

Gas Trading Licence (GTL10) Performance Audit Report

Wesfarmers Kleenheat Gas Pty Ltd

March 2015

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1.0 Executive summary

This document presents the findings emanating from Wesfarmers Kleenheat Gas Pty Ltd (“Kleenheat”) GTL10 Performance Audit (“Audit”) that was conducted by KPMG. The Audit covered the period 1 September 2012 to 31 August 2014. The Audit was undertaken in accordance with the Audit Plan that was presented and approved by the Economic Regulation Authority (“Authority”) in October 2014.

While the GTL10 does not differentiate between Natural Gas (“NG”) and Liquefied Petroleum Gas (“LPG”), for the purposes of the Audit, we have separated NG from LPG in order to reflect Kleenheat’s business operations.

1.1 Introduction

Section 11ZA of the Energy Coordination Act 1994 requires Kleenheat to provide the Authority with a Performance Audit conducted by an independent expert approved by the Authority. The Performance Audit is an audit of the effectiveness of the measures taken by Kleenheat to meet the criteria specified in the GTL10.

During May 2014, the Authority approved the appointment of KPMG to undertake the Audit for the period 1 September 2012 to 31 August 2014.

The Audit was conducted with reference to the Australian Auditing Standard ASAE 3500 —Performance Engagement (ASAE 3500), Audit and Review Guidelines – Electricity and Gas Licences April 2014, ASA 500 (Audit Evidence), ASA 530 (Audit Sampling) and in consultation with the Authority where required.

The GTL10 permits Kleenheat to retail gas in the Coastal, Goldfields-Esperance, Great Southern and Wheatbelt gas supply areas.

Currently, Kleenheat supplies NG to residential and small use business customers between Geraldton and Busselton, including the Perth Metropolitan area via the Mid-West/South-West Gas Distribution System (GDS) and LPG to residential and small use business customers via Kleenheat’s owned and operate LPG distribution systems in Oyster Harbour (Albany) and Margaret River.

From discussions with management, KPMG understands that, in regards to some licence obligations, Kleenheat maintains different systems, processes and controls for NG and LPG customers respectively. As such, for the purposes of the Audit, the Audit Plan differentiates between LPG and NG.

1.2 Objectives

The objective of the Audit is to evaluate the effectiveness of the measures taken by Kleenheat to meet the obligations of the performance and quality standards referred to Kleenheat’s Gas Trading Licence. To this end, the Audit focuses on Kleenheat’s systems, processes, governance structures and reporting regimes to ensure compliance with the obligations, standards, outputs and outcomes stipulated by the Gas Trading Licence.

1.3 Scope

The scope of audit work required an assessment of Kleenheat’s systems, the effectiveness of its processes, and an appraisal of Kleenheat’s use of regulatory controls to ensure compliance with the obligations, standards, outputs and outcomes required by the licence. The Audit aimed to identify areas where remedial action is required and recommend corrective action as necessary. In addition, the Audit separately identified and proposed opportunities to enhance Kleenheat’s culture of regulatory compliance. The scope required an assessment of the adequacy and effectiveness of Kleenheat’s performance against the licence requirements for the period 1 September 2012 to 31 August 2014. These were to be assessed by considering:

- Process compliance – the effectiveness of systems and procedures in place throughout the audit period including the adequacy of internal controls.
- Outcome compliance – the actual performance against standards prescribed in the licence throughout the audit period.
- Output compliance - the existence of the output from systems prescribed in the licence throughout the audit period (that is, proper records exist to provide assurance that procedures are being consistently followed and controls are being maintained).
- Integrity of performance reporting – the completeness and accuracy of the performance reporting to the Authority.

- Compliance with any individual licence conditions – the requirements imposed on the specific licensee or specific issues to follow up that are advised by the Authority.

The Audit was limited to Kleenheat's head office in Murdoch.

The Licence makes provision for applicable legislation within relevant sections, citing the following regulations and codes:

Act

- Energy Coordination Act 1994

Regulations

- Energy Coordination (Customer Contracts) Regulations 2004
- Energy Coordination (Last Resort Supply) Regulations 2005
- Energy Coordination (Licensing Fees) Regulations 1999
- Energy Coordination (Ombudsman Scheme) Regulations 2004
- Energy Coordination (Gas Tariffs) Regulations 2000

Codes

- Gas Marketing Code of Conduct
- Gas Compendium (contained in Schedule 2 of the License)

Licence

- GTL10

Reporting

- Compliance reports per section 6 of the Gas Compliance Reporting Manual May 2014
- Performance reports per section 16 of the Gas Compliance Reporting Manual

Audit Evidence (this list is not exhaustive)

- Undercharging/Overcharging Procedure
- Disconnection/Reconnection Procedure
- Complaint Handling Procedure
- Financial Hardship Policy and related procedural documents
- A sample of invoices for LPG and NG customers
- Payment Arrangement Guidelines
- Refund Procedure
- Customer Creation And Termination Procedure
- Welcome Pack
- Customer Service Charter
- Complaint Reporting
- Customer Complaints Brochure
- Regulatory and Compliance Handbook
- Customer Renewal Process
- Gas Continuation Policy
- Annual compliance report
- Annual performance reports

1.4 Audit Planning Approach

In developing the Audit Plan, KPMG adopted a risk based approach, consistent with the Authority's mandatory methodology for assessing risk, which is based on Australian/New Zealand Standard 31000:2009 (Risk Management – Principles and Guidelines).

KPMG facilitated risk workshops with key Kleenheat personnel in order to:

- Understand the organisation's regulatory environment, compliance culture as well the systems, processes and controls that are in place to manage each compliance obligation;
- Risk assess each obligation in terms of consequence and likelihood;
- Identify the controls that management has designed and implemented to manage each obligation;
- Understand and document management's assessment of the control environment; and
- Assign an audit priority rating to each compliance obligation.

The following Kleenheat staff members were involved in the Audit process:

- Melanie Gordon - Regulatory Manager
- Nicole Harris - Customer Service Operations Manager
- Justin Manning - Customer Service Supervisor
- Charlotte Garlick - Customer Service Team Leader
- Bernadette Hall - Customer Advocate
- Bernadette Doyle - National Credit & CCA Compliance Manager
- Julie Drakesmith - Credit Team Leader

Step 1 – Establish the Context

This step was undertaken in order to understand Kleenheat's business objectives, organisational structure, the regulatory framework, underlying systems and processes. Furthermore, this step allowed KPMG to understand management's risk management culture and appetite. The key output from this step was the development and validation of Kleenheat's Compliance Obligation Register that was used as the basis in carrying out subsequent steps, as noted below.

Step 2 – Identify Risks

Through discussions with key staff, KPMG examined the licence conditions for both NG and LPG, and identified the risks that may affect compliance with these conditions. As part of this, considered where, when, why and how events could prevent, degrade or delay compliance with the licence obligations. Risk discussions were centred on the compliance risks e.g. supply quality and reliability, consumer protection and legislation/licence.

Step 3 – Risk Analysis

A two stage approach was adopted in analysing compliance risks:

- Firstly, identified the consequences and likelihood of the inherent risks to give an overall inherent risk rating.
- Secondly, identified and assessed the strength of the existing internal controls that mitigate the inherent risks.

Inherent Risk

The inherent risk was arrived through the combination of the consequence rating and the likelihood rating. The inherent risk rating that was used is depicted in the table below:

	Likelihood		Consequence	
	1. Minor	2. Moderate	3. Major	
A. Likely	Medium	High	High	
B. Probable	Low	Medium	High	
C. Unlikely	Low	Medium	High	

Described below are the inherent risk ratings:

Level	Description
High	Likely to cause major damage, disruption or breach of licence obligations
Medium	Unlikely to cause major damage but may threaten the efficiency and effectiveness of service
Low	Unlikely to occur and consequences are relatively minor

Step 4 – Identify and assess internal controls

Once the inherent risks were identified and classified, KPMG worked with management in order to identify and preliminary assess the strength of the existing internal controls that mitigate each inherent risk.

The table below describes the preliminary adequacy rating for existing controls:

Level	Description
Strong	Controls that mitigate the identified risks to an appropriate level
Moderate	Controls that only cover significant risks; improvement required
Weak	Controls are weak or non-existent and have minimal impact on the risks

Step 5 – Assign audit priority ratings

The next stage in the audit planning process was to determine audit priorities for each of the Licence conditions based on the combined rating for inherent risk and control adequacy. The prescribed 5-level audit priority scale was used:

		Preliminary Adequacy of existing controls		
		Weak	Moderate	Strong
Inherent Risk	High	Audit priority 1	Audit priority 2	
	Medium	Audit priority 3	Audit priority 4	
	Low	Audit priority 5		

1.4.1 Audit Plan Approval

Following the completion of the risk workshops and supporting activities, each obligation was reviewed and risk prioritised according to its inherent risk rating using the Authority's methodology. The relevant management team members confirmed the applicable risk and control ratings prior to completion of the Audit Plan.

The final Audit Plan was approved by the Authority on 13 October 2014.

1.4.2 Execution of the Audit Plan

The execution stage comprised a singular audit priority assessment of each obligation. Testing took the form of interviews, walkthroughs, document reviews, process and system output reviews, observations and discussion, and substantive testing within requisite areas, with the testing being based on our sample test population. The nature of our testing and various sample sizes are detailed below:

Audit Priority	Nature of Testing	Sample Size
1	Inquiry, inspection & re-performance	20
2	Inquiry, observation & inspection	15
3	Inquiry, observation & inspection	10
4	Inquiry & observation	5
5	Inquiry & observation	1

The Authority's guidelines indicate that compliance with applicable obligations should be reported using the following structure:

Performance audit compliance and controls rating scales			
Adequacy of Controls Rating		Compliance Rating	
Rating	Description	Rating	Description
A	Adequate controls – no improvement needed	1	Compliant
B	Generally adequate controls – improvement needed	2	Non-compliant – minor impact on customers or third parties
C	Inadequate controls – significant improvement required	3	Non-compliant – moderate impact on customers or third parties
D	No controls evident	4	Non-compliant – major impact on customers or third parties

1.5 Audit Team Members and Time Undertaken to Complete Audit

Audit Members	Hours
Jeeva Maistry, Engagement leader and quality reviewer	164
Martin Haarmans, Lead auditor	216
Georgia Evans, Senior Field Auditor	184
Marissa Santiago, Field Auditor	156
Dominic Hosgood, Field Auditor	160
Justin Sutrisno, Field Auditor	220
Total	1,100

1.6 Culture of Compliance

Through the risk workshops, and reaffirmed through our detailed fieldwork, we have noted that both Kleenheat management and staff have a positive, proactive culture and attitude towards compliance. Management has designed and implemented processes, controls and systems to ensure compliance with license obligations. All staff members have undergone extensive training to ensure they fully understand regulatory obligations that impact their immediate work functions. Refresher training programs and initiatives are carried out at regular intervals.

