

WESTERN POWER

2024 Asset Management System Review

AMS Review Report

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AMENDMENT HISTORY

Version	Sections	Amendment Details
1-0	All	First Draft
2-0	All	Draft Final
3-0	All	Draft Final – addressing ERA comments – Redline
4-0	Observations and Recommendations	Final – addressing ERA comments

EXECUTIVE SUMMARY

Directions for the Review

Western Power is the holder of two operating licences granted by the Economic Regulation Authority of Western Australia (the ERA), these being the Electricity Distribution Licence (EDL1) and the Electricity Transmission Licence (ETL2). It is a condition of each licence that Western Power has an Asset Management System in place, with this system setting out the measures taken by Western Power for the proper management of those assets used in the supply or provision of electricity services, in accordance with its licence obligations.

Western Power is required to provide the ERA with an independent report by a suitability qualified entity as to the effectiveness of the Asset Management System governing the operation of its licences in the period from July 2020 to June 2024. AMCL Pty Ltd (the Reviewer) was engaged in March 2024 by Western Power to undertake this review to assess the effectiveness of the licensee's asset management system in accordance with the ERA's 2019 Audit and Review Guidelines for Electricity and Gas Licences (August 2022).

The Asset Management System Review (AMSR) was conducted from April to August 2024. A review plan was submitted in May 2024 and approved by the ERA. The Review was undertaken by desktop assessment of documentation and then on-site interviews of personnel, with AMCL also visiting a Western Power regional and metropolitan site, reviewing documentary evidence and hearing testimony of key personnel. The Review was carried out in line with the review plan.

Under the terms of AMCL's engagement and in accordance with the requirements of the ERA's review guidelines, the review was undertaken to the standard of Limited Assurance, in accordance with the approved review plan. Particular areas required more detailed assessments in line with audit priorities especially where a recommendation as to improvements has been made.

This report documents the assessments made by AMCL in the undertaking of the 2024 Review of Western Power's Asset Management System for licences EDL1 and ETL2.

Licences and Assets Covered by this Review

As noted, Western Power currently holds two licences from the ERA to operate electricity supply assets in Western Australia, viz:

- EDL1, granted to enable Western Power the functions required to construct and operate new distribution system assets or operate the existing distribution system assets and the system as a whole in accordance with the terms and conditions of the licence in the designated licence area; and
- ETL2, granted to enable Western Power the functions required to construct and operate new transmission system assets or operate the existing transmission system assets and the system as a whole in accordance with the terms and conditions of the licence in the designated licence area.

As a general principle, distribution assets are those that operate at a voltage level of 33kV and below, and transmission system assets are those that operate at a voltage level of 66kV and above.

AMCL has observed that there were no "substantial changes" to the nature of Western Power's business during the review period, with the licenced functions remaining unchanged for the purposes of this review. It was observed that:

- Progress has been made over the review period in the development and embedment of Standalone Power Systems (SPS) and Battery Energy Storage Systems (BESS) across the Western Power network, and more specifically into Western Power's asset management system. There has been a focus on updating AMS policy and procedure to include SPS and BESS assets, and to create new artefacts and processes where required to expand Western Power's ISO 55001 certification to include these assets within scope at its 2025 recertification audit. For the purposes of this review these have been treated as distribution system assets managed under EDL1 and accordingly have been subjected to the requirements of this review.

Actions from the 2020 Review

The 2020 AMSR provided three recommendations to address limitations observed in Western Power's asset management system at the time.

We have observed evidence demonstrating that Western Power has implemented actions agreed with the ERA for each of the above recommendations.

2024 Review Process

The review was conducted through a combination of initial desktop assessment of key documentation, presentations by and interviews with key personnel, and a series of follow-up queries and documentation requests. The initial documentation request was based on the list of documents reviewed during the 2020 review, with similar or current equivalent documents sought.

AMCL reviewed all documentation provided and allocated each to the Asset Management Process and Effectiveness Criteria which we considered it to be relevant. This enabled an initial view of potential process or performance issues that needed to be further explored through the interviews and additional documentation requests.

In total, over 275 documents were reviewed and allocated to relevant Effectiveness Criteria as assessed by AMCL. Where possible, multiple allocations of a document to more than one Asset Management Process was avoided, except in cases where the documents clearly had a broader enterprise intent such as overall strategy or business planning documents, with these documents noted as being common to the Asset Management System as a whole.

Throughout the course of the review, over 50 Western Power personnel were interviewed and involved in follow-up discussions to understand Western Power's Asset Management System, its governing policies and processes, and its performance. AMCL adopted an approach that stepped through each Asset Management Process and Effectiveness Criteria, with Western Power addressing each Effectiveness Criteria with a presentation of its associated Asset Management System functionality to provide understanding of performance.

Overall Assessment of the 2024 Review

In general, it was observed that Western Power continues to maintain and improve on a sophisticated, well-structured and disciplined Asset Management System. Through the documentation review, onsite interviews, and field inspection process, Western Power demonstrated clear intent in its application of the system and diligence in its upkeep.

A small number of minor limitations were observed in relation to the policy, process and performance effectiveness of Western Power's Asset Management System when assessed in accordance with the ERA's Audit Guidelines, with one recommendation being required for consideration.

The upkeep of transactional and operational records appears to be ongoing with information to and from field activities observed to be prompt and appropriate. The upkeep of the various system documentation for policies and procedures was both comprehensive and effective. Western Power recognised that several changes in corporate direction required asset management activities and the

associated policies and procedures to be updated in line with new asset management objectives. This review found that some documented strategies are still awaiting an update to reflect these changes, which is reflected in the relevant effectiveness criteria ratings.

AMCL observed that Western Power had actioned regulatory requirements and previous review recommendations with considered responses in line with its ability to manage its network. There has been progressive development over the review period related to non-asset solutions, cost justification and lifecycle cost analysis, with documented evidence of these developments sighted in the latter half of the review period. This evidence includes updated strategy, process and outputs.

Findings of the 2024 Review

One recommendation has been made. This is against Asset Management Process 12.2 for EDL1 and ETL2.

In summary, the recommendation and the Asset Management Process and Effectiveness Criteria to which it applies is as follows:

No.	Recommendation	Asset Management Process. Effectiveness Criteria	Rating	Licence
01/2024	<p>We recommend that Internal Audit documentation clearly identifies elements of asset management system being audited, and be able to demonstrate how the current Internal Audit activity is providing appropriate review of the entire system, rather than relying on the ISO55001 certification and underpinning audits.</p> <p>This will enable Western Power to show that the current Internal Audit activity is providing appropriate review of the entire system.</p>	12.2	B3	EDL1 ETL2

TABLE OF CONTENTS

1. REVIEW OBJECTIVES.....	2
1.1 Review Objectives and Purpose.....	2
1.2 Review Methodology.....	2
2. SCOPE OF WORK.....	3
2.1 Type of Assurance Engagement.....	5
2.2 Site Visits	5
2.3 Personnel and Documentation.....	5
2.4 Work Schedule.....	6
3. DEVIATIONS FROM THE REVIEW PLAN.....	8
4. ACTIONS FROM PREVIOUS REVIEWS	9
4.1 A. Resolved during Current Review Period	9
4.2 B. Unresolved during Current Review Period.....	14
5. PERFORMANCE SUMMARY	15
5.1 Performance Summary for EDL1.....	15
5.2 Performance Summary for ETL2.....	19
6. AUDITOR'S OBSERVATIONS.....	23
6.1 Key Findings.....	23
6.2 Information Sources.....	24
6.3 Review Procedures	24
6.4 Observations and Recommendations.....	25
7. RECOMMENDATIONS	111
7.1 Recommendations from Previous Audit - Resolved	112
7.2 Recommendations from Previous Audit – Unresolved.....	115
7.3 Recommendations from Current Audit – Unresolved.....	116
8. APPROVAL OF THE REVIEW REPORT	117
APPENDIX A WESTERN POWER REPRESENTATIVES THAT PARTICIPATED IN THE REVIEW ..	119
APPENDIX B DOCUMENTATION AND INFORMATION SOURCES REVIEWED	122
APPENDIX C PERFORMANCE RATING SCALES.....	163

1. REVIEW OBJECTIVES

1.1 REVIEW OBJECTIVES AND PURPOSE

AMCL notes the following purpose for the Review as stated in the ERA's Audit Guidelines¹:

The purpose of a review is to assess the licensee's asset management system, which includes the asset management plan, and the staff and IT resources that support the plan.

An asset management plan sets out the measures the licensee will take to properly operate and maintain assets. The plan must detail the licensee's business strategies to ensure it maintains an effective asset management system over at least a five-year period.

The Review is required to be performed consistent with the regulatory framework prescribed in the Electricity Industry Act 2004 (WA), the licenses and these guidelines.

1.2 REVIEW METHODOLOGY

The methodology for the review included three core elements:

- Review plan – The review plan was developed consistent with Section 3 of the ERA Guidelines and in conformance with the requirements outlined in ASAE 3000 (Sec. 40-47) and ASAE 3500 (Sec. 32 to 52).
- Interview – The effectiveness of Western Power's Asset Management System was assessed consistent with Section 4 of the ERA Guidelines. This included assessing: the effectiveness of the control environment, the effectiveness of information systems, the effectiveness of control procedures, the attitude towards effectiveness, and whether effective outcomes are achieved.
- Review Report – This review report is consistent with Section 5 of the ERA Guidelines to express our opinion in respect of the findings of the review.

¹ 2019 Audit and Review Guidelines, Electricity and Gas Licenses (August 2022)

2. SCOPE OF WORK

AMCL notes that the Review scope is as specified in the RFQ is as follows:

The scope of the asset management system review needs to focus on the asset management system, including asset management plans, which set out the measures that are to be taken by the licensee for the proper operation and maintenance of assets. The plans must convey the licensee's business strategies to ensure the effective management of assets over at least a five year period.

The scope of the review must include an assessment of the adequacy and effectiveness of Western Power's asset management system for the period 1 July 2020 to 30 June 2024 by evaluating the key processes of:

- *Asset planning*
- *Asset creation and acquisition*
- *Asset disposal*
- *Environmental analysis*
- *Asset operations*
- *Asset maintenance*
- *Asset management information system*
- *Risk management*
- *Contingency planning*
- *Financial planning*
- *Capital expenditure planning*
- *Review of the asset management system*

The scope of this review must also include a follow up on the status of the last review report's (2020) management actions.

The effectiveness criteria that are to be used are described in the 'Audit Guidelines' available from the ERA's website (www.erawa.com.au).

AMCL affirms this as the scope of the Review. AMCL also affirms that the Areas of Special Focus identified by the ERA have been taken into account when conducting the review. The Areas of Special Focus identified by the ERA are as follows:

The ERA has identified a number of areas of special focus during the review, and these are to be taken into account by the auditor when preparing the review plan and when conducting the review. The auditor must assign an audit priority of '2' to the above criteria in the review plan for EDL1 and ETL2:

Process	Asset management effectiveness criteria
Asset planning	<p>Criteria 1.4 – Non-asset options (e.g., demand management) are considered.</p> <p>Criteria 1.5 – Lifecycle costs of owning and operating assets are assessed.</p> <p>Criteria 1.8 – Likelihood and consequences of asset failure are predicted.</p>
Asset creation and acquisition	<p>Criteria 2.1 – Full project evaluations are undertaken for new assets, including comparative assessment of non-asset options.</p> <p>Criteria 2.2 Evaluations include all life-cycle costs.</p>
Environmental analysis	<p>Criteria 4.1 Opportunities and threats in the asset management system environment are assessed.</p> <p>Criteria 4.2 – Performance standards (availability of service, capacity, continuity, emergency response, etc) are measured and achieved.</p> <p>Criteria 4.4 – Service standard (customer service levels etc) are measured and achieved.</p>
Asset maintenance	<p>Criteria 6.2 – Regular inspections are undertaken of asset performance and condition.</p> <p>Criteria 6.4 – Failures are analysed and operational/maintenance plans are adjusted where necessary.</p>
Risk management	<p>Criteria 8.3 – The probability and consequence of asset failure are regularly assessed.</p>
Review of asset management system	<p>Criteria 12.1 – A review process is in place to ensure that the asset management plan and the asset management system described in it remain current.</p>

2.1 TYPE OF ASSURANCE ENGAGEMENT

For the review, AMCL performed a limited assurance engagement.

2.2 SITE VISITS

AMCL performed the review in line with Clause 3.2.2 of the ERA's Audit Guidelines²:

The auditor must visit the licensee's business operations to conduct the audit or review; performing audit procedures remotely is not allowed.

The review included both a metropolitan and regional site visit, along with the interviews taking place within Western Power's head office in Perth. The regional site visit took place on 20 June 2024, at a regional work site in Wundowie, which is east of Perth. The regional site visit included the inspection of 2 pole replacement activities being undertaken by Operational Maintenance South personnel.

The metropolitan site visit took place on 21 June 2024 in the Network Operation Control Centre. The metropolitan site visit included the observation of operation and asset management activities, including a review of the switching program carried out for the pole replacements from the regional site visit. It also included a brief discussion with the Dx and Tx operation shift teams.

2.3 PERSONNEL AND DOCUMENTATION

For each of the key process areas, the interviews were planned to be conducted with the accountable process owner and the responsible process operator. Asset management system documentation to be reviewed is the system and process description, information standards, related software system guides and information management governance descriptions, as well as related master data and transaction records.

Western Power personnel interviewed throughout the course of the review are provided in Appendix A.

The list of documentation and information sources examined by AMCL during the course of the review is provided in Appendix B.

² 2019 Audit and Review Guidelines, Electricity and Gas Licenses (August 2022)

2.4 WORK SCHEDULE

AMCL performed the six primary stages with associated activities during the review, as listed in Table 1, below.

AMSR Stage	Activities
1. Engagement & Mobilisation	<ul style="list-style-type: none"> • Confirmation of resources and availabilities, and agreement on potential variations • Timetable confirmation, and arrangements for field work • Establishment of data room access and/or confirmation of data sources
2. Development/Agreement of Review Plan	<ul style="list-style-type: none"> • Agreement of focus areas with the ERA and Western Power • Risk Assessment of Asset Management System areas for further investigation • AMCL and Western Power agreed on priorities for the review based on previous (2020) review outcome and actions items • Confirmation of review plan and preliminary timetable for Field work
3. Desktop Review and Assessment	<ul style="list-style-type: none"> • Preparation of questions and matters for further follow-up • Further information requests • Development of questions and areas of assessment with key personnel • Identification of interview requirements
4. Western Power On-site	<ul style="list-style-type: none"> • Interviews, presentations, reviews, based on feedback from desktop assessments • Follow-up interviews with field/operational staff as required and as identified through Desktop Review and head-office interviews. • On-site activities also included a site-visit to observe field operations and asset management activities in practice.
5. Report preparation, including review and follow-up	<ul style="list-style-type: none"> • Submission of Draft report for consideration and feedback by Western Power • Discussion with Western Power on draft report

AMSR Stage	Activities
6. Close	<ul style="list-style-type: none"> Submission of Final Draft Report for consideration and review Discussions with ERA and Western Power on key observations and recommendations Report finalisation and submission

Table 1: Work Activities

The time applied by the AMCL team to carry out the review is provided in Table 2.

Reviewer	Role	Hours
Mathew Oakey	Lead Reviewer	196
Cameron Sloman	Reviewer	198
Paul Brazier	Peer Review	60

Table 2: Time applied to review by AMCL team

The period over which the review has been performed was the 23rd April 2024 to 14th August 2024.

3. DEVIATIONS FROM THE REVIEW PLAN

There were no material deviations from the review approach outlined in the review plan during the review process. All licence effectiveness criteria were assessed, with none of the license criteria determined as being "not applicable".

4. ACTIONS FROM PREVIOUS REVIEWS

Commentary on Western Power’s actions in response to previous review findings is provided in the table format specified within the ERA Guidelines in Table 5.

4.1 A. RESOLVED DURING CURRENT REVIEW PERIOD

Reference	Process and Policy deficiency / Performance Deficiency	Previous Reviewer’s recommendation	Date resolved	Further Action Required?
01/2020	<p>B3</p> <p>(EC1.4) Asset planning - Non-asset options (e.g. demand management) are considered</p> <p>B3</p> <p>(EC2.1) Asset Creation and Acquisition – Full project evaluations are undertaken for new assets, including comparative assessment of non-asset options.</p> <p>The requirement to demonstrate the investigation on non-asset options was explored across a range of projects. Western Power were unable to effectively demonstrate that non-asset options were routinely considered, identified and appropriately investigated at the planning stages of project development. It was not clear that the concept of non-asset options was well understood or</p>	<p>We recommend that Western Power further develop, and ensure implementation of its framework for identifying, exploring, and progressing non-asset options (e.g. Demand Management) to address identified network and asset needs. This should involve clarifying and communicating the purpose and function of non-asset options in deferring the need for Western Power investment and consequently additions to the Regulatory Asset Base.</p> <p>To satisfy the requirement of this criteria it would normally be expected that the following existed:</p> <ul style="list-style-type: none"> • Non-Asset Strategy; • The establishment of clear processes, criteria and thresholds for potential Non-Asset solutions in order to implement the strategy; 	October 2021	No further action required.

Reference	Process and Policy deficiency / Performance Deficiency	Previous Reviewer's recommendation	Date resolved	Further Action Required?
	<p>applied consistently. Western Power were unable to demonstrate that an effective Demand Management Policy, or framework was established and operating.</p>	<ul style="list-style-type: none"> • A Non-Asset Program established, implemented, governed, and monitored; • Embedding in the Investment Governance Framework the requirement for non-asset options to be actively explored and reported on for all investments above the pre-determined threshold; and • Management reporting on the above, including reporting on non-asset deliberations through the Investment Governance Framework compliance reporting arrangements. 		
02/2020	<p>C2 / C3</p> <p>(EC1.5) Asset Planning - Lifecycle costs of owning and operating assets are assessed</p> <p>C2 / C3</p> <p>(EC2.2) Asset Creation and Acquisition - Evaluations include all life-cycle costs</p> <p>Western Power were unable to provide a consistent view on the application of lifecycle costing at network investment decision making level.</p> <p>In particular, no overarching documentation by way of a framework or guideline was able to be</p>	<p>We recommend that Western Power:</p> <p>a. Document an approach for the development of asset whole-of-lifecycle costs, and for its application in the asset planning and in the asset investment decision making process. This approach for whole-of-life asset costing, should cover the following considerations on a net-present or net-future value basis:</p> <ul style="list-style-type: none"> • an asset's up-front capital costs; • ongoing maintenance and service costs; • risk costs associated with the asset due to deteriorating performance 	October 2021	No further action required.

Reference	Process and Policy deficiency / Performance Deficiency	Previous Reviewer's recommendation	Date resolved	Further Action Required?
	<p>identified that provided guidance on the application of lifecycle costs in asset class strategies, options analysis, investment decisions, equipment procurement, or other decisions where this should be a consideration.</p> <p>The ability of Western Power to demonstrate how operational costs were factored into re-investment decisions was not clear. There appeared to be limited policy and guidance around the costing principles to be used whilst evaluating life cycle costs. This should include consideration of ongoing or escalating operational costs and risk costs associated with time view of investment. These assessments should also inform decisions pertaining to asset life and technical obsolescence of groups of asset types.</p>	<p>for e.g. obsolescence, or non-compliance with regulatory requirements;</p> <ul style="list-style-type: none"> • mid-life refurbishment costs; and • end-of-life retirement, and disposal costs or residual value. <p>b. Within the above guideline, establish (or reinforce) a requirement that whole-of-life cycle costs be considered as standard rigour in asset planning and investment decisions, and that these considerations be explicitly evident in the business case documentation as evidence that the matter has been appropriately considered.</p> <p>In our opinion the above should also capture the treatment of risk costs, which is particularly deficient in relation to transmission assets:</p> <p>c. We recommend that Western Power further develop the policy and procedural requirements of investment governance so that:</p> <ul style="list-style-type: none"> • The principles of the quantification of risk as outlined in the Risk-Based Planning Methodology be embedded as standard planning practice for all transmission asset renewal and capacity upgrade planning assessments; 		

Reference	Process and Policy deficiency / Performance Deficiency	Previous Reviewer's recommendation	Date resolved	Further Action Required?
		<ul style="list-style-type: none"> All business case evaluations of network asset investments in the transmission network include a quantitative evaluation of pre and post investment risk outcomes and measurable benefits as required by the Investment Governance Framework; and That greater rigour be applied in the Investment Gate Approval process to ensure that quantified and monetised network asset risk assessments become a key feature of business cases. <p>Combined, the above will ensure that the expected economic impacts as well as the financial impacts of any proposed investment are considered and understood and will facilitate objective risk-based optimisation of the network investment portfolio.</p>		
03/2020	<p>B3</p> <p>(Effectiveness Criteria 12.1) Review of asset management system - A review process is in place to ensure that the asset management plan and the asset management system described in it remain current.</p> <p>While core documents for the management of the Asset Management System were observed</p>	<p>We recommend that Western Power demonstrate a sustainable approach to maintaining the currency of documents in the asset management system, update the asset management system description and processes accordingly, and resource and implement the required changes. An appropriate SMART performance metric demonstrating year-on-year management of documents and</p>	October 2021	No further action required.

Reference	Process and Policy deficiency / Performance Deficiency	Previous Reviewer's recommendation	Date resolved	Further Action Required?
	<p>to be current, Western Power identified during the interviews the need for improved document management with significant numbers of documents to be addressed.</p> <p>It is understood that a 2019 audit of Western Power's certification to ISO 55001 by Lloyd's Register, identified the currency of key AMS documentation to be an issue, as outlined in the ISO 55001 Assessment Findings and Corrective Action Plan. The action plan identified different areas of corrective actions being required.</p> <p>This affirms that documentation management associated with defining and controlling the Asset Management System is wanting in both process control and effectiveness.</p>	<p>document currency should also be developed and monitored.</p> <p>To satisfy the requirement of this criteria it would normally be expected that the following should exist:</p> <ul style="list-style-type: none"> • Evidence of implementation and monitoring of the Corrective Action Plan in ISO 55001 Assessment Findings and Corrective Action Plan 2019; • Understanding of existing review cycles and basis including impact on dependencies for changing review cycles; • Evidence of reviews and maintenance of the currency of documents; • All asset management documents and processes reflect the current asset management activities and are approved and published when and as required by the system specification. <p>This should include updating holocentric processes to maintain their currency.</p>		

Table 3: Status of resolved actions addressing system deficiencies from the previous audit

4.2 B. UNRESOLVED DURING CURRENT REVIEW PERIOD

Western Power has completed actions agreed with the ERA as detailed in Section 4.1.

5. PERFORMANCE SUMMARY

In assessing the effectiveness of the licensee’s asset management system, AMCL rated both the adequacy of the licensee’s processes and policies (process and policy rating) and the licensee’s performance (performance rating) for each asset management process and effectiveness criterion. The ratings are based on the rating scales from the 2019 ERA Audit and Review Guidelines Electricity and Gas Licenses (August 2022) and provided in Appendix C. The results are summarised in Table 4 and Table 5.

