the applicable service level agreements.	A	1

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339	EDL2 Condition 4.1.1	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.	4	As NiW is both the Code participant and the network operator, this obligation is complied with.	NP	1
340	EDL2 Condition 4.1.1	Clause 3.11A(1)	A network operator must ensure that the meters on its network are systematically sampled and tested for accuracy in accordance with AS 1284.13.	4	The requirement for accuracy of meters is covered by the PPA. . Testing of meters is scheduled via the NiW asset management system and typically carried out once every 24 months. Testing is carried out by an independent electrical contractor, and test reports are provided to NiW. An external test report of all meters in July 2022 confirmed the accuracy of the meters. Testing of meters is included in the PPA.	A	1
341	EDL2 Condition 4.1.1	Clause 3.11A(2)	Subject to clause 3.11A(3), if a “population” of meters is deemed to have failed under AS 1284.13, the network operator must ensure that all of the meters in that population are removed and replaced with new meters within 3 years of the testing of the population.	4	No population of meters is deemed to have failed under AS 1284.13. The PPA stipulates that if any tests deem a meter to be inaccurate, then that meter will be repaired or replaced. All meters are tested at least every 24 months.	NP	NR
342	EDL2 Condition 4.1.1	Clause 3.12(1)	A network operator must ensure that each metering installation complies with at least the prescribed design requirements.	4	The Principal Energy & Production Integration and interviews at the site visit confirmed that NiW has complied with all the prescribed design requirements as set out in the PPA with customers. This requirement is not applicable to most of the meters due to the transitional provisions in the Electricity Industry (Metering) Code 2012, which provide exemptions for meters installed prior to the commencement of the <i>Electricity Industry (Metering) Code 2005</i> from the majority of testing and accuracy	NP	1

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					requirements specified in Part 3 of the 2012 Metering Code.		
343	EDL2 Condition 4.1.1	Clause 3.12(2)	A network operator must ensure that instrument transformers in its metering installations comply with the relevant requirements of any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act and any requirements specified in the applicable metrology procedure.	4	NiW has complied with the obligation for the new meters installed in the audit period. However, NiW does not have a metrology procedure. The metering specifications are documented and agreed with the customers in their PPA. The requirement is not applicable to other existing meters, due to the transitional provisions in the <i>Electricity Industry (Metering) Code 2012</i> , which provide exemptions for meters installed prior to the commencement of the <i>Electricity Industry (Metering) Code 2005</i> from the majority of testing and accuracy requirements specified in Part 3 of the 2012 Metering Code.	A	1
344	EDL2 Condition 4.1.1	Clause 3.12(3)	A network operator must provide isolation facilities of a standard consistent with good electricity industry practice, to facilitate testing and calibration of the metering installation.	4	NiW has complied with the obligation. Calibration and testing is undertaken under the terms of the PPA. Isolation facilities of a standard consistent with good electricity industry practice are in place to facilitate testing and calibration of the metering installations.	NP	1
345	EDL2 Condition 4.1.1	Clause 3.12(4)	A network operator must maintain drawings and supporting information, of a standard consistent with good electricity industry practice, to detail the metering installation for maintenance and auditing purposes.	4	NiW has complied with this obligation. NiW has maintained drawings and supporting information, of a standard consistent with good electricity industry practice, that detail the metering installation for maintenance and auditing purposes. This is included in the PPA and supporting information. NiW also maintains a Metering Standing Data Register that includes the asset attributes and equipment related to each metering installation.	A	1

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346	EDL2 Condition 4.1.1	Clause 3.13(1)	A network operator must procure the user, or the user's customer, to install, or arrange for the installation of, a full check metering installation or partial check metering installation in accordance with the prescribed requirements.	4	NiW has complied with this obligation. Clause 3.13(3)(b) specifically allows for the use of SCADA to perform the check metering. Also note, clause 3.14 of the Metering Code provides an exemption for the requirement to upgrade any metering installations installed before the 2005 Metering Code amendment (this applies to NiW).	NP	1
347	EDL2 Condition 4.1.1	Clause 3.13(3) (c)	A partial check metering installation must be physically arranged in a manner determined by the network operator, acting in accordance with good electricity industry practice.	4	NiW complies with 'partial check' requirements in that NiW uses SCADA data. The requirement for partial check meters is not applicable due to the transitional provisions in the <i>Electricity Industry (Metering) Code 2012</i> , which provide exemptions for meters installed prior to the commencement of the <i>Electricity Industry (Metering) Code 2005</i> from the majority of testing and accuracy requirements specified in Part 3 of the 2012 Metering Code.	NP	1
348	EDL2 Condition 4.1.1	Clause 3.13(4)	A check metering installation for a metering point must comply with the prescribed requirements.	4	As per obligation 347.	NP	1
349	EDL2 Condition 4.1.1	Clause 3.16(1)	If, under clause 3.14(2), a metering installation uses metering class CTs and VTs that do not comply with the Table 3 or Table 3A in Appendix 1 (as applicable), then the network operator must take the actions specified in order to achieve the accuracy requirements in Table 3 or Table 3A in Appendix 1 (as applicable).	4	This requirement is not applicable to the existing meters due to the transitional provisions in the <i>Electricity Industry (Metering) Code 2012</i> , which provide exemptions for meters installed prior to the commencement of the <i>Electricity Industry (Metering) Code 2005</i> from the majority of testing and accuracy requirements specified in Part 3 of the 2012 Metering Code.	NP	NR

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355	EDL2 Condition 4.1.1	Clause 3.20(1)	If reasonably requested by a Code participant, a network operator must provide enhanced technology features in a metering installation.	4	The Principal Energy & Production Integration confirmed that NiW has not received any request to provide enhanced technology features	NP	NR
356	EDL2 Condition 4.1.1	Clause 3.20(3)	A network operator may only impose a charge for the provision of metering installations with enhanced technology features in accordance with its applicable service level agreement with the user.	4	The Principal Energy & Production Integration confirmed that NiW has not imposed any charge for metering installations apart from in accordance with the PPAs with its customers.	NP	NR
357	EDL2 Condition 4.1.1	Clause 3.21(1)	Meters containing an internal real time clock must maintain time accuracy as prescribed. Time drift must be measured over a period of 1 month.	4	As noted in previous audits, NiW does not require internal real time clocks as NiW determines its meter timings through its SCADA clock.	NP	NR
358	EDL2 Condition 4.1.1	Clause 3.21(2)	If a metering installation includes measurement elements and an internal data logger at the same site, it must include facilities on-site for storing the interval energy data for the periods prescribed.	4	NiW SCE interval accumulation is carried out in the SCADA system. Some remote meters are manually read monthly with the data recorded in the SCADA system.	NP	NR
359	EDL2 Condition 4.1.1	Clause 3.22	A network operator providing one or more metering installations with enhanced technology features must be licensed to use, and access, the metering software applicable to all devices being installed and be able to program the devices and set parameters.	4	The Principal Energy & Production Integration confirmed that NiW has not received any request to provide enhanced technology features. NiW does not provide meters with enhanced technology features.	NP	NR
360	EDL2 Condition 4.1.1	Clause 3.23(a)	Where signals are provided from the meter for the user or the user's customer, a network operator must ensure that signals are isolated by relays	4	NiW has complied with this obligation via the inherent design of the SCADA system monitored by the Control Room.	NP	1

