

Customer Connection Services

Land Development Initiative: 3rd Party Audits – DCR dual pathway

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1. Brief description

In response to positive feedback resulting from the FY 2023/2024 Design Conformance Review Trial (Trial) successfully introducing 3rd party audits (Audits) as part of the Design Conformance Review (DCR) process, Western Power, in consultation with industry, has agreed to include Audits as an optional pathway to progress more rapidly through the DCR process.

The original Trial procedure was developed in collaboration with Customers / Land Developers (Developers), their design development teams, and industry partners to produce a more efficient and effective DCR process flow. The Trial procedure is the foundation of this 3rd Party Audit – DCR Dual Pathway Procedure (Procedure), updated to capture the current operating environment and lessons learned from the Trial.

1.1 Introduction

The purpose of establishing this Process and Procedure is to:

1. Formalise commitments amongst the Parties to improve the DCR process.
2. Document departures from the baseline DCR process from which to proceed.
3. Highlight Clearance responsibilities.
4. Outline relationships, roles and responsibilities across the Parties and larger stakeholder groups.
5. Detail the collaboration and communication process and mechanisms to capture findings and decisions that affect the Optional DCR pathway DCR process.

1.2 Scope

The objectives of this Procedure are:

1. To develop a mutually beneficial process to reduce the backlog of Design Package DCR applications and achieve DCR processing timeframes of 80% within 8 weeks.
2. Provide Developers more flexibility and scheduling controls with an expedited DCR process.
3. Bring alignment between industry and Western Power design knowledge for consistency in communicating and delivering design requirements.
4. Develop collaborative relationships that benefit other aspects of business interfaces and engagements between the Parties.

1.3 Departures

This Procedure includes the following amendments to the Underground Distribution Scheme (UDS) manual for the purposes of design packages using this pathway:

1. Clause 4.3.1 Process

As depicted in Figure 1.3.1 below from the UDS clause 4.3.1:

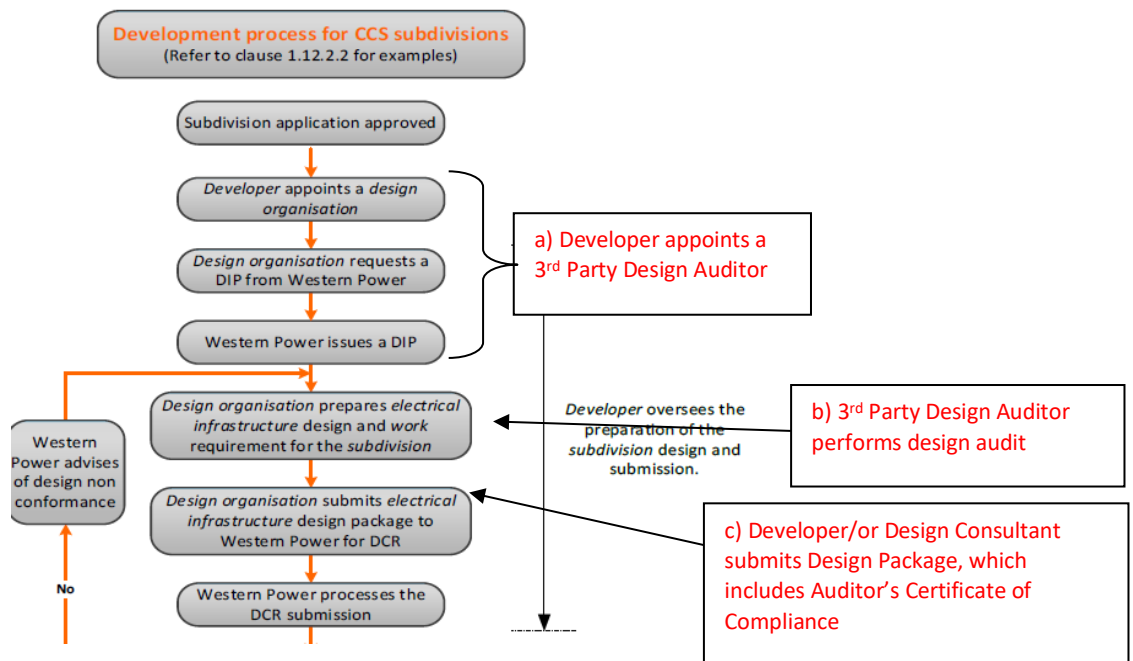
- a) A 3rd Party Design Auditor will be included in the Developer’s design development team, to independently audit the Designer’s (Electrical Consultant’s) design and provide a Certificate of Compliance as part of the Design Package.
- b) The 3rd Party Design Auditor will perform an audit of the design, clarifying any technical queries through Western Power’s TQ process, and resolving inconsistencies with the Designer (Electrical Consultant), before providing a Certificate of Compliance to the Developer.
- c) The Developer, or their authorised representative, submits the Design Package of documentation, supplemented with the Auditor’s Certificate of Compliance. Also refer to the UDS clause 4.3.2.5.