1.7 Compliance Summary

This performance audit covers Kleenheat's Gas Trading License, GTL10, for the period 1 September 2012 to 31 August 2014 and involved the testing of 252 out of a total of 280 license obligations. The difference of 28 not tested relates to gas distribution. These include obligations 7, 8, 9, 18, 23, 25, 26, 27, 28, 87, 88, 89, 92, 93, 94, 95, 104, 105, 226, 244, 261, 269, 270, 271, 272, 273, 274 & 276.

The table below illustrates the compliance profile of Kleenheat as it relates to its NG business. There were 7 non-compliances which were identified during this audit that had not been rectified during the audit period. Further details can be found in Section 3.0 Current Audit Non-Compliances and Recommendations.

NG		Adequacy of controls				Subtotal
		A – Adequate controls	B – Generally adequate controls	C – Inadequate controls	D – No controls evident	
Compliance Rating	1 – Compliant	140	20	3	0	163
	2 – Non-compliant	9	3	2	0	14
	3 – Non-compliant	0	1	2	1	4
	4 – Non-compliant	0	0	0	0	0
	NR - Not Rated	30	7	6	0	43
	Not Applicable					28
Total					252	

The table below illustrates the compliance profile of Kleenheat as it relates to its LPG business. There were 4 non-compliances which were identified during this audit that had not been rectified during the audit period. Further details can be found in Section 3.0 Current Audit Non-Compliances and Recommendations.

LPG		Adequacy of controls				Subtotal
		A – Adequate controls	B – Generally adequate controls	C – Inadequate controls	D – No controls evident	
Compliance Rating	1 – Compliant	136	20	4	0	160
	2 – Non-compliant	4	1	1	1	7
	3 – Non-compliant	0	0	1	1	2
	4 – Non-compliant	0	0	0	0	0
	NR - Not Rated	25	12	2	0	39
	Not Applicable					44
Total					252	

1.8 Audit Opinion

We have performed an engagement to provide limited assurance on the adequacy of design and operational effectiveness of the control procedures of Wesfarmers Kleenheat Gas Pty Ltd ("Kleenheat") in relation to the GTL10 Performance Audit (also referred to as the "Audit") for the period 1 September 2012 to 31 August 2014.

Directors' responsibility for overseeing compliance with GTL10

The directors of Kleenheat are responsible for such internal controls as the directors determine is necessary, including control procedures that are adequately designed and operated effectively in complying with GTL10. Management's assertions about the effectiveness of these control procedures in relation to the Audit are included in the accompanying report.

Our responsibility

Our responsibility is to express a conclusion to directors on the effectiveness of the control procedures based on the obligations stipulated in GTL10.

We conducted our engagement in accordance with the Standard on Assurance Engagements ASAE 3000 Assurance Engagements other than audits or reviews of historical financial information and other auditing standards applicable to internal controls engagements in order to state whether anything has come to our attention that would indicate that the control procedures, in all material respects, did not operate effectively.

An engagement to provide limited assurance in relation to control procedures consists of making enquiries and applying analytical and other limited assurance procedures. A limited assurance engagement is substantially less in scope than a reasonable assurance engagement or an audit conducted in accordance with Australian Auditing and Assurance Standards and consequently does not enable us to obtain assurance that we would become aware of all significant matters that might be identified in a reasonable assurance engagement or an audit. Accordingly, we do not express a reasonable assurance or audit opinion.

Inherent limitations

Because of the inherent limitations in any system of internal controls it is possible that errors or irregularities may occur and not be detected. Further, the internal control structure within which the control procedures which are the subject of our engagement, has not been subject to any reasonable assurance procedures and no opinion is expressed as to its effectiveness.

Our engagement is not designed to detect all weaknesses in the control procedures, as the tests and procedures have not been performed continuously throughout the period and the tests and procedures performed on the control procedures have been performed on a sample basis. Any projection of the evaluation of control procedures to future periods is subject to the risk that the control procedures may become inadequate because of changes in conditions, or that the degree of compliance with them may deteriorate.

The limited assurance opinion expressed in this report has been formed on the above basis.

Conclusion

Based on our engagement to provide limited assurance, which is not an engagement to provide reasonable assurance, we have not become aware of any matter that would lead us to believe that Kleenheat has not maintained, in all material respects, control procedures that were adequately designed and operated effectively in complying with GTL10 for the period 1 September 2012 to 31 August 2014.

KPMG

2.0 Recommendations from the Previous Audit

Table of Previous Non Compliances and Audit Recommendations:

A.Resolved before end of previous audit period				
Reference (no./year)	(Compliance rating/Legislative Obligation/details of the issue)	Auditors' Recommendation or action taken	Date Resolved	Further action required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable
102/12	<i>Non-compliant – 2 Energy Coordination Act section 11M</i> The requirement is that a Licensee must provide to the Authority any information that the Authority may require in connection with its functions under the Energy Coordination Act 1994 in the time, manner and form specified by the Authority.	Licensee to amend the process followed in order to ensure the information for the report is available and that the report is prepared and submitted in accordance with the prescribed timeline.	January 2013	No further action required.
161/12	<i>Non-compliant – 1 Energy Coordination Act section 11M</i> A retailer must give the customer an estimated bill in the manner specified, if the retailer is unable to reasonably base a bill on a reading of the meter.	Licensee should change the wording used on estimated bills to include that the bill is an "estimate".	March 2013	No further action required.
162/12	<i>Non-compliant – 1 Energy Coordination Act section 11M</i> A retailer must specify the stated information in circumstances where the customer's bill is estimated.	The licensee to include on the bill the information required in clause 4.8(2) of the Gas Customer Code which is: "To specify in a visible and legible manner that the bill is estimated and advise the customer that the licensee will tell on request the basis of the estimation; and the reason for the estimation."	March 2013	No further action required.
73/12	<i>Compliant – 4 Energy Coordination (Customer Contracts)Regulation 27(4) & 40(3)</i> A licensee must not supply gas to the customer under a door to door contract during the cooling-off period unless the customer requests supply.	The licensee needs to give consideration to including reference to a cooling off period in the welcome letter.	N/A	N/A - this item is not applicable as the licensee does not undertake door to door sales.

2.0 Recommendations from the previous audit

Reference (no./year)	(Compliance rating/Legislative Obligation/details of the issue)	Auditors' Recommendation or action taken	Date Resolved	Further action required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable
79/12	<i>Compliant - 4 Energy Coordination (Customer Contracts)Regulation 50</i> A licensee must include information about its complaint handling process and contact details of the energy ombudsman on any disconnection warning given to a customer.	The notice should be amended to make reference to the complaints handling process.	March 2013	No further action required.
114/12	<i>Compliant – 3 Energy Coordination Act section 11ZPP</i> The requirement is that a Licensee must comply with the Gas Marketing Code of Conduct.	The newly appointed trainer needs to develop a training programme and undertake training to ensure all customer service personnel are aware of their obligations under the Code and comply with the Code where applicable. The newly appointed trainer to develop a training programme and undertake the training to ensure all customer service personnel are aware of their obligations under the Code and comply with the Code where applicable.	April 2013	No further action required.
115/12	<i>Compliant – 3 Energy Coordination Act section 11M and 11ZPP</i> A licensee must ensure all agents and employees comply with the <i>Gas Marketing Code of Conduct</i> .			
122/12	<i>Compliant- 4 Energy Coordination Act section 11ZPP Code of Conduct Clause 2.4(2)</i> Where the customer has entered into a new contractual relationship with a retailer, a retailer or marketing representative must give the information specified to the customer.	Licensee to review process to ensure it meets this obligation.	May 2013	No further action required.
144/12	<i>Compliant – 4 Energy Coordination Act section 11ZPP Code of Conduct Clause 2.11(2)</i> A marketer must keep a record or other information required by the Code to be kept for at least 2 years.	Training to reinforce the information to be kept and for what period.	N/A	No further action required.

2.0 Recommendations from the previous audit

B.Resolved during current Audit period				
Reference (no./year)	(Compliance rating/Legislative Obligations/details of the issue)	Auditors' Recommendations	Date Resolved	Further action required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable
N/A				

C.Unresolved at end of current Audit period			
Reference (no./year)	(Compliance rating/Legislative Obligations/details of the issue)	Auditors' Recommendations	Further action required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable
116/12	<i>Non-compliant – 2 Energy Coordination Act section 11ZPP Code of Conduct Clause 2.1</i> A marketer must ensure that its marketing representatives comply with Part 2 of the Code of Conduct.	The newly appointed trainer to develop a training programme and undertake the training to ensure all customer service personnel are aware of their obligations under the code and comply with the Code were applicable. The training should reflect the outcome of any discussions that occur with the Authority on marketing.	Yes - Due to a minor breach in the previous year, and two further breaches in the current year whereby training records were not kept for two marketing agents engaged by the licensee it is recommended that the process for recording training records be reviewed to ensure completeness and accuracy. Regular compliance checks needs to be implemented.

3.0 Current Audit Non-Compliance and Recommendations

Table of Current Non Compliances and Recommendations: showing non-compliance and recommendations where management review and development of post-audit implementation plan is required. Opportunities for improvements identified during the audit are reported in Appendix 2 Performance Audit Details.

