

# Evoenergy FY20 - Feb 22 Ring-fencing Compliance Report

22 April 2022

# Document management

## Version control

Date	Version	Description	Author
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## Approval

Date	Name	Position	Signature
28/4/2022	Leylann Hinch	Group Manager, Strategy and Operations	
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# Introduction

## Statement of Compliance

Evoenergy considers it has complied materially with the Australian Energy Regulators (AER) Guideline (Guideline Version 2) obligations for this regulatory period with the exception of one non-material breach of clause 4.4.1 to be reported to the AER as set out on page 9 this report.

## Background

The Australian Energy Regulator (**AER**) released its draft Ring-fencing Guideline in November 2016 and the Ring-fencing Guideline (Guideline Version 2) applicable to this compliance period in October 2017.

The Guideline is binding on distribution network service providers (DNSPs) and seeks to promote competition in the provision of electricity services, whilst preventing DNSPs from providing competitive advantages to its affiliates, operating in unregulated markets.

A key objective of ring-fencing is to provide a level playing field for participants in contestable electricity markets through accounting and functional separation of the provision of direct control services by DNSPs from the provision of other distribution services by them, or their affiliated entities.

Evoenergy has updated its internal ring-fencing procedure to reflect the Ring-fencing Guideline (Guideline Version 3). Additionally, Evoenergy has published its SAPS register as required to comply with the guidelines.

*ActewAGL Distribution (AAD) is committed to continuous improvement in the implementation of the Guideline in the interests of maintaining a high level of trust from our customers that our investment in the network is prudent and efficient.*

*Further, AAD has an interest in promoting the growth of a market for contestable electricity services in the ACT. A vibrant market for electricity services will allow it to drive further efficiencies and innovation in our operations, which will ultimately result in lower prices for its customers.*

## Purpose of Report

This report sets out AAD's compliance with the Guideline (Version 2) for the period 1 July 2020 to 02 February 2022 as agreed to by the AER on 1 March 2022 (email), specifically:

- the measures taken to ensure compliance with the Guideline.
- any breaches of the Guideline by AAD, or which otherwise related to AAD.
- all *other services* provided by AAD in accordance with the Guideline; and
- the purpose of all transactions between AAD and its affiliated entities.

Key AAD documents to ensure compliance with the Guideline are described in **Appendix 1**.

This report is also accompanied by an independent assessment of AAD's ring fencing compliance for the period 1 July 2020 to 02 February 2022.

## Compliance Management Framework

Compliance with the Guideline is managed in accordance with AAD's Compliance Management Manual, which sets out three lines of assurance as shown in Table 1 below.

Assurance is provided by a range of activities across organisations at three broad levels:

- Level 1 – quality assurance – this refers to the operation and continuous or frequent monitoring of day-to-day controls embedded into work processes.
- Level 2 – management assurance – this includes routine and regular line management review of risks and their treatments.
- Level 3 – independent assurance – this refers to selective (generally risk-based) independent and objective review of systems of management or a defined scope of activity.

TABLE 1 – AAD ASSURANCE LEVELS

Assurance Level	Example Activities	Responsibility
<b>First line</b>	Self-assessments on effectiveness of controls and processes (e.g., procedures, processes, reporting mechanisms)	Functional Managers & teams
<b>Second line</b>	Semi-independent assurance of control effectiveness and process performance through Management Initiated Reviews and Audits	Risk and Compliance Team Planning and Regulation Team
<b>Third line</b>	Independent assurance through Internal Audit Program and Regulatory Audits	Internal Audit and Fraud Control Team

During the audit period, AAD has focused on developing, implementing, and communicating ring-fencing controls in response to previous opportunities for improvement.

The focus of FY20 – Feb 2022 has been the second and third line of assurance and how managers and staff assess ring-fencing compliance and proactively engage Regulatory and Compliance teams to validate control health and compliance as input to the annual compliance reporting process. In the audit period AAD conducted a management-initiated review of Ring-fencing compliance and a management-initiated review of the Compliance Management Framework.