NOTE: Western Power’s DCR submission portal includes a ‘tick box’ to confirm processing under this optional pathway. Selecting this pathway is necessary to ensure the application is allocated to the correct processing team and allow the necessary additional documentation to be attached for processing. Failure to ‘tick’ the box and attach the corresponding documentation will result in processing delays.

Figure 1.3.1

4.3.1 Process

The following figure shows the development process for large subdivisions.



2. Clause 4.4.4 Submission requirements of design for design conformance review

In addition to the requirements outlined in 4.4.4.4, the Developer will be responsible for submitting the Auditor's Certificate of Compliance, in its completed form as described in this Procedure. PDF form is acceptable with originals to be provided upon request.

1.4 Assumptions

1. Preceding, subsequent, and intersecting processes remain in their current state and are not the subject of the Optional DCR pathway, except as detailed within this Procedure.
2. Non-standard design solutions and complex issues (i.e. network reinforcement) have been resolved as part of the DIP, TQ, and initial design process by the Electrical Consultant.

1.5 Definitions & Abbreviations

3 rd Party Design Auditor	(Auditor) This organisation is engaged by the Developer to independently review the Electrical Consultant's design, and ultimately provide a Certificate of Compliance that this design meets Western Power's design requirements for the Developer's intended project. Auditors will be an engineering consulting company utilising engineers on the National Engineering Register for electrical and / or civil disciplines that has no actual or perceived relationship with the appointed Electrical Consultant that prepared the Design Package. Multiple Auditors may be engaged, as required, to interrogate their respective disciplines (i.e. electrical; civil).
Certificate of Compliance	(Certificate of Compliance) A document, with supporting documents, prepared by the Auditor that certifies the Electrical Consultant's design is in strict accordance with Western Power's design specifications. The Certificate of Compliance will be signed by a qualified signing authority within the Auditor's organisation, and supported by design drawings that are dated and signed by the qualified individuals who reviewed the design for compliance, and reference any other relevant information relied upon for the audit.
Electrical Consultant	(Electrical Consultant) The organisation engaged by the Developer to have their qualified experts prepare the series of design documentation in accordance with Western Power's design specifications, which is subject to Auditor review and comprises the majority of the Design Package.
Design Development Team	(Design development team) The collection of design professionals that the Developer engages to support the preparation and audit of the Design Package on behalf of the Developer. For the purposes of the Optional DCR pathway it would, at a minimum, consist of the original Electrical Consultant and a 3 rd Party Design Auditor.
Design Information Package	(DIP) The DIP is a collection of information and instructions on how the Developer and their design development team is to prepare the electrical design specific to the Developer's proposed project for inclusion in the Design Package.

Design Package	(Design Package) This is the comprehensive package of documentation and information the Developer prepares and submits to Western Power for DCR processing.
Land Developers	(Developers) Western Power’s customers for the Optional DCR pathway process and owners of the design responsibilities pertaining to their respective residential land development projects.
Technical Query	(TQ) TQs are clarifications and questions of a technical nature regarding design development and production, which require resolution through engagement between other stakeholders. Stakeholders establish their respective TQ processes for this engagement.
Western Power	(Western Power) Manages the physical network that transports electricity in the southwest of WA, and is responsible for all connections to this infrastructure, including electrical design conformance for Developers wishing to connect to the electrical network. Western Power performs a DCR against Developer Design Packages.

2. Baseline DCR Process

2.1 Overview

Developers looking to develop land are required to follow a progressive, multi-staged approvals process to plan and ultimately install electrical infrastructure suitable for connection to the Western Power electrical network. The DCR process is one stage of this process, which has been burdened due to a series of events, creating a backlog of applications and a constraint in the flow of approvals.

A series of meetings and workshops between Western Power and industry representatives has led to development of an Optional DCR pathway process with the intent of bringing consistency in design, expedited processing, and generated efficiencies in the DCR process. The outcomes from the Optional DCR pathway process will inform the Parties and support amendments to the current DCR process.

2.2 Process, Participants, and Roles

The process for the Optional DCR pathway and an explanation of roles and relationships of participants are explained below. See Appendix A for a figure illustrating the process, detailed as follows:

2.2.1 Developer

The Developer is responsible for managing their design development requirements and submitting their completed Design Package to Western Power. Developers can choose to engage an Electrical Consultant (Consultant) to prepare and submit Design Packages on their behalf.