A.Resolved during current Audit Period

NG

Manual Ref.	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Date resolved (& management action taken)	Auditor comments
102	A2 <i>Energy Coordination Act section 11M</i> A licensee must provide to the Authority any information that the Authority may require in connection with its functions under the Energy Coordination Act 1994 in the time, manner and form specified by the Authority.	April 2013. The licensee's has developed a Regulatory and Compliance Handbook which outlines external reporting requirements under the licence, including reference to the Gas Compliance Reporting Manual.	No further action required.
136	A2 <i>Energy Coordination Act section 11M</i> A retailer must issue a bill no more than once a month unless the conditions specified in subclause 4.1(a)(i)(ii) are met.	October 2014. The licensee does not issue bills more than once a month unless specific exceptions require them to do so. A sample of 20 customers were selected from the customer invoice history and it was noted that, based on the invoice history, customers have been billed no more than once a month. It was noted that there was a known compliance breach; however, this was resolved during the audit period by the licensee.	No further action required.
147	A2 <i>Energy Coordination Act section 11M</i> Unless the customer agrees otherwise, a retailer must include the minimum prescribed information in subclause 4.5(1)(a)-(cc) on the customer's bill.	October 2013. Licensee has made system improvements.	No further action required.

3.0 Current Audit Non-Compliances/Recommendations

Manual Ref.	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Date resolved (& management action taken)	Auditor comments
161	A2 <i>Energy Coordination Act section 11M</i> If a retailer offers alternative tariffs and a customer applies to receive an alternate tariff (and demonstrates to the retailer that they satisfy the conditions of eligibility), a retailer must change the customer to an alternate tariff within 10 business days of the customer satisfying those conditions.	August 2014. Licensee has made changes to procedures following this isolated incident.	No further action required.
183	B2 <i>Energy Coordination Act section 11M</i> Prior to commencing a direct debit, a retailer must obtain the customer's verifiable consent and agree with the customer, wherever possible, on the amount to be debited, and the date and frequency of the direct debit.	January 2014 The licensee has implemented a control whereby calls are tested with CISCO for new starters or current staff changing desk locations since a breach was identified. It is recommended that the licensee continue monitoring the testing of calls to ensure that all calls are appropriately recorded.	No further action required.
187	A2 <i>Energy Coordination Act section 11M</i> If a retailer has charged a residential customer a late fee, a retailer must not charge an additional late payment fee in relation to the same bill within 5 business days from the date of receipt of the previous late payment fee notice.	August 2014. Licensee has made system improvements and refresher training has been provided.	No further action required.
188	A2 <i>Energy Coordination Act section 11M</i> A retailer must not charge a residential customer more than 3 late payment fees in relation to the same bill, and 12 late payment fees in a year.	August 2014. Licensee has made system improvements and refresher training provided.	No further action required.
222	B2 <i>Energy Coordination Act section 11M</i> A retailer must follow the procedures specified in subclause 7.1(1) prior to arranging for disconnection of a customer's supply address for failure to pay a bill. A customer has failed to pay a bill in the circumstances specified in subclause 7.1(2).	Noted that the licensee has since implemented a new automated strategy that commence in May 2014 to avoid the manual transfer of accounts and reminder notices being sent out ahead of the required timeframe.	No further action required.

3.0 Current Audit Non-Compliances/Recommendations

Manual Ref.	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Date resolved (& management action taken)	Auditor comments
277	A2 <i>Energy Coordination Act section 11M</i> The annual retailer and distributor reports specified in clauses 13.15 and 13.16 are to be published not later than the following October 1.	April 2013. The licensee's has developed a Regulatory and Compliance Handbook which outlines external reporting requirements under the licence.	No further action required.
279	A2 <i>Energy Coordination Act section 11M</i> A copy of each report must be given to the Minister and the Authority not less than 7 days before it is published.	April 2013. The licensee's has developed a Regulatory and Compliance Handbook which outlines external reporting requirements under the licence.	No further action required.
280	A2 <i>Energy Coordination Act section 11M</i> A retailer and distributor must provide the information in the records in clauses 13.15 and 13.16 to the Authority in a format acceptable to the Authority no later than the following 23 September.	April 2013. The licensee's has developed a Regulatory and Compliance Handbook which outlines external reporting requirements under the licence.	No further action required.

LPG

Manual Ref.	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Date resolved (& management action taken)	Auditor comments
102	A2 <i>Energy Coordination Act section 11M</i> A licensee must provide to the Authority any information that the Authority may require in connection with its functions under the Energy Coordination Act 1994 in the time, manner and form specified by the Authority.	April 2013. The licensee's has developed a Regulatory and Compliance Handbook which outlines external reporting requirements under the licence, including reference to the Gas Compliance Reporting Manual.	No further action required.
277	A2 <i>Energy Coordination Act section 11M</i> The annual retailer and distributor reports specified in clauses 13.15 and 13.16 are to be published not later than the following October 1.	April 2013. The licensee's has developed a Regulatory and Compliance Handbook which outlines external reporting requirements under the licence.	No further action required.
279	A2 <i>Energy Coordination Act section 11M</i> A copy of each report must be given to the Minister and the	April 2013. The licensee's has developed a Regulatory and Compliance Handbook which outlines external reporting requirements	No further action required.

3.0 Current Audit Non-Compliances/Recommendations

Manual Ref.	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Date resolved (& management action taken)	Auditor comments
	Authority not less than 7 days before it is published.	under the licence.	
280	A2 <i>Energy Coordination Act section 11M</i> A retailer and distributor must provide the information in the records in clauses 13.15 and 13.16 to the Authority in a format acceptable to the Authority no later than the following 23 September.	April 2013. The licensee's has developed a Regulatory and Compliance Handbook which outlines external reporting requirements under the licence.	No further action required.

B.Unresolved at end of current Audit Period

NG

Reference (non./year)	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Auditors' Recommendation	Management action taken by end of Audit period
01/2014	#39 - C1 <i>Energy Coordination (Customer Contracts) Reg 12 (5)(e)</i> A licensee must reconnect supply to a customer within 20 business days after disconnection in an emergency situation or for health, safety or maintenance reasons if the situation or problem giving rise to the need for disconnection has been rectified and if the customer has paid any applicable reconnection fee.	Licensee to document procedures to be followed for reconnections occurring after a disconnection in an emergency situation or for health, safety or maintenance reasons.	
02/2014	#42 - C1 <i>Energy Coordination (Customer Contracts) Reg 12 (6), Clauses 5.1.2.1 & 5.1.2.2 AGA Code</i> A licensee must not disconnect supply to a customer who denies access to a meter until: the customer has refused access on at least 3 concurrent billing cycles, the customer is given the option to offer alternative access arrangements, the customer is provided written advice on each occasion access was denied, the licensee has used its best endeavours to contact the customer and the licensee has provided the customer a written notice of its intention to disconnect at least 5 business days prior to the disconnection date.	Procedure for disconnecting supply to a customer who denies access to a meter needs to be documented.	

3.0 Current Audit Non-Compliances/Recommendations

Reference (non./year)	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Auditors' Recommendation	Management action taken by end of Audit period
03/2014	#43 - C1 <i>Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.1.3 AGA Code</i> A licensee who disconnects in the event of an emergency must provide a 24 hour information service, estimate the time when gas supply will be restored and use best endeavours to restore supply when the emergency is over.	Procedure for disconnecting in the event of an emergency needs to be documented.	
04/2014	#44 - C1 <i>Energy Coordination (Customer Contracts) Reg 12 (6), Clauses 5.1.4.1 & 5.1.4.2 AGA Code</i> A licensee who disconnects supply for health and safety reasons must provide the customer written notice of the reason, allow the customer 5 business days to remove the reason where the customer is able to and after the 5 business days issue a notice to the customer of its intention to disconnect supply at least 5 business days' notice prior to the disconnection date.	Procedures for disconnection of supply for health and safety reasons need to be documented.	
05/2014	#45 - C1 <i>Energy Coordination (Customer Contracts) Reg 12 (6), Clauses 5.1.5.1 & 5.1.5.2 AGA Code</i> A licensee who disconnects supply for planned maintenance must provide the customer 4 days written notice and have endeavoured to minimise disruption and restore supply.	Procedure detailing disconnection of supply for planned maintenance needs to be documented.	
06/2014	#52 - B2 <i>Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.2.2.2 AGA Code</i> If a licensee is under an obligation to reconnect supply and the customer makes a request for reconnection after 3pm on a business day, the licensee shall use best endeavours to reconnect the customer as soon as possible on the next business day.	It is recommended that the licensee reinforces the requirement to forward reconnection requests to the distributor to ensure that supply of gas is reconnected within the specified timeframe. This can be done via automated reminders or notifications on the system.	A full review of the process undertaken between operational teams has been carried out and improvements identified. Refresher training has been carried out with all staff and system improvements are being developed.
07/2014	#116 - C2 <i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.1</i> A retailer must ensure that its gas marketing agents comply	Due to a minor breach in the previous year, and two further breaches in the current year whereby training records were not kept for two marketing agents engaged by the licensee	Quarterly review of its training records for completeness will commence quarter ending December 2014.

3.0 Current Audit Non-Compliances/Recommendations

Reference (non./year)	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Auditors' Recommendation	Management action taken by end of Audit period
	with Part 2 of the Code of Conduct.	it is recommended that the process for recording training records be reviewed to ensure completeness and accuracy. Regular compliance checks needs to be implemented.	
08/2014	#134 - C2 <i>Energy Coordination Act section 11M</i> If a retailer agrees to sell gas to a customer or arrange for the connection of the customer's supply address, the retailer must forward the customer's request for the connection to the relevant distributor.	A request has been logged with IT to implement an automatic notification when the upload of a service requests is not successful. Prior to the implementation of the above, a step should be added to Procedural documentation to check the status of the service requests. This will ensure that the request is uploaded successfully within the recommended time.	
09/2014	#135 - C3 <i>Energy Coordination Act section 11M</i> Unless the customer agrees otherwise, a retailer must forward the customer's request for the connection to the relevant distributor that same day, if the request is received before 3pm on a business day; or the next business day, if the request is received after 3pm or on a weekend or public holiday.	A request has been logged with IT to implement an automatic notification when the upload of the service requests is not successful. Prior to the implementation of the above, a step should be added to Procedural documentation to check the status of the service requests. This will ensure that the request is uploaded successfully within the recommended time.	New connection procedure has been updated as recommended.
10/2014	149 - D3 <i>Energy Coordination Act section 11M</i> If a retailer identifies and wishes to bill a customer for an historical debt, the retailer must advise the customer of the amount of the historical debt and its basis, before, with or on the customer's next bill.	Procedural documentation needs to be developed with regards to billing for historical debt.	
11/2014	#153 - C1 <i>Energy Coordination Act section 11M</i> A retailer must ensure that at least once every 12 months it obtains metering data in accordance with clause 4.6(1)(a).	It is recommended that the licensee implement a control around ensuring that metering data is obtained within a timely manner. This can be done through automated reminders being issued to ATCO.	A monthly report has been developed to monitor meter reads received from Distributor.
12/2014	#168 - C1 <i>Energy Coordination Act section 11M</i> If a retailer is satisfied after conducting a review of a bill that the bill is incorrect, the retailer must adjust the bill in accordance with clauses 4.17	Document procedures to be followed when adjustment for an incorrect bill is required.	