# Compliance Measures

## Prevent cross subsidies

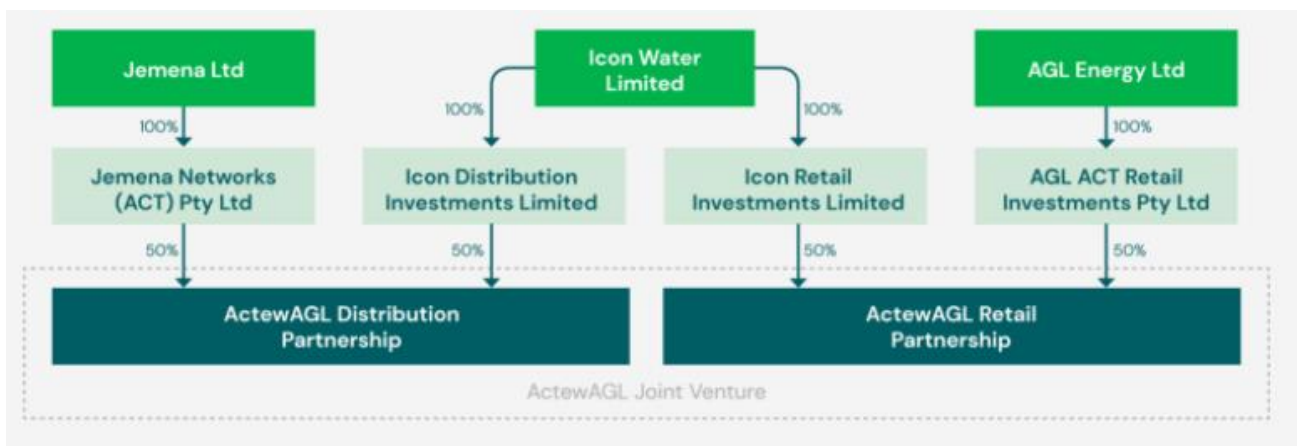
### Legal Separation

#### Considerations

ActewAGL comprises two partnerships – the AAD partnership and the ActewAGL Retail (AAR) partnership. The AAD partnership owns and operates the ACT electricity network and owns the gas networks in the ACT, Queanbeyan and Palerang shires, and Nowra. AAR sells electricity and natural gas, along with managing customer service and marketing functions in a competitive market.

The AAD partnership is a legal entity and is the DNSP for the purposes of the Guideline. AAD is owned equally by Icon Water Ltd and Jemena Ltd via subsidiary companies. The AAR partnership is owned equally by Icon Water Limited and AGL Energy Ltd via subsidiary companies. This ownership structure is shown in Figure 1 below.

FIGURE 1 – ACTEWAGL LEGAL AND OWNERSHIP STRUCTURE



AAD comprises three business units:

- Evoenergy – which provides direct control services (and other non-electricity services under a waiver).
- The Contestable Business Unit (CBU) - which provides other distribution services.
  - Note: Divestment of CBU metering assets in December 2021.
- Corporate Services, which provides shared corporate services.

The legal separation obligations in the Guideline prevent AAD from using regulated funds to subsidise services provided by Related Electricity Service Providers (RESPs). Two RESPs are referenced within this report as Contestable Business Unit (CBU) and ActewAGL Retail (AAR)