The Optional DCR pathway process introduces a 3rd Party Design Auditor (Auditor) who will be engaged by the Developer to undertake a design audit, independent of the Electrical Consultant. The Auditor will be responsible for providing a Certificate of Compliance that the Consultant’s design meets Western Power’s

prescribed design criteria, typically outlined in the Design Information Package (DIP). Once the audit process is complete and has included any design modifications to achieve compliance certification, the Developer will then submit their Design Package, with the certified design in the Auditor's certification package (Certificate of Compliance with signed design drawings and relevant supporting information), to Western Power for DCR processing.

It is envisaged the Developer will bring structure to Technical Query (TQ) communications and design audit coordination between the Electrical Consultant and Auditor to manage their TQ / Conferral process and build a platform for collaboration on Western Power design requirements within their design team. Information gathered by the Developer through their design audit coordination process can be shared across the stakeholder group through the Quarterly Technical Forums, which expand and align design knowledge across all stakeholders.

2.2.2 Electrical Consultant

Consultants are part of the Developer's design team. As their Design Packages are presumed compliant, it is envisaged that the original Consultant will only be involved for response to TQs from the Developer's Auditor. Consultants may participate in regular stakeholder engagements to bring technical skills alignment within their organisation in parallel with other stakeholders.

2.2.3 3rd Party Design Auditor

Auditors are part of the Developer's design team, engaged directly by the Developer, with no actual or perceived relationship to the Consultant to maintain process integrity. It is envisaged that the Developer will provide the Auditor with the Consultant's design and all Western Power design information, such as the DIP, so that they can interrogate the design for compliance. Auditors must provide a Certificate of Compliance signed by their managing Director / Partner, as well as identifying the design drawings and documents that have been certified.

2.2.4 Western Power

Western Power is responsible for processing Design Packages through DCR. Optional DCR pathway submissions will be electronically identified as part of the online submission process – there is a 'tick box' for the Developer to 'tick' when submitting an audited design through the portal. DCR submissions marked for the Optional DCR pathway will be re-directed to a dedicated team for processing as they are received.

Western Power's existing TQ process remains available to provide technical guidance and support to the Developer's design team (Consultant & Auditor).

2.3 Process

Developer activities outlined within the Optional DCR pathway process in appendix A, may differ from Developer actual activities. Regardless, the output is a Design Package which includes a Design Certificate of Compliance with supporting documentation from a qualified 3rd Party Auditor.

2.3.1 Optional DCR pathway Design Packages

Optional DCR pathway Design Packages must meet the following criteria:

1. Have passed through the DIP phase.

2. Have the required planning approvals.

As participation is not mandatory, Developers that choose not to participate will continue through the standard DCR process.

2.3.2 Submit Design & DIP to 3rd Party Auditor

Developer's will provide their Auditor with the necessary information to perform their audit certification process. It is envisaged the package of information would include their Electrical Consultant's design and Western Power's specifications and instructions to complete the design, such as the DIP and Underground Distribution Schemes (UDS) Manual, at a minimum.

2.3.3 Design Review and Compliance Certification

The Auditor will review the Electrical Consultant's design against the prescribed criteria and query any inconsistencies through the Developer's defined TQ / Conferral process with the Consultant. Any queries pertaining to the design criteria that cannot be resolved with the Electrical Consultant, will be clarified through Western Power's defined TQ process.

If the Auditor is not satisfied the design is fully compliant with Western Power's requirements, they must work with the Developer and Electrical Consultant to remedy all inconsistencies. Once the design is fully compliant, the Auditor will submit to the Developer a design certification package which, at a minimum, contains:

1. A "Certificate of Compliance" signed by a senior engineer / officer with signing authority in the Auditor's organisation; and
1. Copies of the design drawings which have been certified, and have been annotated with the date, name, NER number, and signature of the qualified engineer who certified the design; and
2. Any other information which the Auditor relied upon which is relevant to the design certification.

2.3.4 Submit Design Package with Design Compliance Certificate

Once the Developer has reviewed and is satisfied with the design certification package, they will submit their design and audit Package to the Western Power portal for DCR processing. Alternatively, the Developer will authorise their Electrical Consultant to submit through the Western Power portal. Please note that the party submitting the documentation into the Western Power portal must tick the box to identify the package as an alternative pathway submission.

2.3.5 Design Conformance Review

Upon receipt of the updated Design Package with the Certificate of Compliance from the Developer, Western Power will allocate the package to a dedicated team in a separate DCR processing queue for review. Up to 100% compliance reviews may take place for all Optional DCR pathway Design Packages, to be determined by the complexity and risk profile of each individual design. Western Power will communicate with the developer and/or their design team for any clarifications during the DCR.

2.3.6 Interfacing Roles and Responsibilities

The table below illustrates the various stakeholder's roles and responsibilities for Optional DCR pathway activities.