5.1 PERFORMANCE SUMMARY FOR EDL1

Asset management process & effectiveness criteria (Refer to the Electricity or Gas Compliance Reporting Manual)	Process & Policy Rating	Performance Rating
1. Asset Planning	A	2
1.1. Asset management plan covers the processes in this table	A	1
1.2. Planning processes and objectives reflect the needs of all stakeholders and are integrated with business planning	B	2
1.3. Service levels are defined in the asset management plan	A	1
1.4. Non-asset options (e.g. demand management) are considered	B	2
1.5. Lifecycle costs of owning and operating assets are assessed	A	2
1.6. Funding options are evaluated	A	1
1.7. Costs are justified and cost drivers identified	B	2
1.8. Likelihood and consequences of asset failure are predicted	A	1
1.9. Asset management plan is regularly reviewed and updated	A	2
2. Asset Creation and Acquisition	A	1
2.1. Full project evaluations are undertaken for new assets, including comparative assessment of non-asset options	A	1
2.2. Evaluations include all life-cycle costs	A	1
2.3. Projects reflect sound engineering and business decisions	A	1
2.4. Commissioning tests are documented and completed	A	1

Asset management process & effectiveness criteria (Refer to the Electricity or Gas Compliance Reporting Manual)	Process & Policy Rating	Performance Rating
2.5. Ongoing legal / environmental / safety obligations of the asset owner are assigned and understood	B	2
3. Asset Disposal	A	1
3.1. Under-utilised and under-performing assets are identified as part of a regular systematic review process	A	1
3.2. The reasons for under-utilisation or poor performance are critically examined and corrective action or disposal undertaken	A	1
3.3. Disposal alternatives are evaluated	A	1
3.4. There is a replacement strategy for assets	A	1
4. Environmental Analysis	A	1
4.1. Opportunities and threats in the asset management system environment are assessed	A	1
4.2. Performance standards (availability of service, capacity, continuity, emergency response, etc.) are measured and achieved	A	1
4.3. Compliance with statutory and regulatory requirements	A	1
4.4. Service standard (customer service levels etc) are measured and achieved.	A	2
5. Asset Operations	A	2
5.1. Operational policies and procedures are documented and linked to service levels required	A	2
5.2. Risk management is applied to prioritise operations tasks	A	1
5.3. Assets are documented in an Asset Register including asset type, location, material, plans of components, an assessment of assets' physical/structural condition	A	1
5.4. Accounting data is documented for assets	A	1
5.5. Operational costs are measured and monitored	A	1
5.6. Staff resources are adequate, and staff receive training commensurate with their responsibilities	B	2
6. Asset Maintenance	A	1
6.1. Maintenance policies and procedures are documented and linked to service levels required	A	1
6.2. Regular inspections are undertaken of asset performance and condition	A	1

Asset management process & effectiveness criteria (Refer to the Electricity or Gas Compliance Reporting Manual)	Process & Policy Rating	Performance Rating
6.3. Maintenance plans (emergency, corrective and preventative) are documented and completed on schedule	A	1
6.4. Failures are analysed and operational/maintenance plans adjusted where necessary	A	1
6.5. Risk management is applied to prioritise maintenance tasks	A	1
6.6. Maintenance costs are measured and monitored	A	1
7. Asset Management Information System	A	1
7.1. Adequate system documentation for users and IT operators	A	1
7.2. Input controls include appropriate verification and validation of data entered into the system	A	1
7.3. Security access controls appear adequate, such as passwords	A	1
7.4. Physical security access controls appear adequate	A	1
7.5. Data backup procedures appear adequate and backups are tested	A	1
7.6. Computations for licensee performance reporting are materially accurate	A	1
7.7. Management reports appear adequate for the licensee to monitor licence obligations	A	1
7.8. Adequate measures to protect asset management data from unauthorised access or theft by persons outside the organisation	A	1
8. Risk Management	A	1
8.1. Risk management policies and procedures exist and are being applied to minimise internal and external risks	A	1
8.2. Risks are documented in a risk register and treatment plans are actioned and monitored	A	1
8.3. The probability and consequences of asset failure are regularly assessed	A	1
9. Contingency Planning	A	1
9.1. Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks	A	1

Asset management process & effectiveness criteria (Refer to the Electricity or Gas Compliance Reporting Manual)	Process & Policy Rating	Performance Rating
10. Financial Planning	A	1
10.1. The financial plan states the financial objectives and strategies and actions to achieve the objectives	A	1
10.2. The financial plan identifies the source of funds for capital expenditure and recurrent costs	A	1
10.3. The financial plan provides projections of operating statements (profit and loss) and statement of financial position (balance sheets)	A	1
10.4. The financial plan provides firm predictions on income for the next five years and reasonable indicative predictions beyond this period	A	1
10.5. The financial plan provides for the operations and maintenance, administration and capital expenditure requirements of the services	A	1
10.6. Significant variances in actual/budget income and expenses are identified and corrective action taken where necessary	A	1
11. Capital Expenditure Planning	A	1
11.1. There is a capital expenditure plan covering works to be undertaken, actions proposed, responsibilities and dates	A	1
11.2. The capital expenditure plan provides reasons for capital expenditure and timing of expenditure	A	1
11.3. The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan	A	1
11.4. There is an adequate process to ensure that the capital expenditure plan is regularly updated and implemented	A	1
12. Review of Asset Management System	B	2
12.1. A review process is in place to ensure that the asset management plan and the asset management system described in it remain current	A	1
12.2. Independent reviews (e.g. internal audit) are performed of the asset management system	B	3

Table 4: Performance summary table for EDL1 reviews

5.2 PERFORMANCE SUMMARY FOR ETL2

Asset management process & effectiveness criteria (Refer to the Electricity or Gas Compliance Reporting Manual)	Process & Policy Rating	Performance Rating
1. Asset Planning	A	2
1.1. Asset management plan covers the processes in this table	A	1
1.2. Planning processes and objectives reflect the needs of all stakeholders and are integrated with business planning	B	2
1.3. Service levels are defined in the asset management plan	A	2
1.4. Non-asset options (e.g. demand management) are considered	B	2
1.5. Lifecycle costs of owning and operating assets are assessed	A	2
1.6. Funding options are evaluated	A	1
1.7. Costs are justified and cost drivers identified	B	2
1.8. Likelihood and consequences of asset failure are predicted	A	1
1.9. Asset management plan is regularly reviewed and updated	A	2
2. Asset Creation and Acquisition	A	1
2.1. Full project evaluations are undertaken for new assets, including comparative assessment of non-asset options	A	1
2.2. Evaluations include all life-cycle costs	A	1
2.3. Projects reflect sound engineering and business decisions	A	1
2.4. Commissioning tests are documented and completed	A	1
2.5. Ongoing legal / environmental / safety obligations of the asset owner are assigned and understood	B	2
3. Asset Disposal	A	1
3.1. Under-utilised and under-performing assets are identified as part of a regular systematic review process	A	1
3.2. The reasons for under-utilisation or poor performance are critically examined and corrective action or disposal undertaken	A	1
3.3. Disposal alternatives are evaluated	A	1
3.4. There is a replacement strategy for assets	A	1

Asset management process & effectiveness criteria (Refer to the Electricity or Gas Compliance Reporting Manual)	Process & Policy Rating	Performance Rating
4. Environmental Analysis	A	1
4.1. Opportunities and threats in the asset management system environment are assessed	A	1
4.2. Performance standards (availability of service, capacity, continuity, emergency response, etc.) are measured and achieved	A	1
4.3. Compliance with statutory and regulatory requirements	A	1
4.4. Service standard (customer service levels etc) are measured and achieved.	A	2
5. Asset Operations	A	2
5.1. Operational policies and procedures are documented and linked to service levels required	A	2
5.2. Risk management is applied to prioritise operations tasks	A	1
5.3. Assets are documented in an Asset Register including asset type, location, material, plans of components, an assessment of assets' physical/structural condition	A	1
5.4. Accounting data is documented for assets	A	1
5.5. Operational costs are measured and monitored	A	1
5.6. Staff resources are adequate, and staff receive training commensurate with their responsibilities	B	2
6. Asset Maintenance	A	1
6.1. Maintenance policies and procedures are documented and linked to service levels required	A	1
6.2. Regular inspections are undertaken of asset performance and condition	A	1
6.3. Maintenance plans (emergency, corrective and preventative) are documented and completed on schedule	A	1
6.4. Failures are analysed and operational/maintenance plans adjusted where necessary	A	1
6.5. Risk management is applied to prioritise maintenance tasks	A	1
6.6. Maintenance costs are measured and monitored	A	1

Asset management process & effectiveness criteria (Refer to the Electricity or Gas Compliance Reporting Manual)	Process & Policy Rating	Performance Rating
7. Asset Management Information System	A	1
7.1. Adequate system documentation for users and IT operators	A	1
7.2. Input controls include appropriate verification and validation of data entered into the system	A	1
7.3. Security access controls appear adequate, such as passwords	A	1
7.4. Physical security access controls appear adequate	A	1
7.5. Data backup procedures appear adequate and backups are tested	A	1
7.6. Computations for licensee performance reporting are materially accurate	A	1
7.7. Management reports appear adequate for the licensee to monitor licence obligations	A	1
7.8. Adequate measures to protect asset management data from unauthorised access or theft by persons outside the organisation	A	1
8. Risk Management	A	1
8.1. Risk management policies and procedures exist and are being applied to minimise internal and external risks	A	1
8.2. Risks are documented in a risk register and treatment plans are actioned and monitored	A	1
8.3. The probability and consequences of asset failure are regularly assessed	A	1
9. Contingency Planning	A	1
9.1. Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks	A	1
10. Financial Planning	A	1
10.1. The financial plan states the financial objectives and strategies and actions to achieve the objectives	A	1
10.2. The financial plan identifies the source of funds for capital expenditure and recurrent costs	A	1
10.3. The financial plan provides projections of operating statements (profit and loss) and statement of financial position (balance sheets)	A	1

Asset management process & effectiveness criteria (Refer to the Electricity or Gas Compliance Reporting Manual)	Process & Policy Rating	Performance Rating
10.4. The financial plan provides firm predictions on income for the next five years and reasonable indicative predictions beyond this period	A	1
10.5. The financial plan provides for the operations and maintenance, administration and capital expenditure requirements of the services	A	1
10.6. Significant variances in actual/budget income and expenses are identified and corrective action taken where necessary	A	1
11. Capital Expenditure Planning	A	1
11.1. There is a capital expenditure plan covering works to be undertaken, actions proposed, responsibilities and dates	A	1
11.2. The capital expenditure plan provides reasons for capital expenditure and timing of expenditure	A	1
11.3. The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan	A	1
11.4. There is an adequate process to ensure that the capital expenditure plan is regularly updated and implemented	A	1
12. Review of Asset Management System	B	2
12.1. A review process is in place to ensure that the asset management plan and the asset management system described in it remain current	A	1
12.2. Independent reviews (e.g. internal audit) are performed of the asset management system	B	3

Table 5: Performance summary table for ETL2 reviews

6. AUDITOR'S OBSERVATIONS

The observations for each asset management process and effectiveness criterion form the basis for the auditor's ratings and recommendations.

6.1 KEY FINDINGS

6.1.1 GENERAL ASSESSMENT

In general, it was observed that Western Power continues to maintain and improve on a sophisticated, well-structured and disciplined Asset Management System. Through the documentation review, onsite interviews, and field inspection process, Western Power demonstrated clear intent in its application of the system and diligence in its upkeep.

A small number of minor limitations were observed in relation to the policy, process and performance effectiveness of Western Power's Asset Management System when assessed in accordance with the ERA's Audit Guidelines, with one recommendation being required for consideration.

The upkeep of transactional and operational records appears to be ongoing with information to and from field activities observed to be prompt and appropriate. The upkeep of the various system documentation for policies and procedures was both comprehensive and effective. Western Power recognised that several changes in corporate direction required asset management activities and their associated policies and procedures to be updated in line with new asset management objectives. This review found that some documented strategies are still awaiting an update to reflect these changes, which is reflected in the relevant effectiveness criteria ratings.

AMCL observed that Western Power had actioned regulatory requirements and previous review recommendations with considered responses in line with its ability to manage its network. There has been progressive development over the review period related to non-asset solutions, cost justification and lifecycle cost analysis, with documented evidence of these developments sighted in the latter half of the review period. This evidence includes updated strategy, process and outputs.

It was noted that staff were not able to clearly identify an asset owner, but there are many activities managed by staff across the lifecycle of the assets that achieve compliance with legal, environmental and safety obligations.

AMCL observed significant monitoring of service standards through various dashboards and reports. It was noted that several key performance indicators were not achieving required targets, and that Western Power has introduced programs to improve performance outcomes.

Interviews with staff were conducted in a positive atmosphere, with appropriately prepared staff, and a willingness to support the review.

6.1.2 KEY CONSIDERATIONS

It is to be noted that the ERA Audit Guidelines provide a specific set of requirements that are different but not incompatible to the ISO 55001 framework. The ERA Audit Guideline requires Western Power to demonstrate specific behaviours, asset management practices, and asset management outcomes beyond ISO 55001 requirements. It forms the basis for part of the AMS structure and development. Attaining ISO 55001 certification does not necessarily mean there will not be limitations of the Asset Management System when assessed against the ERA Audit Guidelines.

AMCL observed that Western Power’s successful certification to the ISO 55001 standard has engendered a culture of reliance on this for assurance of its Asset Management System. The area of concern is that the requirement for Internal Audit as per ISO 55001:2014 (Clause 9.3) is not being fully met. The audit plan does not comprehensively assess the asset management system independent of the ISO 55001 certification audit. AMCL has made a recommendation to address this concern for Western Powers consideration.

6.2 INFORMATION SOURCES

Western Power personnel interviewed throughout the course of the review are provided in Appendix A.

The list of documentation and information sources examined by AMCL during the review is provided in Appendix B.

6.3 REVIEW PROCEDURES

The Review Procedures below are reflective of a Limited Assurance review, as noted in the Review Plan (v4-0).

Review Priority		Review procedures
1	High priority	<ul style="list-style-type: none"> Interview supervisory and operational personnel Inspect relevant documents Obtain evidence policies, procedures and controls are in place and working effectively Examine compliance reports and breach register Examine reports and correspondence with other regulators (e.g. Building and Energy) Examine asset management system effectiveness criteria Sample, at a high level, output and timeliness procedures Recalculate a sample of relevant performance indicators
2		
3	Moderate priority	<ul style="list-style-type: none"> Interview supervisory and operational personnel Inspect relevant documents Obtain evidence policies, procedures and controls are in place and controls are working effectively Examine compliance reports and breach register Examine asset management system effectiveness criteria Walkthrough the process to calculate relevant performance indicators
4	Low priority	<ul style="list-style-type: none"> Interview supervisory or operational personnel Undertake a desktop review of relevant documents Undertake a desktop review of policies, procedures and controls in place View compliance reports and breach register Undertake a desktop review of asset management system effectiveness criteria
5		

Table 6: Review procedures for each review priority

To meet the requirements, Western Power’s and AMCL’s approach for interviews was for several sequential meetings with different participants on each key process area. This was preferred to one

large team meeting of extended duration. Western Power and AMCL identified that the most effective approach for review of information was to use a file sharing site, prepopulated with available information, and with additional files added by Western Power as identified and requested by AMCL.

6.4 OBSERVATIONS AND RECOMMENDATIONS

This section explains for each asset management process or effectiveness criterion the basis for the auditor's ratings and recommendations.

Reporting Against EDL1 and ETL2

In general, many of the processes and activities that take place to enact Western Power's asset management system are common across both the EDL1 licence and the ETL2 licence. Consequently, the observations, ratings, and recommendations (where given) will also be common across both licences.

As such, the observances are generally given against EDL1, and reflected by simple reference against ETL2 where this is appropriate. Where evidence and artefacts differ for the two licences across an Effectiveness Criteria, this is highlighted primarily by exception reporting against ETL2. Where an observation or recommendation is attributable to one licence only, this is made clear.

Document tracking and Identification

AMCL developed and applied a librarian system for capturing the documents provided as evidence and artefacts in relation to the Asset Management Processes and their respective Effectiveness Criteria. The documents provided by Western Power on our request, or on its initiative in response to AMCL lines of review, have been logged and referenced to the most relevant Asset Management Process (and Effectiveness Criteria where possible) and given a unique Key Review Artefact (KRA) reference number accordingly.

It is these allocated KRA reference numbers that are used throughout this section of the report to refer to specific Western Power documents, with the index allocation given in parentheses. By way of example:

- *Document (KRA1.01) is the Asset Management System Description (Western Power EDM reference 40304923, allocated to Asset Management Process 1); and*
- *Document (C.06) is the Asset Management Policy, which is a "common" overarching document (Western Power EDM reference 26576898, not allocated to any specific Asset Management Process, hence the "C" allocation).*

The master list of documents reviewed is given in Appendix B, along with the initial views on Asset Management Process and Effectiveness Criteria allocations where this was made.

The final allocations of each Western Power document to each Asset Management Process and respective Effectiveness Criteria's (where possible) is provided in Appendix B.

It should be noted that many documents attended to several Asset Management Processes or Effectiveness Criteria's. However, where possible documents were allocated to a single primary Asset Management Process. This does not prevent a document from being an artefact for an Effectiveness Criteria in a different Asset Management Process to the primary allocation. Consequently, in some cases citations of evidence for an Effectiveness Criteria may refer to a document from another Asset Management Process.

Opportunities for Improvement

In line with the ERA guidelines, opportunities for improvement are not included in this Asset Management System review report. Opportunities for improvement could be developed by Western Power where the Process and Policy rating is B, or where the performance rating is a 2.

Nomenclature used in this section of the report

Asset Management Process refers to Asset Management Process of the Asset Management System.

Effectiveness Criteria refers to an effectiveness criterion within an Asset Management Process.

As noted above, documents referred to as supporting evidence in this section of the report use the AMCL codes KRA(X.YY), referring to document (YY) associated with Asset Management Process (X), as listed in the tables for each Asset Management Process given in Appendix B.

References to other Effectiveness Criterion(a) are generally noted as "Effectiveness Criteria Ref. No." For example, a reference to Effectiveness Criterion 8.2 will be shown as "Effectiveness Criteria Ref. No. 8.2."

6.4.1 ASSET MANAGEMENT PROCESS 1 ASSET PLANNING

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
1.	Asset planning					
	Asset Planning focuses on meeting customer needs in the most effective and efficient manner (delivering the right service at the right price)					
		EDL1			A	2
		ETL2			A	2
1.1	Asset management plan covers the processes in this table	EDL1	2	<p>Western Power provides an explicit alignment of all the processes in Table 23 of the <i>2019 Audit and Review Guidelines – Electricity and Gas Licenses</i> with the business processes of the Asset Management System as described in the <i>Asset Management System Description</i> (C.10).</p> <p>As recognised in the <i>2023 - ISO 55001 Surveillance Visit Report – Final</i> (KRA12.06) this document indicates that the Asset Management System continues to be certified to ISO 55001:2014, with the asset management plan established in accordance with the requirements of the <i>Asset Management Policy</i> (C.06). Western Power’s alignment is clear in the policy and subsequent supporting documents, including but not necessarily limited to:</p> <ul style="list-style-type: none"> • <i>Asset Management System Description</i> (C.10) • <i>Asset Management Objectives</i> (C.07) • <i>Asset Management Framework - Published</i> (KRA1.04) • <i>Asset Management System Map</i> (C.11) 	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
		ETL2	2	As for EDL1.	A	1
1.2	Planning processes and objectives reflect the needs of all stakeholders and are integrated with business planning	EDL1	2	<p>Stakeholder requirements form one of the components that inform the <i>Asset Management Framework (2024)</i> (KRA1.14), helping to define what asset management at Western Power should achieve through to Planning.</p> <p>Western Power’s corporate priorities in the <i>Corporate Strategy 2023-2031</i> (C.05) at a high level are as follows:</p> <ul style="list-style-type: none"> • Look after and develop our people • Deliver reliable supply and efficient services to the community • Grow the transmission network to enable decarbonisation • Maintain and transform the distribution network • Maintain business and financial sustainability for the future. <p>The <i>Asset Management Objectives (2021)</i> (KRA1.05) document how the external stakeholder requirements and organisational objectives cascade down to derive asset management objectives, which the asset management system is built to achieve. The date for next review is “trigger based”.</p> <p>Stakeholder identification, communication and consultation forms a key process in the <i>Asset Management Strategy Standard (2021)</i> (KRA1.13). This includes internal and external stakeholders and within the standard it seeks to ensure all stakeholders are consulted, committed and engaged to identify the strategies. The date for next review is “trigger based”.</p>	B	2

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<p>The <i>Grid Strategy 2022</i> (KRA1.04) section 2 outlines how Western Power addresses the corporate strategy action areas and is aligned to the network objectives, both of which have been identified in line with stakeholder need. The document addresses grid performance and grid transformation and provides key planning considerations for implementation.</p> <p>Key Strategies for achieving asset management objectives, such as <i>Network Safety Strategy (2017)</i> (KRA8.03) outlines the approach to managing safety risks associated with the network. The provided version has been reviewed based on internal stakeholder input.</p> <p>Network Development Strategies include the <i>66 kV Rationalisation Strategy (2021)</i> (KRA3.06) and <i>Alternative Options Strategy (AOS) 2023</i> (KRA1.16), with specific statements related to customer requirements.</p> <p>A number of asset class/system strategies exist. <i>Distribution Overhead Conductors Asset Management Strategy (2021)</i> (KRA03.03) sets strategies for a modular grid approach.</p> <p>Western Power noted that the <i>Corporate Strategy (2023)</i> (C.05) is not fully incorporated into the Asset Management System, and elements such as individual strategies, guidelines and processes have not yet been updated for new strategic alignment. Along with the five corporate priorities mentioned above, Western Power's current Corporate Strategy is as follows, "we need to safely provide reliable supply, keep costs low and enable decarbonisation for our community".</p> <p>The <i>Network Plan 25</i> (KRA1.17) outlines the breakdown of the corporate objectives of Western Power into Network objectives and outcomes for the 2023-2031 horizon. It also documents the plan to achieve these outcomes and the possible opportunities and</p>		

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				challenges it may face. It identifies priorities for distribution of safety, reliability, transformation and sustainability, and for transmission prioritises condition and criticality.		
		ETL2	2	<p>As for EDL1.</p> <p>The <i>Transmission Reliability Strategy (2017)</i> (KRA1.06) articulates the strategy for managing reliability performance of the transmission network for 2017-2027 with particular emphasis on the Access Arrangement Four (AA4) period, which spans the five years from 2017/18 to 2021/22. This was due for review in 2021 but at the time of this review it had not yet been completed.</p> <p>The <i>Transmission System Plan 2023</i> (KRA1.19) reports publicly on the FY2022/23 to FY2032/33 planning horizon to support alignment with Western Power's latest demand forecast and maintain continuity with existing network planning activities.</p>	B	2
1.3	Service levels are defined in the asset management plan	EDL1	2	<p>These are defined in the <i>Asset Management Objectives (C.07)</i>, appear clear, demonstrable, and sufficient to drive the correct behaviours within the asset management system for the period.</p> <p>Performance targets in 2023 for Distribution Reliability for Access Arrangement 5 are stated in the <i>Distribution Reliability Strategy (KRA1.07)</i>.</p>	A	1
		ETL2	2	<p>These are defined in the <i>Asset Management Objectives (C.07)</i>, appear clear, demonstrable, and sufficient to drive the correct behaviours within the asset management system for the period.</p>	A	2

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<p>There are measures and estimated targets for reliability and network security that are stated in the <i>Transmission Reliability Strategy (2017)</i> (KRA1.06). The measures and estimated targets referenced are for AA3 and have not been updated for AA4 in line with the strategy, and should now be updated for AA5.</p> <p>The AM objectives in place were sufficient to rate this is A for Process and Policy. Although the Transmission reliability and network security targets may still be applicable for AA5, this should be confirmed with a review and so Performance has been rated as 2.</p>		
1.4	Non-asset options (e.g. demand management) are considered	EDL1	2	<p>The <i>Grid Strategy 2022</i> (KRA1.04) has an appendix looking at potential distribution solution options to cope with increased relative and total demand in recent years. Western Power has invested in improved planning and modelling tools to minimise the need for additional planning resources. The appendix does identify Customer Load as one of several responses to managing the network drivers. The use of customer load demand management is noted as an emerging solution.</p> <p>In response in September 2020 to a change to the Electricity Networks Access Code 2004, Western Power developed an <i>Alternative Options Strategy 2023</i> (KRA1.16) and <i>Network Opportunity Map</i> (KRA1.08) (NOM). The definition of 'alternative options' includes 'demand-side management' and allows for considered options to be used 'either instead of or in combination with network augmentation'. The key objective of the strategy is to support the proactive engagement between Western Power and the market to seek least cost solutions to network issues keeping network costs as low as possible for customers.</p>	B	2

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<p>The <i>Alternative Options Strategy</i> (KRA1.16) and NOM have been included in the <i>AMS Map</i> (C.11).</p> <p>The <i>NOM</i> gives providers notification of potential opportunities so that they can begin to proactively develop alternative solutions to those traditionally pursued by Western Power to address network issues. A key outcome of the planning process is a list of potential opportunities which are published annually in the <i>NOM</i>.</p> <p>As noted in the <i>NOM</i> Table 5.2.5, a current objective is to undertake 'a balanced evaluation of all relevant factors and alternatives, including demand-side management and other non-network solutions, optimising life cycle costs of asset management and maximising risk reduction for investments made'. Western Power's 2023 strategy for distribution transformation includes supporting the growth of distributed energy resources (DER) and maximising the opportunities they present, as well as an initiative of developing the distribution system operator (DSO) capabilities for efficient non-asset demand management, as the aggregator market matures and grows. The current stated strategic response objective is to maximise the utilisation of the existing assets to supply efficient and affordable energy to the customers. Western Power is focused on improving the condition of the existing assets to address network risk, while keeping costs low'.</p> <p>An example of consideration of a non-network option was provided in <i>CKN: Install 3rd Transformer - Business Case</i> (KRA2.07), prepared in November 2023. This did not discuss non-asset options related to demand management.</p> <p>Another example <i>IAR130703 - Distribution PV Management (DPVM) - Stage 1 - Business Case</i> (KRA5.15) identifies a non-asset consideration of supply management options for the purposes of system stability.</p>		

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				While the <i>Alternative Options Strategy 2023</i> (KRA1.16) satisfies the recommendation from the previous review by providing an approach for considering demand management that was established and producing the NOM, it was not yet clear that non-asset options are consistently being considered for demand management by Western Power, through both the evidence provided for document review and during the interview process. This has been reflected in the scoring for this effectiveness criteria for both process and performance.		
		ETL2	2	As for EDL1.	B	2
1.5	Lifecycle costs of owning and operating assets are assessed	EDL1	2	<p>Western Power has developed the <i>Life Cycle Costing Standard (2023)</i> (KRA1.10) to provide a consistent approach to the analysis of lifecycle costs related to owning and operating assets. Its purpose is to provide specific guidance for application of LCC in the operational context of Western Power. The standard requires application of the standard for options analysis and decision making, identification of cost drivers to target cost-reduction improvements, and cost performance monitoring.</p> <p>The standard recommends an approved tool be used to carry out life cycle cost analysis. An approved tool is the Investment Evaluation Model (IEM).</p> <p>The <i>Capacity Project "MH Planning Limit Mitigation" Business Case (2024)</i> (KA2.47) was sighted, and is an upgrade project, but does not use IEM as it identifies an initial investment cost and zero change to the opex cost. The Financial team has developed an NPV value as shown on the business case.</p>	A	2
		ETL2	2	As for EDL1.	A	2

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				Business cases were observed that have consideration for lifecycle cost methods and analysis. <i>IAR125503 - Business Case - North Beach T3 Transformer Replacement</i> (KRA2.05) indicated use of the IEM for two options. <i>CKN: Install 3rd Transformer - Business Case</i> (KRA2.07) indicated use of the IEM for multiple options.		
1.6	Funding options are evaluated	EDL1	4	<p>The Capital planning process is evident for funding availability. The <i>2024-25 Business Plan – Board Submission.DOC</i> (KRA10.12) evaluates the key funding streams for upcoming CAPEX programs including transmission network growth, customer decarbonisation in the form of customer funded transmission load or generation connections. It highlights a deficit in net cashflow from operating activities over AA5 and presents a plan to overcome this.</p> <p>An analysis on funding options to aid the plan and create phase of the Battery Energy Storage System (BESS) asset solution was sighted in the <i>Battery Energy Storage System Strategy</i> (KRA1.39), this included a range of Federal Grant funding available to aid the capital cost of BESS and its associated infrastructure.</p> <p>Refer to Asset Management Process Ref.10 for additional evidence sighted during this review.</p>	A	1
		ETL2	4	As for EDL1.	A	1
1.7		EDL1	4	The SPS Asset Management Strategy (KRA1.38) recognises the relationship between failure modes and cost. It sets objectives relating to affordability, and considered different strategies with consideration of cost challenges. It sets a strategy for options	B	2

Costs are justified and cost drivers identified

analysis, and recommended approaches to treatments based on an understanding of key cost drivers.

In general, it was observed that the investment approval gateway process as described in *Investment Governance Framework (KRA1.22.h)* was appropriately followed, robust and well governed.

The process of reporting requires the 6 monthly IGF Compliance report be submitted to the Investment Review Committee (IRC) which is comprised of Western Power Executives and chaired by the CEO. An IGF non-compliance, breaching of financial allocation, is defined as where the actual money spent on an investment to date is greater than 105% of the allocated funding and is also greater than \$50k. The IRC may assign management actions to address the root causes of the non-compliances.

Results were reported to the Investment Review Committee regularly. At the October 2023 IRC meeting when the Jan-Jun'23 Report was submitted (with 40 breaches), the IRC deemed the number of breaches in the period as unacceptable and that going forward that compliance should be close to 100%. Since the time of that report, the Portfolio Value Office (PVO) team's Qlik-based 'Portfolio Dashboard' was further enhanced to provide centralised and accessible self-serve functionality for Sponsors to monitor their investments' (and portfolios') compliance. The Regulatory Compliance team in RIA also undertook an increased level pro-active reporting and notification to Sponsors on leading indicators in an effort to help avoid potential breach scenarios.

These actions have helped drive the significantly improved period-on-period compliance levels. The *IGF Compliance Report - Feb 2024 Meeting - IRC Paper (July - Dec 2023)* (KRA11.13) reported on the compliance levels for each of the investment gateways. The report indicated a significant reduction in the number of investments breaching financial allocation, dropping from 40 in the previous period to 5 between July and December 2023. There has been further strategy development for specific network issues that consider the failure modes, schedule and related high-level capital costs, such as *Summer 2022 MV Feeder Loading Mitigation (6 of 7) MH Overutilisation Issue Briefing Paper (2022)* (KRA1.02). This documents the options and recommended solution, with consideration of drivers and costs.