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			or electronic buffers to prevent accidental or malicious damage to the meter.				
361	EDL2 Condition 4.1.1	Clause 3.23(b)	Where signals are provided from the meter for the user or the user's customer, a network operator must provide the user, or the user's customer, with sufficient details of the signal specification to enable compliance with clause 3.23(c) of the Code.	4	NiW has complied with this obligation. Details of the metering is included in the PPA with the customer.	NP	1
364	EDL2 Condition 4.1.1	Clause 3.27	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.	4	The site visit and interviews confirmed that the new meters were installed by a registered metering operator. The Metering Standing Data Register records the meter date of manufacture, meter type and installation date.	NP	1
		Part 4	The metering database				
366	EDL2 Condition 4.1.1	Clause 4.1(1)	A network operator must establish, maintain and administer a metering database containing standing data and energy data for each metering point on its network.	4	NiW maintains a database of the required information. Customer consumption is compiled on a monthly basis for invoicing to customers. Log sheets are used to record any manual meter readings. NiW has complied with this obligation. The procedure is set out in the EMG Electrical End of Month Procedure.	A	1
367	EDL2 Condition 4.1.1	Clause 4.1(2)	A network operator must ensure that its metering database with its associated links, circuits, information storage and processing systems are secured by devices or methods consistent with a good industry practice (to hinder unauthorised access and enable	4	There is an IT policy in place to protect access to the database, including authorised user roles and passwords. Access has to be granted in order for access to be possible. NiW has complied with this obligation. This control is set out in the BHP Technology and	A	1

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			unauthorised access to be detected).		Cyber Security – Our Requirements Policy (Sept. 2022).		
368	EDL2 Condition 4.1.1	Clause 4.1(3)	A network operator must prepare and, if applicable, implement a disaster recovery plan to ensure that it is able, to rebuild the metering database and provide energy data to Code participants within 2 business days after the day of any disaster.	4	<p>NiW has a data disaster recovery plan. Data is backed up on a daily basis. A monthly offsite back-up is also maintained.</p> <p>In the event of a disaster, all data is able to be recovered expediently as part of NiW's disaster recovery and business continuity plan. The servers are backed up and recovery time has been tested.</p> <p>Recovery of energy data is within the next meter reading as energy readings self- correct at the next meter reading (half hour). The database registry is recovered within one hour and general recovery of servers within one day.</p> <p>The energy data is captured to two independent systems – one SCADA and one SQL database.</p> <p>Either data set maybe used for provision of energy data. A disaster in one will not affect the data retained in the other, which will be immediately available, allowing the requirement to be complied with. Additionally, both data sets are backed up independently.</p> <p>Meter data is not required to be supplied to customers until after month end. The disaster recovery plan is covered by having independent dual data sets.</p> <p>This control is set out in the BHP Technology and Cyber Security – Our Requirements Policy (Sept. 2022).</p>	A	1
369	EDL2 Condition 4.1.1	Clause 4.2(1)	A network operator must ensure that its registry complies with the Code and the prescribed clause of the market	4	NiW has provided for the audit a complete print out of the registry information which contains the standing data required by the Code and additional	NP	1

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			rules.		data.		
370	EDL2 Condition 4.1.1	Clause 4.3(1)	The standing data for a metering point must comprise at least the items specified.	4	NiW has provided for the audit a complete print out of the registry information which contains the standing data required by the Code and additional data.	NP	1
371	EDL2 Condition 4.1.1	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.	4	The Principal Energy & Production Integration confirmed that any instances of incorrect energy data due to loss of communications are identified and rectified with NiW's customers before invoicing. The PPA's set out the dispute resolution processes. For some remote meters, where the communication link is weak, data is stored in the communication modules adjacent to the meter. This was confirmed during the site visit.	NP	1
372	EDL2 Condition 4.1.1	Clause 4.5(1)	A Code participant must not knowingly permit the registry to be materially inaccurate.	4	The Principal Energy & Production Integration confirmed that NiW has not knowingly permitted the registry to be materially inaccurate. There have been no customer complaints in the audit period.	NP	NR
373	EDL2 Condition 4.1.1	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.	4	The Principal Energy & Production Integration confirmed that no such event has occurred in the audit period.	NP	NR
374	EDL2 Condition 4.1.1	Clause 4.6(1)	If the network operator is notified of a change to, or inaccuracy in, an item of standing data by a Code participant that is the designated source for the item of standing data under Table 2 in clause 4.3(1) then the network operator	4	The Principal Energy & Production Integration confirmed that NiW has not received any notices in the audit period.	NP	NR

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			must update the registry to address the issue.				
375	EDL2 Condition 4.1.1	Clause 4.6(2)	If a network operator is notified of a change to, or inaccuracy in, an item of standing data by a Code participant which is not the designated source for the item of standing data, or otherwise becomes aware of a change to or inaccuracy in an item of standing data, then the network operator must determine whether the registry should be updated, and update the registry as required.	4	The Principal Energy & Production Integration confirmed that NiW has not received any notices in the audit period.	NP	NR
376	EDL2 Condition 4.1.1	Clause 4.7(1)	If standing data for a metering point is updated in the registry, the network operator must, within 2 business days after the update (or such other time as is specified in the applicable service level agreement) notify the update to the current user and each previous user if the updated standing data relates to a period or periods when the previous user was the current user.	4	The Principal Energy & Production Integration confirmed that no updates have been made to standing data in the audit period.	NP	NR
377	EDL2 Condition 4.1.1	Clause 4.8(3)	A network operator must allow a user who is a retailer or a generator to have local and, where a suitable communications link is installed, remote access to the energy data for metering points at its associated connection points, using a password provided by the network operator that provides 'read only' access.	4	NiW is both the network operator and the retailer. Therefore, the user always has remote access to the metering point and data. .	NP	1