# Summary of Previous Audit Findings

TABLE 2 – SUMMARY OF OBLIGATIONS AND AUDIT FINDINGS

Ring-fencing Obligation	FY18-19 Audit findings	FY19-20 Audit findings
Legal separation	AAD complies with the Guideline	AAD complies with the Guideline
Establish and maintain accounts	AAD complies with the Guideline	AAD complies with the Guideline
Obligation not to discriminate	AAD complies with the Guideline	AAD complies with the Guideline
Physical separation/co-location	AAD complies with the Guideline	AAD complies with the Guideline
Staff sharing	AAD complies with the Guideline	AAD complies with the Guideline
Branding and cross-promotion	AAD complies with the Guideline	AAD complies with the Guideline
Office and staff registers	Issues were identified by the auditor	Recommendation only with action opened and completed by Evoenergy.
Protection of confidential information	AAD complies with the Guideline	AAD complies with the Guideline
Disclosure and sharing of information	AAD complies with the Guideline	AAD complies with the Guideline No requests received.
Information register	AAD complies with the Guideline	AAD complies with the Guideline
Conduct of service providers	AAD complies with the Guideline	AAD complies with the Guideline
Waivers	AAD complies with the Guideline	AAD complies with the Guideline
Compliance and enforcement	AAD complies with the Guideline	Compliance achieved with delivery of refresher training to all staff. Enquiries from staff managed.
Compliance reporting	AAD complies with the Guideline	AAD complies with the Guideline

## Office and staff registers

### *FY18-19 Audit findings*

In its FY18-19 audit, Deloitte found that the nature of the positions included in the Staff Register were not linked to actual secondments carried out over the audit period and that the Staff Register provided by Evoenergy did not clearly outline the roles of the staff members who were seconded across the business. This made it difficult to confirm if seconded staff were subject to staff sharing.

#### ***FY19-20 Audit findings***

In FY19-20, AAD continued to monitor its *Office Register (O.7)* and *Staff Register (O.5)* on its website. In relation to the Staff Register, AAD's interpretation of clause 4.2.2(a) of the Guidelines is that it covers staff involved in the provision or marketing of both direct control and contestable electricity services at the same time and not staff that are seconded to provide one or the other of these service types.

Discussions were held with various stakeholders, where it was understood that secondments of corporate services are allowed (e.g., Evoenergy Financial controller). However, Evoenergy, CBU and Retail secondments may not be allowed resulting in secondments of staff being discontinued; effectively ending during FY 18-19. Compliance for the regulatory period of FY 19-20 was achieved by Evoenergy.

#### **Disclosure and sharing of information**

During FY20 – Feb 2022, AAD did not share any electricity information with a third party or RESP. It is noted, whilst no third-party requests for electricity information were received, one request was received from a RESP. This request was subsequently declined. No confidential information was shared by AAD and no requests for access to AAD's Information Register were received from third parties.

#### **Compliance and Enforcement**

##### ***FY 20 – Feb 22 Compliance actions***

AAD has delivered targeted ringfencing training to all personnel across the Joint Venture. Online training was conducted during July 2021 for all AAD and AAR staff with information consistent with AER Ringfencing Guidelines (Version 2). Training completion results confirm 98% of staff completed the training (with those who did not complete the training being on extended leave).

All new AAD and AAR staff complete the online training at their induction session.

The Ring-fencing Staff Information Manual (PO0307) and online training sets out AAD's commitment to comply with the Guideline and the process for staff to make enquiries or identify potential breaches via the ring-fencing enquiry mailbox.

From 01 July 2020 to 02 February 2022, there were fifteen (15) ring-fencing enquiries from Evoenergy personnel received to the ring-fencing enquiry mailbox regarding compliance with ring-fencing obligations. Each enquiry was assessed, and internal professional advice sought before responding to the enquiries to advise the appropriate form of action. Of those enquiries, all were managed to prevent potential for breach of the Ring-fencing Guideline.

#### **Details and findings from the management-initiated review**

During June and July 2021, AAD conducted an internal review into the management of ringfencing across AAD. The objective of the review was to assess the effectiveness of controls in place to support compliance with the Ring-fencing Guideline. In undertaking the review, AAD assessed the design and operating effectiveness of controls for the following elements of the Guideline:

- legal separation

- maintenance of accounts
- allocation of costs
- obligation not to discriminate
- office, staff, and branding separation
- information access and disclosure restrictions
- restrictions to be placed on service providers.

Overall, the review found a variety of controls have been developed to assist with management of ring-fencing obligations throughout the business. Management has a sound understanding of ring-fencing obligations and a large number of existing controls have been built into business as usual (**BAU**) activities. Additionally, management was able to demonstrate pro-active improvement activities that are in progress to further strengthen controls.