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<p><i>IAR180263 - MH Feeder Planning Limit Mitigation Works Planning Report</i> (KRA2.17) provides understanding of the scoping costs required to address exceeding utilisation targets. <i>"MH Planning Limit Mitigation" Business Case</i> (2024) (KRA2.47) identified cost challenges and provided various responses including increased amounts for capacity risk and long lead procurement.</p> <p><i>IAR130703 - Distribution PV Management (DPVM) - Stage 1 - Business Case</i> (KRA5.15) is from early 2022 and recognised the drivers for costs. It was noted that this document predates the update to the business case template, consistent use of the IEM and <i>Benefits Evaluation Model</i> (KRA1.22.d).</p> <p>The <i>ERA Approved Access Arrangement</i> (KRA1.23) applied from 1 July 2023 and provides various drivers for consideration by the business.</p>		
		ETL2	4	<p>As for EDL1.</p> <p>Cost drivers were identified, and costs justified in the following business cases:</p> <ul style="list-style-type: none"> <i>IAR125503 - Business Case - North Beach T3 Transformer Replacement</i> (KRA2.05) <i>CKN: Install 3rd Transformer - Business Case</i> (KRA2.07) and supporting <i>CKN: Install 3rd Transformer - Works Planning Report</i> (KRA2.19) 	B	2
1.8	Likelihood and consequences of asset failure are predicted	EDL1	2	The likelihood and consequence of asset failure in general translate into network and business risk. The understanding of this and the factoring of it into asset planning was generally observed to be in place at the top-level of the business and covered multiple asset classes through the Network Risk Register.	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<p><i>NCESS Draft Service Specification</i> (KRA1.25) recognises the risk of unstable operations as part of the basis for the desired technical capability.</p> <p><i>BESS Strategy</i> (KRA1.39) identifies alignment between asset management objectives and network risk assessment criteria with a description of the strategy focus and risk rating target. Consideration of asset risk in the areas of safety, reliability, and environment are qualitatively assessed, with details held in the Network Risk Register against the enterprise risk consequence categories. Further risk assessment has been identified as required during implementation of the strategy.</p> <p><i>SPS Strategy</i> (KRA1.38) identifies alignment between asset management objectives and network risk assessment criteria with a description of the strategy focus and risk rating target. A number of risk scenarios have been identified with existing issues and consequences already identified.</p> <p><i>IAR180263 - MH Feeder Planning Limit Mitigation Works Planning Report</i> (KRA2.17) identifies three network risks each with current and target residual risk ratings.</p> <p>The <i>Distribution Overhead Network Rebuild Strategy</i> (KRA6.13) considers likelihood and consequence as part of understanding impacts and incidents, end-of-life maturity assessment and in several of the rules for short term risk management. It also refers to <i>Distribution Maintenance Strategy</i> (KRA6.12) which identifies a range of strategies for various asset failures based on a range of likelihood and consequences.</p> <p>The <i>Network Risk Register</i> (8.05) showed the top-level asset system risk register, with risks assessed using qualitative likelihood and consequence.</p> <p>The 2024 AMSR Process 08 Risk Management.pdf (C.14) slides 41 to 47 notes that condition and asset failure information has been used to inform the asset likelihood of</p>		

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<p>failure information. The approach for wood pole likelihood model, and key considerations for consequence, likelihood, severity and cost were sighted. This slide pack presented the latest Network Risk Assessment Likelihood and Consequence Parameters which have been revised within the last 6 months. These follow a cyclical review as per the controlled document management guidelines.</p> <p>Sample testing has been conducted to check processes are effective in predicting asset failure. Evidence of this includes the management of the risk model of distribution wood poles. The risk model is trained on historical actual failures and model performance has been assessed against actual failures. This is documented in the Network Risk Management Tool (NRMT) Section 6 (KRA1.40) which discusses the achieved level of model performance over the years and indicates improved estimation in the most recent model (v6.0). The performance reports (APQR) (KRA4.08 & 4.09) and Annual State of the infrastructure report (KRA4.10) demonstrates the outcome against the objective.</p>		
		ETL2	2	<p>As for EDL1.</p> <p>Likelihood and consequence form key considerations in the risk assessment criteria, as per section 5.4 of the <i>Transmission Reliability Strategy</i> (KRA1.06).</p>	A	1
1.9	Asset management plan is regularly reviewed and updated	EDL1	4	<p>A key <i>Asset Management Objective</i> (KRA1.05) of Western Power is to maintain a fit for purpose Asset Management System. This objective stipulates a target to perform an asset management system review every 48 months.</p> <p>The Asset Management Framework is reviewed on a 4-year cycle. Yearly ISO 55001 surveillance audits are undertaken at Western Power which assess the key AM</p>	A	2

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<p>documents and processes including the asset management plan. This process ensures the system is monitored for compliance and opportunities for improvement will be identified to continually improve them.</p> <p>There is strong evidence that the <i>Asset Management System Description (C.10)</i> is well organised, aligned to key standards, internally managed and maintained, and is regularly reviewed and updated, with ongoing minor corrections being identified.</p> <p>This review identified some documents mentioned in the Asset Management System Description need increased diligence with review and updating. It was noted that two current documents that are a key part of the asset management objective strategy layer of the asset management plan has not been updated in the audit period:</p> <ul style="list-style-type: none"> • <i>Power Quality Strategy (EDM# 34237321) (KRA5.05)</i> due November 2021 • <i>Transmission Network Reliability Strategy (DM# 13841805) (KRA1.06)</i> due November 2021 <p>Although it is poor practice to have two key AMS documents out of date, there was no impact identified to customers or 3rd parties and so this has been scored a 2 for Performance until it is reviewed and updated.</p>		
		ETL2	4	As for EDL1.	A	2

Table 7: Asset Management Process 1 Asset Planning

6.4.2 ASSET MANAGEMENT PROCESS 2 ASSET CREATION AND ACQUISITION

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
2.	Asset Creation and Acquisition					
	Asset creation/acquisition is the provision or improvement of assets.					
		EDL1			A	1
		ETL2			A	1
2.1	Full project evaluations are undertaken for new assets, including comparative assessment of non-asset options	EDL1	2	<p>Western Power’s Investment Governance Standard applies for project evaluations. Western Power has a range of documents that are used to govern project evaluations, these include:</p> <ul style="list-style-type: none"> • <i>Investment Management policy</i> (KRA10.04) • <i>Investment Governance Framework</i> (KRA10.02) • <i>Investment Management Standard</i> (KRA10.09) • <i>Business Case Guideline</i> (KRA1.22e) • <i>Benefit Evaluation Model (BEM)</i> (KRA1.22d) • <i>Alternative Option Strategy</i> (KRA1.16) <p>Evidence of these procedure being followed for both Dx ad Tx assets was reviewed during the document review and observed as part of the interview process. Consideration of full life-cycle costs, the identification of unique (i.e. non-common)</p>	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<p>operational costs, and risk costs were clear and appear to factor in the evaluations reviewed.</p> <p>Evaluation of non-asset options was also evident in the examples provided. Both the life-cycle costs and non-asset options appeared to be detailed, and in line with the procedure discussed in Effectiveness Criteria Ref No. 1.4 and 1.5.</p> <p>Evidence Reviewed:</p> <ul style="list-style-type: none"> • <i>MH Planning Limit Mitigation Business Case</i> (KRA2.47) • <i>MH Feeder Planning Limit Mitigation Works Planning Report</i> (KRA2.17) 		
		ETL2	2	<p>As for EDL1.</p> <p>Evidence Reviewed:</p> <ul style="list-style-type: none"> • <i>CKN: Install 3rd Transformer Business Case</i> (KRA2.07) • <i>CKN: Install 3rd Transformer IEM</i> (KRA2.08) • <i>CKN: Install 3rd Transformer BEM</i> (KRA2.09) • <i>CKN: Install 3rd Transformer IRC Presentation</i> (KRA2.11) • <i>CKN: Install 3rd Transformer Issue Briefing Paper</i> (KRA2.18) • <i>CKN: Install 3rd Transformer Works Planning Report</i> (KRA2.19) • <i>North Beach T3 Transformer Replacement</i> (KRA2.05) 	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
2.2	Evaluations include all life-cycle costs	EDL1	2	<p>Consideration of full life-cycle costs, the identification of unique (i.e. non-common) operational costs, and risk costs were clear and appear to factor in the evaluations reviewed during the document review and through the interview process.</p> <p>Lifecycle costs were based on a defined asset lifespan and also include disposal costs and terminal values. The lifecycle cost assessments reviewed during the interview all followed the <i>Life Cycle Costing Standard (2023)</i> (KRA1.10). Refer to Effectiveness Criteria Ref No. 1.5 for more detail on the policy and procedure governing Western Power’s life-cycle evaluation process.</p> <p>Evidence Reviewed:</p> <ul style="list-style-type: none"> • <i>MH Planning Limit Mitigation Business Case</i> (KRA2.47) • <i>MH Feeder Planning Limit Mitigation Works Planning Report</i> (KRA2.17) 	A	1
		ETL2	2	<p>As for EDL1.</p> <p>The <i>CKN: Install 3rd Transformer IEM</i> (KRA2.08) reviewed showed a calculation of life cycle costs was evaluated for each viable option as part of the project evaluation process.</p> <p>Evidence Reviewed:</p> <ul style="list-style-type: none"> • <i>CKN: Install 3rd Transformer Business Case</i> (KRA2.07) • <i>CKN: Install 3rd Transformer IEM</i> (KRA2.08) • <i>North Beach T3 Transformer Replacement</i> (KRA2.05) 	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
2.3	Projects reflect sound engineering and business decisions	EDL1	4	<p>Clear evidence that Western Power considers a range of engineering options and undertakes evaluations based on key business considerations in its asset investment decision making was observed. Effectiveness of the installed assets was then assessed to ensure they met engineering standards and the required specifications. This process is outlined in Effectiveness Criteria Ref 2.4 below.</p> <p>The following documents and procedures are in place to guide the development and evaluation of projects to ensure they reflect sound engineering decisions, while the documented outlined in Effectiveness Criteria Ref 2.1 above ensure projects are evaluated to reflect sound business decisions.</p> <ul style="list-style-type: none"> • <i>Technical Standards Development & Review Guide_AMSR 24</i> (KRA2.06) • <i>Design Management Procedure</i> (KRA2.50) <p>The <i>Metering Strategy AA5 Working Document</i> (KRA2.01) provides an overarching strategy to metering projects for AA5 in line with regulatory drivers, key requirements from the asset policy directives in the <i>Metering Asset Management Plan</i> (KRA2.02) and Western Power’s corporate vision and objectives.</p> <p>Evidence reviewed for these decisions in practice included:</p> <ul style="list-style-type: none"> • <i>MH Planning Limit Mitigation Business Case</i> (KRA2.47) • <i>MH Feeder Planning Limit Mitigation Works Planning Report</i> (KRA2.17) • <i>12 to 36 kV Indoor Metal Enclosed Gas Insulated Switchboards – Part D – Vendor Technical Schedules</i> (KRA2.33) 	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
		ETL2	4	<p>As for EDL1.</p> <p>Evidence reviewed:</p> <ul style="list-style-type: none"> • <i>CKN: Install 3rd Transformer Business Case (KRA2.07)</i> • <i>CKN: Install 3rd Transformer IEM (KRA2.08)</i> • <i>CKN: Install 3rd Transformer BEM (KRA2.09)</i> • <i>CKN: Install 3rd Transformer IRC Presentation (KRA2.11)</i> • <i>CKN: Install 3rd Transformer Issue Briefing Paper (KRA2.18)</i> • <i>CKN: Install 3rd Transformer Works Planning Report (KRA2.19)</i> • <i>North Beach T3 Transformer Replacement (KRA2.05)</i> 	A	1
2.4	Commissioning tests are documented and completed	EDL1	4	<p>At Western Power the Project Erection Authority (PEA) are tasked with ensuring an asset is built in line with the design specifications. This includes outlining the scope of commissioning for each stage of the project. The PEAs produce a commissioning sheet in which the Engineering and Design commissioning team then conduct commissioning testing based on the scope, this is verified by a Commissioning Officer. The following commissioning sheet evidence was reviewed during the interview process, <i>PTA Moley Ellenbrook Traction Supply - Commissioning Key Artefacts (KRA2.14)</i>.</p> <p>The <i>Handover Procedures & Practices document (KRA2.44)</i> details the handover processes and requirements for both Brownfield and Greenfield equipment, including examples of handovers and certification, and process flowcharts.</p> <p>There was clear evidence provided during the interview of Western Power's commissioning process being followed for both Dx and Tx assets, with evidence of project evaluation and quality assurance activities being part of both the project delivery and close out phases. This is a comprehensive and well defined process</p>	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<p>between commissioning and asset handover into operations and it satisfies this effectiveness criteria.</p> <p>Evidence sited as part of the interview process and held within the <i>2024 AMSR Process 02 Asset Creation and Acquisition.pdf</i> (C.15):</p> <ul style="list-style-type: none"> • Distribution Commissioning Work Instructions - EDM 34137510 • Commissioning Officer authorisation requirements - EDM 34167181 • Apparatus Forms reviewed for the chosen pole replacement at site visit. 		
		ETL2	4	As for EDL1.	A	1
2.5	Ongoing legal / environmental / safety obligations of the asset owner are assigned and understood	EDL1	4	<p>Western Power demonstrated a strong safety, compliance and risk management culture across all of its asset management and business functions as also observed for Effectiveness Criteria 4.3 and 8.2 which overlaps with these requirements. The evidence cited against these criteria is noted but is not repeated here.</p> <p>Legislative and regulatory requirements form a key aspect of the <i>SCADA and Telecommunications Network Strategy</i> document (KRA2.03).</p> <p>The <i>Technical Standards Development & Review Guide</i> (KRA2.06) and <i>Incident Management Procedure</i> (KRA2.21) details the responsibilities of various functions in complying with legal, environmental and safety obligations.</p> <p>Monitoring and reporting of safety and security incidents was observed in the following reports:</p>	B	2

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<ul style="list-style-type: none"> • <i>Weekly Security Incidents Summary – 7 January 2024</i> (KRA2.40) • <i>Weekly Security Incidents Summary – 31 December 2023</i> (KRA2.40) • <i>March 2024 – Monthly Security Incidents Summary</i> (KRA2.41) • <i>PBU Monthly Reporting MS – March 2024 – Redacted to contain Physical Security Only</i> (KRA2.42) • <i>PBU Monthly Reporting MS – February 2024 – Redacted to contain Physical Security Only</i> (KRA2.43) • <i>January 2024 Security Operations Report (Wilsons)</i> (KRA2.43) • <i>January 2024 KPI Report (Wilsons)</i> (KRA2.43) <p>Evidence for this criteria in practice was reviewed within the <i>CKN: Install 3rd Transformer Works Planning Report</i> (KRA2.19) and <i>MH Feeder Planning Limit Mitigation Works Planning Report</i> (KRA2.17), where it was clear that there is a requirement to review access code compliance and regulatory tests as part of the full project evaluation process.</p> <p>The actual failure and incident management process, from review to incorporation of lessons learned was reviewed during the 06 Asset Maintenance interview, with the evidence below cited within the <i>2024 AMSR Process 06 Asset Maintenance</i> (C.16) slide pack, page 33-35. Western Power utilises the corporate system Ellipse (MSSS module) to conduct asset failure validation to consistently capture, store and report asset failures. Asset failure validation involves high-level root cause analysis of the incident and classification of failure type. Notifiable incidents are further investigated as per</p>		

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<p>Regulation 22 of the Electricity (Network Safety) Regulations 2015 (WA). Notifiable Incidents related to asset failures are reported and managed in Guardian.</p> <p>Incident Management evidence:</p> <ul style="list-style-type: none"> • ICAM incident investigation report template EDM#44252535 • Dx Lines & Plant asset FMEA: EDM#54599353 • FV&C - Work Instruction: EDM#63460129 (Dx specific) • FV&C Template Sheet - Validation Tool: EDM#63460835 (Dx specific) • FV&C Procedure: EDM#5634068 <p>The <i>Project Symphony Lessons Learn Report Milestone 3</i> (KRA2.13) provides an in depth look into the management of policy and regulation obligations during large project executions and provides a range of outcomes and lessons to learn from the process to ensure barriers and risks are mitigated going forward.</p> <p>Western Power 's asset management whole of life cycle activities are assigned to various functions in the value chain as articulated in the Corporate RACI and <i>Asset Management System Description</i> (C.10). However, through the document review and interview process it was unclear which function or role within Western Power actually owns the assets. This was not evident in either policy or practice. This lack of clarity on the asset owner could create confusion moving forward on who is ultimately responsible for the assets in terms of setting asset class strategy and maintaining the asset to the required obligations. A RACI of asset ownership would help clarify this in policy and practice. However, it was considered that there was enough understanding across the business for this not to affect customers or third parties.</p>		

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
		ETL2	4	As for EDL1.	B	2

Table 8 Asset Management Process 2 Asset Creation and Acquisition

6.4.3 ASSET MANAGEMENT PROCESS 3 ASSET DISPOSAL

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
3.	Asset Disposal					
	Asset disposal is the consideration of alternatives for the disposal of surplus, obsolete, under-performing or unserviceable assets.					
		EDL1			A	1
		ETL2			A	1
3.1	Under-utilised and under-performing assets are identified as part of a regular systematic review process	EDL1	4	<p>It was observed that the identification and addressing in terms of decision making of underperforming distribution asset types is addressed and managed through the various asset class plans and Distribution Network Strategies, outlined below:</p> <ul style="list-style-type: none"> • <i>Distribution Structures Asset Management Strategy</i> (KRA3.02) • <i>Distribution Overhead Conductors Asset Management Strategy</i> (KRA3.03) • <i>Dx Reliability Strategy</i> (KRA1.07) <p>Western Power monitor the condition and performance of it's in service assets through the application of the <i>Asset Performance Management Standard</i> (KRA4.18). This approach is used to identify under performing assets.</p> <p>To maintain network performance Western Power has two board approaches for maintenance and subsequently the trigger for asset replacement, outlined below:</p> <ul style="list-style-type: none"> • Treat on Condition is used for high risk or high cost assets, assets with long lead times or those that are practical to monitor. This is managed through 	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<p>condition assessment, preventative maintenance, proactive replacement and some corrective maintenance.</p> <ul style="list-style-type: none"> Treat on Failure is used for assets where they will remain in operation until they fail or become obsolete. These assets will then be addressed with corrective maintenance or replacement. However, if Western Power identify poor asset condition through a routine inspection, feedback from manufacturer or a customer call that presents an unacceptable risk to Asset Management objectives then they will proactively maintain or replace the asset in question. <p>Under-utilised assets are identified either based on a trigger/change to the network or through an annual planning review. A network change trigger would include any case in which the network configuration is altered due to the addition or removal of a customer. The effectiveness of the process was reviewed through the 06 Asset Maintenance interview with specific evidence of underperforming assets being reviewed from defect identification to asset remediation as part of the regional site visit. Additional evidence was evaluated for Dx structures and Dx pole top fire identification to remediation in the form of a case study within the <i>2024 AMSR Process 06 Asset Maintenance</i> (C.16) slide pack, page 18-27.</p> <p>If an asset is assessed to be no longer required, then Western Power selects it for decommissioning. Decommissioned assets are assessed for reuse/disposal depending on their condition, this is discussed further in section 3.4 below.</p>		
		ETL2	4	As for EDL1.	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<p>It was observed that the identification and addressing of underperforming transmission asset types is addressed and managed through the various asset class plans and Transmission Network Strategies, outlined below:</p> <ul style="list-style-type: none"> • <i>Transmission Circuit Breaker Switchboards Strategy</i> (KRA3.04) • <i>Transmission Power Transformer Detailed Strategy</i> (KRA3.05) • <i>66 kV Rationalisation Strategy</i> (KRA3.06) • <i>Tx Reliability Strategy</i> (KRA1.06) 		
3.2	The reasons for under-utilisation or poor performance are critically examined and corrective action or disposal undertaken	EDL1	5	<p>When replacing an asset, Western Power will perform a review of the condition of that asset to provide information / data on how the assets condition deteriorated. This is put in a register and the asset custodian will review this and use it to help to understand if more inspections / maintenance should be performed or if new asset failure types can be identified / understood. This forms part of the Primary Plant Return Process and the Returned Plant Tracker was reviewed during the interview process. This process was reviewed from initial identification of poor performance of 2 wood poles through to the pole replacement as part of the onsite interviews and regional site visit to Wundowie. This evidence and observation of the process was deemed sufficient to satisfy this effectiveness criteria.</p> <p>The <i>Distribution Structures Asset Management Strategy</i> (KRA3.02) documents this process as well, stating that '<i>Pole condition is assessed during the end-of-life stage of the asset life cycle to provide information regarding the remaining strength. Type testing of replaced and failed hardwood and softwood poles is ongoing to continuously improve aging and Serviceability Assessment Models.</i>'</p>	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<p>Other evidence includes the following:</p> <ul style="list-style-type: none"> • <i>Distribution Structures Asset Management Strategy</i> (KRA3.02) • <i>Distribution Overhead Conductors Asset Management Strategy</i> (KRA3.03) • <i>INC10875930 (1075390) conductor failure fire NW302-11 Hyden 25 Dec 23.pdf</i> (KRA3.13) • MAJOR INCIDENT REPORT – INC1963877 – MIR – Geoview Unavailable.pdf (KRA7.26) • <i>INC1989681 - XA21 Loss of connection to Oracle DB</i> (KRA7.27) • INC2269581 Qlik reverting back to August.pdf (KRA7.28) 		
		ETL2	4	<p>As for EDL1.</p> <p>The <i>66kV Rationalisation Strategy</i> (KRA3.06) highlights emerging issues with the 66kV network assets hitting the mean replacement life and documents a strategy with corrective actions to mitigate this along with potential opportunities.</p> <p>Evidence included the following artefacts:</p> <ul style="list-style-type: none"> • <i>Transmission Circuit Breaker Switchboards Strategy</i> (KRA3.04) • <i>Transmission Power Transformer Detailed Strategy</i> (KRA3.05) • 230420 – Final – Post Incident Review – Transmission Tower Damage (KRA4.07) 	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
3.3	Disposal alternatives are evaluated	EDL1	4	<p>Western Power has clear guidelines to the option analysis of renewal and maintenance procedures in which a clear methodology is presented for treatment options, sighted in the <i>Renewal and Maintenance Requirements Option Analysis Methodology</i> (KRA3.07).</p> <p>It was observed that at asset class strategy or plan level, an appropriate range of suitable technical options are considered to address asset end-of-life issues and/or technological obsolescence.</p> <p>Before an asset can be disposed an Asset Write Off form must be submitted and signed off as per the <i>Asset Disposal Guidelines</i> (KRA3.01). These processes and evidence were reviewed for the pole replacements that were observed as part of the onsite interviews and regional site visit to Wundowie. This evidence and observation of the process was deemed sufficient to satisfy this effectiveness criteria.</p>	A	1
		ETL2	4	<p>As for EDL1.</p> <p>The <i>66kV Rationalisation Strategy</i> (KRA3.06) takes an in depth look into the opportunities available to Western Power as the 66kV network nears its mean replacement life. This document seeks to guide investment decisions related to the replacement of this network in line with Western Power's corporate objectives.</p> <p>Condition treatment rules including the candidates for replacement or refurbishment were documented in the <i>Transmission Switchboard and Circuit Breaker Asset Management Strategy</i> (KRA3.04) similar was sighted for Power Transformers in the <i>Power Transformer Asset Management Strategy</i> (KRA3.05)</p>	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
3.4	There is a replacement strategy for assets	EDL1	4	<p>Clear and robust asset replacement strategies were observed in the following asset class and asset management strategies during the review.</p> <ul style="list-style-type: none"> • <i>Distribution Structures Asset Management Strategy</i> (KRA3.02) • <i>Distribution Conductors Asset Management Strategy</i> (KRA3.03) <p>In addition, the Distribution Wood Pole reuse process was observed during the interviews with a clear recovery criteria and re-use process for replaced poles where they meet the recovery criteria.</p> <p>Asset disposal planning is directed by <i>Renewal and Maintenance Options Analysis Procedure</i> (KRA3.07), and the actual removal and disposal of an asset no longer required is directed by the <i>Asset Disposal Policy Guidelines</i> (KRA3.01).</p> <p>These processes and evidence were reviewed for the pole replacements that were observed as part of the onsite interviews and regional site visit to Wundowie. This evidence and observation of the process was deemed sufficient to satisfy this effectiveness criteria.</p>	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
		ETL2	4	<p>Clear and robust asset replacement strategies were observed in the following asset class and asset management strategies during the review.</p> <ul style="list-style-type: none"> • <i>Transmission Circuit Breaker Switchboards Strategy (KRA3.04)</i> • <i>Transmission Power Transformer Detailed Strategy (KRA3.05)</i> • <i>Western Power 66 kV Rationalisation Strategy (KRA3.06)</i> 	A	1

Table 9: Asset Management Process 3 Asset Disposal

6.4.4 ASSET MANAGEMENT PROCESS 4 ENVIRONMENTAL ANALYSIS

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
4.	Environmental analysis					
	Environmental analysis examines the asset management system environment and assesses all external factors affecting the asset management system.					
		EDL1			A	1
		ETL2			A	1
4.1	Opportunities and threats in the asset management system environment are assessed	EDL1	2	<p>Western Power presented a clear and comprehensive process for assessing the opportunities and threats in the asset management system environment over the review period. Since the last ERA review period Western Power's <i>Corporate Strategy</i> (C.05) has been refreshed twice due to significant shifts in the environment triggering the need to refresh. This was due to the four 'strategic elephants' determined in 2021:</p> <ol style="list-style-type: none"> 1. Optimising the modular grid transition 2. Delivering outcomes for customers 3. Integrating DER into the grid 4. Driving financial sustainability <p>A key priority of Western Power's 2023 <i>Corporate Strategy</i> (C.05) was to deliver a climate resilient network, with climate change identified as a strategic risk. This risk has</p>	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<p>been factored into the way Western Power are planning to maintain and transform the distribution network over the coming years.</p> <p>Strategic Risks to Western Power over the coming years are documented in the <i>Statement of Expectations 2024-2025</i> (KRA4.04).</p> <p>The <i>Strategic Development Plan 2019/20 – 2023-24</i> (KRA4.14) documents the rise of emerging technology for the energy future and the opportunities and threats this poses to Western Power. It also documents the internal and external opportunities the Western Power will look to use to achieve its strategic objectives.</p> <p>Additional evidence reviewed for this effectiveness criteria included:</p> <ul style="list-style-type: none"> • <i>Corporate Strategy 2017-2022</i> (C.05) • <i>Corporate Strategy 2021-2031</i> (C.05) • <i>Corporate Strategy 2023-2031</i> (C.05) • <i>Asset Management Objectives Report</i> (C.07) • <i>Network Management Plan</i> (C.08) • <i>Asset Management System Description</i> (C.10) • <i>Digital Capability Strategy 2022-2027 FINAL PDF (EDM 58796701).pdf</i> (KRA4.05) 		
		ETL2	2	As for EDL1.	A	1
4.2	Performance standards	EDL1	2	Western power presented a clear and well executed approach to identifying the performance standards across the network to meet customer needs. A clear process for	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
	(availability of service, capacity, continuity, emergency response, etc.) are measured and achieved			<p>translating the corporate strategy into measurable asset performance indicators was evident. It was observed however that the <i>Asset Performance Management Standard</i> (KRA4.18) has not been updated since 2021 though the cover says 2016.</p> <p>Evidence of the policy and process framework directing this include:</p> <ul style="list-style-type: none"> • <i>Asset Management Objectives</i> (C.07) • <i>State of the Infrastructure Report for 2022-23</i> (KRA4.10) • <i>Statement of Expectations 2024-25</i> (KRA4.04) • <i>Asset Performance Management Standard</i> (KRA4.18) <p>Reporting on performance took various forms subject to the area of focus, but in general high-level performance reporting against performance standards was observed to be consistently undertaken across all functional areas observed as required in accordance with the Electricity Networks Access Code as per the <i>Service Standard Performance Report 2022-23</i> (KRA4.22) and in line with Western Power's <i>Creation of Performance Reporting Outputs Process</i> (KRA4.29).</p> <p>Executive level performance reporting is evidenced by the following reports, with the performance standards being broadly achieved across the business.</p> <ul style="list-style-type: none"> • <i>Business Performance Report - April 2024</i> (KRA5.08) • <i>Western Power Monthly Performance Report for Board - June 2022</i> (KRA5.09) • <i>Business_Performance_Report_-_June_2023</i>. (KRA5.10) • <i>Asset Performance Quarterly Report (APQR)_FY24_Q1</i> (KRA4.08) 		