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378	EDL2 Condition 4.1.1	Clause 4.8(3A)	A network operator must allow a user who is a retailer or a generator to have access to data held in its metering database for metering points at its associated connection points, by the prescribed methods, using a password provided by the network operator which provides 'read only' access.	4	NiW is both the network operator and the retailer. Therefore, the user always has remote access to the metering point and data. .	NP	1
379	EDL2 Condition 4.1.1	Clause 4.8(4)(a)	A network operator must have devices and methods in place to ensure that energy data held in its metering installation is secured from unauthorised local or remote access using the methods prescribed.	4	From discussion with the Principal Energy & Production Integration and review of IT policies and systems, the audit confirmed that NiW has security devices, controls and passwords in place in accordance with its IT policy.	NP	1
380	EDL2 Condition 4.1.1	Clause 4.8(4)(b)	A network operator must have devices and methods in place to ensure that the data held in its metering database is secured from unauthorised local, or remote, access using the methods prescribed.	4	From discussion with the Principal Energy & Production Integration and review of IT policies and the systems, the audit confirmed that NiW has security devices, controls and passwords in place in accordance with its IT policy.	NP	1
381	EDL2 Condition 4.1.1	Clause 4.8(5)	Without limiting subclause 4.8(4), a network operator must ensure that electronic passwords and other electronic security controls are only issued to the specified authorised personnel and otherwise keep its records of electronic passwords, and other electronic security controls, secure from unauthorised access.	4	From discussion with the Principal Energy & Production Integration and review of IT policies and the systems, the audit confirmed that NiW has security devices, controls and passwords in place in accordance with its IT policy.	NP	1
382	EDL2 Condition 4.1.1	Clause 4.9	A network operator must retain energy data in its metering database for each metering point on its network, including	4	NiW has metering database has data going back to 2005. This data is available on the network to authorised personnel.	NP	1

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			any energy data that has been replaced under subclause 5.24, for at least the periods, and with the level of accessibility, prescribed.		Energy data is reported to customers on a monthly basis. The metered usage is recorded at 30 minute intervals. NiW has complied with this obligation.		
		Part 5	Metering services				
383	EDL2 Condition 4.1.1	Clause 5.1(1)	A network operator must use all reasonable endeavours to accommodate another Code participant's requirement to obtain a metering service and requirements in connection with the negotiation of a service level agreement.	4	The Principal Energy & Production Integration confirmed that there have been no such requirements in the audit period.	NP	NR
384	EDL2 Condition 4.1.1	Clause 5.1(2)	Without limiting subclause 5.1(1), a network operator must: <ul style="list-style-type: none"> expeditiously and diligently process all requests for a service level agreement; negotiate in good faith with a Code participant regarding the terms for an agreement; and to the extent reasonably practicable in accordance with good electricity industry practice, permit a Code participant to acquire a metering service containing only those elements of the metering service which the Code participant wishes to acquire. 	4	The Principal Energy & Production Integration confirmed that there have been no such requirements in the audit period.	NP	NR

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385	EDL2 Condition 4.1.1	Clause 5.3(1)	A network operator must, for each metering point on its network, obtain energy data from the metering installation and transfer the energy data into its metering database by no later than 2 business days after the date for the scheduled meter reading for the metering point (or such other time as is specified in the applicable service level agreement).	4	The Principal Energy & Production Integration and site visit interviews confirmed that energy data is downloaded from each metering installation every 30 minutes via the SCADA system.	NP	1
386	EDL2 Condition 4.1.1	Clause 5.4(1)	A network operator must, for each meter on its network, at least once in every 12-month period undertake a meter reading that provides an actual value that passes the validation processes in Appendix 2.	4	The Principal Energy & Production Integration confirmed that NiW engages a third party contractor to complete annual calibration of its meters. The audit sighted the annual test results from June 2022.	NP	1
387	EDL2 Condition 4.1.1	Clause 5.4(1A)	The meter reading referred to in clause 5.4(1) must not be undertaken by the customer associated with the meter and must be undertaken by a person who is employed or appointed by the network operator and who is suitably skilled in accordance with good electricity industry practice to carry out meter readings.	4	Meter readings are not undertaken by any customer as NiW employs qualified and trained high voltage technicians to take manual readings of customer associated meters when/if required.	NP	1
388	EDL2 Condition 4.1.1	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).	4	NiW is both the network operator and retailer so any assistance required is provided.	NP	1
389	EDL2 Condition 4.1.1	Clause 5.5(2)	Subject to subclause 5.5(2A)(b), a network operator may impose a charge for the provision of data, but only if	4	NiW is both the network operator and retailer so no charges are imposed for the provision of data between network operator and retailer.	NP	NR

No ⁴	Licence Condition	Legislative Reference	Description	Audit Priority ⁵	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			<ul style="list-style-type: none"> a user has requested the energy data to the extent permitted by, and in accordance with the applicable service level agreement between it and the user; and if a customer has given a direction under subclause 17A (1), in accordance with the prescribed conditions. 				
390	EDL2 Condition 4.1.1	Clause 5.5(2A)	A network operator must not impose a charge for the provision of standing data and for the provision of energy data if another enactment prohibits it doing so.	4	NiW is both the network operator and retailer so no charges are imposed for the provision of data between network operator and retailer.	NP	NR
392	EDL2 Condition 4.1.1	Clause 5.7	If a replacement energy data value is inserted in a metering database for a metering point, the network operator must provide replacement energy data to the user for the metering point and the IMO within the timeframes prescribed.	4	The audit confirmed that any replacement energy data for a metering point is provided to the customer in the monthly invoices.	NP	1
393	EDL2 Condition 4.1.1	Clause 5.8	A network operator must provide a user with whatever information the network operator has that is necessary to enable the user to comply with its obligations under the Code of Conduct, within the time necessary for the user to comply with the obligations.	4	NiW is both network operator and retailer so any information required would be provided.	NP	1
397	EDL2 Condition 4.1.1	Clause 5.12(1)	If a user gives a network operator an energy data request for a metering point in accordance with the communication rules, and the energy data request relates only to a time or times for	4	The Principal Energy & Production Integration confirmed that there have been no energy data requests from users to NiW under this clause of the Code in the audit period. The users have been provided energy data according to the PPAs.	NP	NR

No ⁴	Licence Condition	Legislative Reference	Description	Audit Priority ⁵	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			which the user was the current user at the metering point, then the network operator must provide a user with a complete set of energy data for the metering point within the timeframes prescribed.				
398	EDL2 Condition 4.1.1	Clause 5.13	<p>If the current user for a metering point gives the network operator a standing data request for the metering point in accordance with the communication rules, then the network operator must:</p> <ul style="list-style-type: none"> • provide the current user with a complete current set of standing data for a metering point; and • advise whether there is a communications link for the metering point, within 2 business days after the receipt of the request. 	4	The Principal Energy & Production Integration confirmed that no request for standing data has been received within the audit period.	NP	NR
399	EDL2 Condition 4.1.1	Clause 5.14(3)	If a user makes a bulk standing data request, the network operator must in accordance with the communication rules, acknowledge receipt of the request and provide the requested standing data within the timeframes prescribed.	4	The Principal Energy & Production Integration confirmed that no request for standing data has been received within the audit period.	NP	NR
400	EDL2 Condition 4.1.1	Clause 5.15	If a network operator provides energy data to a user or the IMO it must also provide the date of the meter reading in accordance with the requirements specified.	4	The Principal Energy & Production Integration confirmed that any data provided to a user includes the date of the meter reading in accordance with the requirements specification.	NP	1
401	EDL2 Condition 4.1.1	Clause 5.16	If a user collects or receives energy data from a metering installation then the user must provide the network operator	4	NiW is both network operator and retailer so any information required would be provided.	NP	1