The review assessed the process undertaken to provide advice and assess ring fencing enquiries, controls and breaches. This included assessment of the fifteen (15) ringfencing enquiries raised during the period. Some observations were noted to improve and strengthen the visibility and consistency of the management of ring-fencing activities. The observations that were noted included:

- Evoenergy Financial Controller (part of AAD Corporate Team) was seconded to ActewAGL Retail from February to April in 2021. While appropriate controls (e.g., system access restrictions and separate physical office etc.) were put in place to conform with ringfencing guidelines, the Regulatory Team was not informed of this movement until after it had occurred. To ensure that the Regulatory Team have oversight of staff movements and have a process to undertake regarding secondments, monthly reports detailing staff movements from HR and IT system access permissions will be reviewed by the IT/Regulatory Teams as a second control to internal notification by relevant departments. This finding was a failure of internal controls. Evoenergy do not consider this to be in breach of the Ring-fencing Guideline (Guideline Version 2).
- Staff member moved from AAD (Corporate Services) to ActewAGL Retail. At time of movement, their access pass to Evoenergy sites had not been disabled. On further investigation it was noted that the site was not accessed by the staff member after the relocation. Appropriate control to monitor these movements is ongoing and involves immediate supervisors reviewing exit forms of employees ensuring physical access has been requested for removal. A secondary control will be implemented by Evoenergy Regulatory Team scheduled to undertake quarterly reviews of IT and system-based reports. This finding identified a failure of internal control as the staff member involved was a Finance personnel from Corporate Services (CS provide shared services). Evoenergy do not consider this to be in breach of the Ring-fencing Guideline (Guideline Version 2).
- Evoenergy rejected a request to access information raised by a RESP following internal review. This request was not published on the Information Sharing Register. This has since been amended and effective 2 February 2022, all declined requests are captured and made publicly available. Evoenergy's Information Sharing Register is being enhanced to include a field to allow capability to record future declined requests for information. Evoenergy do not consider this to be in breach of the Ring-fencing Guideline (Guideline Version 2).
- Outdated draft register was found on internal Evoenergy intranet site. This has since been removed. This finding relates to internal management of procedures. Evoenergy do not consider this to be in breach of the Ring-fencing Guideline (Guideline Version 2).



- Evoenergy Leadership Team page (Evoenergy Intranet) used an outdated list to provide view access to the intranet page. Five CBU staff and Seven AAR staff were included in the list and had view access Evoenergy Leadership team page. Evoenergy Leadership Team page does not contain any confidential electricity information or customer information. This page is for internal communication and publications (safety matters, news, events and upcoming training). Current control is conducted by AAD (Corporate Services) which involves annual review of access permissions. As an additional control Evoenergy Regulatory Team will conduct regular review through the creation of scheduled internal monitoring. Evoenergy do not consider this to be in breach of the Ring-fencing Guideline (Guideline Version 2). Notification was provided to the Regulatory Compliance Team upon identification of the access during internal audit.
- General Manager People and Legal advised the Regulatory Team that the Executive Assistant (EA) to General Manager (GM) ActewAGL Retail has access to executive briefing materials, including those of Evoenergy and sought advice as to the need to include on the Staff Register. On investigation, it was determined that the EA has limited access to the information only for the compilation and printing of board papers to support the GM ActewAGL Retail as an 'Officer,' included on the Staff Register. The EA to the GM ActewAGL Retail was then included on the Staff Register due to their role to support an Officer of the company. Evoenergy do not consider this to be in breach of the Ring-fencing Guideline (Guideline Version 2).