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<p>Reporting required under Western Power’s licences was also reviewed during the review process, including:</p> <ul style="list-style-type: none"> • <i>2020-21 Annual Compliance Report – Schedule A (KRA4.11)</i> • <i>2022-23 Annual Compliance Report – Schedule A (KRA4.11)</i> • <i>Annual Reliability and Power Quality Report for the year ended 30 June 2021 (KRA4.26)</i> • <i>Annual Reliability and Power Quality Report for the year ended 30 June 2023 (KRA4.26)</i> 		
		ETL2	2	As for EDL1.	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
4.3	Compliance with statutory and regulatory requirements	EDL1	4	<p>Western Power continue to maintain a strong compliance culture across the business. This is clearly reflected in the Asset Management system and across business management processes. During the interview process the Legislative Obligations Catalogue was observed, this is where the 2000+ obligations that Western Power must meet and tracked and managed. This tracker is reviewed on a quarterly basis. It was confirmed that ENSR obligations were held within the Legislative Obligations Catalogue and are tracked and managed in accordance with this process. Evidence sited throughout this AMSR demonstrated that asset management decisions consistently comply to requirement of Western Power’s regulatory and legislative obligations.</p> <p>The <i>Annual Compliance Report</i> (KRA4.11) documents operating licence obligation breaches and Western Power’s actions to mitigate these in the future.</p> <p>Additional evidence observed includes:</p> <ul style="list-style-type: none"> • <i>Compliance Failure Reporting Procedure</i> (KRA4.01) • <i>Compliance Framework</i> (KRA4.02) • <i>Corporate Compliance Standard</i> (KRA4.03) • <i>Statement of Expectations 2024-25</i> (KRA4.04) • <i>Legislative Obligations Compliance Plan – Asset Performance</i> (KRA4.06) • <i>Corporate Compliance – SLT Induction pack</i> (KRA4.12) • <i>Asset Performance Quarterly Report (APQR)_FY24_Q1</i> (KRA4.08) 	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
		ETL2	4	As for EDL1.	A	1

4.4	Service standard (customer service levels etc) are measured and achieved.	EDL1	2	<p>Western Power continue to present a well-founded and well-executed approach for identifying service standards required to address customer needs, and for translating these through its planning mechanisms into network asset-based outcomes and objectives.</p> <p>Corporate objectives were observed to be measured in terms of financial performance. Monthly reports against corporate objectives were also observed in <i>Western Power's Monthly Performance Report for Board – June 2022</i> (KRA5.09). External Performance Indicators that were proposed by Western Power and agreed upon by the treasury are published on the website.</p> <p>Reporting on performance took various forms subject to the area of focus, a list of the 8 key performance reports was reviewed during the interview process with its purpose and intended customer. The high-level performance reporting against performance standards at Western Power was observed to be consistently undertaken across all functional areas observed as required in accordance with the Electricity Networks Access Code as per the <i>Service Standard Performance Report 2022-23</i> (KRA4.22).</p> <p>The draft key performance indicators for FY25 were observed during the interview process and also align to the corporate strategy.</p> <p>It was observed that over the review period Western Power were broadly meeting service standards across the network. However, during a review of the current performance on the service standard dashboard for the metropolitan area all key SAIDI and SAIFI targets were being missed, with all areas forecast to exceed the allowed benchmark for the year.</p> <p>Evidence reviewed included:</p> <ul style="list-style-type: none"> • <i>Service Standard Performance Report 2021-22</i> (KRA4.22) • <i>Service Standard Performance Report 2022-23</i> (KRA4.22) • <i>Annual Reliability and Power Quality Report for the year ended 30 June 2021</i> (KRA4.22) 	A	2
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Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<ul style="list-style-type: none"> Annual Reliability and Power Quality Report for the year ended 30 June 2023 (KRA4.22) 		
		ETL2	2	As for EDL1.	A	2

Table 10: Asset Management Process 4 Environmental Analysis

6.4.5 ASSET MANAGEMENT PROCESS 5 ASSET OPERATIONS

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
5.	Asset operations Asset operations is the day-to-day running of assets (where the asset is used for its intended purpose).					
		EDL1			A	2
		ETL2			A	2

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
5.1	Operational policies and procedures are documented and linked to service levels required	EDL1	4	<p>Western Power continued to demonstrate a comprehensive suite of operational policies and procedures, clearly linked to service levels set for the business through the strategic and business planning process of the company. Western Power has all the key business processes documented within the Holocentric system and these are mapped to the business structure. However, during the interview process when reviewing the list of key business processes in the Holocentric system the Western Power team flagged that some documents were overdue an update and this was planned to take place but had not yet started.</p> <p>Evidence observed included:</p> <ul style="list-style-type: none"> • <i>SOP 164 Restoration of Lines, Feeders, Reclosers & Fuses (KRA5.02)</i> • <i>G_245_Prioritising Network Restoration Guideline (KRA5.03)</i> • <i>G 237 Contact Procedure Emergency Service Organisations & Critical Infrastructure (KRA5.04)</i> • <i>Incident Management Procedure (KRA5.20)</i> • <i>NCESS Trigger Documentation (KRA5.25)</i> • <i>G 386 Network Emergency Levels (KRA5.33)</i> • <i>G 380 Network Operations Gude to Emergency Levels with System Change Restrictions (KRA5.34)</i> • <i>Management Review 2022 Network Operations (KRA5.31)</i> • <i>Management Review 2023 Network Operations (KRA5.32)</i> 	A	2

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
		ETL2	4	As for EDL1.	A	2
5.2	Risk management is applied to prioritise operations tasks	EDL1	2	<p>The identification of risks and the prioritisation of operation responses is a clear feature in the evidence cited in Ref 5.1 above, as well as in the document <i>G 237 Contact Procedure Emergency Service Organisations & Critical Infrastructure</i> (KRA5.04) and <i>G_245_Prioritising Network Restoration Guideline</i> (KRA5.03). The <i>Network Control Services (NCS) North Country (NC) Load Area Business Case</i> (KRA5.26) shows Western Power prioritising a business case to prevent associated network risk increasing to 'high' for North Country.</p> <p>In addition to this the document <i>F 105 Control Room Evacuation & Test Exercises</i> (KRA5.01) demonstrated the understanding of potential risk issues associated with managing the operations centre, and Western Power's preparedness for addressing these risks.</p> <p>A discussion during the interview session was also held on how the Fire Risk Management system has been revised and improved after a detailed review of Western Power's fire consequence ratings.</p>	A	1
		ETL2	2	<p>As for EDL1.</p> <p>In addition, there is significant overlap of this review area with matters pertaining to Asset Management Process Ref No. 9 – Contingency Planning, especially with regards to operational responses to transmission network issues. This area continues to be well treated by Western Power.</p>	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
5.3	Assets are documented in an Asset Register including asset type, location, material, plans of components, an assessment of assets' physical/structural condition	EDL1	3	<p>This Effectiveness Criteria significantly overlaps with Effectiveness Criteria Ref No. 7.2.</p> <p>Ellipse is Western Power's primary source of record for all asset condition, maintenance and location data. The location data within the ellipse system is cross referenced to the Geographical Information System (GIS) are these are the main software systems for holding all Dx and Tx asset related information. Engineering drawings are also held in ellipse.</p> <p>A review of work orders within ellipse showed that assets had unique asset identifier, location, component, physical attribute, condition and voltage data attributed to them.</p> <p>Communications asset data is stored in the Connectmaster system, which has been brought in during this review cycle due to the previously used Clarity system being at end of life.</p> <p>A demonstration of the 'Asset Explorer Interface' within ellipse was given during the interview process. This acts as the interface to the business for the asset register. This demonstration confirmed that Western Power are documenting and maintaining all the required asset data within its asset register to satisfy this effectiveness criteria.</p>	A	1
		ETL2	4	As for EDL1.	A	1

5.4	Accounting data is documented for assets	EDL1	4	<p>It is noted that this Effectiveness Criteria overlaps significantly with Effectiveness Criteria Ref No. 6.6 and Asset Management Process Ref. No. 7.</p> <p>Western Power’s Fixed Asset register (FAR) held within the ellipse system is used as the store of accounting data the valuation of assets for financial and statutory reporting purposes. Assets in the FAR are grouped into asset classes within asset profiles; in accordance to asset type, function and useful life. Asset class is the lowest level and it holds the default financial features of the assets such as useful life, depreciation method, property, plant and equipment vs intangibles. The FAR is managed through the application of the <i>Financial Management Policy</i> (KRA10.04).</p> <p>The Regulated Asset Base (RAB) is derived from the FAR and is a key input and driver into the calculation of Western Power’s revenue during an access period. The RAB provides a record and valuation of Western Power’s capital base used to provide covered network services and is a mechanism by which Western Power recovers its investments.</p> <p>During the interview process Western Power demonstrated the relationship between the Fixed Asset Register (where asset value data is captured as parent asset category levels in accordance with standard accounting practices,) and the more granular detail required for the Regulated Asset Base register.</p> <p>Western Power uses work orders as a mechanism to capture all expenditure. All work orders carry financial and asset data, this financial data includes:</p> <ul style="list-style-type: none"> • Funding source (internal vs external) • Regulatory category • Capital works vs operational works • Asset segment • Expenditure type 	A	1
		ETL2	4	As for EDL1.	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
5.5	Operational costs are measured and monitored	EDL1	4	<p>It was clear that Western Power consistently measure and monitor operational costs across the various levels of the business though the multiple performance reports observed during this review.</p> <p>Evidence reviewed included:</p> <ul style="list-style-type: none"> • <i>Business Performance Report April 2024 (KRA5.08)</i> • <i>Business Performance Report June 2023 (KRA5.10)</i> • <i>Western Power Monthly Performance Report for Board – June 2022 (KRA5.09)</i> • <i>Operational Delivery Performance Pack Feb 2024 (KRA5.13)</i> • <i>Operational Delivery Performance Pack Mar 2023 (KRA5.14)</i> • <i>Aset Performance Quarterly Report FY24 Q1 (KRA5.27)</i> 	A	1
		ETL2	4	As for EDL1.	A	1

5.6	Staff resources are adequate, and staff receive training commensurate with their responsibilities	EDL1	2	<p>Western Power presented a comprehensive range of artefacts and processes to govern competency management both at an enterprise and functional level. At the functional level these included:</p> <ul style="list-style-type: none"> • <i>Network Operations Training Matrix extract</i> (KRA5.06) • <i>Development of Network Operations Employees</i> (KRA5.18) <p>The <i>People Strategy 2023-2026</i> (KRA5.12) sets out the people and organisational requirements required at Western Power to deliver the corporate strategy. This includes ensuring the workforce is capable with the right composition of capabilities and it also looks to enable employees to align behaviours to Western Power's values.</p> <p>The <i>Living our Values</i> (KRA5.11) framework is a new document that outlines the how behaviourally Western Power employees should be working to meet the new values and implement them across the business.</p> <p>Behavioural competencies are managed and evaluated via the 'My Success' system, while safety critical areas maintain technical competency requirements, network authority cards and worker authorisations through the 'Fetch' system. This was reviewed during the regional site visit. Contractors are responsible for managing the competencies of their own staff. Western Power has a responsibility to ensure that all persons (including contractors) engaged in the design, construction, commissioning, operation, maintenance and decommissioning of its network are suitably competent and adequately trained. Western Power has various processes to help ensure compliance, one of which is to ensure persons conducting work on its network are authorised by Western Power to do so. This is achieved through the authorisation process starting with a Basic Network Authority (BNA) and adding task specific authorisations dependant on an individual's role and/or work being undertaken. Authorisation is supported by the Network Authorisation Procedure and the Offline Authorisation Tool (OAT).</p> <p>Resource requirements at Western Power form part of business case decision making as per the <i>Distribution PM Management Business Case</i> (KRA5.15), however there was</p>	B	2
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			<p>still not a clear enterprise-wide human resource planning framework in place, as per our previous 2020 AMS review findings.</p> <p>The use of internal and external resource in the form of a composite resourcing model is outlined in the <i>Network Delivery Strategy FY21-22 – FY31/32</i> (KRA5.30). This outlines a three delivery arm resourcing approach across internal, standard contract and preferred vendor resource to meet resource requirements. Additional external delivery channels were determined in the <i>Addendum to Network Delivery Strategy FY21/22 to FY31/32</i> (KRA5.30).</p> <p>Dashboards and analytics around the tracking of resource requirements at a function level was presented during the interview process, however a single consolidated plan at the enterprise level was not able to be observed.</p> <p>Throughout various interviews there was a common issue with lack of resource availability, for example the emergency management training scenario and overdue documents were not being reviewed, which staff attribute to resource constraints. These resource shortages were wide ranging and affected each delivery arm mentioned above.</p> <p>Resource constraints are becoming a more common issues across the Australian electricity network and with the growth required for Western Power’s Transmission network in a limited technical resource pool, we believe it would still be beneficial for Western Power to develop a human resource planning framework, minimally covering the scope of the asset management system (although, in our opinion an enterprise-wide approach would be most beneficial). Ideally this would include policy and procedural requirements to direct the following:</p> <ul style="list-style-type: none">• The identification of human resource requirements aligned to Access Arrangement investment plans, developed in a standard form for each functional area as required, so that the various plans can be rolled up and monitored at the enterprise level;		
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Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<ul style="list-style-type: none"> The identification and planning of staff training requirements for those resources, through the development of a staff training plan for each functional area as required, again in a standard enterprise-wide format; and The development of a skills and resources strategic plan to identify and capture expected future skill/competency requirements to meet the challenges of the changing network operational environment. <p>This would not necessarily centralise the function, but allow for a framework so that the planning can be undertaken at the functional area level, done in accordance with corporate guidelines so that it can be reviewed and monitored across the asset management system.</p>		
		ETL2	2	As for EDL1.	B	2

Table 11: Asset Management Process 5 Asset operations

6.4.6 ASSET MANAGEMENT PROCESS 6 ASSET MAINTENANCE

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
6.	Asset maintenance Asset maintenance is the upkeep of assets.					
		EDL1			A	1
		ETL2			A	1
6.1	Maintenance policies and procedures are documented and linked to service levels required	EDL1	4	<p>Western Power continue to maintain and utilise a robust maintenance policy and procedural framework. There was clear alignment within the framework documents that maintenance practices were developed with clear alignment to Western Power’s asset management objectives and required service levels of its asset classes. Evidence reviewed is detailed below:</p> <ul style="list-style-type: none"> <i>Tx and Dx Easement Management Strategy (KRA6.02).</i> <i>Distribution Transformer Asset Reuse Guideline (KRA6.04)</i> <i>Distribution Network Maintenance Strategy (KRA6.12)</i> <i>Distribution Structures Asset Management Strategy (KRA6.15)</i> 	A	1
		ETL2	4	<p>As for EDL1.</p> <p>Evidence includes:</p> <ul style="list-style-type: none"> <i>Transmission Network Maintenance Strategy (KRA6.01)</i> 	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<ul style="list-style-type: none"> Transmission Lines Management Strategy (KRA6.03) 		
6.2	Regular inspections are undertaken of asset performance and condition	EDL1	2	<p>Routine inspection of asset performance and condition was a central focus in the documents reviewed for the Effectiveness Criteria Ref. No. 6.1. This included clearly detailed inspection strategy and photo guides for transformer condition (KRA6.04).</p> <p>A list of the Dx inspections undertaken at Western Power was presented at the interview. The holistic inspection cycles for Dx assets were reviewed in detail during the interview process, with the cycle consisting of full, visual and vegetation cycles. This showed that assets located in extreme/high fire risk zones, or areas of high public exposure are assigned a more frequent holistic inspection cycle. The frequency and scope of these inspections is also outlined in (KRA6.12). Specific inspection record examples or multiple assets were sighted during the interview process through a demonstration of the Asset Explorer records system including the records of the two poles replaced during the regional site visit. This demonstrated that inspections were being undertaken as per inspection instruction.</p> <p>Western Power are also looking to introduce a Service Connection Condition Monitoring activity to effectively monitor and manage shock risk, as per the <i>OAP-Business Case-SCCM Stage 2 FY21-FY22</i> (KRA6.10).</p> <p>Additional evidence includes:</p> <ul style="list-style-type: none"> Operational Delivery Performance April 2024 (KRA6.05) Operational Delivery Performance Mar 2023 (KRA6.16) 	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
		ETL2	2	<p>As for EDL1.</p> <p>Routine inspection of asset performance and condition is a central focus in both the <i>Transmission Network Maintenance Strategy</i> (KRA6.01) and the <i>Transmission Lines Management Strategy</i> (KRA6.03).</p> <p>A list of the Tx inspections undertaken at Western Power was presented at the interview, this included online condition monitoring in which Western Power can monitor the condition of primary plant assets in real time.</p>	A	1

6.3	Maintenance plans (emergency, corrective and preventative) are documented and completed on schedule	EDL1	4	<p>Western Power continue to maintain and utilise a robust maintenance policy and procedural framework. This framework included detailed maintenance plans for emergency, corrective and preventative maintenance across asset types, which were deemed sufficient to meet this effectiveness criteria. Western Power also provided clear evidence during the review that these plans were being completed on schedule.</p> <p>The <i>FY24/25 Annual Works Plan Overview</i> (KRA6.06) was reviewed across Distribution and Transmission assets, it included allocation of resources to complete the plan, completed activities, outstanding actions, balance compared to plan.</p> <p>Preventative routine, condition-based, corrective emergency, corrective deferred maintenance place as discussed in the <i>Distribution Network Maintenance Strategy</i> (KRA6.12).</p> <p>Changes to the maintenance plan are reviewed and mitigated as part of the <i>Operational Delivery Performance meeting pack</i> (KRA6.08).</p> <p>A pole replacement work order was also observed during the regional site visit.</p> <p>Evidence was observed during the interview process and in the <i>Operational Delivery Performance April 2024</i> (KRA6.05) and <i>Operational Delivery Performance Mar 2023</i> (KRA6.16) presentation packs to show that maintenance projects were being completed on schedule. In the case of a small amount of maintenance projects that had been delayed, these were often recoverable and had plans in place to either mitigate the delay or recover fully. The reason for each delay was recorded and reviews as part of these reports.</p> <p>Additional evidence reviewed included:</p> <ul style="list-style-type: none"> <i>FY 24/25 Internal and External Allocation Supporting Documents</i> (KRA6.07) 	A	1
		ETL2	4	<p>As for EDL1.</p> <p>Maintenance plans are documented in the <i>Transmission Network Maintenance Strategy</i> (KRA6.01)</p>	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
6.4	Failures are analysed and operational/maintenance plans adjusted where necessary	EDL1	2	<p>Western Power continued to demonstrate a robust approach to analysing and understanding asset condition and performance issues, with all asset failures being recorded in ellipse. This allowed the intelligence gained feeding into the asset class plans and asset management strategies. A review of the asset failure records in the ellipse system was undertaken during the interview process.</p> <p>As discussed in Effectiveness Criteria Ref. 2.4, Western Power conducts asset failure validation to consistently capture, store and report asset failures. Asset failure validation involves high level root cause analysis of the incident and classification of failure type. Notifiable incidents are further investigated as per Regulation 22 of the Electricity (Network Safety) Regulations 2015 (WA). Notifiable Incidents related to asset failures are reported and managed in Guardian. Key findings are fed back to updated asset strategies. This has most recently occurred for the Conductor strategy, Dx Overhead Network Rebuild Strategy and Dx Structure Strategy.</p> <p>Failure analysis evidence was sited within the <i>2024 AMSR Process 06 Asset Maintenance</i> (C.16) slide pack:</p> <ul style="list-style-type: none"> • ICAM incident investigation report template EDM#44252535 • Dx Lines & Plant asset FMEA: EDM#54599353 • FV&C - Work Instruction: EDM#63460129 (Dx specific) • FV&C Template Sheet - Validation Tool: EDM#63460835 (Dx specific) • FV&C Procedure: EDM#5634068 	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<p>Additional evidence to this included:</p> <ul style="list-style-type: none"> Section 4 of the <i>Distribution Structures Asset Management Strategy</i> (KRA6.15) outlines the approach to analysing the condition and performance of assets to forecast potential failures and plan maintenance to mitigate this. Review of asset performance and hazards regularly discussed as part of the <i>Operational Delivery Performance meeting</i> (KRA6.05 and KRA6.16). 		
		ETL2	2	<p>As for EDL1.</p> <p>Section 4 of the <i>Transmission Line Management Strategy</i> (KRA6.03) outlines the approach to analysing the condition and performance of assets to forecast potential failures and plan maintenance to mitigate this.</p>	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
6.5	Risk management is applied to prioritise maintenance tasks	EDL1	4	<p>Western Power continue to demonstrate a mature and comprehensive approach to using risk to prioritise maintenance tasks. Below is a selection of evidence cited during the review to satisfy the process and policy criteria:</p> <ul style="list-style-type: none"> Vegetation and Easement management maintenance tasks are prioritised by risk of fire likelihood and consequence as per table 45 of the <i>Tx and Dx Easement Management Strategy</i> (KRA6.02). As per the <i>Distribution Structures Asset Management Strategy</i> (KRA6.15) 'Assets are required to be inspected periodically to enable identification of condition and assessment of risk.' The <i>Distribution Overhead Network Rebuild Strategy</i> (KRA6.13) has a clear prioritisation process centred around network risk (Capital Allocation Process figure 6.1). Network risk and short term risk management are guiding principles across this strategy. <p>During the interview process evidence was reviewed to confirm the prioritisation of maintenance tasks based on risk was in line with the policies observed above. A risk-based approach to prioritising maintenance tasks was also evident during the metropolitan site visit to Western Power's Operations centre in which emergency response and daily maintenance tasks were prioritised based on risk to public safety and the network.</p>	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
		ETL2	4	As per EDL1. The <i>Transmission Line Management Strategy</i> (KRA6.03) states that ' <i>The treatments are prioritised by the operational asset manager based on risk (severity and the potential consequences of asset failure) and assigned a priority code to inform delivery of the required timeframe for treatment.</i> ' This was also evidenced during the interview process.	A	1
6.6	Maintenance costs are measured and monitored	EDL1	4	This Effectiveness Criteria overlaps with Effectiveness Criteria Ref. 5.5. Western Power continue to demonstrate a comprehensive and rigorous approach to measuring and monitoring maintenance performance on activity level and cost bases. Reports on this against plan are routinely presented to the leadership team for review and governance requirements. The data behind these reports is pulled directly from Western Power's central reporting system CoRE, which is discussed in further detail in Effectiveness Criteria Ref. 10.4. This ensures a single source of truth on key business data. The CoRE dashboard was reviewed in detail during the interview process. Other evidence includes: <ul style="list-style-type: none"> • <i>Western Power Monthly Performance Reports for Board</i> (KRA5.09) • <i>Operational Delivery Performance Reports</i> (KRA6.05 and KRA6.16) 	A	1
		ETL2	4	As for EDL1.	A	1