3.0 Current Audit Non-Compliances/Recommendations

Reference (non./year)	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Auditors' Recommendation	Management action taken by end of Audit period
	and 4.18.		
13/2014	#176 - C1 <i>Energy Coordination Act section 11M</i> If a retailer proposes to recover an amount of an adjustment which does not arise due to any act or omission of the customer, the retailer must follow the procedure specified in subclause 4.19(1) (a)-(d).	Document procedure that needs to be followed when proposing to recover an adjustment amount not arising due to any act or omission of the customer.	
14/2014	#181 - C3 <i>Energy Coordination Act section 11M</i> The due date on the bill must be at least 12 business days from the date of that bill. Unless a retailer specifies a later date, the date of dispatch is the date of the bill.	The licensee should review the protocol set within the system to ensure that due dates of bills are at least 12 business days from issue dates.	Necessary system changes have been made.
15/2014	#225 - C1 <i>Energy Coordination Act section 11M</i> A retailer must not arrange for disconnection of a customer's supply address for denying access to the meter unless the conditions specified in subclause 7.4(1) are satisfied. A retailer may arrange for a distributor to carry out 1 or more of the requirements referred to in subclause 7.4(1) on behalf of the retailer.	Procedure for disconnecting supply to a customer who denies access to a meter to be documented.	
16/2014	#229 - B3 <i>Energy Coordination Act section 11M</i> A retailer must forward the request for reconnection to the relevant distributor that same business day if the request is received before 3pm on a business day; or no later than the next business day if the request is received after 3pm on a business day, or on the weekend or on a public holiday.	It is recommended that the licensee reinforces the requirement to forward reconnection requests to the distributor to ensure that supply of gas is reconnected within the specified timeframe. This can be done via automated reminders or notifications on the system.	Workshops have been carried out with all teams involved, process reviewed and improvements identified. System improvements are currently being developed.

3.0 Current Audit Non-Compliances/Recommendations

Unresolved at end of current Audit Period (cont.)

LPG

Reference (non./year)	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Auditors' Recommendation	Management action taken by end of Audit period
17/2014	<p>#42 - C1 <i>Energy Coordination (Customer Contracts) Reg 12 (6), Clauses 5.1.2.1 & 5.1.2.2 AGA Code</i> A licensee must not disconnect supply to a customer who denies access to a meter until: the customer has refused access on at least 3 concurrent billing cycles, the customer is given the option to offer alternative access arrangements, the customer is provided written advice on each occasion access was denied, the licensee has used its best endeavours to contact the customer and the licensee has provided the customer a written notice of its intention to disconnect at least 5 business days prior to the disconnection date.</p>	<p>Procedure for disconnecting supply to a customer who denies access to a meter needs to be documented.</p>	
18/2014	<p>#116 - C2 <i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.1</i> A retailer must ensure that its gas marketing agents comply with Part 2 of the Code of Conduct.</p>	<p>Due to a minor breach in the previous year, and two further breaches in the current year whereby training records were not kept for two marketing agents engaged by the licensee it is recommended that the process for recording training records be reviewed to ensure completeness and accuracy. Regular compliance checks needs to be implemented.</p>	<p>Quarterly review of its training records for completeness will commencing quarter ending December 2014.</p>
19/2014	<p>#134 - C1 <i>Energy Coordination Act section 11M</i> If a retailer agrees to sell gas to a customer or arrange for the connection of the customer's supply address, the retailer must forward the customer's request for the connection to the relevant distributor.</p>	<p>The requirement to forward customer requests to the distributor be clearly documented in Procedural documentation.</p>	
20/2014	<p>#135 - D2 <i>Energy Coordination Act section 11M</i> Unless the customer agrees otherwise, a retailer must forward the customer's request for the connection to the relevant distributor that same day, if the request is received before 3pm on a business day; or the next business day, if the request is</p>	<p>The requirement to forward customer requests to the distributor be clearly documented in Procedural documentation, and for emails sent to the distributor to be captured within Outlook and retained.</p>	<p>Procedure has been updated and emails sent to Distributor are now being captured and archived.</p>

3.0 Current Audit Non-Compliances/Recommendations

Reference (non./year)	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Auditors' Recommendation	Management action taken by end of Audit period
	received after 3pm or on a weekend or public holiday.		
21/2014	#149 - D3 <i>Energy Coordination Act section 11M</i> If a retailer identifies and wishes to bill a customer for an historical debt, the retailer must advise the customer of the amount of the historical debt and its basis, before, with or on the customer's next bill.	Procedural documentation needs to be developed with regards to billing for historical debt.	
22/2014	#154 - C1 <i>Energy Coordination Act section 11M</i> A retailer must give the customer an estimated bill in the manner specified, if the retailer is unable to reasonably base a bill on a reading of the meter.	A procedure needs to be developed and implemented to provide guidance regarding how to estimate usage.	Procedure has been developed to provide guidance on how to calculate estimated usage.
23/2014	#155 – B2 <i>Energy Coordination Act section 11M</i> In circumstances where the customer's bill is estimated, a retailer must specify in a visible and legible manner the information specified in subclause 4.8(2)(a)-(c) The customer may request a verification of a meter reading and a meter reading.	The licensee should make changes to the process implemented to detect instances of estimated bills that do not comply with the obligation. The licensee should consider automating this process.	
24/2014	#158 - C1 <i>Energy Coordination Act section 11M</i> If a retailer has based a bill upon an estimation because the customer failed to provide access to the meter, and the customer subsequently requests the retailer to provide a bill based on a reading of the meter and provides access to the meter, and pays the retailer's reasonable charge for reading the meter (if any), the retailer must do so.	Document the procedures to be followed subsequent to receiving a LPG customer meter read.	
25/2014	#159 - C1 <i>Energy Coordination Act section 11M</i> If a customer requests the meter to be tested and pays a retailer's reasonable charge (if any) for doing so, a retailer must request the distributor or metering agent to do so.	Meter test procedures for LPG customers to be documented.	

3.0 Current Audit Non-Compliances/Recommendations

Reference (non./year)	Non Compliance/Controls improvement (Rating/Legislative Obligation / Details of Non Compliance or inadequacy of controls)	Auditors' Recommendation	Management action taken by end of Audit period
26/2014	#160 - C1 <i>Energy Coordination Act section 11M</i> If the meter is tested and found to be defective, the retailer's reasonable charge for testing the meter (if any) is to be refunded to the customer.	Meter test procedures for LPG customers to be documented, including process followed when the meter is found to be defective.	
27/2014	#181 - C3 <i>Energy Coordination Act section 11M</i> The due date on the bill must be at least 12 business days from the date of that bill. Unless a retailer specifies a later date, the date of dispatch is the date of the bill.	The licensee should review the protocol set within the system to ensure that due dates of bills are at least 12 business days from issue dates.	Necessary system changes have been made.

4.0 Post Audit Implementation Plan

Licensee to provide a post audit implementation plan.

Appendix 1 – Compliance Summary Natural Gas

Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)						
				A	B	C	D	NP	1	2	3	4	NR	NA	
1	Energy Coordination Act section 11Q(1-2)	Trading Licence clause 4.1	5	✓						✓					
2	Energy Coordination Act section 11WG(1)	Trading Licence clause 12.1	5	✓						✓					
3	Energy Coordination Act section 11WG(2)	Trading Licence clause 13.1	5	✓										✓	
4	Energy Coordination Act section 11WK(1-2)	Trading Licence clause 5.1	5	✓						✓					
5	Energy Coordination Act section 11WK(3)	Trading Licence clause 5.1	5	✓						✓					
6	Energy Coordination Act section 11X(3)	Trading Licence clause 5.1	4	✓										✓	
10	Energy Coordination Act section 11ZA(1)	Trading Licence clause 16.1	4	✓						✓					
11	Energy Coordination Act section 11ZAF(a)	Trading Licence clause 14.1	NA												✓
12	Energy Coordination Act section 11ZAF(b)	Trading Licence clause 14.1	NA												✓
13	Energy Coordination Act section 11ZAF(c)	Trading Licence clause 14.1	NA												✓
14	Energy Coordination Act section 11ZAH(2)	Trading Licence clause 14.1	NA												✓

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Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)							Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA		
15	Energy Coordination Act section 11ZAJ	Trading Licence clause 14.1	NA													✓
16	Energy Coordination Act section 11ZAJ Energy Coordination (Customer Contracts) Reg 38A (4)	Trading Licence clause 14.1	NA													✓
17	Energy Coordination Act section 11ZK(3)	Trading Licence clause 5.1	NA													✓
19	Energy Coordination Act section 11ZOR(2)	Trading Licence clause 18.1	4	✓						✓						
20	Energy Coordination Act section 11ZOV(1)	Trading Licence clause 5.1	4	✓						✓						
21	Energy Coordination Act section 11ZOV(2)	Trading Licence clause 5.1	4	✓						✓						
22	Energy Coordination Act section 11ZOZ(3)	Trading Licence clause 5.1	4	✓											✓	
24	Energy Coordination Act section 11ZQH	Trading Licence clause 18.1	5	✓						✓						