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			with the energy data (in accordance with the communication rules) within the timeframes prescribed.				
402	EDL2 Condition 4.1.1	Clause 5.17(1)	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.	4	The Principal Energy & Production Integration confirmed that NiW provides its customers with metering data as per the requirement of the PPAs, once every month as part of the monthly invoices issued to customers. The audit sighted examples of invoices.	NP	1
403	EDL2 Condition 4.1.1	Clause 5.17A(1)	A network operator must provide data for a metering point from its metering database to a person if (and to the extent that) the customer associated with the metering point gives the network operator a direction to do so that complies with subclause 5.17A(2).	4	The audit confirmed that NiW provides its customers with monthly energy data in its invoices so requests to provide metering point data tend to be intra-month. In addition, customers make ad hoc requests to NiW to provide energy data (e.g. maximum usage). NiW fulfils these ad hoc requests when they are made.	NP	1
404	EDL2 Condition 4.1.1	Clause 5.17A(3)	A network operator must comply with a direction under subclause 5.17A(1) within the timeframes prescribed.	4	The audit confirmed that NiW provides its customers with monthly energy data in its invoices so requests to provide metering point data tend to be intra-month. Requests for energy data are provided as soon as practicable and within the required 10 business days.	NP	1
405	EDL2 Condition 4.1.1	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	4	As NiW is both network operator and retailer, information is shared between them. NiW as a user has not collected or received information regarding a change in energisation	NP	NR

No ⁴	Licence Condition	Legislative Reference	Description	Audit Priority ⁵	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			operator with the prescribed information, including the stated attributes, within the timeframes prescribed.		status of a metering point		
406	EDL2 Condition 4.1.1	Clause 5.19(1)	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, and provide that information to the network operator.	4	As NiW is both network operator and retailer, information is shared between them.	NP	1
407	EDL2 Condition 4.1.1	Clause 5.19(2)	A user must, to the extent that it is able, collect and maintain a record of the prescribed information in relation to the site of each connection point with which the user is associated.	4	The Metering Standing Data Register includes the required information for each connection point.	NP	1
408	EDL2 Condition 4.1.1	Clause 5.19(3)	Subject to subclauses 5.19(3A) and 5.19(6), the user must, within 1 business day after becoming aware of any change in an attribute described in subclause 5.19(2), notify the network operator of the change.	4	NiW as the network operator and retailer has not become aware of any change in attribute.	NP	NR
409	EDL2 Condition 4.1.1	Clause 5.19(5)	A network operator must give notice to a user, or (if there is a different current user) the current user, acknowledging receipt of any customer, site or address attributes from the user within the timeframes prescribed.	4	NiW as the network operator and retailer has not received any customer, site or address attributes.	NP	NR
410	EDL2 Condition 4.1.1	Clause 5.19(6)	The user must use reasonable endeavours to ensure that it does not notify the network operator of a change	4	NiW as the network operator has not received any customer, site or address attributes or changes.	NP	NR

No ⁴	Licence Condition	Legislative Reference	Description	Audit Priority ⁵	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			in an attribute described in subclause 5.19(2) that results from the provision of standing data by the network operator to the user.				
411	EDL2 Condition 4.1.1	Clause 5.20(1)	A network operator must, by not later than 6 months after the date this Code applies to the network operator, develop, in accordance with the communication rules, an Energy Data Verification Request Form.	4	NiW has an Energy Data Verification Request Form and has included the requirements in the EMG End of Month Procedure.	NP	1
412	EDL2 Condition 4.1.1	Clause 5.20(2)	An Energy Data Verification Request Form must require a Code participant to provide the information prescribed.	4	NiW has an Energy Data Verification Request Form that includes the prescribed information.	NP	1
414	EDL2 Condition 4.1.1	Clause 5.21(2)	A network operator must comply with any reasonable request under subclause 5.21(1).	4	NiW has not received any requests for meter testing during the audit period. NiW has an Energy Data Verification Request Form and has included the requirements in the EMG End of Month Procedure.	NP	NR
415	EDL2 Condition 4.1.1	Clause 5.21(4)	A test or audit under subclause 5.21(1) is to be conducted in accordance with the metrology procedure and the applicable service level agreement.	3	NiW has not received any requests for meter testing or auditing during the audit period. The meter testing and applicable service level agreement is included in the PPAs.	NP	NR
417	EDL2 Condition 4.1.1	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.	4	NiW has not requested a test or audit during the audit period.	NP	NR
418	EDL2 Condition 4.1.1	Clause 5.21(8)	A network operator may only impose a charge for the testing of the metering installations, or auditing of information from the meters associated with the	4	NiW as network operator has not imposed a charge for the testing of metering installations of the audit of information form meters associated with the	NP	NR

No ⁴	Licence Condition	Legislative Reference	Description	Audit Priority ⁵	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			metering installations, or both, in accordance with the applicable service level agreement between it and the user.		metering installation during the audit period. The applicable service levels are set out in the PPAs between NiW and its customers.		
419	EDL2 Condition 4.1.1	Clause 5.21(9)	Any written service level agreement entered into under subclause 5.21(7) must include a provision that no charge is to be imposed if the test or audit reveals a non-compliance with this Code.	4	As per the PPAs, the cost of testing and auditing remains with NiW.	NP	1
420	EDL2 Condition 4.1.1	Clause 5.21(11)	If a test or audit shows that the accuracy of the metering installation or information from the meter associated with the metering installation does not comply with the requirements under this Code, the network operator must: <ul style="list-style-type: none"> advise the affected parties as soon as practicable of errors detected under a test or audit, the possible duration of the errors; and must restore the accuracy of the metering installation in accordance with the applicable service level agreement. 	4	The site visit interviews confirmed that no errors have been identified that require the affected party to be notified during the audit period. This requirement is covered by the PPA.	NP	NR
421	EDL2 Condition 4.1.1	Clause 5.21(12)	The original stored error correction data in a meter must not be altered except during accuracy testing and calibration of a metering installation.	4	The Principal Energy & Production Integration confirmed that no data has been altered during the audit period.	NP	NR
422	EDL2 Condition 4.1.1	Clause 5.22(1)	A network operator must validate energy data in accordance with this Code applying, as a minimum, the prescribed rules and procedures set out in Appendix 2 and must, where necessary, substitute	4	Manual meter readings are completed to collect the data during outages. The actual meter reads can still be used for the overall energy usage. Peak power is not estimated during periods of data loss, which meets substitution method 18 requirements.	NP	1