Table 12: Asset Management Process 6 Asset maintenance

6.4.7 ASSET MANAGEMENT PROCESS 7 ASSET MANAGEMENT INFORMATION SYSTEMS

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
7.	Asset management information system					
	An asset management information system is a combination of processes, data and software supporting the asset management functions.					
		EDL1			A	1
		ETL2			A	1
7.1	Adequate system documentation for users and IT operators	EDL1	4	<p>Western Power’s system documentation appeared adequate during this review period. Multiple user guides for asset management systems were also reviewed during the interview process, examples of general user familiarisation, training and work instructions for usage were also provided.</p> <p>Core processes and procedures are on an annual review cycle, with monthly and quarterly review meetings with managed service providers taking place to manage relationships with system providers and maintain the currency of the documentation.</p> <p>Specific examples of this documentation for <i>IT operators</i> included the <i>T&I Problem Management Process</i> (KRA7.14) and the <i>T&I Incident Management Process</i> (KRA7.13). These documents outline the key processes, roles and responsibilities and meetings used to minimise Technology and Innovation problems and incidents.</p> <p>Western Power has documented a new <i>Digital Capability Strategy 2022-2027</i> (KRA7.10), which outlines a roadmap to deliver on its digital vision ‘to create a secure digital environment that places our people and our customers at the centre’. This document</p>	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				outlines the key outcomes and key initiatives required to reach these outcomes in an implementation roadmap.		
		ETL2	4	As for EDL1.	A	1
7.2	Input controls include appropriate verification and validation of data entered into the system	EDL1	2	<p>Through the review process it was evident that ensuring data quality over this review period and onwards was a key initiative at Western Power. Data quality has been highlighted as one of 42 key projects in Western Power's improvement roadmap over the next 3 year horizon, with there now being a specific 'data quality improvement' investment option in the Business Case process.</p> <p>The Ellipse system controls data input and automatically validated and inspects the data once inputted. A run through of this process was given during the interview with this process appearing adequate and mature.</p> <p>The <i>Enterprise Data Quality Scorecard (KRA7.02)</i> is used to monitor and review Western Power's data quality and to determine poor areas of data quality. Data stewards set the data targets that these scorecards measure against.</p> <p>These scorecards are regularly reviewed at a monthly <i>Data Steward Meeting (KRA7.24)</i>. There are also work instructions with processes and procedures in place at manual data entry points to ensure data is entered into systems correctly. A discussion on other input controls for the asset management system was also conducted during the interview.</p>	A	1
		ETL2	2	As for EDL1.	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
7.3	Security access controls appear adequate, such as passwords	EDL1	2	<p>The <i>Level 1 Support Tasks and Access Procedures</i> (KRA7.04) outlines the access procedures for various Western Power applications. This adequately controls the accessibility of these key applications.</p> <p>The <i>Information Access Provisioning Guideline</i> (KRA7.05) outlines how access is provisioned to Western Power users depending on the security classification of the stored data as per the Information Classification Guideline.</p> <p>The <i>ServiceNow</i> system is used by Western Power to control system access in line with these guidelines. Access for key systems is reviewed through a 60 day audit cycle, with access automatically removed when an employee leaves Western Power.</p> <p>Data access is approved by the information owner or an assigned delegate, such as the data steward.</p> <p>Western Power has also implemented additional security controls such as multi-factor authentication to protect information across all online services, systems and data repositories. Passwords also must be changed at least every 90 days.</p>	A	1
		ETL2	2	As for EDL1.	A	1
7.4	Physical security access controls appear adequate	EDL1	2	<p>The <i>Physical Security Strategy 2022-2027</i> (KRA7.11) outlines major threats Western Power may face and provides a clear explanation of the governance and risk assessment to mitigate these. The Security Risk Management initiative sets out to define and implement a physical security risk methodology over the 5 year period to manage these risks.</p>	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<p>Evidence was provided of the registering and auditing of contractors accessing data centres (KRA7.17 & KRA7.18) to ensure access is reviewed and controlled regularly.</p> <p>Over this review period SOCI legislation has been implemented and embedded to ensure Western Power comply, with SOCI control now referenced in the strategic risk controls in the Guardian risk system.</p> <p>Access to Western Power sites is controlled via swipe cards with active monitoring and barriers, this was evident during the onsite. The head office data centre requires an induction and is also controlled via swipe card.</p> <p>Western Power also use two tier 3 data centres to host its critical IT infrastructure. These data centres are certified by the Uptime Institute as Tier III DCs and have robust physical access security measures including, security checkpoints, 24/7 manned security stations; biometric readers; identify verification; prohibited items and behaviour screening.</p>		
		ETL2	2	As for EDL1.	A	1
7.5	Data backup procedures appear adequate and backups are tested	EDL1	2	<p>The <i>ICT Backup and Recovery Standard</i> (KRA7.12) covers the principles of backup and recovery of data at Western Power. Western Power's core systems are backed up regularly and the data is stored in a secure location. There have been 3 recent critical system outages with each following procedure and being restored successfully with little adverse effect. Incident reports for each of these restorations was reviewed as part of this review.</p> <p>This evidence includes:</p>	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<ul style="list-style-type: none"> MAJOR INCIDENT REPORT – INC1963877 – MIR – Geoview Unavailable.pdf (KRA7.26) MAJOR INCIDENT REPORT – INC1989681 – XA21 Loss of connection to Oracle DB.pdf (KRA7.27) INC2269581 Qlik reverting back to August.pdf (KRA7.28) 		
		ETL2	2	As for EDL1.	A	1
7.6	Computations for licensee performance reporting are materially accurate	EDL1	4	<p>Western Power has identified and developed a range of reports to meet licensee performance reporting requirements for both internal and external stakeholders. A list of these reports was shown during the interview with a licensee performance reporting flowchart to show an overview of how reports are developed and controlled.</p> <p>These reports are prepared using <i>Oracle</i> and <i>Qlik</i> systems and are then passed to the <i>Centre of Reporting Excellence (CoRE)</i> for consumption by the business. In using these enterprise-wide reporting systems it ensures a single source of truth for the data behind the reports. Additional processes are used to verify the accuracy of external reports including testing and approval practices for changes to critical systems and internal review and approval processes for reports. These processes formed part of the overall flowchart mentioned above.</p> <p>The following reports were reviewed during the review process:</p> <ul style="list-style-type: none"> 2020-21 Annual Performance Report - Metering Code (KRA7.21) 2022-23 Annual Performance Report - Metering Code (KRA7.21) 	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
		ETL2	4	As for EDL1.	A	1
7.7	Management reports appear adequate for the licensee to monitor licence obligations	EDL1	4	<p>The Centre of Reporting Excellence (CoRE) system controls reporting data at Western Power and the main dashboard in CoRE is the top-level management report. This system is embedded and mature in its use at Western Power.</p> <p>The <i>T&I Incident Management Process</i> (KRA7.13) outlines the metrics and KPIs and performance targets that the process will be monitored by.</p> <p>The <i>2022 and 2024 Financial Year Reporting Timetable, Checklist & Instructions</i> (KRA7.21) holds the timetable of reporting required over the financial year to comply with licence obligations. It also holds process checklists with actions, accountable roles and procedures to ensure management reports are of the adequate quality and timeliness.</p> <p>A sample list of reports was presented in the interview with a list of 11 report types for a range of purposes with a range of internal stakeholders at various levels through the business and include reports forwarded to external stakeholders.</p> <p>A selection of report has been reviewed and appear to adequately meet the excellence criteria:</p> <ul style="list-style-type: none"> • <i>2020-21 Annual Performance Report - Metering Code</i> (KRA7.21) • <i>2022-23 Annual Performance Report - Metering Code</i> (KRA7.21) • <i>Operational Delivery Performance Pack Feb 2024</i> (KRA5.13) • <i>Operational Delivery Performance Pack Mar 2023</i> (KR5.14) 	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<ul style="list-style-type: none"> • <i>Business Performance Report - April 2024</i> (KRA5.08) • <i>Western Power Monthly Performance Report for Board - June 2022</i> (KRA5.09) • <i>Business_Performance_Report_-_June_2023.pdf</i> (KRA5.10) 		
		ETL2	4	As for EDL1.	A	1
7.8	Adequate measures to protect asset management data from unauthorised access or theft by persons outside the organisation	EDL1	2	<p>Western Power has set out 5 clear strategic outcomes within its <i>Cyber Security Strategy 2022-2027</i> (KRA7.07) to improve its cyber security maturity over the coming years, with investment across the business already uplifting its cyber security capability. The 5 strategic outcomes are,</p> <ol style="list-style-type: none"> 1. Proactively manage our cyber security risks to build trust with our stakeholders 2. Foster a culture that embraces cyber security to combat cyber threats 3. Embed a 'secure-by design' approach to enable our business to innovate securely 4. Perform essential cyber hygiene to prevent and mitigate attacks with foundational security measures 5. Continue to strengthen our ability to rapidly detect and respond to maintain vigilance against evolving cyber threats <p>This is a clear indication that Western Power is continuing to evolve and mature the measures it has in place to protect its asset data. Tracking of this strategy is governed via a bi-monthly steering committee, with the latest steering committee report showing</p>	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<p>the improvement program is largely on track, <i>Cyber Security Program Steering Committee Meeting Presentation</i> (KRA7.09).</p> <p>Cyber security is governed by the Financial Risk and Audit Committee with a quarterly report generated with the report from last quarter showing no major cyber security incidents, <i>Quarterly Cyber Security Report – May (Q3/2023-2024)</i> (KRA7.08).</p> <p>The <i>2022 and 2024 Financial Year Reporting Timetable, Checklist & Instructions</i> (KRA7.21) holds the timetable of licence audits including actions and accountability.</p> <p>The <i>Information Access Provisioning Guideline</i> (KRA7.05) describes how data in approved business intelligence, analytics and reporting stores and tools is secured according to the Information Classification Guideline and how access is provisioned to Western Power users.</p>		
		ETL2	2	As for EDL1.	A	1

Table 13: Asset Management Process 7 Asset management information system

6.4.8 ASSET MANAGEMENT PROCESS 8 RISK MANAGEMENT

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
8.	Risk management					
	Risk management involves the identification of risks and their management within an acceptable level of risk.					
		EDL1			A	1
		ETL2			A	1
8.1	Risk management policies and procedures exist and are being applied to minimise internal and external risks	EDL1	2	<p>Western Power has maintained a well-established and comprehensive approach to understanding and mitigating risks across the business and network. This was clearly demonstrated during the interview process to run across all functional areas and lie at the centre of key asset management processes. There are two key standards for risk management at Western Power:</p> <ul style="list-style-type: none"> The <i>Enterprise Risk Management Standard</i> (KRA8.13) outlines the 3 layers of activities Western Power undertake to manage risk. These fall under a hierarchy of Strategic, Functional/Operational/Program, and Project risks. The <i>Network Risk Management Standard</i> (KRA8.06) documents a number of risk management processes and principles for both internal and external risks. Network risk management is aligned to the requirements of AS5577, ISO 55001 and ISO31000. <p>Risks were defined under the following categories of commercial, reputational, asset performance related, network performance related, public and worker safety, or reputational, as per the <i>Enterprise Risk Assessment Criteria</i> (KRA8.12), and they were</p>	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<p>clearly identified in relevant strategies. Although the risk criteria for both enterprise and network risk fall under the same categories, for network risk, safety risks were broken down into Workforce and Public and there was also an additional layer of detail for Customer risks.</p> <p>Western Power has recently moved from an 'as low as reasonably practicable' to a 'so far as is reasonably practicable' risk mitigation strategy for network safety risks and this was reflected in the <i>Network Safety Strategy</i> (KRA8.03), which provides a list of risk mitigation activities across the asset lifecycle to minimise safety risk. This change was directed by updates to the WHS legislation and there has been no material changes to safety risk or treatment cost due to this updated methodology.</p> <p>Section 1.1 of the <i>Resilience Standard</i> (KR8.01) outlines the hierarchy of documents forming the Assurance and Risk Management suite.</p> <p>As per the <i>Organisation Resilience Model in the Resilience Standard</i> (KRA8.01) there are a series of response practices for the management of foreseeable and unforeseeable risks.</p> <p>Other evidence observed in support of this assessment include:</p> <ul style="list-style-type: none"> • <i>Network Risk Register extract for overview</i> (KRA8.05) • <i>Extract from Legislative Obligations Compliance Plan -Engineering & Design</i> (KRA8.07) • <i>Legislative Obligations Compliance Plan - Safety, Environment & Quality</i> (KRA8.09) 		

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<ul style="list-style-type: none"> <i>Risk and Resilience Framework</i> (KRA8.11) <i>Asset Performance Management Standard</i> (KRA8.14) 		
		ETL2	2	As for EDL1.	A	1
8.2	Risks are documented in a risk register and treatment plans are actioned and monitored	EDL1	2	<p>The <i>Network Risk Management Standard</i> (KRA8.06) documents the requirement to record, report, monitor and risks as part of network risk management.</p> <p>Western Power use the Guardian System to maintain its strategic, critical and functional risk registers. This system maintains the risk register, mitigations, owners and treatment plans with action for each risk. The system prompts the risk owners to undertake regular review of the action plan with the risk team and to monitor and update it when required.</p> <p>The <i>Network Risk Register Extract</i> (KRA8.05) provided evidence of a monitored risk register with actions tracked to completion.</p> <p>An overview of the Guardian System and a review of the Asset Management Risk profile and Functional Risk register was given during the interview. In this the asset management threats list, controls library, residual risk targets and treatments, and actions were reviewed and deemed to be sufficient. A quarterly enterprise risk management report for Q3 2024 was also reviewed during the interview.</p> <p>The <i>Legislative Obligation Compliance Plans for Engineering & Design</i> (KRA8.07) and <i>Safety, Environment & Quality</i> (KRA8.09) were reviewed as part of the document review.</p>	A	1
		ETL2	2	As for EDL1.	A	1

8.3	The probability and consequences of asset failure are regularly assessed	EDL1	2	<p>Western Power demonstrated a clear quantitative risk methodology during the interview process, and this was reflected throughout various risk documentation outlined below. This was clearly developed and applied for predicting asset failures within the distribution network, particularly in relation to public safety and bushfire risk.</p> <p>The network risk equation, documented in the <i>Network Risk Management Standard</i> (KRA8.06) states that risk is a calculation of the likelihood of the event taking place and the likelihood and severity of the consequence. These parameters were recently revised to remain current.</p> <p>The detail behind the quantitative risk assessment is as follows:</p> <ul style="list-style-type: none"> • Likelihood of event – knowledge of ageing, environmental conditions, past and future operating conditions • Likelihood of consequence – detailed knowledge of asset failure modes and effects of failures • Severity of consequence – physical location of the asset, the electrical location of the asset <p>As per the Organisation Resilience Model in the <i>Resilience Standard</i> (KRA8.01), likelihood and consequence severities are determined in line with the <i>Enterprise Risk Assessment Criteria</i> (KRA8.12). This process was also documented in the <i>Asset Performance Management Standard</i> (KRA8.14). The <i>Risk and Resilience Framework</i> (KRA8.11) sits above this document and was also reviewed during this document review.</p> <p>The <i>Network Safety Strategy</i> (KRA8.03) documents that safety risk assessments must consider both the likelihood and consequence of asset failures. It also documents the consequence of various safety risk categories.</p> <p>An example quantitative risk assessment of a wood pole fire, including the likelihood model, consequence likelihood, severity and cost considerations and conversion factors was reviewed during the interview process and this was deemed fit for purpose.</p>	A	1
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Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				Examples of probability and consequences of asset failure assessments for various distribution assets was reviewed during the interview process. Each risk assessment is reviewed periodically as per the guidelines in the <i>Network Risk Management Standard</i> (KRA8.06). The level of risk guides the period and detail of the risk assessment review, with 'extreme' risks having the most frequent and detailed review cycle.		
		ETL2	2	As for EDL1. An example of a risk assessment was reviewed for <i>North Beach T3 – Transformer Replacement</i> (KRA8.10) and included quantitative measures of probability and consequence.	A	1

Table 14: Asset Management Process 8 Risk Management

6.4.9 ASSET MANAGEMENT PROCESS 9 CONTINGENCY PLANNING

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
9.	Contingency planning					
	Contingency plans document the steps to deal with the unexpected failure of an asset.					
		EDL1			A	1
		ETL2			A	1
9.1	Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks	EDL1	2	<p>Western Power continue to demonstrate a well-considered, diligent, and thorough approach to understanding and preparing for major contingency events. The comprehensive documentation suite covering emergency management planning, specific contingency event planning, recovery operational procedure planning, testing of contingency plans for effectiveness and organisational preparedness, and post-incident reviews is regularly updated and improved upon.</p> <p>Western Power recently conducted a summer readiness and preparedness exercise facilitated by the <i>Emergency Management Team in September 2023</i> (KRA9.13). The purpose of the exercise was to assess:</p> <ul style="list-style-type: none"> • 'Core EMT' and Support function planning and staff resourcing capabilities during significant times of the year (School Holidays/Christmas/New Year) • Adequacy of planning and resourcing capabilities during a prolonged event. • Adequacy of planning and resourcing capabilities during concurrent events. 	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<ul style="list-style-type: none"> Effectiveness of staff resourcing plans and capability to meet requirements of an emergency event as a 24/7 essential service provider. The effective management of fatigue (concept of 50% field operations staff rostered on), and Risks to the business when under-resourcing occurs. <p>The exercise was completed successfully with the <i>Post Exercise Report</i> (KRA9.14) identifying a selection of outcomes to further improves Western Power’s response to and management of emergency events.</p> <p>Evidence observed included:</p> <ul style="list-style-type: none"> <i>Network Emergency Management Plan</i> (KRA9.01) <i>SOP 126 Manual Operation of the Network Following Failure of Critical Systems</i> (KRA9.02) <i>G 367 Contingency Plan-Earthquake</i> (KRA9.03) <i>G 368 Contingency Plan-Flood</i> (KRA9.04) <i>G 380 Network Operations Guide to Emergency Levels with System Change Restrictions</i> (KRA9.05) <i>G 386 Network Emergency Levels</i> (KRA9.06) <i>G 315 Pandemic Epidemic Guideline</i> (KRA9.07) <i>S 026 Standard - Contingency Planning</i> (KRA9.08) 		

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<ul style="list-style-type: none"> • <i>Enar Tx Outage Report 8th May 2024 (KRA9.09)</i> • <i>SOP 104 Control Centre Business Continuity Plan RESTRICTED (KRA9.10)</i> • <i>CRISIS MANAGEMENT PLAN PDF (KRA9.11)</i> 		
		ETL2	2	As for EDL1.	A	1

Table 15: Asset Management Process 9 Contingency planning

6.4.10 ASSET MANAGEMENT PROCESS 10 FINANCIAL PLANNING

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
10.	Financial planning					
	Financial brings together the financial elements of the service delivery to ensure its financial viability over the long term.					
		EDL1			A	1
		ETL2			A	1
10.1	The financial plan states the financial objectives and strategies and actions to achieve the objectives	EDL1	4	<p>The <i>2024-25 Business Plan – Board Submission</i> (KRA10.12) provides the 10 year business outlook and serves the purpose of a ‘Financial Plan’ that underpins the strategic asset plan, statement of expectation and statement of corporate intent. It also reflects on Fifth Access Arrangement (AA5) draft decision response, which included additional investment to address Shepherd report recommendations, additional climate resilience and reliability treatments and capital expansion to support growing Distributed Energy Resources on the network. The 10 year business outlook is developed based on,</p> <ul style="list-style-type: none"> transmission network growth, distribution transformation, reliable supply; and efficient customer service 	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<p>The board reviews various scenarios on these strategic risks to model how funding levels will affect the outlook over the next 10 years.</p> <p>The <i>Statement of Corporate Intent documents from 2020-2024</i> (KRA10.01) provide a view of Western Power’s key performance measures and targets for each year. After 2020 it includes a forecast on the planned spend for each key investment area/category.</p>		
		ETL2	4	As for EDL1	A	1
10.2	The financial plan identifies the source of funds for capital expenditure and recurrent costs	EDL1	4	<p>The <i>2024-25 Business Plan – Board Submission</i> (KRA10.12) identifies the sources of funding for capital expenditure and recurrent costs. The scenario options outlined within the 10 year business outlook discuss the potential customer funding sources.</p> <p>The <i>Statement of Corporate Intent documents from 2020-2024</i> (KRA10.01) provide a forecast of the net borrowing for each year. After 2020 it includes a forecast on the planned spend for each key investment area/category.</p> <p>The <i>Capital Expenditure and Depreciation Standard</i> (KRA10.05) establishes the rules and guidelines to determine what is classified as Capital Expenditure.</p> <p>The <i>Network Plan 25 Pack</i> (KRA10.14) provides the volumes of capital (capex) and operating expense (opex) plans, with opex split between Distribution and Transmission and subdivided into appropriate regulatory expense categories.</p>	A	1
		ETL2	4	As for EDL1.	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
10.3	The financial plan provides projections of operating statements (profit and loss) and statement of financial position (balance sheets)	EDL1	4	<p>The <i>2024-25 Business Plan – Board Submission</i> (KRA10.12) provides 10-year projections of operating statements and investment for two scenarios:</p> <ol style="list-style-type: none"> 1. <i>The additional investment expenditure profile per our current asset treatment and planning strategies plus additional customer decarbonisation driven connections and associated delivery challenges and,</i> 2. <i>The deliverability of the investment expenditure profiles maintained per the AA5 FD, and potential impacts on network outcomes.</i> <p>Reports were sighted that provide statements of operating statements and statements of financial position:</p> <ul style="list-style-type: none"> • <i>Business Performance Report April 2024</i> (KRA5.08) • <i>Business Performance Report June 2023</i> (KRA5.10) • <i>Western Power Monthly Performance Report for Board – June 2022</i> (KRA5.10) 	A	1
		ETL2	4	As for EDL1.	A	1
10.4	The financial plan provides firm predictions on income for the next five years and reasonable	EDL1	4	<p>The <i>2024-25 Business Plan – Board Submission</i> (KRA10.12) provides predictions on profitability over AA5 and up to the middle of AA7 in the Financial Outlook.</p> <p>Western Power use the <i>Qlik Reporting System</i> to create financial dashboards held in the CoRE system, in line with the metrics within the business plan to monitor and track progress to the plan. The information in these dashboards underpins the financial data that goes into the various stakeholder reports, including those mentioned in 10.3.</p>	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
	indicative predictions beyond this period			The <i>Investment Governance Framework</i> (KRA10.02) defines roles and responsibilities for management of regulated revenue funding for investment activities.		
		ETL2	4	As for EDL1.	A	1
10.5	The financial plan provides for the operations and maintenance, administration and capital expenditure requirements of the services	EDL1	4	The <i>2024-25 Business Plan – Board Submission</i> (KRA10.12) provides actuals, current and predictions over the next 10 years for Network, Customer and Business Support. This also now includes an outlook on strategic workforce planning, which is a new addition to the previous review. This provides a forecast of headcount on current delivery models to support the investment program forecast over the next 5 years. The <i>Network Plan 25 Pack</i> (KRA10.14) provides a breakdown on the actuals, variance against plan for FY25 and forecasts across all capital (capex) and operating (opex) expenditure.	A	1
		ETL2	4	As for EDL1.	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
10.6	Significant variances in actual/budget income and expenses are identified and corrective action taken where necessary	EDL1	4	<p>The <i>2024-25 Business Plan – Board Submission</i> (KRA10.12) summarises the risks and options available for the forecast expenditure increases over the AA5 FD revenue allowance.</p> <p>Variations to the plan are monitored in the CoRE KPI and Reporting system. It is used for corporate performance monitoring and reporting and it is where Western Power monitor and report on financial performance with identified variances to the plan requiring commentary on the reasons for the variance. These are reviewed in monthly reporting with corrective action taken where necessary and overall in a yearly reviews where corrective actions are reviewed for their performance (KRA5.10).</p> <p>The CoRE KPI and Reporting system was reviewed during the interviews. It monitored the following financial metrics:</p> <ul style="list-style-type: none"> • profit / loss • Balance sheet • Cash flow • Revenue • Consolidated total expenditure (also CAPEX and OPEX) • Program of work 	A	1
		ETL2	4	As for EDL1.	A	1

Table 16: Asset Management Process 10 Financial planning

6.4.11 ASSET MANAGEMENT PROCESS 11 CAPITAL EXPENDITURE PLANNING

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating	
11.	<p>Capital Expenditure Planning</p> <p>The capital expenditure plan provides a schedule of new works, rehabilitation and replacement works, together with estimated annual expenditure for these works over the next five or more years.</p> <p>Since capital investments tend to be large and lumpy, projections would normally be expected to cover at least 10 years, preferably longer. Projections over the next five years would usually be based on firm estimates.</p>						
		EDL1				A	1
		ETL2				A	1
11.1	There is a capital expenditure plan covering works to be undertaken, actions proposed, responsibilities and dates	EDL1	4	<p>The <i>Network Delivery Strategy FY21/22-FY31/32</i> (KRA11.01) provides a plan for works delivery of FY21/22 Works Program and out to FY31/32 for capital expenditure. This document focuses on the Planning and Execute/Deliver stage of Western Power's Asset Operations.</p> <p>The <i>Investment Governance Framework (IGF)</i> (KRA11.20) is the hierarchy of processes and documents that underpins the capital expenditure planning processes of Western Power and is essential to the implementation of the 10-year network plan within the Network Delivery Strategy.</p> <p>The <i>IGF Program and Project Management Guideline</i> (KRA11.05) documents Western Power's approach to ensuring efficient delivery of Programs and Projects, controls</p>	A	1	

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<p>leading to planned outcomes and the requirements of recording decisions and documentation for auditability.</p> <p>The <i>IGF Delivery Risk Management Guideline</i> (KRA11.03) is used to provide a consistent approach to identifying, assessing and managing delivery risk for programs and projects.</p> <p>The <i>IGF Business Case Guideline</i> (KRA11.04) defines the approval gate workflow for the review and signoff of each investment within the 10-year network plan. This 6-gate approval workflow is held within Western Power's OPPM systems. This system controls the workflow, including storing the required business case documentation and evidence, and assigning and managing signoff responsibilities. It also captures the key dates for investment signoff, delivery and benefits realisation.</p>		
		ETL2	2	As for EDL1.	A	1
11.2	The capital expenditure plan provides reasons for capital expenditure and timing of expenditure	EDL1	4	<p>The <i>IGF Business Case Guidelines</i> (KRA11.04) requires an issues briefing paper to be prepared for an investment to enter the scoping stage (gate 1), which include detail in the investment driver with justification. To enter the planning stage (gate 2) a works planning report is prepared which details the issues the investment will address.</p> <p>The <i>IGF Business Case Guidelines</i> (KRA11.04) states that in order for an investment to be approved (gate 3) it must justify expenditure on defined benefits and be aligned to investment strategies.</p>	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<p>The <i>Change Control Form</i> (KRA11.08) reviewed during the audit ensures changes to the expenditure plan are controlled and the impact of the change on cost and timing of expenditure is reviewed and agreed prior to approval.</p> <p>Various business case evidence was reviewed during the AMSR document review and during the interviews; see Effectiveness Criteria Ref.2 for the specific evidence reviewed.</p>		
		ETL2	4	As for EDL1.	A	1
11.3	The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan	EDL1	2	<p>During the interview Western Power presented the overarching planning process for capital expenditure, showing how the planning cycle flows down from the <i>Corporate Strategy</i> (C.05) through the Asset and Network Strategies and into the associated documents and flowcharts within the <i>Investment Governance Framework</i> (KRA11.20).</p> <p>Flowcharts showed the 10-Year Network Plan in <i>Network Delivery Strategy FY21/22 – FY31/32</i> (KRA11.01) feeding directly into the Business Outlook as noted by the board in <i>2024-25 Business Plan - Board Submission</i> (KRA10.12), which is made up of planned investments that have been approved through the IGF Business Case process. The <i>IGF Business Case Guidelines</i> (KRA11.04) states that in order for an investment to be approved at Gate 3 it must justify expenditure on defined benefits and be aligned to investment strategies.</p> <p>Therefore, capital expenditure planning directly aligns to the asset strategies regarding asset life and condition that is applied within the network plan.</p>	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				In addition to the above, the commentary provided for Effectiveness Criteria Ref1.5 and 2.2 regarding the use of risk costing data and quantifiable outcomes in investment business cases also applies to this Effectiveness Criteria.		
		ETL2	2	As for EDL1.	A	1
11.4	There is an adequate process to ensure that the capital expenditure plan is regularly updated and implemented	EDL1	4	<p>The <i>Investment Management Policy</i> (KRA11.21) is the key enabling document for the <i>Integrated Governance Framework</i> (KRA11.20) (IGF), with its governance principles approved by the board. The IGF then provides the scope, processes and accountability for capital investment decision making and it established the Investment Review Committee.</p> <p>The <i>Portfolio Management Standard</i> (KRA11.23) outlines the business planning process through the top-down allocation of portfolios and the bottom up selection of investments and provides for the yearly development of the Network Plan.</p> <p>The <i>Investment Management Standard</i> (KRA11.22) sets out the approval of individual investments through the IGF business case gate process.</p> <p>As per the <i>Network Delivery Strategy FY21/22-FY31/32</i> (KRA11.01), a detailed works plan is developed each year of the strategy to identify key challenges and to establish the internal resource capacity for the upcoming year. The internal resource capacity is then reviewed quarterly to identify any threats to delivery. The <i>Network Delivery Strategy</i> also undergoes frequent assessment and an annual review cycle to update it in accordance with the latest Network Plan.</p>	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<p>An example of a request for change <i>T0517653 - Transformer Refurbishment AA4 Ph 2 - REQUEST FOR CHANGE (RFC) Form</i> (KRA11.08) displayed the change controls for an individual update to the expenditure plan.</p> <p>The investment sponsors carry out ongoing quality assurance activities as the Investment Review Committee processes in relation to the IGF and the Investment and Portfolio Management standards mentioned above, with the following reports reviewed:</p> <ul style="list-style-type: none"> The <i>IGF Compliance Report July-December 2022</i> (KRA11.12) highlighted a number of overspend breaches over the period, these were reviewed with 14 remediated. The <i>IGF Compliance Report July-December 2023</i> (KRA11.13) demonstrated mediation of most of the past breaches and monitoring of the investment and project gateway activities and satisfactory compliance. <p>The system used to store project data is OPPM. Several sample data check reports were provided and reviewed including <i>OPPM Monthly Data Checks June 2023</i> (KRA11.15). The report reviewed a range of data values to check project data quality. A review of the OPPM system was also undertaken during the interview.</p>		
		ETL2	4	As for EDL1.	A	1

