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CS ENERGY PROCEDURE

CHANGE MANAGEMENT IN THE PTW SYSTEM
CS-PTW-SOP-06

Responsible Officer: CS Energy PTW Administrator
Responsible Manager: Head of Operations Services
Responsible Executive: Executive General Manager Plant Operations

DOCUMENT HISTORY

Key Changes	Prepared By	Checked By	Approved By	Date
Original Release	D Clarke	PTW Committee	A Brown	12/04/2012
Deleted 4th bullet and sub-bullets in Section 5.4 (CM templates)	J Newkirk	M Dignan	P Matha	07/02/2024

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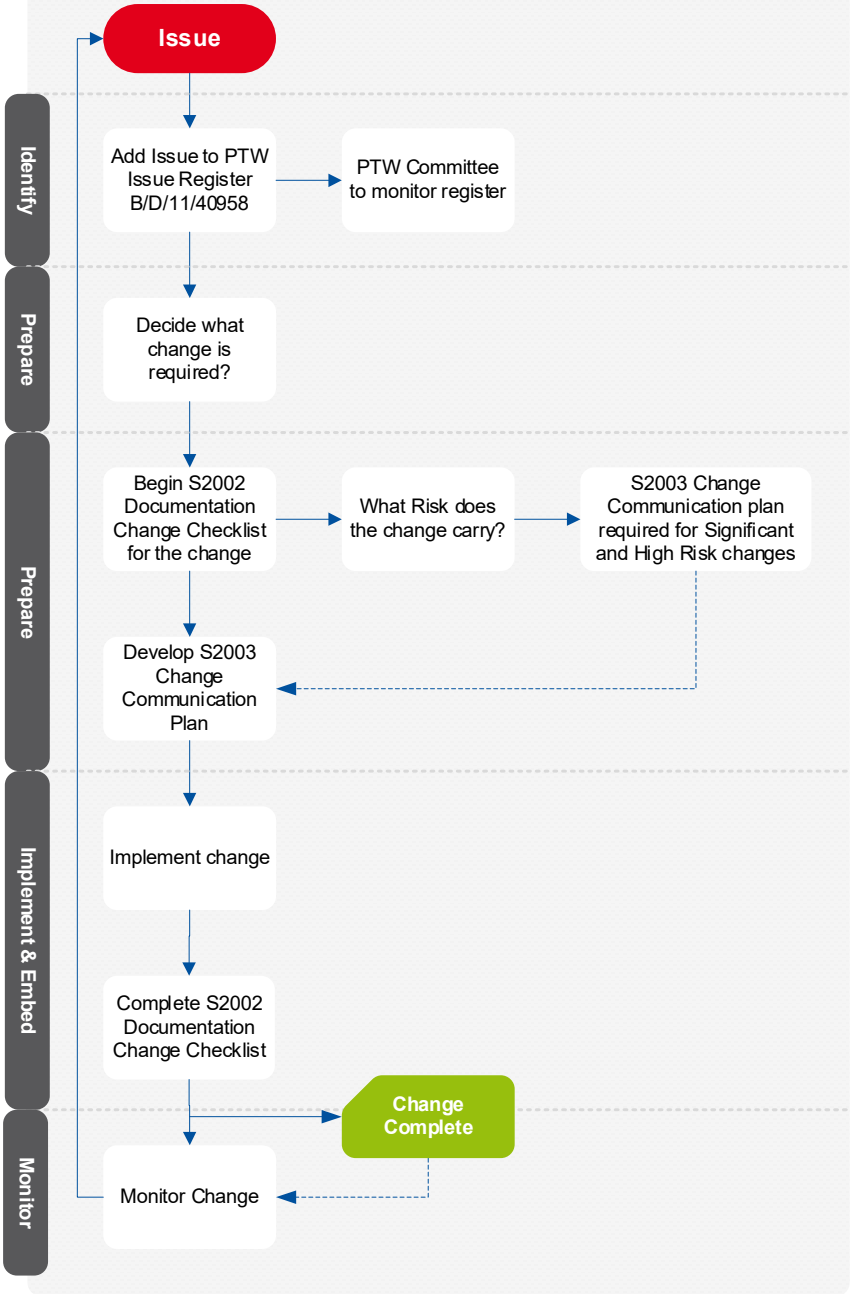
1 CHANGE MANAGEMENT ON A PAGE

Change Process



Types of Change

Low Risk Changes
Likely to have minor impact on the PTW system. These changes can be implemented at any time e.g. Grammar fixes, Definition fixes, Minor updates, SAP support issues.