No ⁴	Licence Condition	Legislative Reference	Description	Audit Priority ⁵	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			and estimate energy data under this Code applying, as a minimum, the prescribed rules and procedures set out in Appendix 3.		Procedures for validation, substitution and estimation are set out in the PPAs that NiW has agreed with its customers.		
423	EDL2 Condition 4.1.1	Clause 5.22(2)	The network operator must use check metering data, where available, to validate energy data provided that the check metering data has been appropriately adjusted for differences in metering installation accuracy in accordance with subclause 3.13.	4	NiW does not use check meters. Instead NiW uses an internal check of generation through its SCADA system.	NP	NR
424	EDL2 Condition 4.1.1	Clause 5.22(3) (Amended Feb. 2022)	If a check meter is not available or energy data cannot be recovered from the metering installation within the time required under this Code, or if clause 5.22(7) applies, then the network operator must prepare substitute values using a method contained in Appendix 3 (or in the case of a substitution under clause 5.22(7), a method contained in the metrology procedure) and agreed where necessary with the relevant Code participants.	4	NiW does not use check meters. Instead NiW uses an internal check of generation through its SCADA system. Manual meter readings are completed to collect the data during outages. The actual meter reads can still be used for the overall energy usage. Peak power is not estimated during periods of data loss, which meets substitution method 18 requirements. Procedures for validation, substitution and estimation are set out in the PPA that NiW has agreed with its customers.	NP	1
425	EDL2 Condition 4.1.1	Clause 5.22(4)	If a network operator detects a loss of energy data or incorrect energy data from a metering installation, it must notify each affected Code participant of the loss or error within 24 hours after detection.	4	Any loss of energy data or incorrect energy data is handled according to the applicable metrology procedure (PPAs). There is no loss of energy data or incorrect recording of data as NiW is able to use manual meter reads if there are problems with the SCADA information and vice versa. Therefore, as any discrepancy related to the consumption within the billing self-corrects in the next billing cycle there is generally no need to notify the customer that	NP	NR

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					energy data has been lost or incorrectly recorded. As such, there was no estimation or substitution of the energy data during the audit period. Examples of NiW's interpolation using manual reads were observed through the EoM Tool that NiW uses for preparing its invoices.		
426	EDL2 Condition 4.1.1	Clause 5.22(5)	Substitution or estimation of energy data is required when energy data is missing, unavailable or corrupted, including in the circumstances described in this subclause.	4	As per obligation 425.	NP	NR
427	EDL2 Condition 4.1.1	Clause 5.22(6)	A network operator must review all validation failures before undertaking any substitution.	4	The meter accuracies are regularly tested (at least every 2 years) in accordance with the requirements in the PPAs. The latest test was in June 2022. There were no metering issues reported. Validation checks and error corrections are made to data using an automated routine when importing data into the database which is consistent with this obligation.	NP	1
428	EDL2 Condition 4.1.1	Clause 5.23(1)	If a network operator determines that there is no possibility of determining an actual value for a metering point, then the network operator must designate an estimated or substituted value for the metering point to be a deemed actual value for the metering point.	4	The Maintenance Superintendent confirmed there have been no instances in the audit period where actual values could not be determined.	NP	NR
429	EDL2 Condition 4.1.1	Clause 5.23(3)	If a network operator has designated a deemed actual value for a metering point, then the network operator must: <ul style="list-style-type: none"> repair or replace the meter or one or more of components of metering equipment (as appropriate) at the 	4	The meter accuracies are regularly tested (at least every 2 years) in accordance with the requirements in the PPAs. Validation checks and error corrections are made to data using an automated routine when importing data into the database which is consistent with this	NP	NR

No ⁴	Licence Condition	Legislative Reference	Description	Audit Priority ⁵	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			metering point; and <ul style="list-style-type: none"> subclauses 5.24(3(c) and 5.24(4) apply in respect of the estimated or substituted value which was designated to be the deemed actual value. 		obligation. The Maintenance Superintendent confirmed that following any substitution of a deemed value, any faulty equipment, communication link or logging system would be repaired or replaced. No such event has occurred in the audit period.		
430	EDL2 Condition 4.1.1	Clause 5.24(1)	If a network operator uses an actual value (first value) for energy data for a metering point, and a better quality actual or deemed actual value is available (second value), the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice.	4	The meter accuracies are regularly tested (at least every 2 years) in accordance with the requirements in the PPAs. Validation checks and error corrections are made to data using an automated routine when importing data into the database which is consistent with this obligation. The Maintenance Superintendent confirmed that following any substitution of a deemed value, any faulty equipment, communication link or logging system would be repaired or replaced. No such event has occurred in the audit period.	NP	NR
431	EDL2 Condition 4.1.1	Clause 5.24(2)	If a network operator uses a deemed actual value (first value) for energy data for a metering point, and a better quality deemed actual value is available (second value), then the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice.	4	As per obligation 430.	NP	NR
432	EDL2 Condition 4.1.1	Clause 5.24(3)	If a network operator uses an estimated or substituted value (first value) for energy data for a metering point, and a better quality actual, deemed, estimated or substituted value is available (second value), then the network	4	As per obligation 430.	NP	NR

No ⁴	Licence Condition	Legislative Reference	Description	Audit Priority ⁵	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice or the user and its customer jointly request it to do so.				
433	EDL2 Condition 4.1.1	Clause 5.24(4)	A network operator (acting in accordance with good electricity industry practice) must consider any reasonable request from a Code participant for an estimated or substituted value to be replaced under subclause 5.24.	4	The Principal Energy & Production Integration confirmed that no requests under subclause 5.24 of the <i>Electricity Industry Metering Code 2012</i> have occurred during the audit period. All requests have been made under the conditions of the PPAs in place between the parties.	NP	NR
434	EDL2 Condition 4.1.1	Clause 5.25	A network operator must ensure the accuracy of estimated energy data in accordance with the methods in its metrology procedure and ensure that any transformation or processing of data preserves its accuracy in accordance with the metrology procedure.	3	NiW has not used any estimated energy data during the audit period.	NP	NR
437	EDL2 Condition 4.1.1	Clause 5.30(1) (SWIN only)	If a network operator makes an election under subclause 5.28 in relation to the network, then the parties must enter into an agreement in relation to the network, which must deal with at least the matters prescribed.	4	NiW and Western Power have not entered into any metering data agency agreement during the audit period.	NP	NR
439	EDL2 Condition 4.1.1	Clause 5.31(2)	For each non-compliant metering installation notified under subclause 5.31(1)(b), the electing network operator may, by notice to the electricity networks corporation, require the electricity networks corporation to upgrade a non-compliant metering installation, in which case the electricity networks corporation must	4	NiW and Western Power have not entered into any metering data agency agreement during the audit period.	NP	NR