Table 17: Asset Management Process 11 Capital Expenditure Planning

6.4.12 ASSET MANAGEMENT PROCESS 12 REVIEW OF ASSET MANAGEMENT SYSTEM

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
12.	Review of asset management system					
	The asset management system is regularly reviewed and updated.					
		EDL1			B	2
		ETL2			B	2
12.1	A review process is in place to ensure that the asset management plan and the asset management system described in it remain current.	EDL1	2	<p>The <i>Corporate Document Framework</i> (C.13) mentions the <i>Asset Management Policy</i> (C.06) and the requirement for a scheduled review cycle at least once every three years. <i>The Corporate Document Framework</i> (C.13) was last approved August 2023.</p> <p>The asset management system has been outlined and scoped by the <i>Asset Management System Map</i> (C.11). This document was updated in June 2020, and again in November 2021. It is scheduled to be reviewed next in November 2024. A 3 yearly review cycle is acceptable and common practice within the industry.</p> <p>The <i>Asset Management Framework – Published</i> (KRA12.02) provides the structure upon which the asset management system is designed. Within the framework document it states that it promoted the maintaining of the AMS in line with the AM Policy principle. The document was previously updated in May 2020 and reviewed in March 2024.</p> <p>The <i>Asset Management Steering Committee minutes</i> (KRA12.14) noted that a preliminary review of the AMS, AMF and the AM Objectives had occurred.</p>	A	1

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				<p>A review of the Asset Management Framework was undertaken in October 2023, <i>AMSIC meeting (AMS & AMF)</i> (KRA12.10) in which minor changes were identified for multiple sections of the document to make the <i>AMF</i> (KRA12.02) current.</p> <p>The <i>Asset Management System Description</i> (C.10) defines the asset management system and provides an overview of documents tools and systems. This was updated in November 2021, as the 18th version. A range of audit and review activities are described. It is scheduled to be reviewed next in November 2024. A 3 yearly review cycle is acceptable and common practice within the industry.</p> <p>The <i>2023 – ISO 55001 Surveillance Visit Report – Final</i> (KRA12.06) provides evidence that that an external auditor has identified that the AMS is regularly reviewed and improved to maintain compliance with the ISO 55001 standard, which in turn satisfies the AM Policy requirement.</p> <p>The document <i>23Aug2023_Asset_Management_System_Steering_Committee_-_Agenda_and_Proceedings</i> (KRA12.14) provides evidence of the AMS Steering Committee reviewing the AMS to ensure it remains current, with forward planning actions being identified, including the update of AM objective to align to the updated business objectives.</p>		
		ETL2	2	As for EDL1.	A	1
12.2	Independent reviews (e.g. internal audit) are	EDL1	5	<p>The <i>Asset Management System Description</i> (KRA12.17) outlines the AMS audit and review activities and responsible bodies (Table 13.2) which include,</p> <ul style="list-style-type: none"> • Certification and compliance assessments against ISO 55001 and AS 5577 	B	3

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
	performed of the asset management system			<ul style="list-style-type: none"> • Adhoc independent audits • Review of performance against objectives • Review of progress of completion in improvement actions from AMSIP. <p>The <i>Extracts of Internal Audit Quarterly reports</i> (KRA12.05) confirm internal auditing of elements of the AMS is taking place over the review period.</p> <p>The <i>2023 – ISO 55001 Surveillance Visit Report – Final</i> (KRA12.06) provides evidence that elements of the AMS is independently reviewed and audited and that Western Power is aiming to deliver the internal audit plan.</p> <p><i>Extract of IAQR May 22 ARC for AMSR 2024</i> (KRA12.05a), a May (Q3/2021-22) Quarterly Report on Internal Audit showed results for an audit <i>IA 329 – Asset Maintenance (Distribution Network) Delivery of Works Plan</i>, with an audit rating of Effective and two findings for action related to managing prioritisation and the deferred fault process. The extract also indicates a number of other elements of the AMS have audit reports.</p> <p>There is a list of corrective and preventative actions where internal audit findings are tracked to completion (KRA12.04).</p> <p>The <i>Guardian extract of AMS actions from audits</i> (KRA12.07) provides a list of non-conformances from the previous AMSR 2020 audit and ISO 55001:2014 external audits. All actions have been closed.</p> <p>It is not clear how the internal audit plan covers the entire asset management system, as only select elements appear to be internally audited, with a reliance on all elements being audited as part of the external ISO 55001 certification.</p>		

Ref. no.	Asset management process & effectiveness criteria	EDL1 or ETL2	Review Priority	Observations and Recommendations	Process and policy rating	Performance Rating
				While staff stated there was a certification audit every three years with annual surveillances audits of the entire system, there is no evidence or clarity of how the asset management system is being assessed by internal audit.		
		ETL2	5	As for EDL1.	B	3
<p>Recommendation: 01/2024-EC12.1</p> <p>Licence EDL1 and ETL2</p> <p>We recommend that Internal Audit documentation clearly identifies elements of asset management system being audited, and be able to demonstrate how the current Internal Audit activity is providing appropriate review of the entire system, rather than relying on the ISO55001 certification and underpinning audits.</p> <p>This will enable Western Power to show that the current Internal Audit activity is providing appropriate review of the entire system.</p>						

Table 18 Asset Management Process 12 Review of Asset Management System

7. RECOMMENDATIONS

This section includes recommendations on the actions Western Power should take to address:

- Performance ratings: - Asset management processes or effectiveness criteria that were rated 3 or 4.
- Process and policy rating – Asset management processes or effectiveness criteria that were rated C or D.

The Resolved Recommendations from the previous audit are included in Table 19.

7.1 RECOMMENDATIONS FROM PREVIOUS AUDIT - RESOLVED

Recommendations resolved during current review period have been documented and included in Table 19.

Reference / Recommendation reference from previous review (if applicable)	Process and policy deficiency / Performance deficiency (Rating / Asset management process & effectiveness criterion / Details of deficiency)	Date resolved and action taken by the licensee	Reviewer's comments
01/2020	<p>B3</p> <p>(EC1.4) Asset planning - Non-asset options (e.g. demand management) are considered</p> <p>B3</p> <p>(EC2.1) Asset Creation and Acquisition – Full project evaluations are undertaken for new assets, including comparative assessment of non-asset options.</p> <p>The requirement to demonstrate the investigation on non-asset options was explored across a range of projects. Western Power were unable to effectively demonstrate that non-asset options were routinely considered, identified and appropriately investigated at the planning stages of project development. It was not clear that the concept of non-asset options was well understood or applied consistently. Western Power were unable to demonstrate that an effective Demand Management Policy, or framework was established and operating.</p>	<p>17th June 2024</p> <p>The licensee has implemented an <i>Alternative Options Strategy</i> (KRA1.16), developed and published a Networks Opportunity Map, and embedded non-network options as part the business case template. See Effectiveness Criteria 1.4, 1.5 and 2.1 for evidence reviewed during the review.</p>	<p>No further action required.</p>

Reference / Recommendation reference from previous review (if applicable)	Process and policy deficiency / Performance deficiency (Rating / Asset management process & effectiveness criterion / Details of deficiency)	Date resolved and action taken by the licensee	Reviewer's comments
02/2020	<p>C2 / C3</p> <p>(EC1.5) Asset Planning - Lifecycle costs of owning and operating assets are assessed</p> <p>C2 / C3</p> <p>(EC2.2) Asset Creation and Acquisition - Evaluations include all life-cycle costs</p> <p>Western Power were unable to provide a consistent view on the application of lifecycle costing at network investment decision making level.</p> <p>In particular, no overarching documentation by way of a framework or guideline was able to be identified that provided guidance on the application of lifecycle costs in asset class strategies, options analysis, investment decisions, equipment procurement, or other decisions where this should be a consideration.</p>	<p>17th June 2024</p> <p>The licensee has implemented a <i>Life Cycle Costing Standard</i> (KRA1.10) as part of an upgraded Investment Evaluation Model and business case template.</p> <p>The licensee has considered lifecycle costs with updated processes, templates, and tools. See Effectiveness Criteria Ref. 1.5 and 2.2 for evidence reviewed during the review.</p>	<p>No further action required.</p>

Reference / Recommendation reference from previous review (if applicable)	Process and policy deficiency / Performance deficiency (Rating / Asset management process & effectiveness criterion / Details of deficiency)	Date resolved and action taken by the licensee	Reviewer's comments
	<p>The ability of Western Power to demonstrate how operational costs were factored into re-investment decisions was not clear. There appeared to be limited policy and guidance around the costing principles to be used whilst evaluating life cycle costs. This should include consideration of ongoing or escalating operational costs and risk costs associated with time view of investment. These assessments should also inform decisions pertaining to asset life and technical obsolescence of groups of asset types.</p>		
03/2020	<p>B3</p> <p>(Effectiveness Criteria 12.1) Review of asset management system - A review process is in place to ensure that the asset management plan and the asset management system described in it remain current.</p> <p>While core documents for the management of the Asset Management System were observed to be current, Western Power identified during the interviews the need for improved document management with significant numbers of documents to be addressed.</p> <p>It is understood that a 2019 audit of Western Power's certification to ISO 55001 by Lloyd's Register, identified the currency of key AMS documentation to be an issue, as</p>	<p>17th June 2024</p> <p>The asset management system has been reviewed, with core documents on a regular review cycle during the audit period. See Effectiveness Criteria Ref. 12.1 for evidence reviewed during the review.</p>	<p>No further action required.</p>

Reference / Recommendation reference from previous review (if applicable)	Process and policy deficiency / Performance deficiency (Rating / Asset management process & effectiveness criterion / Details of deficiency)	Date resolved and action taken by the licensee	Reviewer's comments
	<p>outlined in the ISO 55001 Assessment Findings and Corrective Action Plan. The action plan identified different areas of corrective actions being required.</p> <p>This affirms that documentation management associated with defining and controlling the Asset Management System is wanting in both process control and effectiveness.</p>		

Table 19: A. Actions to address findings from Previous Audit – Resolved

7.2 RECOMMENDATIONS FROM PREVIOUS AUDIT – UNRESOLVED

Western Power has completed actions agreed with the ERA as detailed in Section 4.1.

7.3 RECOMMENDATIONS FROM CURRENT AUDIT – UNRESOLVED

Rec. reference (No/year)	Licence Reference	Process and policy deficiency / Performance deficiency (Rating / Reference Number, Asset management process & effectiveness criterion / Details of deficiency)	Reviewer’s Recommendation	Action taken by the licensee by end of review period
01/2024	EDL1 / ETL2	<p>B3</p> <p>(EC12.2) Independent reviews (e.g. internal audit) are performed of the asset management system</p> <p>It is not clear how the internal audit plan covers the entire asset management system, as only select elements appear to be internally audited, with a reliance on all elements being audited as part of the external ISO 55001 certification.</p> <p>While staff stated there was a certification audit every three years with annual surveillances audits of the entire system, there is no evidence or clarity of how the asset management system is being assessed by internal audit.</p>	<p>We recommend that Internal Audit documentation clearly identifies elements of asset management system being audited, and be able to demonstrate how the current Internal Audit activity is providing appropriate review of the entire system, rather than relying on the ISO55001 certification and underpinning audits.</p> <p>This will enable Western Power to show that the current Internal Audit activity is providing appropriate review of the entire system.</p>	<p>The recommendation has not yet been addressed.</p>

Table 20: B. Recommendations from current review – unresolved

8. APPROVAL OF THE REVIEW REPORT

AMCL, as the auditor, confirms the review report is an accurate presentation of our findings and opinions.

Signature: Mathew Oakey



Date: 25th October 2024

Contact Details:

AMCL
171 Sussex Street
Sydney NSW 2000
Mathew.Oakey@amcl.com

APPENDICES

Appendix A WESTERN POWER REPRESENTATIVES THAT PARTICIPATED IN THE REVIEW

The Western Power personnel interviewed throughout the course of the review are provided in Table 21, below.

Position
Overview of Asset Management System - 09:00 17 June 2024
Strategic Asset Performance Manager
Principal Asset Management Engineer
Head Of Asset Performance
Head Of Regulation & Investment Assurance
Lead Principal Grid Portfolio Investment Consultant
Strategic Asset Performance Manager
Principal Asset Management Engineer
Service Delivery Manager
Principal Engineer
Regulatory Compliance Manager
Quality and Compliance Officer
Actions to address 2020 Recommendations - 11:30 17 June 2024
Strategic Asset Performance Manager
Principal Asset Management Engineer
Senior Asset Systems Analyst
1. Asset Planning - 13:30 17 June 2024
Strategic Asset Performance Manager
Principal Asset Management Engineer
Principal Grid Portfolio Investment Consultant
Dx Grid Strategy & Planning Manager
Tx Grid Strategy & Planning Manager
Grid Portfolio Optimisation Team Leader
Principal Data Scientist
Predictive Analytics & Data Science Team Leader
Engineering Team Leader
Engineering Team Leader
Senior Business Solutions Consultant
2. Asset Creation & Acquisition - 08:30 18 June 2024
Principal Asset Management Engineer
Principal Grid Portfolio Investment Consultant
Grid Portfolio Manager
Principal Engineer Distribution Design

Operational Asset Performance Manager
Principal Engineer Protection
Principal Electrical Design Engineer
3. Asset Disposal - 10:30 18 June 2024
Principal Asset Management Engineer
Lead Operational Asset Performance Manager
Senior Transmission Sponsor
Engineering Team Leader
10. Financial Planning - 13:00 18 June 2024
Principal Asset Management Engineer
Enterprise Reporting Manager
4. Environmental Analysis - 15:00 18 June 2024
Strategic Asset Performance Manager
Principal Asset Management Engineer
Lead Regulatory Compliance Manager
Strategy Manager
Senior Compliance Specialist
Corporate Compliance Manager
5. Asset Operations - 08:30 19 June 2024
Quality and Compliance Officer
Operations Development Manager
Network Access Engineering Manager
Strategic Workforce & Programs Manager
Head of Finance & Revenue
Principal Asset Systems Analyst
Standalone Power Systems Manager
6. Asset Maintenance - 11:00 19 June 2024
Principal Engineer
Principal Engineer
Planning & Works Allocation Manager
Distribution Scoping & Scheduling Manager
7. Asset Management Information System - 14:00 19 June 2024
Principal Asset Management Engineer
Service Delivery Manager
Head Of Technology & Data Services
Cyber Security Manager
Data Operations & Analytics Manager
Regulatory Compliance Manager
Data Operations Team Leader
Principal Asset Systems Analyst
Regional Site Visit: Wundowie Dx Pole Replacement - 07:30 20 June 2024
Principal Engineer
Project Manager
Field Supervisor
Linesmen - Switching Operators - Traffic controllers

9. Contingency Planning - 14:00 20 June 2024
Principal Asset Management Engineer
Emergency Management Manager
Network Operational Systems Manager
8. Risk Management - 08:30 21 June 2024
Principal Asset Management Engineer
Lead Principal Asset Management Engineer
Risk & Resilience Manager
Principal Grid Portfolio Investment Consultant
11. Capital Expenditure Planning - 11:00 21 June 2024
Strategic Asset Performance Manager
Principal Asset Management Engineer
Portfolio Value Office Lead
Corporate Finance Manager
Finance & Investment Team Leader
Grid Portfolio Manager
Regulatory Compliance Manager
Engineering Team Leader
Metropolitan Site Visit: Network Operations Control Centre - 14:00 21 June 2024
Strategic Insights and Optimisation Manager
Principal Engineer
Network Control Manager
Control Room Team Leader
12. Review of the Asset Management System - 15:00 21 June 2024
Lead Strategic Insights & Optimisation Manager
Principal Asset Management Engineer

Table 21: Western Power Interviews

Appendix B DOCUMENTATION AND INFORMATION SOURCES REVIEWED

Documents referenced through this review use the reference number in the following tables.

Document No.	Licence	Asset Management Process												Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered			
		1	2	3	4	5	6	7	8	9	10	11	12									
C.01	Both											X	X		Framework Document	34001353	Business Case Guideline	Finance & Revenue	02-May-24	22-May-24		
C.02	Both													X	X		Framework Document	34112285	IGF Benefits Management Guideline	Finance & Revenue	02-May-24	22-May-24
C.03	Both	X	X		X							X	X				Annual Planning Report	63924139 63313954	Network Opportunity Map (NOM) 2023 Transmission System Plan (TSP) 2023	Grid Transformation	02-May-24	27-May-24
C.04	Both	X	X		X							X	X				Annual Planning Report	63924139 63313954	Network Opportunity Map (NOM) 2023 Transmission System Plan (TSP) 2023	Grid Transformation	02-May-24	27-May-24
C.05	Both	X	X	X	X	X	X	X	X	X	X	X	X	X				Corporate Strategy	Corporate Strategy 2017-2022 Corporate Strategy 2021-2031	Strategy & Sustainability	02-May-24	20-May-24

Document No.	Licence	Asset Management Process												Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered	
		1	2	3	4	5	6	7	8	9	10	11	12							
																	Corporate Strategy 2023-2031			
C.06	Both	X	X	X	X	X	X	X	X	X	X	X	X	X	Corporate Policy	26576898	Asset Management Policy	Asset Performance	02-May-24	27-May-24
C.07	Both	X	X	X	X	X	X	X	X	X	X	X	X	X	Asset Management Objectives	4242337	Asset Management Objectives	Asset Performance	02-May-24	27-May-24
C.08	Both	X	X	X	X	X	X	X	X	X					Plan	34159326	Network Management Plan	Asset Performance	02-May-24	27-May-24
C.09	Both	X										X	X		Plan	63273514	Network Plan 25 Pack	Grid Transformation	02-May-24	27-May-24
C.10	Both	X	X	X	X	X	X	X	X	X	X	X	X	X	AMSR Policy, Guidelines, or Procedures	40304923	Asset Management System Description	Asset Performance	02-May-24	27-May-24
C.11	Both	X	X	X	X	X	X	X	X	X	X	X	X	X	AMSR Policy, Guidelines, or Procedures	40309083	Asset Management System Map	Asset Performance	02-May-24	27-May-24
C.12	Both	X	X	X	X	X	X	X	X	X	X	X	X	X	Organisation Chart	63004654	Western Power Organisational Structure 2024	Asset Performance	02-May-24	27-May-24
C.13	Both	X			X	X		X						X	Legislative & Compliance Obligations Management	23219616	Corporate Document Framework (23219616)	Governance Risk and Compliance	02-May-24	21-May-24
C.14	Both	X							X						AMSR Information Pack		2024 AMSR Process 08 Risk Management.pdf		02-May-24	21-May-24
C.15	Both		X			X	X								AMSR Information Pack		2024 AMSR Process 02 Asset Creation and Acquisition		02-May-24	21-May-24

Document No.	Licence	Asset Management Process												Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered	
		1	2	3	4	5	6	7	8	9	10	11	12							
C.16	Both		X	X			X								AMSR Information Pack		2024 AMSR Process 06 Asset Maintenance		02-May-24	21-May-24

Table 21: Information provided by Western Power for Review – Common Documents

Document No.	Licence	Effectiveness Criteria									Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		1.1	1.2	1.3	1.4	1.5	1.6	1.7	1.8	1.9						
KRA1.01	Both	X	X	X							Management Standard	40304923	Asset Management System Description		02-May-24	27-May-24
KRA1.02	EDL1							X			Issues Briefing Paper	61905992	Summer 2022 MV Feeder Loading Mitigation (6 of 7) MH Overutilisation Issue Briefing Paper	Grid Transformation	02-May-24	27-May-24
KRA1.03	EDL1			X					X	X	Guideline/Technical Standard		None-Tx example given in KRA1.25	Grid Transformation	02-May-24	27-May-24
KRA1.04	Both		X		X					X	Strategic Asset Management Plan	53340255	Grid Strategy 2022	Grid Transformation	02-May-24	27-May-24

Document No.	Licence	Effectiveness Criteria									Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered	
		1.1	1.2	1.3	1.4	1.5	1.6	1.7	1.8	1.9							
KRA1.05	Both		X									Planning Standard/Methodology for planning for all potential failure types		Asset Management Objectives	Grid Transformation	02-May-24	27-May-24
KRA1.06	ETL2		X	X							X	Strategy/Objectives/Service Levels	34373791	Tx Reliability Strategy	Grid Transformation	02-May-24	27-May-24
KRA1.07	EDL1		X									Strategy/Objectives/Service Levels	34266074	Dx Reliability Strategy	Grid Transformation	02-May-24	27-May-24
KRA1.08	Both		X		X							Strategy/Plan	63924139	Network Opportunity Map (NOM) 2023	Grid Transformation	02-May-24	27-May-24
KRA1.09	Both					X						Forecast Methodology Review	57144365	NIEIR-Western Power-Forecasts Forecast Review June 2021.pdf	Technology & Data Services	02-May-24	20-May-24
KRA1.10	Both					X						Life cycle costing process and analysis for assets, asset types, disposal or renewal options		Lifecycle Costing Assessment Standard		02-May-24	21-Jun-24
KRA1.11	EDL1		X									Design Standards Critical Efficiency Review	46453397	Distribution Design Efficiency Review Report by WSP_AMSR 24	Engineering & Design	02-May-24	20-May-24
KRA1.12	EDL1					X						Planning Processes			Grid Transformation	02-May-24	27-May-24

Document No.	Licence	Effectiveness Criteria									Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		1.1	1.2	1.3	1.4	1.5	1.6	1.7	1.8	1.9						
KRA1.13	Both	X									Network Renewal & Maintenance Strategies Overview	56795218	Asset Management Strategy Standard	Asset Performance	02-May-24	27-May-24
KRA1.14	Both	X	X	X	X	X	X	X	X	X	Asset Management	34113439	Asset Management Framework - Published	Asset Performance	02-May-24	27-May-24
KRA1.15	EDL1				X						Network Development Strategies				02-May-24	
KRA1.16	Both				X						Network Development Strategies	63949291	Alternative Options Strategy (AOS) 2023	Grid Transformation	02-May-24	27-May-24
KRA1.17	EDL1		X								Strategy/Plan	63273514	Network Plan 25 Pack	Grid Transformation	02-May-24	27-May-24
KRA1.18	ETL2		X								Strategy/Plan	63273514	Network Plan 25 Pack	Grid Transformation	02-May-24	27-May-24
KRA1.19	Both		X	X							Strategy/Plan	63313954	Transmission System Plan (TSP) 2023	Grid Transformation	02-May-24	27-May-24
KRA1.20	EDL1				X						Network Development Strategies		None-Tx example given in KRA1.26	Grid Transformation	02-May-24	27-May-24
KRA1.21	Both						X				Funding analysis process and yearly analysis				02-May-24	
KRA1.22.a	Both							X			Decision making / investment / value framework and value	EDM# 41868859	Program and Project	Finance & Revenue	02-May-24	15-May-24

Document No.	Licence	Effectiveness Criteria									Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		1.1	1.2	1.3	1.4	1.5	1.6	1.7	1.8	1.9						
											models and measures with examples		Management Guideline			
KRA1.22.b	Both							X			Decision making / investment / value framework and value models and measures with examples	EDM# 43041786	Delivery Risk Management Guideline	Finance & Revenue	02-May-24	15-May-24
KRA1.22.c	Both							X			Decision making / investment / value framework and value models and measures with examples	EDM# 34112285	Benefits Management Guideline	Finance & Revenue	02-May-24	15-May-24
KRA1.22.d	Both							X			Decision making / investment / value framework and value models and measures with examples	EDM# 61726811	Benefit Evaluation Model (BEM)	Finance & Revenue	02-May-24	15-May-24
KRA1.22.e	Both							X			Decision making / investment / value framework and value models and measures with examples	EDM# 34001353	Business Case Guideline	Finance & Revenue	02-May-24	15-May-24
KRA1.22.f	Both							X			Decision making / investment / value framework and value models and measures with examples	EDM# 34069810	Change Control Guideline	Finance & Revenue	02-May-24	15-May-24
KRA1.22.g	Both							X			Decision making / investment / value framework and value	EDM# 42403084	Quality Assurance Guideline	Finance & Revenue	02-May-24	15-May-24

Document No.	Licence	Effectiveness Criteria									Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		1.1	1.2	1.3	1.4	1.5	1.6	1.7	1.8	1.9						
											models and measures with examples					
KRA1.22.h	Both									X	Decision making / investment / value framework and value models and measures with examples	EDM# 34147155	Investment Governance Framework	Finance & Revenue	02-May-24	15-May-24
KRA1.22.i	Both									X	Decision making / investment / value framework and value models and measures with examples	EDM# 43924472	Long Lead Commitment (LLC) Memo Guideline	Finance & Revenue	02-May-24	15-May-24
KRA1.23	Both				X	X					Set of regulatory body correspondence on each of: non-asset options; lifecycle cost; assessment / risk assessment	Access Arrangement 2022-2027 - Economic Regulation Authority Western Australia (erawa.com.au)	WP-AA5-Approved-Access-Arrangement-Clean-PDF-Version.PDF (erawa.com.au) Attachment 5.1 AA4 Capital Expenditure Report Access Arrangement Information	Asset Performance	02-May-24	29-May-24
KRA1.24	Both				X	X					Performance methodology, metrics and source data on each of: non-asset options; lifecycle cost;	Access Arrangement 2022-2027 - Economic Regulation Authority	WP-AA5-Approved-Access-Arrangement-Clean-PDF-Version.PDF	Asset Performance	02-May-24	29-May-24