Out of these observations, additional improvements have been made within existing processes and systems to strengthen the framework and ensure compliance to Guidelines. Actions have been targeted to include development of proactive refresher communications for obligation owners, proactive assurance programs such as quarterly/monthly reporting of staff movements, IT access permissions, physical access permissions and procurement contracts, assessment checklists for registers and internal monitoring assessment standards against ring-fencing Guidelines (Version 3)

These actions have been assigned in the compliance and risk management system (ARIA) with two actions completed and two in process of implementation by Evoenergy Regulatory Team consisting of periodical reviews of IT, HR, Procurement, physical access and Ring-fencing Guidelines control. It is anticipated that actions will be fully addressed and implemented in the coming months with a review and update of documentation in line with AER ringfencing guidelines (Version 3).

## Breaches

During the period of 01 July 2020 to 02 February 2022, Evoenergy self-identified one (1) non-material breach, through Management Initiated Review (MIR) of the AER Ringfencing Guidelines (Guideline Version 2).

Detail of non-material breach:

- An Evoenergy Standard Services Contract for Supply and Erect Scaffolding was varied on 31/07/2020 to execute the option to extend and include Modern Slavery legal clauses. Ring-fencing clauses were not introduced into the contract when it was varied. The Procurement Grid Site (Intranet) states: “The Ring-fencing Guideline (November 2016) requires ActewAGL Distribution to ensure that any new or varied agreement between Distribution (Evoenergy) and a supplier requires the service provider to comply with various obligations as if they were ActewAGL Distribution”.

Evoenergy identified this as a non-material breach resulting in non-reporting at the time. Evoenergy will now report this observation as a breach of clause 4.4.1 of Ringfencing Guidelines (Guideline Version 2) though Evoenergy considers this non-material due to the following clauses:

4.1 - Contractor was procured through open market contract and no discrimination between other service providers.

4.2.1 - No Officer, Staff or branding were shared with the contract provider.

4.2.2 - No Staff sharing with the contract provider.

4.3.2 - Contractor did not have access to nor was provided with confidential information. This was a scaffolding contract and only the location of where scaffolding was required had been shared with the contractor.

4.2.3 – No branding or cross promotion is shared within contracts of this nature. This particular contract was varied in this instance and had been in place for a number of years.

As part of the Management Initiated Review, it was noted that there are opportunities to further strengthen controls to prevent breaches from occurring. Management is committed to making these improvements with progress on implementation underway.

## AAD other services

AAD has been granted a waiver to continue to own and operate its:

- Natural gas distribution pipelines located in the ACT and the Queanbeyan Palerang council area east of Canberra (ACT Gas Network) until 30 June 2024.
- Natural gas distribution pipelines located in the Nowra network in the Shoalhaven local government area on the NSW south coast (Nowra Gas Network) until 30 June 2024.

## AAD transactions with related entities

Table 3 sets out the transactions for services provided by affiliates to AAD and Table 4 set out transactions for services provided by AAD to its affiliates.

TABLE 3 – SERVICES PROVIDED BY AFFILIATES TO AAD

Affiliate	Overview of service provided by Affiliate	Comment
ActewAGL Retail, a partnership of AGL ACT Retail Investments Pty Ltd and Icon Retail Investments Limited	Electricity and gas retail services to Evoenergy.	No comment
Icon Water Limited	Water and sewerage services to Evoenergy	Icon Water is the regulated monopoly provider of water and sewerage services in ACT and therefore is not subject to the procurement process.
Icon Water Limited	Reimbursement of employee-related costs for seconded employees.	No comment.
Zinfra	Construction services to AAD's electricity distribution network business	
Jemena Limited	Jemena undertake works on behalf of external parties on AAD's gas network, and gift these to Evoenergy. These are recorded at fair value by Evoenergy however there is no exchange of cash.	AAD's gas network business provides an "other service" for which a waiver to comply with the Guidelines has been granted by the AER. The gas network business is subject to separate ring-fencing requirements under the National Gas (South Australia) Act 2008 (SA). This transaction has been included for completeness.
Jemena Limited	Jemena provide various management services to Evoenergy, including asset management, general management and construction management, for both routine and non-routine activities within the Gas business.	AAD's gas network business provides an "other service" for which a waiver to comply with the Guidelines has been granted by the AER. The gas network business is subject to separate ring-fencing requirements under the National Gas (South Australia) Act 2008 (SA). This transaction has been included for completeness