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			undertake the upgrade in accordance with the metering data agency agreement and good electricity industry practice.				
440	EDL2 Condition 4.1.1	Clause 5.34(2)	Except to the extent that the metering data agency agreement provides otherwise, the costs which may be recovered by the electricity networks corporation under subclause 5.34(1) must not exceed the amounts prescribed.	4	NiW and Western Power have not entered into any metering data agency agreement during the audit period.	NP	NR
		Part 6	Documentation				
447	EDL2 Condition 4.1.1	Clause 6.1(1)	A network operator must, in relation to its network, comply with the agreements, rules, procedures, criteria and processes prescribed.	4	As noted previously, NiW does not have a dedicated, overall metrology procedure. However, each of the individual Power Purchase Agreements (PPAs) cover meter installation and accuracy and, as such, form NiW's metrology procedures. There is no evidence that NiW has departed from any of the information included in the PPAs that it is required to comply with. The audit confirmed that NiW has not received any complaints from its customers related to not complying with the information set out in the PPAs.	NP	1
448	EDL2 Condition 4.1.1	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.	4	As per obligation 447, the audit confirmed that NiW has complied with the requirements.	NP	1
448A	EDL2 Condition 4.1.1	Clause 6.2	A network operator must, as soon as practicable and in any event no later than 6 months after the date this Code applies to it, submit to the ERA for its approval the prescribed documents in subclauses 6.2(a)-(d).	3	NiW has not submitted the prescribed documents in sub-clauses 6.2(a)-(d) to the ERA for approval being: <ul style="list-style-type: none"> proposed model Service Level Agreement 	B	2

No ⁴	Licence Condition	Legislative Reference	Description	Audit Priority ⁵	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
					<ul style="list-style-type: none"> Metrology Procedure proposed mandatory link criteria under clause 3.6. <p>NiW has PPAs that set out the Service Level Agreement with its customers. As there is no model SLA, Metrology Procedure or mandatory link criteria, the NiW has not submitted or published any documents. This is considered a minor non-compliance with no impact on the customers.</p> <p><u>Recommendation 1/2023</u> <i>NiW to continue to report to the ERA, the non-compliance with obligations, 448A and 448C due to the absence of a metrology procedure to demonstrate compliance with the Metering Code. There is no impact on the customer.</i></p>		
448B	EDL2 Condition 4.1.1	Clause 6.18	A network operator must publish the document within 10 business days after notification of the ERA's approval under subclauses 6.13(1)(a)(i), 6.16 or 6.17.	4	NiW has not submitted any documents to the ERA for approval under subclauses 6.13(1)(a)(i), 6.16 or 6.17. Therefore, this obligation has not been rated.	NP	NR
448C	EDL2 Condition 4.1.1	Clause 6.19A(1)	A network operator must publish its communication rules as soon as practicable, and in any event within 6 months after the date this Code applies to it.	4	As noted previously, NiW does not have a dedicated, overall metrology procedure. However, each of the individual Power Purchase Agreements (PPAs) cover meter installation and accuracy and, as such, form NiW's metrology procedures. As these are confidential agreements with customers, they have not been published. This is considered a minor non-compliance and has no impact on customers. <u>Refer recommendation 1/2023.</u>	B	2
448D	EDL2 Condition 4.1.1	Clause 6.19B(1)	Once communication rules have been published for a network under clause 6.19A, or amended under clause 6.21(3),	4	NiW has not amended its communication rules during the audit period. Therefore, this obligation has not been rated.	NP	NR

No ⁴	Licence Condition	Legislative Reference	Description	Audit Priority ⁵	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			the communication rules may only be amended thereafter in accordance with the communication rules made under subclause 6.7(1)(k) or clause 6.19C.				
449	EDL2 Condition 4.1.1	Clause 6.20(4)	A network operator must amend any document in accordance with the ERA's final recommendation.	4	The Principal Energy & Production Integration confirmed that NiW has not received any request by the ERA to amend any documents within the audit period.	NP	NR
450	EDL2 Condition 4.1.1	Clause 6.20(5)	The network operator must publish any document that has been amended under subclause 6.20(4).	4	NiW has had no documents amended under subclause 6.20(4) during the audit period.	NP	NR
		Part 7	Notes and confidential information				
451	EDL2 Condition 4.1.1	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.	4	From review during the audit, NiW has complied with the requirements. Email, phone and postal address are available. The audit confirmed that NiW has not received any complaints from customers in the audit period.	NP	1
452	EDL2 Condition 4.1.1	Clause 7.2(2)	A network operator must notify each Code participant of its initial contact details and of any change to its contact details at least 3 business days before the change takes effect.	4	NiW as the network operator has not changed its address during the audit period. Therefore, this obligation has not been rated.	NP	NR
453	EDL2 Condition 4.1.1	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.	4	There have been no changes to the contact details in the audit period. Therefore, this obligation has not been rated.	NP	NR

No ⁴	Licence Condition	Legislative Reference	Description	Audit Priority ⁵	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
454	EDL2 Condition 4.1.1	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.	4	There have been no changes to the contact details in the audit period. Therefore, this obligation has not been rated.	NP	NR
455	EDL2 Condition 4.1.1	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.	4	The Principal Energy & Production Integration confirmed that NiW has not disclosed or permitted the disclosure of confidential information. NiW's data systems have secure access. The audit confirmed that NiW has not received any complaints from customers in the audit period.	NP	1
456	EDL2 Condition 4.1.1	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.	4	NiW has not been required to disclose or permit the disclosure of confidential information that is required to be disclosed by the Code during the audit period.	NP	NR
		Part 8	Dispute resolution				
457	EDL2 Condition 4.1.1	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.	4	The Principal Energy & Production Integration confirmed that there have been no metering disputes within the audit period. Therefore, this obligation has not been rated.	NP	NR
458	EDL2 Condition 4.1.1	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	4	As per obligation 457.	NP	NR

No ⁴	Licence Condition	Legislative Reference	Description	Audit Priority ⁵	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
			management officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.				
459	EDL2 Condition 4.1.1	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.	4	As per obligation 457.	NP	NR
460	EDL2 Condition 4.1.1	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.	4	As per obligation 457.	NP	NR
461	EDL2 Condition 4.1.1	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).	4	As per obligation 457.	NP	NR
ELECTRICITY INDUSTRY NETWORK QUALITY AND RELIABILITY OF SUPPLY CODE							
462	Condition 4.1.1	Clause 5(1))	A distributor or transmitter must, as far as reasonably practicable, ensure that electricity supply to a customer's electrical installations complies with prescribed standards.	4	The Principal Energy & Production Integration and Maintenance Superintendent confirmed that NiW has, as far as is reasonably practicable, complied with the prescribed standards during the audit period. The power quality survey completed during the audit period show compliance with the voltage fluctuation and harmonic requirements included in	NP	1