Document No.	Licence	Effectiveness Criteria									Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		1.1	1.2	1.3	1.4	1.5	1.6	1.7	1.8	1.9						
											assessment / risk assessment.	Western Australia (erawa.com.au)	(erawa.com.au) Attachment 5.1 AA4 Capital Expenditure Report Access Arrangement Information			
KRA1.25	Both	X		X	X						Strategy/Plan	67346641	NCESS Draft Service Specification	Grid Transformation	02-May-24	27-May-24
KRA1.26			X	X	X						Strategy/Plan	45352838	Network Control Services (NCS) North Country (NC) Load Area Business Case	Grid Transformation	02-May-24	28-May-24
KRA1.27	ETL2		X	X							Strategy/Plan	34237321	EDM-34237321-Transmission Power Quality Strategy.pdf	Grid Transformation	02-May-24	28-May-24
KRA1.28	ETL2		X	X							Strategy/Plan	34273096	EDM#66055540-DSO strategy.pdf	Grid Transformation	02-May-24	28-May-24
KRA1.29	ETL2		X	X							Strategy/Plan	34273096	EDM-34273096-66 kV Rationalisation Strategy.pdf	Grid Transformation	02-May-24	28-May-24
KRA1.30	EDL1		X	X							Strategy/Plan	50699925	EDM-50699925-Distribution Protection Strategy.pdf	Grid Transformation	02-May-24	28-May-24

Document No.	Licence	Effectiveness Criteria									Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		1.1	1.2	1.3	1.4	1.5	1.6	1.7	1.8	1.9						
KRA1.31	EDL1		X	X							Strategy/Plan	50705932	EDM-50705932-Distribution Steady State Voltage Strategy.pdf	Grid Transformation	02-May-24	28-May-24
KRA1.32	EDL1		X	X							Strategy/Plan	50713817	EDM-50713817-Distribution Feeder Loading Strategy.pdf	Grid Transformation	02-May-24	28-May-24
KRA1.33	ETL2		X	X							Strategy/Plan	54242453	EDM-54242453-Transmission System Utilisation Strategy.pdf	Grid Transformation	02-May-24	28-May-24
KRA1.34	ETL2		X	X							Strategy/Plan	55125418	EDM-55125418-South Region Strategy (assessment for decarb impact).pdf	Grid Transformation	02-May-24	28-May-24
KRA1.35	ETL2		X	X							Strategy/Plan	59030262	EDM-59030262-South Metro Region Strategy.pdf	Grid Transformation	02-May-24	28-May-24
KRA1.36	ETL2		X	X							Strategy/Plan	63923793	EDM-63923793-NOM 2023 Network Data-Substation Capacity Assessment.pdf	Grid Transformation	02-May-24	28-May-24

Document No.	Licence	Effectiveness Criteria									Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		1.1	1.2	1.3	1.4	1.5	1.6	1.7	1.8	1.9						
KRA1.37	ETL2		X	X	X						Strategy/Plan	67258606	EDM-67258606-Non Co-optimised Energy System Services (NCESS).pdf	Grid Transformation	02-May-24	28-May-24
KRA1.38	Both	X	X	X	X	X	X	X	X		Strategy/Plan		SPS Strategy		17-Jun-24	21-Jun-24
KRA1.39	Both	X	X	X	X	X	X	X	X		Strategy/Plan		BESS Strategy		17-Jun-24	21-Jun-24
KRA1.40	EDL1								X		Technical Manual	EDM 34270854	Network Risk Management Tool (NRMT)		23-Oct-2024	23-Oct-2024

Table 22: Information provided by Western Power for Review – Asset Management Process1 - Planning

Document No.	Licence	Effectiveness Criteria					Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		2.1	2.2	2.3	2.4	2.5						
KRA2.01	EDL1			X			Asset Class Plan	57674929	Metering Strategy AA5_Working Doc_V3_16092021	Finance and Revenue	02-May-24	21-May-24
KRA2.02	EDL1			X			Asset Class Plan	49358278	MAMP Western Power 2022-2027_	Finance and Revenue	02-May-24	21-May-24
KRA2.03	Both			X		X	Asset Class Plan	46651700	SCADA & Telecommunications Strategy	Asset Performance	02-May-24	27-May-24
KRA2.04	EDL1						Asset Class Plans	28270231	Distribution Structures Asset Management Strategy	Asset Performance	02-May-24	27-May-24

Document No.	Licence	Effectiveness Criteria					Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		2.1	2.2	2.3	2.4	2.5						
KRA2.05	ETL2	X		X			Life cycle costing analyse for assets, asset types, disposal or renewal options, Procedure or standard required, plus evidence of application	59008453	IAR125503 - Business Case - North Beach T3 Transformer Replacement	Asset Performance	02-May-24	27-May-24
KRA2.06	Both		X	X		X	Summarise/overview design efficiency review processes	45961650	Technical Standards Development & Review Guide_AMSR 24	Engineering & Design		20-May-24
KRA2.07	ETL2	X					Network Development Strategies	65022671	CKN: Install 3rd Transformer - Business Case	Grid Transformation		27-May-24
KRA2.08	ETL2	X	X				Network Development Strategies	64826466	CKN: Install 3rd Transformer - IEM	Grid Transformation		27-May-24
KRA2.09	Both			X			Network Standards and Engineering Design Standards	64449892	CKN: Install 3rd Transformer - BEM	Grid Transformation		20-May-24
KRA2.10	ETL2	X					Network Development Strategies	64449892	CKN: Install 3rd Transformer - BEM	Grid Transformation		27-May-24
KRA2.11	ETL2	X					Network Development Strategies	66404966	CKN: Install 3rd Transformer - IRC Presentation	Grid Transformation		27-May-24
KRA2.12	EDL1	X					Network Challenges & Response					
KRA2.13	EDL1	X				X	Network Challenges & Response	Project Symphony Milestone 3: Lessons Learned.pdf	Project Symphony Lessons Learnt Report Milestone 03: Testing	Distribution Energy Transition	02-May-24	27-May-24
KRA2.14	EDL1				X		Network Challenges & Response		PTA Moley Ellenbrook Traction Supply -			

Document No.	Licence	Effectiveness Criteria					Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		2.1	2.2	2.3	2.4	2.5						
								Commissioning Key Artefacts				
KRA2.15	EDL1				X		Network Challenges & Response					
KRA2.16	EDL1				X		Network Challenges & Response					
KRA2.17	Both	X				X	Capital Project Business Case Walk Through - Augmentation	66360634	IAR180263 - MH Feeder Planning Limit Mitigation Works Planning Report		02-May-24 27-May-24	
KRA2.18	Both			X			Forecasting methodology report new connections maximum demand	68410552	CKN: Install 3rd Transformer - Issue Briefing Paper	Grid Transformation	20-May-24	
KRA2.19	EDL1	X		X			Capital Project Business Case Walk Through - Augmentation	61562312	CKN: Install 3rd Transformer - Works Planning Report	Grid Transformation	02-May-24 27-May-24	
KRA2.20	Both					X	Field Operations, SEQT Management System and related elements				02-May-24 21-May-24	
KRA2.21	Both					X	Field Operations, SEQT Management System and related elements	34255745	Incident Management Procedure - SHE MS (1)	Safety, Environment, Quality and Training	02-May-24 21-May-24	
KRA2.22	EDL1	X		X			Network Development Strategies	59008453	IAR125503 - Business Case - North Beach T3 Transformer Replacement	Asset Performance	02-May-24 27-May-24	
KRA2.23	EDL1	X		X			Network Development Strategies	59008453	IAR125503 - Business Case - North Beach T3 Transformer Replacement	Asset Performance	02-May-24 27-May-24	

Document No.	Licence	Effectiveness Criteria					Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		2.1	2.2	2.3	2.4	2.5						
KRA2.24	EDL1	X		X			Network Development Strategies	59008453	IAR125503 - Business Case - North Beach T3 Transformer Replacement	Asset Performance	02-May-24	27-May-24
KRA2.25	EDL1	X		X			Network Development Strategies	59008453	IAR125503 - Business Case - North Beach T3 Transformer Replacement	Asset Performance	02-May-24	27-May-24
KRA2.26	Both	X		X			Network Development Strategies	59008453	IAR125503 - Business Case - North Beach T3 Transformer Replacement	Asset Performance	02-May-24	27-May-24
KRA2.27	Both	X		X			Network Development Strategies	59008453	IAR125503 - Business Case - North Beach T3 Transformer Replacement	Asset Performance	02-May-24	27-May-24
KRA2.28	Both	X		X			Network Development Strategies	59008453	IAR125503 - Business Case - North Beach T3 Transformer Replacement	Asset Performance	02-May-24	27-May-24
KRA2.29	Both	X					Network Development Strategies	58168219	North Region Strategy	Grid Transformation	02-May-24	27-May-24
KRA2.30	EDL1			X			Network Development Strategies	66360634	IAR180263 - MH Feeder Planning Limit Mitigation Works Planning Report	Grid Transformation	02-May-24	27-May-24
KRA2.31	ETL2	X					Network Development Strategies	68410552	CKN: Install 3rd Transformer - Issue Briefing Paper	Grid Transformation	02-May-24	27-May-24
KRA2.32	ETL2	X					Network Development Strategies	61562312	CKN: Install 3rd Transformer - Works Planning Report	Grid Transformation	02-May-24	27-May-24

Document No.	Licence	Effectiveness Criteria					Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		2.1	2.2	2.3	2.4	2.5						
KRA2.33	Both			X			Engineering & Design	42509915	12 to 36 kV Indoor Metal Enclosed Gas Insulated Switchboards - Part D - Vendor Technical Schedules	Engineering & Design	02-May-24	20-May-24
KRA2.34	Both		X	X			Engineering & Design	50849140	Pricing Workbook GIS Switchboards – 1_AMSR 24_Confidential	Engineering & Design	02-May-24	20-May-24
KRA2.35	Both		X	X			Engineering & Design	50849798	Pricing Workbook GIS Switchboards – 2_AMSR 24_Confidential	Engineering & Design	02-May-24	20-May-24
KRA2.36	Both			X			Engineering & Design	34094866	Extract from Engineering and Design Controlled Document Register AMSR 24	Engineering & Design	02-May-24	20-May-24
KRA2.37	Both			X			Network Development Strategies				02-May-24	
KRA2.38	Both				X		Commissioning Notices				02-May-24	
KRA2.39	Both					X	Examples of Monthly Security Report		Surveillance Team Daily Report	Property & Fleet	02-May-24	20-May-24
KRA2.40	Both					X	Examples of Monthly Security Report		<ul style="list-style-type: none"> • Weekly Security Incidents Summary – 7 January 2024 • Weekly Security Incidents Summary – 31 December 2023 	Property & Fleet	02-May-24	20-May-24
KRA2.41	Both					X	Examples of Monthly Security Report		March 2024 – Monthly Security Incidents Summary		02-May-24	20-May-24

Document No.	Licence	Effectiveness Criteria					Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		2.1	2.2	2.3	2.4	2.5						
KRA2.42	Both					X	Examples of Monthly Security Report		PBU Monthly Reporting MS – March 2024 – Redacted to contain Physical Security Only		02-May-24	20-May-24
KRA2.43	Both					X	Examples of Monthly Security Report		<ul style="list-style-type: none"> • PBU Monthly Reporting MS – February 2024 – Redacted to contain Physical Security Only • January 2024 Security Operations Report (Wilsons) • January 2024 KPI Report (Wilsons) 		02-May-24	20-May-24
KRA2.44	Both				X		Assets commissioning guideline/procedure	33923442	Handover Procedures & Practices 2022_	Operational Maintenance	02-May-24	21-May-24
KRA2.45	Both	X	X				Summary of regulatory body correspondence on each of: project evaluation; lifecycle cost analysis, with references.	Access Arrangement 2022-2027 - Economic Regulation Authority Western Australia (erawa.com.au)	WP-AA5-Approved-Access-Arrangement-Clean-PDF-Version.PDF (erawa.com.au) Attachment 5.1 AA4 Capital Expenditure Report Access Arrangement Information	Asset Performance	02-May-24	29-May-24
KRA2.46	Both	X	X				Performance methodology, metrics and source data on each of: project evaluations; lifecycle cost; assessment.	Access Arrangement 2022-2027 - Economic Regulation Authority	WP-AA5-Approved-Access-Arrangement-Clean-PDF-Version.PDF (erawa.com.au) Attachment 5.1 AA4 Capital Expenditure	Asset Performance	02-May-24	29-May-24

Document No.	Licence	Effectiveness Criteria					Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		2.1	2.2	2.3	2.4	2.5						
							Western Australia (erawa.com.au)	Report Access Arrangement Information				
KRA2.47	Both	X	X	X			67032445	Capacity Project "MH Planning Limit Mitigation" Business Case	Grid Transformation		27-May-24	
KRA2.48	Both				X			Commissioning Notices		17-Jun-24	21-Jun-24	
KRA2.49	Both			X	X			Engineering & Design	Engineering Design Issue Register	17-Jun-24	21-Jun-24	
KRA2.50	Both			X			30626649	Network Standards and Engineering Design Standards	Design Management Procedure	17-Jun-24	21-Jun-24	

Table 23: Information provided by Western Power for Review – Asset Management Process2 – Creation and Acquisition

Document No.	Licence	Effectiveness Criteria				Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		3.1	3.2	3.3	3.4						
KRA3.01	Both	X				EDM 22439694	Asset Disposal Policy Guidelines	Finance and Metering	02-May-24	22-May-24	
KRA3.02	EDL1	X	X		X	28270231	Distribution Structures Asset Management Strategy	Asset Performance	02-May-24	27-May-24	
KRA3.03	EDL1	X	X	X	X	58662468	Distribution Overhead Conductors Asset Management Strategy	Asset Performance	02-May-24	27-May-24	
KRA3.04	ETL2	X	X	X	X	40955284	Transmission Circuit Breaker Switchboards Strategy	Asset Performance	02-May-24	27-May-24	

Document No.	Licence	Effectiveness Criteria				Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		3.1	3.2	3.3	3.4						
KRA3.05	ETL2	X	X	X	X	Asset Class Plans	33141537	Transmission Power Transformer Detailed Strategy	Asset Performance	02-May-24	27-May-24
KRA3.06	Both	X	X	X	X	Replacement Strategy	34273096	66 kV Rationalisation Strategy	Grid Transformation	02-May-24	27-May-24
KRA3.07	Both	X		X	X	Methodology	34333892	Renewal and Maintenance Options Analysis Procedure	Asset Performance	02-May-24	27-May-24
KRA3.08	ETL2		X			Network Development Strategies		Nil		02-May-24	
KRA3.09	Both	X				Network Development Strategies	63923793	EDM-63923793-NOM 2023 Network Data-Substation Capacity Assessment	Grid Transformation	02-May-24	27-May-24
KRA3.10	Both	X				Audit results against ISO 55001 CI 10.2	64304196	2023 - ISO 55001 Surveillance Visit Report - Final	Asset Performance	02-May-24	27-May-24
KRA3.11	Both				X	Replacement Strategy		Primary Plant Return Process		17-Jun-24	21-Jun-24
KRA3.12	Both			X	X	Replacement Strategy		Reuse / Refurbish Pole Extract		17-Jun-24	21-Jun-24
KRA3.13	Both		X			Performance Report		INC10875930 conductor failure fire NW302-11 Hyden 25 Dec 23.pdf			8-Oct-2024

Table 24: Information provided by Western Power for Review – Asset Management Process3 - Disposal

Document No.	Licence	Effectiveness Criteria				Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		4.1	4.2	4.3	4.4						
KRA4.01	Both			X		Procedure	24012640	Compliance Failure Reporting Procedure - UPDATED VERSION	Governance Risk and Compliance	02-May-24	20-May-24

Document No.	Licence	Effectiveness Criteria				Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		4.1	4.2	4.3	4.4						
KRA4.02	Both			X		Framework	34019834	COMPLIANCE FRAMEWORK_	Governance Risk and Compliance	02-May-24	20-May-24
KRA4.03	Both			X		Standard	42982044	Corporate Compliance Standard (42982044)_	Governance Risk and Compliance	02-May-24	20-May-24
KRA4.04	Both	X		X		Business/Financial Plan	64123548	Statement of Expectations 2024-25	Strategy & Sustainability	02-May-24	20-May-24
KRA4.05	Both	X				Asset Information System Strategy	58796701	Digital Capability Strategy 2022-2027 FINAL PDF (EDM 58796701).pdf	Technology & Data Services	02-May-24	20-May-24
KRA4.06	Both			X		Legislative Obligations Compliance Plan - Asset Performance		Extract from Legislative Obligations Compliance Plan - Asset Performance	Asset Performance	02-May-24	20-May-24
KRA4.07	Both		X			Major Network/Supply Incidents Review Reports	64790771	230420 – Final – Post Incident Review – Transmission Tower Damage	Governance Risk and Compliance	02-May-24	20-May-24
KRA4.08	Both				X	Network Renewal & Maintenance Strategies Overview	66698531	Asset Performance Quarterly Report (APQR)_FY24_Q1	Asset Performance	02-May-24	27-May-24
KRA4.09	Both				X	Network Renewal & Maintenance Strategies Overview	66698531	Asset Performance Quarterly Report (APQR)_FY24_Q1	Asset Performance	02-May-24	27-May-24
KRA4.10	Both		X			State of Infrastructure Report	66458429	State_of_the_Infrastructure_report_2022-23	Asset Performance	02-May-24	27-May-24
KRA4.11	Both			X		Network Renewal & Maintenance Strategies Overview	57684364 64834350	2020-21 Annual Compliance Report - Schedule A '2022-23 Annual Compliance Report - Schedule A	Regulation and Investment Assurance	02-May-24	24-May-24

Document No.	Licence	Effectiveness Criteria				Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		4.1	4.2	4.3	4.4						
KRA4.12	Both			X		Legislative & Compliance Obligations Management		Corporate Compliance - SLT induction pack	Governance Risk and Compliance	02-May-24	21-May-24
KRA4.13	Both			X		Legislative & Compliance Obligations Management		Copy of Regulatory Changes Register (10687224)_	Governance Risk and Compliance	02-May-24	21-May-24
KRA4.14	Both	X				Business Planning		Board resolution Strategic Development Plan 2022 55769480 Statement of Expectations 2024-2025 62100420 Strategic Development Plan 57955935 Strategic Development Plan 2019-20-2023-24 46832148 Strategic Development Plan 2021 Strategic Development Plan 2021-2024	Strategy & Sustainability	02-May-24	20-May-24
KRA4.15	Both				X	Network Operations, Contingency & Emergency Management	68259375	Transmission Service Standard Benchmarks and Service Standard Adjustment Mechanism Apr 2024	Network Operations	02-May-24	16-May-24
KRA4.16	Both	X				Field Operations, SEQT Management System and related elements		Our SHE Vision and Journey A3	Safety, Environment, Quality and Training	02-May-24	21-May-24
KRA4.17	Both	X				Field Operations, SEQT Management System and related elements				02-May-24	

Document No.	Licence	Effectiveness Criteria				Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		4.1	4.2	4.3	4.4						
KRA4.18	Both		X			Asset Performance Management	32966882	Asset Performance Management Standard	Asset Performance	02-May-24	27-May-24
KRA4.19	Both	X				Network Development Strategies	63273514	Network Plan 25 Pack	Grid Transformation	02-May-24	27-May-24
KRA4.20	Both			X		Legislative & Compliance Obligations Management		Bi-annual Compliance Assurance Report Q3 FY2023 - GT Bi-annual Compliance Assurance Report Q3 FY2023 - SEQT	Governance Risk and Compliance	02-May-24	21-May-24
KRA4.21	Both			X		Legislative & Compliance Obligations Management		Bi-annual Compliance Assurance Report Q3 FY2024 - GT Bi-annual Compliance Assurance Report Q3 FY2024 - SEQT		02-May-24	
KRA4.22	Both		X			Service Standard Performance Report	57989947 62152472 57948914 62120562	Service Standard Performance Report for 2020-21 'Service Standard Performance Report for 2022-23 'Annual Reliability and Power Quality Report for the year ended 30 June 2021 'Annual Reliability and Power Quality Report for the year ended 30 June 2023	Regulation and Investment Assurance	02-May-24	24-May-24
KRA4.23	Both		X			Major Network/Supply Incidents Review Reports	68314604	240113 – EXTRACT – Heatwave, Thunderstorms and North Country Bushfires - OILL Process	Governance Risk and Compliance	02-May-24	20-May-24
KRA4.24	Both		X			Major Network/Supply Incidents Review Reports	68313618	20231120 – EXTRACT – L2 Heatwave Advice and L3 Mariginiup Bushfire – OILL Process	Governance Risk and Compliance	02-May-24	20-May-24

Document No.	Licence	Effectiveness Criteria				Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		4.1	4.2	4.3	4.4						
KRA4.25	Both	X	X		X	Set of regulatory body correspondence on each of: opportunities and threats in the AMS environment, Performance standards are achieved, Service Levels are achieved.	NA	NA KRA4.25 - External link for various performance reports Asset Performance	Asset Performance	02-May-24	29-May-24
KRA4.26	Both	X	X		X	Performance methodology, metrics and source data on each of: opportunities and threats in the AMS environment, Performance standards are achieved, Service Levels are achieved.	57989947 62152472 57948914 62120562 66698531	Service Standard Performance Report for 2020-21 'Service Standard Performance Report for 2022-23 'Annual Reliability and Power Quality Report year ended 30 June 2021 'Annual Reliability and Power Quality Report ended 30 June 2023 Asset Performance Quarterly Report (APQR)_FY24_Q1.pdf	Regulation and Investment Assurance	02-May-24	24-May-24
KRA4.27	Both		X	X	X	Service Standard Performance Report		Corporate Strategy Planning Process		17-Jun-24	21-Jun-24
KRA4.28	Both	X	X	X	X	Service Standard Performance Report		AA5 Annual Monitoring Report		17-Jun-24	21-Jun-24
KRA4.29	Both		X	X	X	Service Standard Performance Report		Creation of Performance Reporting Outputs Process		17-Jun-24	21-Jun-24

Table 25: Information provided by Western Power for Review – Asset Management Process4 – Environmental Analysis

Document No.	Licence	Effectiveness Criteria						Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		5.1	5.2	5.3	5.4	5.5	5.6						
KRA5.01	Both		X					Testing and Checks Evidence	68261191	F 105 Control Room Evacuation & Test Exercises	Network Operations	02-May-24	16-May-24
KRA5.02	Both	X	X					Operational Procedures	68262698	SOP 164 Restoration of Lines, Feeders, Reclosers & Fuses	Network Operations	02-May-24	16-May-24
KRA5.03	Both	X	X					Operational Procedures	68259484	G_245_Prioritising Network Restoration Guideline	Network Operations	02-May-24	16-May-24
KRA5.04	Both	X	X					Operational Procedures	68263895	G 237 Contact Procedure Emergency Service Organisations & Critical Infrastructure	Network Operations	02-May-24	16-May-24
KRA5.05	Both	X	X					Performance Standard	52272080	Dx Power Quality Strategy	Grid Transformation	02-May-24	27-May-24
KRA5.06	Both						X	Training & Competency Matrix	68275572	Extract from R019 Network Operations Training Matrix	Network Operations	02-May-24	16-May-24
KRA5.07	Both	X						Strategic Spares Policy				02-May-24	
KRA5.08	Both					X		Financial Performance Reviews	68359888	Business Performance Report - April 2024	Business Planning and Reporting	02-May-24	22-May-24
KRA5.09	Both					X		Financial Performance Reviews	68371094	Western Power Monthly Performance Report for Board - June 2022	Business Planning and Reporting	02-May-24	22-May-24
KRA5.10	Both					X		Financial Performance Reviews	68362598	Business_Performance_Report_-_June_2023.pdf	Business Planning and Reporting	02-May-24	22-May-24
KRA5.11	Both						X	Training and Competency Framework	66193255	Living our Values Framework	Human Resources	02-May-24	22-May-24

Document No.	Licence	Effectiveness Criteria						Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		5.1	5.2	5.3	5.4	5.5	5.6						
KRA5.12	Both						X	People, Resourcing, & Sourcing Strategies and Plans	60810737	People Strategy 2023-2026	Human Resources	02-May-24	22-May-24
KRA5.13	Both						X	Program Delivery & Monitoring	67595113	Operational Delivery Performance Pack Feb 2024	Network Maintenance Planning & Delivery	02-May-24	22-May-24
KRA5.14	Both						X	Program Delivery & Monitoring	62979822	Operational Delivery Performance Pack Mar 2023	Network Maintenance Planning & Delivery	02-May-24	22-May-24
KRA5.15	EDL1						X	Network Challenges & Our Response	58633249	IAR130703 - Distribution PV Management (DPVM) - Stage 1 - Business Case	Grid Transformation	02-May-24	27-May-24
KRA5.16	EDL1						X	Network Challenges & Our Response				02-May-24	
KRA5.17	EDL1						X	Network Challenges & Our Response				02-May-24	
KRA5.18	Both						X	Network Operations, Contingency & Emergency Management	68269361	QM 014 Training and Development of Network Operations Employees	Network Operations	02-May-24	16-May-24
KRA5.19	Both						X	Field Operations, SEQT Management	41205405	Golden Safety Rules - SHE MS	Safety, Environment,	02-May-24	21-May-24

Document No.	Licence	Effectiveness Criteria						Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		5.1	5.2	5.3	5.4	5.5	5.6						
								System and related elements			Quality and Training		
KRA5.20	Both	X						Field Operations, SEQT Management System and related elements	34255745	Incident Management Procedure - SHE MS (1)	Safety, Environment, Quality and Training	02-May-24 21-May-24	
KRA5.21	Both			X				Network Development Strategies				02-May-24	
KRA5.22	Both	X					X	Network Operations, Contingency & Emergency Management	68263262	QM 001 Quality Manual	Network Operations	02-May-24 16-May-24	
KRA5.23	Both	X					X	AMS Governance Controls & Communications	34264852	Safety, Health and Environment Management System Document Control Register - SHE MS_		02-May-24 24-May-24	
KRA5.24	Both			X				Network Challenges & Our Response				02-May-24	
KRA5.25	Both		X					Network Challenges & Our Response	67699794	NCESS Trigger Documentation	Grid Transformation	02-May-24 27-May-24	
KRA5.26	Both		X					Network Challenges & Our Response	45352838	Network Control Services (NCS) North Country (NC) Load Area Business Case	Grid Transformation	02-May-24 27-May-24	
KRA5.27	Both							Operations Performance Report(s)	66698531	Asset Performance Quarterly Report (APQR)_FY24_Q1	Asset Performance	02-May-24 27-May-24	

Document No.	Licence	Effectiveness Criteria						Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		5.1	5.2	5.3	5.4	5.5	5.6						
KRA5.28	ETL2	X						Asset Performance Management				02-May-24	
KRA5.29	Both						X	Asset Performance Management				02-May-24	24-May-24
KRA5.30	Both						X	Network Delivery Strategy - Distribution and Transmission	58210328 67255506	Network Delivery Strategy FY21/22 – FY31/32 Addendum to Network Delivery Strategy FY21/22 to FY31/32	Network Maintenance Planning & Delivery	02-May-24	22-May-24
KRA5.31	Both	X						Network Operations, Contingency & Emergency Management	68263263	Management Review 2022 Network Operations	Network Operations	02-May-24	16-May-24
KRA5.32	Both	X						Network Operations, Contingency & Emergency Management	68261637	Management Review 2023 Network Operations	Network Operations	02-May-24	16-May-24
KRA5.33	Both	X	X					Operational Procedures		G 386 Network Emergency Levels		02-May-24	24-May-24
KRA5.34	Both	X	X					Operational Procedures		G 380 Network Operations Guide to Emergency Levels with System Change Restrictions		02-May-24	24-May-24
KRA5.35	Both	X	X					Operational Procedures		Holocentric Process Documentation		17-Jun-24	21-Jun-24
KRA5.36	Both	X	X					Operational Procedures		Network Control & Switch Writing Assessment		17-Jun-24	21-Jun-24
KRA5.37	Both	X	X					Operational Procedures		R008 Controlled Document Index		17-Jun-24	21-Jun-24