Stakeholder Interface Roles and Responsibilities	Western Power	Developer	Consultant	Auditor
Consultant Selection	I	R		
Auditor Selection	I	R	I	
Design Criteria	R	I	I	I
Design Development	C	R	R	
Submit Design and DIP to 3 rd Party Auditor		R	C	I
Design review and compliance certification	C	R	C	R
Submit Design Package with Certificate of Compliance	I	R	I	I
Design Conformance Review	R	I	I	I
Notification of DCR outcomes	R	I	I	I
Complete all design and construction requirements to the satisfaction of Western Power to achieve energisation.	C	R	C	C
	Responsible	Consulted	Informed	

3. Communications

Just like other Western Power services, information gained from DCR processing and reporting may be shared across the stakeholder industry group through industry bulletins and during regular engagements, such as the Quarterly Technical Design Forum.

3.1 Technical Query Process

The existing Technical Query (TQ) process remains available to the Parties which may also be used to capture key lessons learned through design development and approvals engagements for the purpose of

sharing knowledge across the industry stakeholder group. TQs are to be sent to the DIP.support@westernpower.com.au mailbox or as directed by Western Power. Information captured should be prepared in such a manner as to redact any proprietary / personal information, leaving sufficient detail to support meaningful engagement across the stakeholder design teams. These lessons are to be shared during the regular stakeholder meetings with a view to align design requirements (Western Power) with design outcomes (Developers).

1. Developers will establish their respective internal TQ process to capture information between their Electrical Consultant and Auditor.
2. Western Power's TQ and reporting processes will capture the technical engagement between Western Power and the Developer's design development team. Western Power's TQ process is intended to review design proposals and non-standard solutions, as well as provide points of clarification that cannot be resolved between the Auditor and Electrical Consultant. All communications received will be captured with the intent to develop lessons learned. Only technical TQs will receive a response and all Parties related to the specific Design Package are to be on distribution for all TQs. Specifically, while TQs may be directed to technical disciplines, the point of contact is to be on copy (CC) at all times and involved in all conversations so they may participate if / as required.

3.2 Stakeholder Design Conformance Coordination

Appendix A includes key technical interface point shown in grey where TQ / Conferral takes place between stakeholders for design development and audit coordination. These interface points are post "1. Complete DIP Process" and "2. Audit Process & Design Certification."

1. Complete DIP Process

Initial coordination will take place between the Consultant and the Developer to agree the best for project design solutions within the bounds of Western Power's design requirements. During this initial coordination the Consultant will also be clarifying Western Power design requirements and information that affect the project, such as those identified within the Design Information Package.

2. Audit Process & Design Certification

Coordination at this stage is expected to comprise of three parts:

- Auditor interface with the Electrical Consultant to clarify any perceived design inconsistencies.
- Auditor interface with Western Power to clarify design specifications.
- Auditor to interface with the Developer to validate the design against project requirements. Western Power is only expected to be contacted when a common understanding cannot be reached by the Auditor and Electrical Consultant, or to clarify any design requirements in the specifications. Western Power will respond to all TQs within the advertised service level response times, supplementing any written responses with direct contact depending on the nature of each TQ. Complexity will ultimately dictate resolution timing.

3.3 Quarterly Consultative Forums

Western Power will continue to hold quarterly industry consultation forums, which include participants from the broader industry. Updates on DCR processing challenges and opportunities can be shared and forward planning to roll out improvements across the DCR, and interfacing processes.

3.4 Ad-Hoc Meetings

Engagements such as process meetings or technical clarification sessions may be informally arranged from time to time as required to ensure an unencumbered DCR workflow is maintained.

4. General and Administrative

4.1 Timing and Program

The Optional DCR pathway will commence in June 2024 for an initial 18-month duration. The Optional DCR pathway will be evaluated every 6 months to ensure it remains a mutually beneficial endeavour, with the end date re-assessed as part of that evaluation.

4.2 Costs

All Parties will be responsible for their respective costs, inclusive of Developers paying the Western Power DIP and DCR application processing costs.

4.3 Overall Process Analysis

The Optional DCR pathway process is a single stage within a larger end-to-end process. Stakeholders are asked to maintain visibility on the end-to-end process regardless of which DCR pathway they choose.

5. Review

This procedure will be reviewed and evaluated Every 6 months, or until such time as it is determined that this option becomes a standardised business as usual processing option. Any elements deemed appropriate for incorporation as a standard business as usual process, shall be documented within the respective business governing documents, such as the UDS.

6. Related documents

Title	EDM reference
Underground Distribution Schemes Manual	3384127

7. Approval history

Version	Approved by	Date of approval	Reference	Notes
1.	Head of Function Customer Connection Services	17 June 2024	Verbal	Subject to external review and acceptance. During Initiative meeting (Carter, Whiteaker, Cox) 10:30 17 June 2024
2.	External Review	25 June 2024	E-Mail	(e-mail sent to Cox & Carter 25 June 2024 @ 11:56am
3.				

Appendix A – Optional DCR Pathway (3rd Party Audit) Process Diagram