No ⁴	Licence Condition	Legislative Reference	Description	Audit Priority ⁵	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
					<p>Clauses 6 and 7 of the Code. The survey was completed to the current AS 61000 standard.</p> <p>The standards are agreed with NiW's retail customers in the PPAs and these specify the relevant standard that was in place at the time, AS 2279). However, although the most recent versions of the PPAs are dated 2014, they still refer to the now-replaced AS.</p> <p>The old Australian standard (AS2279) uses a different method for voltage flicker and less detail for harmonics. The old Australian standard also has a more demanding total harmonic level than the Code.</p> <p><i>An improvement opportunity is to update the references to AS 2279 in the PPAs with the current standard AS 61000 when the PPAs are next updated.</i></p>		
463	Condition 4.1.1	Clause 8	A distributor or transmitter must, so far as reasonably practicable, disconnect the supply of electricity to installations or property in specified circumstances, unless it is in the interest of the customer to maintain the supply.	4	<p>NiW has ensured that the supply of electricity has been maintained and the occurrence and duration of interruptions has been kept to a minimum.</p> <p>The statistics for the interruptions for this 4 year period is as follows:</p> <ul style="list-style-type: none"> • Average length of interruption: 105 minutes • Average no. of interruptions pa: 4 • Average supply availability: 99.96% • Average total length of interruptions pa: 344 minutes <p>The interruptions have been minor and response is in line with service levels expected for the number and size of customers and the network.</p> <p>There is a requirement for mine production to keep</p>	NP	1

No ⁴	Licence Condition	Legislative Reference	Description	Audit Priority ⁵	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
					interruptions to a minimum.		
464	Condition 4.1.1	Clause 9	A distributor or transmitter must, as far as reasonably practicable, ensure that the supply of electricity is maintained and the occurrence and duration of interruptions is kept to a minimum.	4	NiW has ensured that the supply of electricity has been maintained and the occurrence and duration of interruptions has been kept to a minimum. There are heavy PPA financial penalties imposed for any interruptions to supply.	NP	1
465	Condition 4.1.1	Clause 10(1)	A distributor or transmitter must, so far as reasonably practicable, reduce the effect of any interruption on a customer.	4	NiW aims to minimise the effect of any interruption on the customer and there are PPA financial penalties imposed for any interruptions to supply. Planned outages are coordinated with mine production/shutdowns. Any unplanned outages are restored as soon as reasonably practicable and as expected for a radial system. There is no remote switching on the network and personnel are required to travel to the site for local switching operations. This impact to customers is reduced by having on 24/7 on call personnel with vehicle access.	NP	1
466	Condition 4.1.1	Clause 10(2)	A distributor or transmitter must consider whether, in specified circumstances, it should supply electricity by alternative means to a customer who will be affected by a proposed interruption.	4	NiW's networks are essentially radial and there is no backup for line failures. There have been no requests for standby or alternative supply due to shutdown during the audit period. These circumstances are very unlikely as planned outages are coordinated with mine shutdowns.	NP	NR
468	Condition 4.1.1	Clause 13(2)	A distributor or transmitter must, so far as reasonably practicable, ensure that customers in specified areas do not have average total length of interruptions of supply greater than specified dur	4	During the 4 year reporting period, as set out in Schedule 1, cl 13 of the <i>Network Quality and Reliability Code 2005</i> , the average length of interruption of supply to has been 105 minutes. This is less than the 290 minute requirement outlined under this section of the Code.	NP	1

No ⁴	Licence Condition	Legislative Reference	Description	Audit Priority ⁵	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
469	Condition 4.1.1	Clause 13(3)	The average total length of interruptions of supply is to be calculated using the specified method.	4	NiW creates an incident log every time there is an incident and an interruption to the supply. Interruption times can be ascertained from the incident logs and this information is recorded in spreadsheet for reporting purposes. NiW confirmed that it completes calculation of interruptions annually as required. The Electricity Industry Network Quality and Reliability of Supply Code - Reporting Requirements spreadsheet records the interruption information required by the Code.	NP	1
470	Condition 4.1.1	Clause 14(8)	A distributor or transmitter must, on request, provide to an affected customer a free copy of an instrument issued by the Minister and of any notice given under section 14(7) of the <i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005</i> .	4	The Principal Energy & Production Integration confirmed that NiW has not received any such request within the audit period.	NP	NR
471	Condition 4.1.1	Clause 15(2)	A distributor or transmitter that agrees with a customer to exclude or modify certain provisions must set out the advantages and disadvantages to the customer of doing so in their agreement.	4	NiW has in place a PPA with each customer specifying the network quality and reliability of supply and are similar to requirements set out in the Code. There was one new PPA in the audit period and this complies with this obligation.	NP	1
477	Condition 4.1.1	Clause 23(1)	A distributor or transmitter must take all such steps as are reasonably necessary to monitor the operation of its network to ensure compliance with specified requirements.	4	NiW has taken all such steps as are reasonably necessary to monitor the operation of its network to ensure compliance with the specified requirements. The southern system is part of the BHP Billiton mine SCADA. The southern network is not continuously monitored in real time by an operations room dedicated to the network but by is monitored by the mine site operations centre. Alarms or faults are relayed to network staff by	NP	1

No ⁴	Licence Condition	Legislative Reference	Description	Audit Priority ⁵	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁶	Compliance Rating ⁷
					<p>mobile telephone.</p> <p>The northern system is not monitored by the network operator. Outages are reported quickly for the network operator staff to respond. This meets the reasonably necessary requirements.</p> <p>Another network operator monitors the upstream supply and endeavours to notify of any failures and interruptions.</p> <p>Repair work is carried out by contractors.</p> <p>The reporting requirements associated with this obligation do not apply as there are no small use customers.</p>		
478	Condition 4.1.1	Clause 23(2)	A distributor or transmitter must keep records of information regarding its compliance with specific requirements for the period specified.	4	<p>NiW has an internal system for recordkeeping as confirmed in this audit.</p> <p>However, the time requirement for this obligation only applies to reports under clause 27, which in turn are not required as there are no small use consumers.</p> <p>NiW maintains power quality surveys and incident logs in relation to the obligations under clause 23(1)(a).</p>	NP	1
479	Condition 4.1.1	Clause 24(3)	A distributor or transmitter must complete a quality investigation requested by a customer in accordance with specified requirements.	4	<p>The Principal Energy & Production Integration confirmed that NiW completes quality investigations requested by its customers in accordance with specified requirements in the PPAs. NiW has not received a quality investigation request from any customer during the audit period.</p> <p>Therefore, this obligation has not been rated.</p>	NP	NR
480	Condition 4.1.1	Clause 24(4)	A distributor or transmitter must report the results of an investigation to the customer concerned.	4	As per obligation 480.	NP	NR