Table 26: Information provided by Western Power for Review – Asset Management Process5 - Operations

Document No.	Licence	Effectiveness Criteria						Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		6.1	6.2	6.3	6.4	6.5	6.6						
KRA6.01	ETL2	X		X		X		Transmission Network Maintenance Strategy	34320020	Transmission Network Maintenance Strategy	Asset Performance	02-May-24	24-May-24
KRA6.02	EDL1	X	X		X	X		Asset Class Plans	52680825	TX and DX Easement Management Strategy	Asset Performance	02-May-24	24-May-24
KRA6.03	ETL2	X	X		X	X		Asset Class Plans	41008510	Transmission Lines Management Strategy	Asset Performance	02-May-24	24-May-24
KRA6.04	EDL1	X	X					Standard	67317828	Distribution Transformer Asset Reuse Guideline	Asset Performance	02-May-24	24-May-24
KRA6.05	Both						X	Operations Performance Report(s)	68386096	Distribution PSR Packs for April 2024	Network Maintenance Planning & Delivery	02-May-24	22-May-24
KRA6.06	Both			X				Network Investment Planning	66465351	FY24/25 Works Plan Overview	Network Maintenance Planning & Delivery	02-May-24	22-May-24
KRA6.07	Both			X				Program Delivery & Monitoring	66469604	FY 24/25 Internal and External Allocation Supporting Documents	Network Maintenance Planning & Delivery	02-May-24	22-May-24
KRA6.08	Both		X	X				Operations Performance Report(s)	67595113	Operational Delivery Performance Pack Feb 2024	Network Maintenance Planning & Delivery	02-May-24	22-May-24
KRA6.10	EDL1		X		X	X		Network Renewal & Maintenance Strategies Overview	51791174	OAP-Business Case-SCCM Stage 2 FY21-FY22	Asset Performance	02-May-24	24-May-24

Document No.	Licence	Effectiveness Criteria						Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		6.1	6.2	6.3	6.4	6.5	6.6						
KRA6.12	EDL1	X	X	X	X	X	X	Distribution Network Maintenance Strategy	34319988	Distribution Network Maintenance Strategy	Asset Performance	02-May-24	24-May-24
KRA6.13	EDL1	X	X	X	X	X	X	Asset Class Plans	56375716	Distribution Overhead Network Rebuild Strategy EDM 56375716	Asset Performance	02-May-24	24-May-24
KRA6.14	EDL1				X			Asset Class Plan - Poles	28270231 63273514	Network Plan presentation	Asset Performance	02-May-24	27-May-24
KRA6.15	EDL1	X	X		X	X		Strategy and Analysis - Poles	28270231	Distribution Structures Asset Management Strategy	Asset Performance	02-May-24	27-May-24
KRA6.16	EDL1				X			Operations Performance Report(s) - Poles	62979822	Operational Delivery Performance Pack Mar 2023	Network Maintenance Planning & Delivery	02-May-24	22-May-24
KRA6.17	Both	X	X	X	X			Asset Class Plans		SPS Strategy		17-Jun-24	21-Jun-24
KRA6.18	Both	X	X	X	X			Asset Class Plans		BESS Strategy		17-Jun-24	21-Jun-24

Table 27: Information provided by Western Power for Review – Asset Management Process6 - Maintenance

Document No.	Licence	Effectiveness Criteria								Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		7.1	7.2	7.3	7.4	7.5	7.6	7.7	7.8						
KRA7.01	Both			X	X				X	Asset Information Security Policy	33923497	Cyber Security Standard (To be shown onsite)	Cyber Security	02-May-24	20-May-24

Document No.	Licence	Effectiveness Criteria								Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		7.1	7.2	7.3	7.4	7.5	7.6	7.7	7.8						
KRA7.02	Both		X	X					X	Asset Information Performance and Quality Review		Enterprise Data Quality Scorecard.pdf	Technology & Data Services	02-May-24	20-May-24
KRA7.03	Both		X							Asset Information Strategy	67563357	ADDM - Business Scope Document	Technology & Data Services	02-May-24	20-May-24
KRA7.04	Both			X						Asset Information System Security and Access Controls Procedures	68352532	Level 1 Support Tasks and Access Procedures.pdf	Technology & Data Services	02-May-24	20-May-24
KRA7.05	Both			X					X	Asset Information Security Policy	61538548	Information Access Provisioning Guideline.pdf	Technology & Data Services	02-May-24	20-May-24
KRA7.06	Both		X							Network Operations, Contingency & Emergency Management	68272532	G 391 POF Resources Request Management	Network Operations	02-May-24	16-May-24
KRA7.07	Both			X	X	X			X	Asset Management Information Systems		Cyber Security Strategy & Roadmap	Cyber Security	02-May-24	21-Jun-24
KRA7.08	Both			X					X	Asset Management Information Systems		Quarterly Cyber Security Quarterly Report	Cyber Security	02-May-24	21-Jun-24
KRA7.09	Both			X					X	Asset Management Information Systems		Cyber Security Program Steering Committee Meeting Presentation	Cyber Security	02-May-24	21-Jun-24

Document No.	Licence	Effectiveness Criteria								Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		7.1	7.2	7.3	7.4	7.5	7.6	7.7	7.8						
KRA7.10	Both		X							Asset Information Strategy	58796701	Digital Capability Strategy 2022-2027 FINAL PDF (EDM 58796701).pdf	Technology & Data Services	02-May-24	20-May-24
KRA7.11	Both				X					Asset Management Information Systems	EDM 58473764	Physical Security Strategy 2022-27	Property & Fleet	02-May-24	20-May-24
KRA7.12	Both					X				Asset Management Information Systems	59404014	ICT Backup and Recovery Standard (EDM 59404014).pdf	Technology & Data Services	02-May-24	20-May-24
KRA7.13	Both	X	X	X	X	X		X	X	Asset Management Information Systems	34065060	T&I Incident Management Process (EDM#34065060).pdf	Technology & Data Services	02-May-24	20-May-24
KRA7.14	Both	X	X	X	X	X		X	X	Asset Management Information Systems	34032123	T&I Problem Management Process (EDM#34032123).pdf	Technology & Data Services	02-May-24	20-May-24
KRA7.15	Both	X	X							Asset Management Information Systems				02-May-24	
KRA7.16	Both	X								Asset Management Information Systems	34023558	T&I Change Management Process (EDM#34023558).pdf	Technology & Data Services	02-May-24	20-May-24
KRA7.17	Both				X					Asset Information System Security and Access Controls Procedures		P&F Lvl1 Data Centre Access to Caged Area	Property & Fleet	02-May-24	20-May-24
KRA7.18	Both				X					Access evidence to controlled site		• P&F Lvl 1 Data Centre Access Review to Caged Area	Property & Fleet	02-May-24	20-May-24

Document No.	Licence	Effectiveness Criteria								Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered	
		7.1	7.2	7.3	7.4	7.5	7.6	7.7	7.8							
												(Auditing request evidence) • P&F Lvl 1 Data Centre Access Review to Caged Area (Auditing review/update evidence)				
KRA7.19	Both								X	X	Maintained register of changes related to computations.			02-May-24	24-May-24	
KRA7.20	Both								X	X	Checklists used for licence performance reporting which show the levels of review of data and commentary.	58031413 66475265	2022 Financial Year Reporting Timetable, Checklists & Instructions '2024 Financial Year Reporting Timetable, Checklists & Instructions	Regulation and Investment Assurance	02-May-24	24-May-24
KRA7.21	Both								X	X	Sample of reports to be provided.	57898851 62129066	2020-21 Annual Performance Report - Metering Code '2022-23 Annual Performance Report - Metering Code	Regulation and Investment Assurance	02-May-24	24-May-24
KRA7.22	Both		X								Asset Management Information Systems		Digital Capability Strategy Review date extension	Technology & Data Services		27-May-24

Document No.	Licence	Effectiveness Criteria								Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		7.1	7.2	7.3	7.4	7.5	7.6	7.7	7.8						
KRA7.23	Both		X						X	Asset Information Performance and Quality Review		Data Reliability Calculation Report		17-Jun-24	21-Jun-24
KRA7.24	Both		X						X	Asset Information Performance and Quality Review		Data Steward Forum Terms of Reference		17-Jun-24	21-Jun-24
KRA7.25	Both	X	X	X					X	Asset Information Performance and Quality Review		Data Assurance Audits Evidence		17-Jun-24	21-Jun-24
KRA7.26	Both						X			Outage Incident Report		MAJOR INCIDENT REPORT – INC1963877 – MIR – Geoview Unavailable.pdf		02-Aug-24	12-Aug-24
KRA7.27	Both						X			Outage Incident Report		MAJOR INCIDENT REPORT – INC1989681 – XA21 Loss of connection to Oracle DB.pdf		02-Aug-24	12-Aug-24
KRA7.28	Both						X			Outage Incident Report		INC2269581 Qlik reverting back to August.pdf		02-Aug-24	12-Aug-24

Table 28: Information provided by Western Power for Review – Asset Management Process7 – Information System

Document No.	Licence	Effectiveness Criteria			Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		8.1	8.2	8.3						
KRA8.01	Both	X		X	Business Continuity Plans/ Disaster Recovery Plans	58669795	Resilience Standard PUBLISHED VERSION (EDM 58669795)		02-May-24	21-May-24
KRA8.02	Both		X		Cyber security performance and risk review				02-May-24	
KRA8.03	Both	X			Network Safety Strategy	34339701	Network Safety Strategy	Asset Performance	02-May-24	27-May-24
KRA8.04	Both	X		X	Risk Mitigation Strategy	34339701	Network Safety Strategy	Asset Performance	02-May-24	27-May-24
KRA8.05	Both		X		Network Asset Risk Issues Register	NA	NRR extract for overview	Asset Performance	02-May-24	27-May-24
KRA8.06	Both	X	X	X	Risk Management Standard	34297680	Network Risk Management Standard	Asset Performance	02-May-24	27-May-24
KRA8.07	Both		X		Legislative Obligations Compliance Plan -Engineering & Design	34189576	Extract from Legislative Obligations Compliance Plan -Engineering & Design AMSR 24	Engineering & Design	02-May-24	20-May-24
KRA8.08	Both		X		Legislative Obligations Compliance Plan - Grid Transformation				02-May-24	
KRA8.09	Both		X		Legislative Obligations Compliance Plan - Safety, Environment, Quality & Training	34190828	Legislative Obligations Compliance Plan - Safety, Environment & Quality	Safety, Environment, Quality and Training	02-May-24	27-May-24
KRA8.10	ETL2			X	Lifecycle costing analysis for assets, asset types, disposal or renewal options, Procedure or standard required, plus evidence of application	59008453	North Beach T3 - Transformer Replacement - INV	Asset Performance	02-May-24	27-May-24
KRA8.11	Both	X			Enterprise Risk Management Framework	42486667	Risk and Resilience Framework	Governance Risk and Compliance	02-May-24	21-May-24

Document No.	Licence	Effectiveness Criteria			Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		8.1	8.2	8.3						
KRA8.12	Both		X	X	Enterprise Risk Assessment Criteria	34037272	Enterprise Risk Assessment Criteria	Governance Risk and Compliance	02-May-24	21-May-24
KRA8.13	Both	X			Enterprise Risk Management Standard	41495635	Enterprise Risk Management Standard	Governance Risk and Compliance	02-May-24	21-May-24
KRA8.14	Both			X	Assessment of Asset Failure Risk Process	32966882 34297680	Asset Performance Management Standard Network Risk management Standard	Asset Performance	02-May-24	27-May-24
KRA8.15	Both			X	Evidence of regular asset failure risk review	NA 66698531	NRR extract Asset Performance Quarterly Report (APQR)_FY24_Q1	Asset Performance	02-May-24	27-May-24

Table 29: Information provided by Western Power for Review – Asset Management Process8 – Risk Management

Document No.	Licence	Effectiveness Criteria	Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		9.1						
KRA9.01	Both	X	Major Incident Management/Contingency Plans	33989270	Network Emergency Management Plan	Network Operations	02-May-24	16-May-24
KRA9.02	Both	X	Major Incident Management/Contingency Plans	68275275	SOP 126 Manual Operation of the Network Following Failure of Critical Systems	Network Operations	02-May-24	16-May-24
KRA9.03	Both	X	Major Incident Management/Contingency Plans	68272220	G 367 Contingency Plan-Earthquake	Network Operations	02-May-24	16-May-24
KRA9.04	Both	X	Major Incident Management/Contingency Plans	68272533	G 368 Contingency Plan-Flood	Network Operations	02-May-24	16-May-24

Document No.	Licence	Effectiveness Criteria	Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		9.1						
KRA9.05	Both	X	Major Incident Management/Contingency Plans	68275782	G 380 Network Operations Guide to Emergency Levels with System Change Restrictions	Network Operations	02-May-24	16-May-24
KRA9.06	Both	X	Major Incident Management/Contingency Plans	68275278	G 386 Network Emergency Levels	Network Operations	02-May-24	16-May-24
KRA9.07	Both	X	Major Incident Management/Contingency Plans	68272221	G 315 Pandemic Epidemic Guideline	Network Operations	02-May-24	16-May-24
KRA9.08	Both	X	Management Standard	68269364	S 026 Standard - Contingency Planning	Network Operations	02-May-24	16-May-24
KRA9.09	ETL2	X	Major Incident Management/Contingency Plans	68269461	Enar Tx Outage Report 8th May 2024	Network Operations	02-May-24	16-May-24
KRA9.10	Both	X	Major Incident Management/Contingency Plans	68261638	SOP 104 Control Centre Business Continuity Plan RESTRICTED	Network Operations	02-May-24	16-May-24
KRA9.11	Both	X	Major Incident Management/Contingency Plans	34031021	CRISIS MANAGEMENT PLAN PDF	Governance Risk and Compliance	02-May-24	21-May-24
KRA9.12	ETL2	X	Criticality Framework				02-May-24	
KRA9.13	Both	X	Major Incident Management/Contingency Plans	64882402	20230907 - Formal Document Plan for Exercise Scenario Paratus	Network Operations	02-May-24	16-May-24
KRA9.14	Both	X	Major Incident Management/Contingency Plans	65011064	20230912 - Exercise Scenario Paratus Post Exercise Report	Network Operations	02-May-24	16-May-24

Table 30: Information provided by Western Power for Review – Asset Management Process9 – Contingency Planning

Document No.	Licence	Effectiveness Criteria						Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		10.1	10.2	10.3	10.4	10.5	10.6						
KRA10.01	Both	X	X					Business/Financial Plan		Statement of Corporate Intent 2020-21 doc (post deferred State Budget & covid delays) Statement of Corporate Intent 2022 Statement of Corporate Intent 2022-23 Final Statement of Corporate Intent 2024		02-May-24	20-May-24
KRA10.02	Both							Investment Framework	34147155	Investment Governance Framework	Finance & Revenue	02-May-24	20-May-24
KRA10.03	Both							Investment Framework	43041786	IGF Delivery Risk Management Guideline 2019	Finance & Revenue	02-May-24	22-May-24
KRA10.04	Both	X					X	Investment Framework	31597243	Financial Management Policy	Finance & Revenue	02-May-24	22-May-24
KRA10.05	Both		X					Investment Framework	34111482	Capital Expenditure and Depreciation Standard	Finance & Revenue	02-May-24	22-May-24
KRA10.06	Both							Investment Framework	41102544	Investment Management Policy	Finance & Revenue	02-May-24	22-May-24

Document No.	Licence	Effectiveness Criteria						Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		10.1	10.2	10.3	10.4	10.5	10.6						
KRA10.07	Both	X	X					Investment Framework	42624629	Delegation of Financial Authority	Finance & Revenue	02-May-24	22-May-24
KRA10.08	Both	X	X					Investment Framework	42624629	Delegation of Financial Authority	Finance & Revenue	02-May-24	22-May-24
KRA10.09	Both							Investment Framework	34178944	Investment Management Standard	Finance & Revenue	02-May-24	22-May-24
KRA10.10	Both							Investment Framework	34199697	Portfolio Management Standard	Finance & Revenue	02-May-24	22-May-24
KRA10.11	Both							Investment Evaluation Framework	41868859	Program and Project Management Guideline	Finance & Revenue	02-May-24	22-May-24
KRA10.12	Both	X	X	X	X	X	X	Business/Financial Plan	68369884	2024-25 Business Plan - Board Submission	Business Planning and Reporting	02-May-24	22-May-24
KRA10.13	Both		X			X		Strategy/Plan		Network Plan 25 Pack		02-May-24	22-May-24
KRA10.14	Both	X						Stakeholder Identification		Financial Reporting Stakeholder List		17-Jun-24	21-Jun-24

Table 31: Information provided by Western Power for Review – Asset Management Process10 – Financial Planning

Document No.	Licence	Effectiveness Criteria				Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		11.1	11.2	11.3	11.4						
KRA11.01	Both	X		X	X	Network Delivery Strategy	58210328	Network Delivery Strategy FY21/22 – FY31/32	Network Maintenance	02-May-24	22-May-24

Document No.	Licence	Effectiveness Criteria				Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		11.1	11.2	11.3	11.4						
								Planning & Delivery			
KRA11.02	Both				X	Investment Framework	68386096	Distribution PSR Packs for April 2024	Network Maintenance Planning & Delivery	02-May-24	22-May-24
KRA11.03	Both				X	Investment Framework				02-May-24	
KRA11.04	Both		X	X		Investment Framework		IGF Business Case Guideline		02-May-24	22-May-24
KRA11.05	Both	X			X	Investment Framework		IGF Program and Project Management Guideline		02-May-24	22-May-24
KRA11.06	EDL1				X	Capital Expenditure Governance & Application				02-May-24	24-May-24
KRA11.07	Both				X	Evidence of Post Implementation reviews being conducted, and findings fed back into process improvements	57838495 64767980	PIR Service Connection Condition Monitoring (SCCM) Stage 2 'PIR Advanced Metering Infrastructure (AMI1)	Regulation and Investment Assurance	02-May-24	24-May-24
KRA11.08	ETL2		X		X	Evidence of Change controls being implemented, and changes to scope as well as budget are assessed	54889590	T0517653 - Transformer Refurbishment AA4 Ph 2 - REQUEST FOR CHANGE (RFC) Form.docx	Asset Performance	02-May-24	27-May-24
KRA11.09	Both				X	Program Delivery & Monitoring	68386096	Distribution PSR Packs for April 2024	Network Maintenance Planning & Delivery	02-May-24	22-May-24

Document No.	Licence	Effectiveness Criteria				Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		11.1	11.2	11.3	11.4						
KRA11.10	Both				X	Capital Expenditure Governance & Application	58013442 64850989 68178285	IGF Gate Check July - Sept 2021 IGF Gate Check June 2023 IGF Gate 4 Check Apr 2024	Regulation and Investment Assurance	02-May-24	24-May-24
KRA11.11	Both				X	Capital Expenditure Governance & Application	57426495 60054378	IGF Compliance Report - Sept 2021 Meeting - IRC Paper (Jan - June 2021) 'IGF Compliance Report - May 2022 Meeting - IRC Paper (July - Dec 2021)	Regulation and Investment Assurance	02-May-24	24-May-24
KRA11.12	Both				X	Capital Expenditure Governance & Application	62868666	IGF Compliance Report - Feb 2023 Meeting - IRC Paper (July - Dec 2022)	Regulation and Investment Assurance	02-May-24	24-May-24
KRA11.13	Both				X	Capital Expenditure Governance & Application	67419500	IGF Compliance Report - Feb 2024 Meeting - IRC Paper (July - Dec 2023)	Regulation and Investment Assurance	02-May-24	24-May-24
KRA11.14	Both				X	Capital Expenditure Governance & Application			Regulation and Investment Assurance	02-May-24	24-May-24
KRA11.15	Both				X	Capital Expenditure Governance & Application	63225554	OPPM Monthly Data Checks June 2023	Regulation and Investment Assurance	02-May-24	24-May-24
KRA11.16	Both				X	Capital Expenditure Governance & Application	68358368	OPPM Monthly Data Checks May 2024	Regulation and Investment Assurance	02-May-24	24-May-24

Document No.	Licence	Effectiveness Criteria				Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		11.1	11.2	11.3	11.4						
KRA11.17	Both				X	Capital Expenditure Governance & Application	55407314	Health Check Review 2021	Regulation and Investment Assurance	02-May-24	24-May-24
KRA11.18	Both				X	Capital Expenditure Governance & Application		IGF Delivery Risk Management Guideline		02-May-24	24-May-24
KRA11.19	Both		X			Investment Framework		Benefits Briefing		17-Jun-24	21-Jun-24
KRA11.20	Both	X	X		X	Investment Framework	34147155	Investment Governance Framework	Finance & Revenue	02-May-24	20-May-24
KRA11.21	Both	X			X	Investment Framework	41102544	Investment Management Policy	Finance & Revenue	02-May-24	22-May-24
KRA11.22	Both	X			X	Investment Framework	34178944	Investment Management Standard	Finance & Revenue	02-May-24	22-May-24
KRA11.23	Both	X			X	Investment Framework	34199697	Portfolio Management Standard	Finance & Revenue	02-May-24	22-May-24

Table 32: Information provided by Western Power for Review – Asset Management Process11 – Capex Planning

Document No.	Licence	Effectiveness Criteria		Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		12.1	12.2						
KRA12.01	Both		X	Development Process	40965939	Process NTWK.1.2.05 Develop 6 year NMP [APPROVED]	Asset Performance	02-May-24	27-May-24
KRA12.02	Both	X		AMSR Policy, Guidelines, or Procedures	34113439	Asset Management Framework - Published	Asset Performance	02-May-24	27-May-24

Document No.	Licence	Effectiveness Criteria		Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		12.1	12.2						
KRA12.03	Both		X	AMS Audit Schedule	68272536	R 012 Network Operations Internal Audit Schedule	Network Operations	02-May-24	16-May-24
KRA12.04	Both		X	Asset Performance Management	68275279	Network Operations Corrective & Preventative Actions List Screen Shot	Network Operations	02-May-24	16-May-24
KRA12.05	Both		X	Asset Performance Management	68396874 68396113	Extract of IAQR May 22 ARC for AMSR 2024 Extract OF IAQR_for_Q3-_May_24_ARC - AMSR 2024	Governance Risk and Compliance	02-May-24	23-May-24
KRA12.06	Both	X		Asset Performance Management	64304196	2023 - ISO 55001 Surveillance Visit Report - Final	Asset Performance	02-May-24	27-May-24
KRA12.07	Both	X	X	Asset Performance Management	NA	Guardian extract of AMS actions from audits	Asset Performance	02-May-24	27-May-24
KRA12.08	Both	X	X	Asset Performance Management	NA	Guardian extract of AMS actions from audits	Asset Performance	02-May-24	27-May-24
KRA12.09	Both	X	X	Asset Performance Management		NA		02-May-24	27-May-24
KRA12.10	Both	X	X	Asset Performance Management	68113827	AMSIC meeting (AMS & AMF update)	Asset Performance	02-May-24	27-May-24
KRA12.11	Both	X	X	Asset Performance Management	68113827	AMSIC meeting (AMS & AMF update)	Asset Performance	02-May-24	27-May-24
KRA12.12	Both	X	X	Asset Performance Management	68113827	AMSIC meeting (AMS & AMF update)	Asset Performance	02-May-24	27-May-24

Document No.	Licence	Effectiveness Criteria		Document Type/Description	Western Power Reference or Doc No.	Title	Owner	Date Requested	Date Delivered
		12.1	12.2						
KRA12.13	Both	X	X	Asset Performance Management	NA	NA		02-May-24	27-May-24
KRA12.14	Both	X	X	Asset Performance Management	64735217	23Aug2023_Asset_Management_System_Steering_Committee_-_Agenda_and_Proceedings	Asset Performance	02-May-24	27-May-24
KRA12.15	Both	X	X	Asset Performance Management	64735217	23Aug2023_Asset_Management_System_Steering_Committee_-_Agenda_and_Proceedings	Asset Performance	02-May-24	27-May-24
KRA12.16	Both	X		Evidence of Change / Risk management of new corporate strategy to the AMS	64767980	Asset Management Objectives Report	Asset Performance	02-May-24	27-May-24
KRA12.17	Both	X		Strategic Asset Management Plan	40304923	Asset Management System Description - contains description	Asset Performance	02-May-24	27-May-24
KRA12.18	Both		X	AMS Audit Schedule		2022-23 and 2023-24 Internal Audit Plan		17-Jun-24	x

Table 33: Information provided by Western Power for Review – Asset Management Process12 AM System Review

Appendix C PERFORMANCE RATING SCALES

The process and policy rating scale and performance rating scale have been based on the 2019 Audit and Review Guidelines – Electricity and Gas Licenses (August 2022) with the following rating scales.

Rating	Description	Criteria
A	Adequately defined	<ul style="list-style-type: none"> Processes and policies are documented. Processes and policies adequately document the required performance of the assets. Processes and policies are subject to regular reviews, and updated where necessary. The asset management information system(s) are adequate in relation to the assets being managed.
B	Requires some improvement	<ul style="list-style-type: none"> Processes and policies require improvement. Processes and policies do not adequately document the required performance of the assets. Reviews of processes and policies are not conducted regularly enough. The asset management information system(s) requires minor improvements (taking into consideration the assets being managed).
C	Requires substantial improvement	<ul style="list-style-type: none"> Processes and policies are incomplete or require substantial improvement. Processes and policies do not document the required performance of the assets. Processes and policies are considerably out of date. The asset management information system(s) requires substantial improvements (taking into consideration the assets being managed).
D	Inadequate	<ul style="list-style-type: none"> Processes and policies are not documented. The asset management information system(s) is not fit for purpose (taking into consideration the assets being managed).

Table 34: Process and Policy rating scale (reviews)

Rating	Description	Criteria
1	Performing effectively	<ul style="list-style-type: none"> The performance of the process meets or exceeds the required levels of performance. Process effectiveness is regularly assessed, and corrective action taken where necessary.
2	Improvement required	<ul style="list-style-type: none"> The performance of the process requires some improvement to meet the required level. Process effectiveness reviews are not performed regularly enough. Recommended process improvements are not implemented.
3	Corrective action required	<ul style="list-style-type: none"> The performance of the process requires substantial improvement to meet the required level. Process effectiveness reviews are performed irregularly, or not at all. Recommended process improvements are not implemented
4	Serious action required	<ul style="list-style-type: none"> Process is not performed, or the performance is so poor the process is considered to be ineffective.

Table 35: Performance rating scale (reviews)