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Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)							Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA		
25	Energy Coordination Act section 11Z	Trading Licence clause 5.1	NA													✓
29	Energy Coordination Act section 11M Energy Coordination (Gas Tariffs) Regulations 2000 reg. 5(1)	Trading Licence clause 5.1	4	✓						✓						
30	Energy Coordination Act section 11M Energy Coordination (Gas Tariffs) Regulations 2000 reg. 6(2)	Trading Licence clause 5.1	4	✓						✓						
31	Energy Coordination Act section 11M Energy Coordination (Gas Tariffs) Regulations 2000 reg. 6(4)	Trading Licence clause 5.1	5	✓						✓						
32	Energy Coordination (Customer Contracts) Reg 12 (2)	Trading Licence clause 5.1	5	✓											✓	
33	Energy Coordination (Customer Contracts) Reg 12 (4)(a)	Trading Licence clause 5.1	2	✓						✓						
34	Energy Coordination (Customer Contracts) Reg 12 (4)(b)	Trading Licence clause 5.1	2	✓						✓						

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Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)							Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA		
35	Energy Coordination (Customer Contracts) Reg 12 (5)(a)	Trading Licence clause 5.1	5	✓						✓						
36	Energy Coordination (Customer Contracts) Reg 12 (5)(b)	Trading Licence clause 5.1	5		✓									✓		
37	Energy Coordination (Customer Contracts) Reg 12 (5)(c)	Trading Licence clause 5.1	5		✓					✓						
38	Energy Coordination (Customer Contracts) Reg 12 (5)(d)	Trading Licence clause 5.1	NA													✓
39	Energy Coordination (Customer Contracts) Reg 12 (5)(e)	Trading Licence clause 5.1	5			✓								✓		
40	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.1.2 AGA Code	Trading Licence clause 5.1	5	✓						✓						
41	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.1.3 AGA Code	Trading Licence clause 5.1	5	✓						✓						
42	Energy Coordination (Customer Contracts) Reg 12 (6), Clauses 5.1.2.1 & 5.1.2.2 AGA Code	Trading Licence clause 5.1	5			✓								✓		

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Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)							Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)				
				A	B	C	D	NP	1	2	3	4	NR	NA	
43	Energy Coordination (Customer Contracts) Reg 12 (6), Clauses 5.1.3.1 & 5.1.3.2 AGA Code	Trading Licence clause 5.1	5			✓								✓	
44	Energy Coordination (Customer Contracts) Reg 12 (6), Clauses 5.1.4.1 & 5.1.4.2 AGA Code	Trading Licence clause 5.1	5			✓								✓	
45	Energy Coordination (Customer Contracts) Reg 12 (6), Clauses 5.1.5.1 & 5.1.5.2 AGA Code	Trading Licence clause 5.1	5			✓								✓	
46	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.7.2 AGA Code	Trading Licence clause 5.1	NA												✓
47	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.8.1(a) AGA Code	Trading Licence clause 5.1	5	✓					✓						
48	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.8.1(b) AGA Code	Trading Licence clause 5.1	5	✓										✓	

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Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)							Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA		
49	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.8.1(c) AGA Code	Trading Licence clause 5.1	NA													✓
50	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.8.1(d) 5AGA Code	Trading Licence clause 5.1	5	✓											✓	
51	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.8.1(e) and	Trading Licence clause 5.1	5	✓					✓							
52	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.2.2.2 AGA Code	Trading Licence clause 5.1	2		✓					✓						
53	Energy Coordination (Customer Contracts) Reg 13 (1), Clause 4.4.6.2 AGA Code	Trading Licence clause 5.1	NA													✓
54	Energy Coordination (Customer Contracts) Reg 13 (3)	Trading Licence clause 5.1	NA													✓
55	Energy Coordination (Customer Contracts) Reg 13 (4)	Trading Licence clause 5.1	NA													✓

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Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)							Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA		
56 (refer to item 122)	Energy Coordination (Customer Contracts) Reg 14 (2),	Trading Licence clause 5.1	2	✓						✓						
57	Energy Coordination (Customer Contracts) Reg 14 (3), Clauses 4.1.2.1 & 4.1.2.2 AGA Code	Trading Licence clause 5.1	5	✓						✓						
58	Energy Coordination (Customer Contracts) Reg 14, Clause 4.1.3.1 & 4.1.3.2 AGA Code	Trading Licence clause 5.1	5	✓						✓						
59	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.1	Trading Licence clause 5.1	2		✓					✓						
60	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.3.1, 4.2.3.2 & 4.2.3.3	Trading Licence clause 5.1	2	✓						✓						
61	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.3.2 AGA Code	Trading Licence clause 5.1	5	✓											✓	

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Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)							Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA		
62	Energy Coordination (Customer Contracts) Reg 15 (1) and (2)	Trading Licence clause 5.1	NA													✓
63 (refer to item 234)	Energy Coordination (Customer Contracts) Reg 15 (1) and 47 (2) and (4), Clause 4.2.3.4 AGA Code	Trading Licence clause 5.1	5	✓											✓	
64	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.4.1	Trading Licence clause 5.1	2		✓					✓						
65 (refer to item 151)	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.4.2	Trading Licence clause 5.1	5	✓						✓						
66	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.4.4	Trading Licence clause 5.1	2		✓					✓						
67	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.4.5	Trading Licence clause 5.1	5	✓						✓						
68	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.3.2.1 AGA Code	Trading Licence clause 5.1	5	✓						✓						

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Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)												
				A	B	C	D	NP	1	2	3	4	NR	NA		
69	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.3.2.2 AGA Code	Trading Licence clause 5.1	5	✓											✓	
70	Energy Coordination (Customer Contracts) Reg 16 (3)	Trading Licence clause 5.1	5		✓					✓						
71 (refer to items 122, 113 & 115)	Energy Coordination (Customer Contracts) Reg 19	Trading Licence clause 5.1	2	✓						✓						
72	Energy Coordination (Customer Contracts) Reg 20 (2) Clause 4.3.5.1 AGA Code	Trading Licence clause 5.1	4	✓						✓						
73	Energy Coordination (Customer Contracts) Reg 27 (4) and 40 (3)	Trading Licence clause 5.1	NA													✓
74	Energy Coordination (Customer Contracts) Reg 20 (3) and 48	Trading Licence clause 5.1	5	✓						✓						
75	Energy Coordination (Customer Contracts) Reg 22 and 49 (2)	Trading Licence clause 5.1	5	✓						✓						
76	Energy Coordination (Customer Contracts) Reg 49 (3)	Trading Licence clause 5.1	5	✓						✓						

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Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)						Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA	
77	Energy Coordination (Customer Contracts) Reg 49 (4)	Trading Licence clause 5.1	5	✓										✓	
78	Energy Coordination (Customer Contracts) Reg 49 (5)	Trading Licence clause 5.1	5	✓										✓	
79	Energy Coordination (Customer Contracts) Reg 50	Trading Licence clause 5.1	5	✓						✓					
80	Energy Coordination (Customer Contracts) Reg 44	Trading Licence clause 5.1	5	✓						✓					
81	Energy Coordination Act section 11M, Energy Coordination (Customer Contracts) Reg 45 (1)	Trading Licence clause 5.1	5	✓						✓					
82	Energy Coordination Act section 11M, Energy Coordination (Customer Contracts) Reg 45 (2)	Trading Licence clause 5.1	5	✓						✓					
83 (refer to items 113 & 115)	Energy Coordination (Customer Contracts) Reg 46 (1) & (2)	Trading Licence clause 5.1	2	✓						✓					

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Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)							Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA		
84	Energy Coordination (Customer Contracts) Reg 46 (4)	Trading Licence clause 5.1	5	✓						✓						
85	Energy Coordination (Customer Contract) Reg 28, clause 3.1.1(a) AGA Code	Trading Licence clause 5.1	5	✓						✓						
86	Energy Coordination (Customer Contract) Reg 28, clause 3.1.1(b) AGA Code	Trading Licence clause 5.1	5	✓						✓						
90	Energy Coordination (Customer Contract) Reg 33 (3), clause 3.5.2.2 AGA Code	Trading Licence clause 5.1	5	✓						✓						
91	Energy Coordination (Customer Contract) Reg 42	Trading Licence clause 5.1	4	✓											✓	
96	Energy Coordination Act section 11M	Trading Licence clause 16.2	4	✓						✓						
97	Energy Coordination Act section 11M	Trading Licence clause 16.4	4	✓						✓						
98	Energy Coordination Act section 11M	Trading Licence clause 17	NA													✓

Appendix 1 – Compliance Summary Natural Gas

Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)												
				A	B	C	D	NP	1	2	3	4	NR	NA		
99	Energy Coordination Act section 11M	Trading Licence clause 20	5	✓						✓						
100	Energy Coordination Act section 11M	Trading Licence clause 21.1	5	✓						✓						
101	Energy Coordination Act section 11M	Trading Licence clause 22.1	4	✓						✓						
102	Energy Coordination Act section 11M	Trading Licence clause 23.1	1	✓							✓					
103	Energy Coordination Act section 11M	Trading Licence clause 24	5	✓						✓						
106	Energy Coordination Act section 11M	Trading Licence clause 12.2	5	✓											✓	
107	Energy Coordination Act section 11M	Trading Licence clause 12.3	5	✓											✓	
108	Energy Coordination Act section 11M	Trading Licence clause 13.1	5	✓											✓	
109	Energy Coordination Act section 11M	Trading Licence Clause 15.1 and 15.2	4	✓						✓						
110	Energy Coordination Act section 11M	Trading Licence Schedule 3 clause 1.5	5	✓											✓	
111	Energy Coordination Act section 11M	Trading Licence Schedule 3 clause 1.7	5	✓											✓	