TABLE 4 – SERVICES PROVIDED BY AAD TO AFFILIATES

Affiliate	Overview of service provided by AAD	Comment
ActewAGL Retail, a partnership of AGL ACT Retail Investments Pty Ltd and Icon Retail Investments Limited	Regulated electricity and gas services	Regulated service
ActewAGL Retail, a partnership of AGL ACT Retail Investments Pty Ltd and Icon Retail Investments Limited	Warehousing services	Warehousing costs are allocated according to floor space occupied for inventory belonging to each division in accordance with Evoenergy's AER approved cost allocation method
Icon Water Limited	Evoenergy provide dial before you dig and call centre services to Icon Water	No comment.
Icon Water Limited	AAD charge a fee to Icon Water for use of shared IT systems.	IT costs are allocated according to floor space occupied for inventory belonging to each division in accordance with Evoenergy's AER approved cost allocation method
Icon Water Limited	Reimbursement of employee-related costs for seconded employees.	No comment.

## Appendix 1. AAD Key Ring-fencing Documents

ID	Document Name	Purpose/Description	Relevant obligations
GENERAL			
G.1	Ring-fencing Staff Information Manual	To provide all staff with resources for ring-fencing protocols and compliance requirements under the Guideline, where ring-fencing protocols can be stored and accessed as well as where breaches can be reported.	All
G.2	Ring-fencing Compliance Fact Sheet	To provide a ring-fence compliance fact sheet that stipulates the requirements for staff to comply with the guidelines. The fact sheet has a particular focus on call centre staff and technical (hot spot) staff.	All
G.3	Corporate Procedure Ring-fencing	To set out AAD's requirements to comply with the Guideline.	All
LEGAL SEPARATION			
L.1	Classification of Services Flowchart	To set out how AAD services are classified as either regulated distribution services, unregulated distribution services or other services.	3.1
SEPARATE ACCOUNTS			
A.1	Intercompany and Related Accounting Policy	To provide the intercompany and related accounting policy that sets out, the internal accounting procedures, report on transactions between the DNSP and its affiliated entities and any additional information to demonstrate the extent and nature of transactions between the DNSP and its affiliated entities.	3.2.1
A.2	AER Decision - ActewAGL Distribution (Evoenergy) Cost Allocation Method	To set out how AAD allocates its costs between the different services that it provides. Includes information on how AAD allocates costs for services that it provides to RESPs and other affiliated entities.	3.2.2
OBLIGATION TO NOT DISCRIMINATE			
D.1	Procurement Management Manual - Phase 2 Sourcing and Selection	To provide guidance on the Sourcing and Selection phase of the procurement process.  Includes the requirement that at least one quote must be sourced from a non-affiliated entity in order to meet the minimum market approach requirements	4.1 4.4.1
D.2	Obligation not to Discriminate Flowchart	To set out the obligations for AAD staff when interacting with RESPs and other contestable energy service providers.	4.1