3.8 Audit Recommendations

Table of Current Audit Non- Compliances and Recommendations			
A. Resolved during current audit period			
Recommendation (no./year)	Non-Compliance/Controls Improvement (Rating/Licence obligation ref. and obligation/Non-compliance or inadequacy of control)	Date Resolved (& management action taken)	Auditor's Comments
	Nil		
B. Unresolved at end of current audit period			
Recommendation (no./year)	Non-Compliance/Controls Improvement (Rating/Licence obligation ref. and obligation/Non-compliance or inadequacy of control)	Auditor's Recommendation	Action taken by the licensee by end of audit period
1/2023	<p>Metering Installations <i>Rating: B2</i> <i>Electricity Industry Metering Code</i> Obligation 448A -A network operator must, as soon as practicable and in any event no later than 6 months after the date this Code applies to it, submit to the ERA for its approval the prescribed documents in subclauses 6.2(a)-(d). Obligation 448C - A network operator must publish its communication rules as soon as practicable, and in any event within 6 months after the date this Code applies to it.</p> <p>NiW does not have a dedicated, overall metrology procedure. However, each of the individual Power Purchase Agreements (PPAs) cover meter installation and accuracy and, as such, form NiW's metrology procedures.</p> <p>However, under Clauses 1.3 and 6.2 of the Metering Code, a metrology procedure must be submitted to and approved by the ERA. As NiW has not completed the actions required by the Code, and it does not have an approved procedure, it is not compliant with any of the obligations listed above that refer to a metrology procedure.</p> <p>It is recognised that from a practical point of view, there is no real benefit for NiW to develop and submit a metrology procedure to the ERA for approval other than being able to comply with the requirements of the Metering Code.</p>	<p>NiW to continue to report to the ERA, the non-compliance with obligations 448A and 448C due to the absence of a metrology procedure to demonstrate compliance with the Metering Code. There is no impact on the customers.</p>	Nil

Appendix A - Methodology

A1. Audit Approach

Our approach to meeting the requirements for the performance audit is set out below.

Audit Planning

- Conduct an initial meeting with the ERA to confirm the audit approach and timing for the audit and review (*not required*).
- Contact the licensee to gain an understanding of the business, relevant management plans and systems that may affect the risk assessment for planning purposes.
- Prepare a risk assessment including any specific factors or changes relevant to the licensee (in tabular form against each licence condition and asset management system component).
- Submit a draft **Audit Plan**, including the risk assessment and proposed approach, to the ERA for review and approval.
- Send a **Pre-Visit Checklist** of information and documentation to the licensee to enable staff to prepare for the visit (and where possible, send us information prior to the site visit).

Fieldwork

- Undertake a visit to the licensee and conduct various meetings with stakeholders, including corporate services and works/facilities management personnel, to determine the effectiveness of systems and procedures in place and to compare actual performance against the licence standards. The on-site visit included our Engineer.
- Obtain copies of the latest asset management plans, performance reporting statistics and relevant correspondence between the licensee and the ERA for the audit period.
- The audit steps for the **Performance Audit** included:
 - **analysis of documented procedures** to assess whether they are consistent with regulatory requirements or arrangements under the licence;
 - **review of systems and procedures** to assess whether they reflect compliance obligations and performance standards, including assessing and testing the following:
 - **control environment** – management’s philosophy and operating style, organisational structure, assignment of authority and responsibilities, the use of internal audit, the use of information technology and the skills and experience of the key staff members;
 - **information system** – the appropriateness of the information systems to record the information needed to comply with the licence, accuracy of data, security of data, cyber security and documentation describing the information system;
 - **control procedures** – the presence of systems and procedures to monitor compliance with the licence or the effectiveness of the asset management system and to detect and correct non-compliance or under-performance;
 - **compliance attitude** - the action taken by the licensee in response to the previous audit/review recommendations, and an assessment of management’s attitude towards compliance; and
 - **outcome compliance** – the actual performance against standards prescribed in the licence throughout the audit period.
- Update the risk assessment with any new information obtained in the course of the audit testing and, in instances of significant non-compliance, assess the licensee’s plan to ensure compliance and recommend any further improvements to achieve compliance.

Audit Reporting

- Prior to the conclusion of the visit, the lead auditor will discuss any observations and recommendations with the licensee's management to confirm our understanding of the issues and to discuss the action to be taken.
- Provide a draft report to the ERA for review no later than two weeks before the final report is due and make any revisions necessary.
- Provide the updated draft report to the ERA for review and feedback prior to finalising the report.
- Issue the final report to the ERA.
- The ERA will arrange responses to the proposed actions in the Post Audit Implementation Plan.

A2. Key Documents Reviewed

- Energy Coordination Act 1994
- Electricity Industry Act 2004
- Electricity Industry (Metering Code) 2012
- Economic Regulation Authority (Licensing Funding) Regulations 2014
- Electricity Compliance Reporting Manual (February 2023 and previous versions February 2022, June 2020 and July 2018).
- Electricity Distribution Licence EDL2 (Version 11)
- Distribution Operating Area Maps (ERA-EL-071C and ERA-EL-070-1)
- NiW Environmental Management Plan
- NiW Metering Standing Data Register
- Interruptions Register
- BHP Billiton Annual Reports FY2021, 22.
- NiW Breach Register
- NiW Priority Restoration Register memo August 2013)
- Nickel West Description of Metering Overview
- Electricity Retail Licence ERL2 (Version 12)
- Retail Operating Area Maps (ERA-EL-158 and ERA-EL-070-2) Performance Audit and Asset Management Review Report (July 2019)
- Post Audit Implementation Plan (2019)
- Performance and Compliance Reports to the ERA for 2019/20, 2020/21 and 2021/22 and acknowledgment of receipt
- Information on fees paid to the ERA (amounts and dates paid)
- Examples of Customer Invoices and spreadsheets
- Energy Data Verification Request Form
- EMG End of Month Procedure
- EoM Tool
- Electricity Industry Network Quality and Reliability of Supply Code – Reporting Requirements spreadsheet
- Incident logs May 2019 to March 2023

A3. Key Contacts

The licensee's representatives participating in the audit were:

- Essie Croukamp - Principal Energy & Production Integration
- Ian Pritchard - Maintenance Superintendent
- Justin Van Jaarsveldt – Supervisor Electrical
- Shantanu Kumar – Principal Engineer Electrical
- Samuel Loughnan – Graduate Engineer Electrical

A4. Consultants

NAME AND POSITION	HOURS
Geoff White - Director	40
Susan Smith - Manager	40
Tanuja Sanders – Engineering Consultant	10
TOTAL	90

END OF REPORT