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Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)							Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)						
				A	B	C	D	NP	1	2	3	4	NR	NA			
112	Energy Coordination Act section 11M	Trading Licence Schedule 3 clause 2.1 to 2.2	NA														✓
113	Energy Coordination Act section 11M	Trading Licence Schedule 3 clause 3.1	5	✓						✓							
114	Energy Coordination Act section 11ZPP	Trading Licence clause 19.1	2	✓						✓							
115	Energy Coordination Act sections 11ZPP and 11M	Trading Licence Clause 19.2	2	✓						✓							
116	Energy Coordination Act section 11ZPP Code of Conduct clause 2.1	Trading Licence clause 19.1	1			✓					✓						
117	Energy Coordination Act section 11ZPP Code of Conduct clause 2.2	Trading Licence clause 19	5	✓						✓							
118	Energy Coordination Act section 11ZPP Code of Conduct clause 2.3(1)	Trading Licence clause 19	2	✓						✓							
119	Energy Coordination Act section 11ZPP Code of Conduct clause 2.3(2)	Trading Licence clause 19	2		✓					✓							
120	Energy Coordination Act section 11ZPP Code of Conduct clause 2.3(3)	Trading Licence clause 19	2	✓						✓							

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Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)							Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA		
121	Energy Coordination Act section 11ZPP Code of Conduct clause 2.4(1)	Trading Licence clause 19	2	✓						✓						
122	Energy Coordination Act section 11ZPP Code of Conduct clause 2.4(2)	Trading Licence clause 19	2	✓						✓						
123	Energy Coordination Act section 11ZPP Code of Conduct clause 2.4(3)	Trading Licence clause 19	2	✓						✓						
124	Energy Coordination Act section 11ZPP Code of Conduct clause 2.4(4)	Trading Licence clause 19	2	✓						✓						
125	Energy Coordination Act section 11ZPP Code of Conduct clause 2.5(1)	Trading Licence clause 19	4	✓						✓						
126	Energy Coordination Act section 11ZPP Code of Conduct clause 2.5(2)	Trading Licence clause 19	2	✓						✓						
127	Energy Coordination Act section 11ZPP Code of Conduct clause 2.5(3)	Trading Licence clause 19	4	✓						✓						

Appendix 1 – Compliance Summary Natural Gas

Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)						Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA	
128	Energy Coordination Act section 11ZPP Code of Conduct clause 2.6(1)	Trading Licence clause 19	5	✓						✓					
129	Energy Coordination Act section 11ZPP Code of Conduct clause 2.6(2)	Trading Licence clause 19	5	✓						✓					
130	Energy Coordination Act section 11ZPP Code of Conduct clause 2.6(3)	Trading Licence clause 19	5	✓						✓					
131	Energy Coordination Act section 11ZPP Code of Conduct clause 2.7	Trading Licence clause 19	5	✓						✓					
132	Energy Coordination Act section 11ZPP Code of Conduct clause 2.8(1)	Trading Licence clause 19	5	✓						✓					
133	Energy Coordination Act section 11ZPP Code of Conduct clause 2.8(2)	Trading Licence clause 19	2	✓						✓					
134	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium 3.1(1)	1			✓					✓				

Appendix 1 – Compliance Summary Natural Gas

Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)							Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)				
				A	B	C	D	NP	1	2	3	4	NR	NA	
135	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium 3.1(2)	1			✓						✓			
136	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium 3.1(2)	1	✓							✓				
137	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium 4.1(b)	1		✓					✓					
138	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.2(1)	NA												✓
139	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.2(2)	NA												✓
140	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.2(3)	NA												✓
141	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.2(4)	NA												✓
142	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.2(5)	NA												✓
143	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.2(6)	NA												✓

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Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)							Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA		
144	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.3(1)	NA													✓
145	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.3(2)	NA													✓
146	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.4	5	✓						✓						
147	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium 4.5(1)	1	✓							✓					
148	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium 4.5(2)	5	✓						✓						
149	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.5(3)	3				✓					✓				
150	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium 4.6(1)	2	✓						✓						
151	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium 4.6(2)	5	✓						✓						
152	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium 4.7(1)	2	✓						✓						

Appendix 1 – Compliance Summary Natural Gas

Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)						Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA	
153	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium 4.7(2)	3			✓				✓					
154	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium 4.8(1)	4	✓						✓					
155	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.8(2)	5	✓						✓					
156	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.8(3)	5	✓						✓					
157	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.9	5	✓						✓					
158	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.10	5		✓					✓					
159	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.11(1)	5	✓										✓	
160	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.11(2)	5		✓					✓					

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Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)							Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA		
161	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.12(1)	1	✓							✓					
162	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.12(2)	4	✓						✓						
163	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.13	NA													✓
164	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.14(1)	2	✓						✓						
165	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.14(2)	5	✓						✓						
166	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.15	NA													✓
167	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium Clause 4.16(1)(a)	3	✓						✓						
168	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.16(1)(b)	3			✓									✓	

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Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)							Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)				
				A	B	C	D	NP	1	2	3	4	NR	NA	
169	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.16(2)	5		✓									✓	
170	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.16(3)	5		✓									✓	
171	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.17(2)	5	✓					✓						
172	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.18(2)	5		✓				✓						
173	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.18(3), 4.18(5)	5	✓					✓						
174	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.18(4), 4.18(5)	5		✓				✓						
175	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2; Compendium clause 4.18(6)	5		✓				✓						
176	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.19(1)	3			✓			✓						

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Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)						Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA	
177	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.19(2)	4		✓									✓	
178	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.19(3), 4.19(6)	3	✓										✓	
179	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.19(4), 4.19(6)	5		✓									✓	
180	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.19(5)	5		✓									✓	
181	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.1	1			✓						✓			
182	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.2	5		✓				✓						
183	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.3	1		✓					✓					
184	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.4	5	✓					✓						

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Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)							Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA		
185	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.5	5	✓						✓						
186	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.6(1)	5	✓						✓						
187	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.6(2)	1	✓							✓					
188	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.6(3)	1	✓							✓					
189	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.6(4)	5	✓						✓						
190	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.7(1)	4	✓						✓						
191	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.7(2)	5	✓						✓						
192	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.7(3)	5	✓						✓						

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Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)						Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA	
193	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.7(4)	4	✓						✓					
194	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.8(1)	5	✓						✓					
195	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.8(2)	5	✓						✓					
196	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.8(3)	5	✓						✓					
197	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.9	NA												✓
198	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.1(1)	5	✓						✓					
199	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.1(2)	5	✓						✓					
200	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.1(3)	5	✓						✓					

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Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)							Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA		
201	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.2(1)	5	✓											✓	
202	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.2(2)	5	✓						✓						
203	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.2(3)	5	✓						✓						
204	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.3(1)	5	✓						✓						
205	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.4(1)	5	✓						✓						
206	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.4(2)	5	✓						✓						
207	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.4(3)	5	✓						✓						
208	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.6(1)	5	✓						✓						

Appendix 1 – Compliance Summary Natural Gas

Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)							Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA		
209	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.6(2)	5	✓						✓						
210	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.7	5	✓						✓						
211	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.8	5	✓						✓						
212	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.9(1)	5	✓										✓		
213	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.9(2)	5	✓										✓		
214	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(1)	5	✓						✓						
215	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(2)	5		✓					✓						
216	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(3)	5	✓						✓						

Appendix 1 – Compliance Summary Natural Gas

Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)							Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA		
217	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(4)	5	✓						✓						
218	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(5)	5	✓						✓						
219	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(6)	5	✓						✓						
220	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(7)	5	✓						✓						
221	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.11	5	✓						✓						
222	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 7.1	1		✓						✓					
223	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 7.2(1)	5		✓					✓						
224	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 7.3	NA													✓

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Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)							Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)				
				A	B	C	D	NP	1	2	3	4	NR	NA	
225	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 7.4	5			✓								✓	
227	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 and Schedule 2 Compendium clause 7.6	5		✓					✓					
228	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 8.1(1)	5		✓					✓					
229	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 8.1(2)	1		✓							✓			
230	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 8.2	5	✓						✓					
231	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.1(1)	2	✓						✓					
232	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.1(2)	2	✓						✓					
233	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.1(3)	5		✓									✓	

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Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)							Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)				
				A	B	C	D	NP	1	2	3	4	NR	NA	
234	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.2(1)	5	✓										✓	
235	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.2(2)	5	✓										✓	
236	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.2(3)	5	✓										✓	
237	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.2(4)	5	✓						✓					
238	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.3	5	✓										✓	
239	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.4	5		✓					✓					
240	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.5	5	✓						✓					
241	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.5A(1)	4	✓										✓	

Appendix 1 – Compliance Summary Natural Gas

Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)							Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)				
				A	B	C	D	NP	1	2	3	4	NR	NA	
242	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.5A(2)	4	✓										✓	
243	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.5A(3)	4		✓					✓					
245	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.9	5	✓						✓					
246	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.10(1)	5	✓						✓					
247	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.10(2)	5	✓						✓					

Appendix 1 – Compliance Summary Natural Gas

Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)							Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA		
248	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.10(3)	5	✓						✓						
249	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.11(1)	5	✓						✓						
250	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.11(2)	4	✓						✓						
251	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.1(1)	4	✓						✓						

Appendix 1 – Compliance Summary Natural Gas

Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)							Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA		
252	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.1(2)(a) and (b)	4	✓						✓						
253	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.1(2)(c) and (d)	5	✓						✓						
254	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.1(3)(a)	5	✓						✓						
255	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.1(3)(b)	5	✓						✓						
256	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.2	5	✓						✓						

Appendix 1 – Compliance Summary Natural Gas

Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)							Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA		
257	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.3	5	✓						✓						
258	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.4	5	✓						✓						
259	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.1(1)	5	✓						✓						
260	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.1(2)	5	✓						✓						
262	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.2(a)(i)-(xv)	5	✓						✓						
263	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium Clause 13.2(b)(i)-(ix)	5	✓						✓						

Appendix 1 – Compliance Summary Natural Gas

Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)							Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA		
264	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.2(c)	5		✓					✓						
265	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.3(1)	4	✓						✓						
266	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.3(2)	4	✓						✓						
267	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.5	2	✓						✓						
268	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.6	2	✓						✓						
275	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.15	5	✓						✓						
277	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.17(1)	1	✓							✓					
278	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.17(2)	5	✓						✓						

Appendix 1 – Compliance Summary Natural Gas

Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)							Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA		
279	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.17(3)	1	✓							✓					
280	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.18	1	✓							✓					