Moderate Risk Changes
Likely to have an impact on the system i.e. a small change introduced that alters day to day operations e.g. Process clarification, Minor SAP/WCM enhancement, new form, procedure review.

Significant Risk Changes
Likely to impact the system in a significant way e.g. Introduction of a new operating procedure, review of the PTW Procedure, significant SAP WCM Enhancement, Process change that impact people/ plant safety.

High Risk Changes
A large critical change to the PTW system that will have a high impact to the system. E.g. New PTW Procedure, High Risk incident in the PTW System, change of Business Enterprise Solution.

2/Year

Significant changes grouped & implemented twice per year into the PTW System

Low Risk changes can be executed any time

Considerations

Generator's PTW Code	PTW Procedure
Corporate Procedures	Procedural Forms
Training Packages	PID Drawings
SAP WCM	Resources
Intranet Sites	Communications
Safety Expectations	Maintenance Manuals
Plant Labelling	Unwritten Processes

2 PURPOSE

This procedure provides a guideline to control and manage any changes made to CS Energy's Permit to Work (PTW) System. This system integrates with a number of other systems processes making it integral that the necessary checks are in place to ensure changes do not adversely impact those areas. The goal is to introduce and streamlines changes to ensure:

1. Changes introduced into the PTW system are consistently implemented;
2. Flexibility is provided for each site to implement changes at a suitable time for the site;
3. Change management strategies are driving PTW system consistency across the business;
4. A suitable timeframe is provided site personnel to understand/ingest significant changes before the implementation date; and
5. The amount of ongoing change is restricted to allow suitable communication minimising confusion.

PTW Committee Change Charter

3 SCOPE

This procedure has been developed specifically with the PTW System and its unique requirements in mind. In the interests of consistency this procedure could be adopted by other functionality areas where relevant. Management of change effectively is a critical function in ensuring continual system improvement.

This change management procedure is to include, but not limited to, changes to:

- PTW Procedure and Supporting procedures;
- Site specific PTW procedures;
- Procedural forms;
- Operational and maintenance processes;
- Programmable Electronic System Software;
- Personnel training and competency requirements; and
- Official communications.

4 RESPONSIBILITIES AND ACCOUNTABILITIES

The following personnel have responsibilities under this procedure, and may require training/familiarisation of this procedure:

4.1 Head of Operations Services

Endorse this Change Management procedure and allocate sufficient resources to ensure the process can be maintained to ensure quality outcomes.

4.2 CS Energy PTW Administrator

Ensures the change management process is adopted in PTW Committee meetings to manage changes in accordance with this procedure. Also encourage redirects the Committee to ensure the process maintains a quality standard

Also is responsible for ensuring the communication for the change is sufficient to site personnel. This may require additional site based information sessions. All issues are to be brought back to the PTW Committee forum for discussion.

4.3 CS Energy PTW Committee

Ensures the change management process is adopted in PTW Committee meetings to manage changes in accordance with this procedure. Also encourage redirects the Committee to ensure the process maintains a quality standard

4.4 Responsible Person

The person (or leader of a group of specialists) that performs/manages the actual implementation of the requested change and associated communication. This person is to complete the relevant documentation as specified in this procedure. The change is to be tracked through to completion to ensure a quality standard.

5 CHANGE MANAGEMENT PROCESS

Managing any change in PTW system is implemented by completing 5 processes outlined below:

5.1 STEP 1 – Identify the issue/change

- Discuss and document the issue in the formal Committee forums. Alternatively, contact the person responsible for the administration of the PTW system.
- Add the issue to the PTW issue register ("B/D/11/40958").
- Identify and document any sub-issues/sub-tasks linking to the issue.

5.2 STEP 2 – Prepare to Change

- The PTW Committee is to decide the appropriate action to rectify the issue.
- Other business groups or Committees may require input or communication.
- Document the decision in the PTW issue register ("B/D/11/40958") and PTW Committee minutes.