ID	Document Name	Purpose/Description	Relevant obligations
OFFICES, STAFF BRANDING AND PROMOTIONS			
O.1	Security Pass and ID Card Procedure	To ensure all persons are clearly identified as being an employee of AAD or a contractor working for AAD and are provided identity cards and electronic access as appropriate to complete their duties. Sets out how the corporate team is to oversee access	4.2.1 4.2.2
O.2	Physical Separation and Staff Sharing- flowchart	To capture the physical separation and staff-sharing requirements that stipulates the requirements for staff to comply with the Guideline.	4.2.1 4.2.2
O.3	Cardholder/Activity Report "CUB Ring-fencing Report"	Provides a report of all offices accessed by AAD staff, distinguishing between CBU, Corporate and Evoenergy Staff	4.2.1
O.4	Staff Register	To provide Evoenergy's staff register via a publicly available website, identifying the nature of positions (including description of the roles, functions and duties) of its members of staff, to which staff involved in the provision or marketing of direct control services are involved in the provision or marketing of contestable electricity services by a related electricity service provider by reason of clauses 4.2.2(b)i. a, 4.2.2(b)i.b., 4.2.2(b)ii. Or 4.2.2(d) of the Guideline.	4.2.2 4.2.4
O.5	Branding and Cross-Promotion Flowchart	To capture the branding and cross-promotion requirements for Evoenergy's direct control services separately to that used by a related electricity service provider for contestable electricity services, without promoting contestable electricity services provided by a related electricity service provider other than the DNSP itself, including any exceptions as per the Guideline.	4.2.3
O.6	Office Register	To provide Evoenergy's office register via a publicly available website, identifying the classes of offices to which physical separation or co-location requirements have not been applied by reason of clauses 4.2.1(b)i, or 4.2.1(b)iii.	4.2.1 4.2.4
INFORMATION ACCESS AND DISCLOSURE			
I.1	Confidential Information Flowchart	To provide assistance in identifying electricity information and confidential information.	4.3.2 4.3.3 4.3.4
I.2	Information Sharing Protocol	To provide the information sharing protocol via a publicly available website, that sets out how and when it will make confidential information available to RESPs and other legal entities on an equal basis.	4.3.2 4.3.3 4.3.4 4.3.5

ID	Document Name	Purpose/Description	Relevant obligations
I.3	Information Register	To provide the information register via a publicly available website, that publishes all valid requests for access to confidential information (including the kind of information requested and their description) made by RESPs and other legal entities who provide contestable electricity services.	4.3.3 4.3.4 4.3.5
I.4	Listed Legal Entities	To provide the record of listed legal entities via a publicly available website, involving all requests for being included on the register, the date added to the list and information types requested.	4.3.5
I.5	Information Request Form	To provide a form for legal entities seeking to apply for access to information identified on the information register, such that they can be assessed by Evoenergy for disclosure of information, and responded to with; a confirmation of whether the information request is complete and valid under the Guideline, and the timeframe and communication mechanism for the provision of information.	4.3.3 4.3.4 4.3.5
I.6	Register Inclusion Form	To provide a form that legal entities can use to request to be included on the information register with respect to all or specific kinds of information.	4.3.4 4.3.5
I.7	Privacy Policy	To provide a privacy policy that sets out that confidential information is kept confidential, and that confidential information is only used for the purpose for which it was acquired or generated.	4.3.2
<b>SERVICE PROVIDERS</b>			
P.1	Ring-fencing Fact Sheet for Evoenergy Service Providers	To provide guidance to Evoenergy service providers/contractors.	4.4.1
P.2	Conduct of Service Providers-Flowchart	To capture the obligations for conduct of service providers under any new or varied agreements involve, complying with clauses 4.1, 4.2.1, 4.2.2, 4.2.3 and 4.3.2 of the Guideline, and not encouraging or incentivising a service provider to engage in conduct that would go against the DNSP's obligations under clause 4 of the Guideline.	4.4.1
<b>WAIVERS</b>			
W.1	Waiver Register	To provide the waiver register via a publicly available website, that records waivers that have been successfully submitted to the AER, the description of the waiver, the terms and conditions of the waiver and its expiration date.	5.7
<b>COMPLIANCE AND ENFORCEMENT</b>			
C.1	Legal Compliance Process	To document the end-to-end process for capturing new and amended legislation relevant to ActewAGL's operations within the ActewAGL compliance and risk management database (ARIA) including the required monitoring of operational	6.1 6.2

ID	Document Name	Purpose/Description	Relevant obligations
C.2	Compliance Management Manual	<p>compliance against obligations. This document is relevant to compliance controls already in place to address compliance with existing legal obligations.</p> <p>To provide business with tools and knowledge of practices and systems to support legislative compliance.</p>	<p>6.3</p> <p>6.1</p> <p>6.3</p> <p>6.4</p>
C.3	Incident Management Manual	Documents the process for all incident management within ActewAGL and Evoenergy	6.3