Appendix 2 – Compliance Summary LPG

Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)						
				A	B	C	D	NP	1	2	3	4	NR	NA	
1	Energy Coordination Act section 11Q(1-2)	Trading Licence clause 4.1	5	✓						✓					
2	Energy Coordination Act section 11WG(1)	Trading Licence clause 12.1	5	✓						✓					
3	Energy Coordination Act section 11WG(2)	Trading Licence clause 13.1	5	✓										✓	
4	Energy Coordination Act section 11WK(1-2)	Trading Licence clause 5.1	5	✓						✓					
5	Energy Coordination Act section 11WK(3)	Trading Licence clause 5.1	5	✓						✓					
6	Energy Coordination Act section 11X(3)	Trading Licence clause 5.1	4	✓										✓	
10	Energy Coordination Act section 11ZA(1)	Trading Licence clause 16.1	4	✓						✓					
11	Energy Coordination Act section 11ZAF(a)	Trading Licence clause 14.1	NA												✓
12	Energy Coordination Act section 11ZAF(b)	Trading Licence clause 14.1	NA												✓
13	Energy Coordination Act section 11ZAF(c)	Trading Licence clause 14.1	NA												✓

Appendix 2 – Compliance Summary LPG

Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)						Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA	
14	Energy Coordination Act section 11ZAH(2)	Trading Licence clause 14.1	NA												✓
15	Energy Coordination Act section 11ZAJ	Trading Licence clause 14.1	NA												✓
16	Energy Coordination Act section 11ZAJ Energy Coordination (Customer Contracts) Reg 38A (4)	Trading Licence clause 14.1	NA												✓
17	Energy Coordination Act section 11ZK(3)	Trading Licence clause 5.1	NA												✓
19	Energy Coordination Act section 11ZOR(2)	Trading Licence clause 18.1	4	✓						✓					
20	Energy Coordination Act section 11ZOV(1)	Trading Licence clause 5.1	4	✓						✓					
21	Energy Coordination Act section 11ZOV(2)	Trading Licence clause 5.1	4	✓										✓	

Appendix 2 – Compliance Summary LPG

Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)						
				A	B	C	D	NP	1	2	3	4	NR	NA	
22	Energy Coordination Act section 11ZOZ(3)	Trading Licence clause 5.1	4	✓										✓	
24	Energy Coordination Act section 11ZQH	Trading Licence clause 18.1	5	✓						✓					
25	Energy Coordination Act section 11Z	Trading Licence clause 5.1	NA												✓
29	Energy Coordination Act section 11M Energy Coordination (Gas Tariffs) Regulations 2000 reg. 5(1)	Trading Licence clause 5.1	4	✓						✓					
30	Energy Coordination Act section 11M Energy Coordination (Gas Tariffs) Regulations 2000 reg. 6(2)	Trading Licence clause 5.1	4	✓						✓					
31	Energy Coordination Act section 11M Energy Coordination (Gas Tariffs) Regulations 2000 reg. 6(4)	Trading Licence clause 5.1	5	✓						✓					

Appendix 2 – Compliance Summary LPG

Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)						Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA	
32	Energy Coordination (Customer Contracts) Reg 12 (2)	Trading Licence clause 5.1	5	✓						✓					
33	Energy Coordination (Customer Contracts) Reg 12 (4)(a)	Trading Licence clause 5.1	2	✓						✓					
34	Energy Coordination (Customer Contracts) Reg 12 (4)(b)	Trading Licence clause 5.1	2	✓						✓					
35	Energy Coordination (Customer Contracts) Reg 12 (5)(a)	Trading Licence clause 5.1	5	✓						✓					
36	Energy B165Coordination (Customer Contracts) Reg 12 (5)(b)	Trading Licence clause 5.1	5	✓										✓	
37	Energy Coordination (Customer Contracts) Reg 12 (5)(c)	Trading Licence clause 5.1	5	✓						✓					
38	Energy Coordination (Customer Contracts) Reg 12 (5)(d)	Trading Licence clause 5.1	NA												✓
39	Energy Coordination (Customer Contracts) Reg 12 (5)(e)	Trading Licence clause 5.1	5		✓									✓	

Appendix 2 – Compliance Summary LPG

Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)						
				A	B	C	D	NP	1	2	3	4	NR	NA	
40	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.1.2 AGA Code	Trading Licence clause 5.1	5	✓						✓					
41	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.1.3 AGA Code	Trading Licence clause 5.1	5	✓						✓					
42	Energy Coordination (Customer Contracts) Reg 12 (6), Clauses 5.1.2.1 & 5.1.2.2 AGA Code	Trading Licence clause 5.1	5			✓								✓	
43	Energy Coordination (Customer Contracts) Reg 12 (6), Clauses 5.1.3.1 & 5.1.3.2 AGA Code	Trading Licence clause 5.1	5		✓									✓	
44	Energy Coordination (Customer Contracts) Reg 12 (6), Clauses 5.1.4.1 & 5.1.4.2 AGA Code	Trading Licence clause 5.1	5		✓									✓	
45	Energy Coordination (Customer Contracts) Reg 12 (6), Clauses 5.1.5.1 & 5.1.5.2 AGA Code	Trading Licence clause 5.1	5		✓									✓	

Appendix 2 – Compliance Summary LPG

Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)						
				A	B	C	D	NP	1	2	3	4	NR	NA	
46	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.7.2 AGA Code	Trading Licence clause 5.1	NA												✓
47	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.8.1(a) AGA Code	Trading Licence clause 5.1	5	✓										✓	
48	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.8.1(b) AGA Code	Trading Licence clause 5.1	5	✓										✓	
49	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.8.1(c) AGA Code • Trading Licence clause 5.1 • NA • □ □ □ □ □ □ □ □□✓□ • 50 • Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.8.1(d) 5AGA Code • Trading Licence clause 5.1 • 5 • □✓□ □ □ □ □	Trading Licence clause 5.1	5	✓						✓					

Appendix 2 – Compliance Summary LPG

Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA
	<ul style="list-style-type: none"> ☐ ☑☑☐ ☐ • 51 • Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.8.1(e) and (f) AGA Code 													
52	Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.2.2.2 AGA Code	Trading Licence clause 5.1	1	✓						✓				
53	Energy Coordination (Customer Contracts) Reg 13 (1), Clause 4.4.6.2 AGA Code	Trading Licence clause 5.1	NA											✓
54	Energy Coordination (Customer Contracts) Reg 13 (3)	Trading Licence clause 5.1	NA											✓
55	Energy Coordination (Customer Contracts) Reg 13 (4)	Trading Licence clause 5.1	NA											✓
56 (refer to item 122)	Energy Coordination (Customer Contracts) Reg 14 (2),	Trading Licence clause 5.1	2	✓						✓				
57	Energy Coordination (Customer Contracts) Reg 14 (3), Clauses 4.1.2.1 & 4.1.2.2 AGA Code	Trading Licence clause 5.1	5	✓						✓				

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Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)						
				A	B	C	D	NP	1	2	3	4	NR	NA	
58	Energy Coordination (Customer Contracts) Reg 14, Clause 4.1.3.1 & 4.1.3.2 AGA Code	Trading Licence clause 5.1	5	✓						✓					
59	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.1 AGA Code	Trading Licence clause 5.1	2	✓						✓					
60	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.3.1, 4.2.3.2 & 4.2.3.3 AGA Code	Trading Licence clause 5.1	2	✓						✓					
61	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.3.2 AGA Code	Trading Licence clause 5.1	5	✓										✓	
62	Energy Coordination (Customer Contracts) Reg 15 (1) and (2)	Trading Licence clause 5.1	NA												✓
63 (refer to item 234)	Energy Coordination (Customer Contracts) Reg 15 (1) and 47 (2) and (4), Clause 4.2.3.4 AGA Code	Trading Licence clause 5.1	5	✓										✓	

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Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)						
				A	B	C	D	NP	1	2	3	4	NR	NA	
64	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.4.1 AGA Code	Trading Licence clause 5.1	2	✓						✓					
65 (refer to item 151)	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.4.2 AGA Code	Trading Licence clause 5.1	5	✓						✓					
66	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.4.4 AGA Code	Trading Licence clause 5.1	2		✓					✓					
67	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.4.5 AGA Code	Trading Licence clause 5.1	5		✓					✓					
68	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.3.2.1 AGA Code	Trading Licence clause 5.1	5	✓						✓					
69	Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.3.2.2 AGA Code	Trading Licence clause 5.1	5	✓										✓	

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Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)						Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA	
70	Energy Coordination (Customer Contracts) Reg 16 (3)	Trading Licence clause 5.1	5		✓									✓	
71 (refer to items 122, 113 & 115)	Energy Coordination (Customer Contracts) Reg 19	Trading Licence clause 5.1	2	✓						✓					
72	Energy Coordination (Customer Contracts) Reg 20 (2) Clause 4.3.5.1 AGA Code	Trading Licence clause 5.1	4	✓						✓					
73	Energy Coordination (Customer Contracts) Reg 27 (4) and 40 (3)	Trading Licence clause 5.1	NA												✓
74	Energy Coordination (Customer Contracts) Reg 20 (3) and 48	Trading Licence clause 5.1	5	✓						✓					
75	Energy Coordination (Customer Contracts) Reg 22 and 49 (2)	Trading Licence clause 5.1	5	✓						✓					
76	Energy Coordination (Customer Contracts) Reg 49 (3)	Trading Licence clause 5.1	5	✓						✓					
77	Energy Coordination (Customer Contracts) Reg 49 (4)	Trading Licence clause 5.1	5	✓										✓	

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Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)						
				A	B	C	D	NP	1	2	3	4	NR	NA	
78	Energy Coordination (Customer Contracts) Reg 49 (5)	Trading Licence clause 5.1	5	✓										✓	
79	Energy Coordination (Customer Contracts) Reg 50	Trading Licence clause 5.1	5	✓						✓					
80	Energy Coordination (Customer Contracts) Reg 44	Trading Licence clause 5.1	NA	✓											✓
81	Energy Coordination Act section 11M, (Customer Contracts) Reg 45 (1)	Trading Licence clause 5.1	5	✓						✓					
82	Energy Coordination Act section 11M, Energy Coordination (Customer Contracts) Reg 45 (2)	Trading Licence clause 5.1	5	✓						✓					
83 (refer to items 113 & 115)	Energy Coordination (Customer Contracts) Reg 46 (1) & (2)	Trading Licence clause 5.1	2	✓						✓					
84	Energy Coordination (Customer Contracts) Reg 46 (4)	Trading Licence clause 5.1	5	✓						✓					