5.3 STEP 3 – Plan to Change

- Consider the requirements of the change. Use the Risk Matrix to classify the Change Type – refer to Section 4. Does the change constitute a project? Can the change be realistically executed with the existing resources available?
- Use the S2002 Documentation Change Checklist – PTW System to nominate the Change Type. Can the change go ahead without a S2003 Change Communication Plan?
- Develop a communication plan using S2003 Change Communication Plan. The purpose of this plan is to coordinate a communication strategy to ensure affected parties are aware of the change, its purpose and motivation. NOTE: for low risk changes a Change Communication Plan is not required.
- The PTW Committee is to assign a Responsible Person to the change and any sub-tasks for that change to be executed.

5.4 STEP 4 – Implement and Embed the Change

- Implement the change as required.

- Use the S2002 Documentation Change Checklist – PTW System to ensure all affected documents and resources are updated to align with the change.
- Complete items in the Change Communication Plan as required.

5.5 STEP 5 – Monitor the Change

- The change has now been integrated into the system.
- Revisit the change as a specified time within 12 months. Review the effectiveness of the change and implement further strategies as required. Add to the Change Communication Plan for the change as necessary.

6 TYPE OF CHANGE

For the purposes of this procedure, change will be classified based on the risk (consequence/likelihood) of the change to the PTW system. The following questions should be discussed:

- How will the change affect the daily operation of the system?
- Does the change introduce a new process?
- What is the business risk if the change is not complied with?
- Are there specific roles that this change affects?
- Does this change require people to change their actions/thinking?
- Will this change require additional work/resources?
- Is the change critical to people/plant safety?
- How important is that all involved understand the change?

A determination is to be made for the risk of the change at hand. The risk is to be classified in 4 categories: Low, Moderate, Significant and High.

6.1 Low Risk Changes

Low Risk changes are changes that primarily have Minor consequences with an Unlikely/Rare Likelihood to impact the PTW system. Changes of this nature occur regularly in a system of this size and complexity. Continual improvement will lead to a large number of changes in this category. The following are examples of Low Risk changes:

- Grammar or spelling error fixes;
- Definition fixes that do not change the procedure intent;
- Administrative updates to procedures that do not alter intent;
- SAP WCM support issues (already managed by HEAT system); and
- Procedural Form formatting changes.

6.2 Moderate Risk Changes

Moderate Risk changes are changes that primarily have Low/Moderate consequences with an Unlikely/Possible Likelihood to impact the PTW system. Changes of this nature should occur less often in a system of this size and complexity. The following are examples of Moderate Risk changes:

- Procedural reviews that change intent;
- Process changes of a minor nature;

- Minor SAP WCM enhancements;
- Introduction of a new hazard procedure;
- Introduction of a new form; and
- Introduction of new training package.

6.3 Significant Risk Changes

Significant Risk changes are changes that primarily have Major consequences and are Likely to impact the PTW system. Changes of this nature should only occur few times (1-4) per business year. The following are examples of Significant Risk changes:

- Introduction of new operating Procedure;
- Procedural reviews that significantly change the intent;
- Review of the PTW Procedure;
- Process change that impacts people or plant safety; and
- New or significant SAP WCM enhancements.

6.4 High Risk Changes

High Risk changes are changes that primarily have Severe consequences with an Almost Certain Likelihood to impact the PTW system. Changes of this nature should occur very few times (1-2) per business year. The following are examples of High Risk changes:

- Introduction of new PTW Procedure;
- Introduction of a new Code of Practice;
- High Risk incident in the PTW system;
- Process change that impacts people or plant safety; and
- Change of Business Enterprise platform.

6.5 Emergency Changes

If a change is required in the case of an emergency, it is not required to comply with this procedure; however, the risks are to be considered prior to proceeding with the change.

7 HOW OFTEN IS CHANGE IMPLEMENTED IN THE PTW SYSTEM?

This general objective is to group changes into organised improvement blocks. The change blocks are to be implemented twice yearly.

Where possible, the PTW Committee should retract from continual changes made on the fly. When Moderate, Significant and High changes are required to the system – additional consideration is required to ensure it is communicated to employees in a coordinated fashion.

However, it is expected that Low Risk changes will be implemented regularly to ensure quality control of the system.

This is to be achieved (where possible) by ‘banking’ the changes into chunks then releasing/implementing the changes on the same date.

Where deemed necessary, the PTW Committee’s will use discretion to implement a Moderate, Significant or High-risk change independently away from these targeted months.

