

In relation to proposed change 3.3 - PIAM&V Methods Requirement, although we do not oppose to the proposed change, we do question the objective and results the Scheme Administrator (IPART) wants to achieve by implementing.

As an ACP whose projects are based around PIAM&V methods, we feel that current Verification and Audit regime is more than adequate. Current Regime has an IPART Approved PIAM&V Professional and an IPART Approved Auditor to verify the projects. This is a 2 Tier check. However, we do feel that IPART is still not assured on the outcome of some projects even with this Regime. We will like to ask this question. What if projects can only be verified and audited by IPART Approved PIAM&V Professionals and Auditors **WHOM ARE NOT** related to the ACP or Organisation? Will that give IPART more confident with the Regime as compared to implementing Change 3.3? Will it be more effective than implementing Change 3.3? Will that help IPART achieve their objective better than implementing 3.3? Will it even help in change 3.4?

All our Projects are Verified and Audited by Independent and/or External IPART Approved Professionals. They comb through our projects every single time. Therefore, we do not think the Professionals nor the Regime is the issue. We think the issue is the position (or Organisation) which the Verifier and Auditor represents.

We do not think that by moving the PIAM&V professional verifying the Baseline during the Baseline makes any difference from the current verification stage. The RESA has been Verified and Approved by IPART before anything can start. We believe that the issue is not when the Baseline is verified but who is verifying it.

Change 3.3 will add unnecessary administrative cost and time to each project. If it is additional assurance that IPART is hoping to achieve, we think IPART will be very disappointed. Please do not implement something for the sake of it.