- Time periods for change may vary from year to year depending on the operating environment. It is of the PTW Committee's discretion to decide the most appropriate timing to introduce changes to the PTW system.

7.1 Change Implementation Strategy

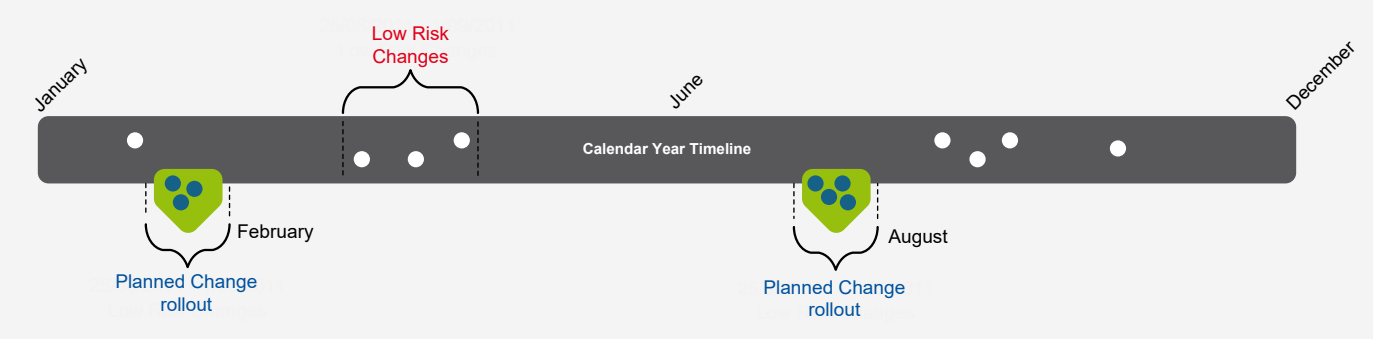


Figure 1 - How often Changes are implemented to the PTW System

8 PTW SYSTEM CONSIDERATIONS AND IMPACTS

CS Energy's PTW System is an interface between maintenance activities and plant operations. The system interfaces with a number of processes within the business. Any changes can affect documents, electronic systems or training processes. With every change, the following items should be considered to ensure it is not impacting the following:

- Generator's Code of Practice – Permit Systems
- CS Energy's PTW Procedure
- Corporate procedures
- Site specific procedures
- Unwritten processes (i.e. the done thing)
- Training packages, manual and associated documentation
- Procedural forms
- SAP or electronic systems
- Intranet sites
- Meeting minutes
- Formal communications
- Maintenance manuals or SOP's
- Organisational structure or resources
- Draft procedures
- Safety and expectations of personnel
- Plant, plant labelling and equipment
- PID drawings or controls

9 DEFINITIONS

Term	Definition
Change	An alteration to a documented process or system and verbal communication to clarify intent of a documented process or system.
Risk	The foreseeable/predictable amount of harm likely to occur that has a negative on people, the environment or CS Energy's assets.
Communication	A documented or verbal message that is distributed to a target audience to gain comprehension.
Implement	The process for putting a design, plan or policy into effect and achieving organisational take up and use

10 REFERENCES

Reference No	Reference Title	Author
B/D/11/19582	Procedure - CS-PTW-01 - Permit to Work (PTW) Manual	CS Energy
B/D/12/11857	Form - S2002 - PTW System Change Checklist	CS Energy
B/D/12/11858	Form - S2003 - PTW Change Communication Plan	CS Energy

11 RECORDS MANAGEMENT

In order to maintain continual improvement, suitability, safety and effectiveness of the organisation, registered documents will be reviewed on a two-yearly basis or at intervals specified by legislative or regulatory requirements. Review of registered documents should occur where it has been identified that there are changes in technology, legislation, standards, regulation or where experience identifies the need for alteration to the content. Registered documents should also be reviewed following an incident, change management process, modification or where directed as part of a risk assessment process. A 'review' can simply mean that it has been identified, confirmed and appropriately recorded that no changes are required and that the existing process remains the same.

Government Owned Corporations must ensure that records are retained according to accountability, legal, administrative, financial, commercial and operational requirements and expectations. In compliance with records retention and disposal, all documentation created in relation to business must be retained in line with minimum retention periods as detailed in legal retention and disposal schedules.