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Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)						
				A	B	C	D	NP	1	2	3	4	NR	NA	
85	Energy Coordination (Customer Contract) Reg 28, clause 3.1.1(a) AGA Code	Trading Licence clause 5.1	5	✓						✓					
86	Energy Coordination (Customer Contract) Reg 28, clause 3.1.1(b) AGA Code	Trading Licence clause 5.1	5	✓						✓					
87	Energy Coordination (Customer Contract) Reg 28, clause 3.1.2 AGA Code	Distribution Licence clause 5.1	NA												✓
90	Energy Coordination (Customer Contract) Reg 33 (3), clause 3.5.2.2 AGA Code	Trading Licence clause 5.1, Distribution Licence clause 5.1	5	✓						✓					
91	Energy Coordination (Customer Contract) Reg 42	Trading Licence clause 5.1	4	✓										✓	
96	Energy Coordination Act section 11M	Trading Licence clause 16.2	4	✓						✓					

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Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)						
				A	B	C	D	NP	1	2	3	4	NR	NA	
97	Energy Coordination Act section 11M	Trading Licence clause 16.4	4	✓						✓					
98	Energy Coordination Act section 11M	Trading Licence clause 17	NA												✓
99	Energy Coordination Act section 11M	Trading Licence clause 20	5	✓						✓					
100	Energy Coordination Act section 11M	Trading Licence clause 21.1	5	✓						✓					
101	Energy Coordination Act section 11M	Trading Licence clause 22.1	4	✓						✓					
102	Energy Coordination Act section 11M	Trading Licence clause 23.1	1	✓							✓				
103	Energy Coordination Act section 11M	Trading Licence clause 24	5	✓						✓					

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Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)						
				A	B	C	D	NP	1	2	3	4	NR	NA	
106	Energy Coordination Act section 11M	Trading Licence clause 12.2	5	✓										✓	
107	Energy Coordination Act section 11M	Trading Licence clause 12.3	5	✓										✓	
108	Energy Coordination Act section 11M	Trading Licence clause 13.1	5	✓						✓					
109	Energy Coordination Act section 11M	Trading Licence Clause 15.1 and 15.2	NA												✓
110	Energy Coordination Act section 11M	Trading Licence Schedule 3 clause 1.5	5	✓										✓	
111	Energy Coordination Act section 11M	Trading Licence Schedule 3 clause 1.7	5	✓										✓	
112	Energy Coordination Act section 11M	Trading Licence Schedule 3 clause 2.1 to 2.2	NA	✓											✓
113	Energy Coordination Act section 11M	Trading Licence Schedule 3 clause 3.1	5	✓						✓					
114	Energy Coordination Act section 11ZPP	Trading Licence Clause 19.1.	2	✓						✓					
115	Energy Coordination Act sections 11ZPP and 11M	Trading Licence clause 19.2	2	✓						✓					

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Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)						
				A	B	C	D	NP	1	2	3	4	NR	NA	
116	Energy Coordination Act section 11ZPP Code of Conduct clause 2.1	Trading Licence clause 19.1	1			✓					✓				
117	Energy Coordination Act section 11ZPP Code of Conduct clause 2.2	Trading Licence clause 19	5	✓						✓					
118	Energy Coordination Act section 11ZPP Code of Conduct clause 2.3(1)	Trading Licence clause 19	NA												✓
119	Energy Coordination Act section 11ZPP Code of Conduct clause 2.3(2)	Trading Licence clause 19	NA												✓
120	Energy Coordination Act section 11ZPP Code of Conduct clause 2.3(3)	Trading Licence clause 19	NA												✓
121	Energy Coordination Act section 11ZPP Code of Conduct clause 2.4(1)	Trading Licence clause 19	2	✓						✓					
122	Energy Coordination Act section 11ZPP Code of Conduct clause 2.4(2)	Trading Licence clause 19	2	✓						✓					
123	Energy Coordination Act section 11ZPP Code of Conduct	Trading Licence clause 19	2	✓						✓					

Appendix 2 – Compliance Summary LPG

Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)						
				A	B	C	D	NP	1	2	3	4	NR	NA	
	clause 2.4(3)														
124	Energy Coordination Act section 11ZPP Code of Conduct clause 2.4(4)	Trading Licence clause 19	2	✓						✓					
125	Energy Coordination Act section 11ZPP Code of Conduct clause 2.5(1)	Trading Licence clause 19	4	✓						✓					
126	Energy Coordination Act section 11ZPP Code of Conduct clause 2.5(2)	Trading Licence clause 19	NA												✓
127	Energy Coordination Act section 11ZPP Code of Conduct clause 2.5(3)	Trading Licence clause 19	4	✓						✓					
128	Energy Coordination Act section 11ZPP Code of Conduct clause 2.6(1)	Trading Licence clause 19	5	✓						✓					
129	Energy Coordination Act section 11ZPP Code of Conduct clause 2.6(2)	Trading Licence clause 19	5	✓						✓					
130	Energy Coordination Act section 11ZPP Code of Conduct clause 2.6(3)	Trading Licence clause 19	5	✓						✓					

Appendix 2 – Compliance Summary LPG

Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)						
				A	B	C	D	NP	1	2	3	4	NR	NA	
131	Energy Coordination Act section 11ZPP Code of Conduct clause 2.7	Trading Licence clause 19	5	✓						✓					
132	Energy Coordination Act section 11ZPP Code of Conduct clause 2.8(1)	Trading Licence clause 19	5	✓						✓					
133	Energy Coordination Act section 11ZPP Code of Conduct clause 2.8(2)	Trading Licence clause 19	2	✓						✓					
134	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 3.1(1)	2			✓				✓					
135	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 3.1(2)	1				✓				✓				
136	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.1(a)	2	✓						✓					

Appendix 2 – Compliance Summary LPG

Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)						Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA	
137	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.1(b)	2	✓						✓					
138	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.2(1)	NA												✓
139	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.2(2)	NA												✓
140	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.2(3)	NA												✓
141	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.2(4)	NA												✓

Appendix 2 – Compliance Summary LPG

Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)						
				A	B	C	D	NP	1	2	3	4	NR	NA	
142	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.2(5)	NA												✓
143	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.2(6)	NA												✓
144	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.3(1)	NA												✓
145	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.3(2)	NA												✓
146	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.4	5	✓						✓					

Appendix 2 – Compliance Summary LPG

Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)						
				A	B	C	D	NP	1	2	3	4	NR	NA	
147	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.5(1)	2	✓						✓					
148	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.5(2)	5	✓						✓					
149	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.5(3)	3				✓					✓			
150	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.6(1)	2		✓					✓					
151	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.6(2)	5	✓						✓					
152	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.7(1)	2	✓						✓					

Appendix 2 – Compliance Summary LPG

Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)						Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA	
153	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.7(2)	3	✓						✓					
154	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.8(1)	4			✓				✓					
155	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.8(2)	1		✓						✓				
156	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.8(3)	5		✓					✓					
157	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.9	5	✓						✓					
158	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.10	5			✓				✓					

Appendix 2 – Compliance Summary LPG

Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)						Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA	
159	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.11(1)	5			✓				✓					
160	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.11(2)	NA												✓
161	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.12(1)	NA												✓
162	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.12(2)	4	✓						✓					
163	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.13	NA												✓
164	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.14(1)	2	✓						✓					

Appendix 2 – Compliance Summary LPG

Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)						Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA	
165	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.14(2)	5	✓						✓					
166	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.15	NA												✓
167	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium Clause 4.16(1)(a)	4	✓										✓	
168	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.16(1)(b)	4		✓									✓	
169	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.16(2)	5		✓									✓	
170	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.16(3)	5		✓									✓	

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Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)						Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA	
171	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.17(2)	5		✓									✓	
172	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.18(2)	5		✓					✓					
173	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.18(3), 4.18(5)	5		✓					✓					
174	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.18(4), 4.18(5)	5		✓					✓					
175	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.18(6)	NA												✓

Appendix 2 – Compliance Summary LPG

Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)						Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA	
176	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.19(1)	4		✓					✓					
177	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.19(2)	4		✓									✓	
178	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.19(3), 4.19(6)	4	✓										✓	
179	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.19(4), 4.19(6)	5		✓									✓	
180	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.19(5)	5		✓					✓					

Appendix 2 – Compliance Summary LPG

Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)						Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA	
181	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.1	1			✓						✓			
182	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.2	5		✓					✓					
183	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.3	2	✓						✓					
184	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.4	5	✓						✓					
185	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.5	5	✓						✓					
186	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.6(1)	5	✓						✓					

Appendix 2 – Compliance Summary LPG

Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)						Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA	
187	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.6(2)	2		✓					✓					
188	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.6(3)	2	✓						✓					
189	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.6(4)	5	✓						✓					
190	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.7(1)	4	✓										✓	
191	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.7(2)	5	✓						✓					
192	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.7(3)	5	✓						✓					

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Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)						Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA	
193	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.7(4)	4		✓					✓					
194	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.8(1)	5	✓						✓					
195	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.8(2)	5	✓						✓					
196	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.8(3)	5	✓						✓					
197	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.9	NA												✓
198	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause	5	✓						✓					

Appendix 2 – Compliance Summary LPG

Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)						
				A	B	C	D	NP	1	2	3	4	NR	NA	
		6.1(1)													
199	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.1(2)	5	✓						✓					
200	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.1(3)	5	✓						✓					
201	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.2(1)	5	✓										✓	
202	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.2(2)	5	✓						✓					
203	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.2(3)	5	✓						✓					

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Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)						
				A	B	C	D	NP	1	2	3	4	NR	NA	
204	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.3(1)	5	✓						✓					
205	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.4(1)	5	✓						✓					
206	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.4(2)	5	✓						✓					
207	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.4(3)	5	✓						✓					
208	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.6(1)	5	✓						✓					

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Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)						Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA	
209	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.6(2)	5	✓						✓					
210	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.7	5	✓						✓					
211	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.8	5	✓						✓					
212	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.9(1)	5	✓										✓	
213	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.9(2)	5	✓										✓	
214	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium	5	✓						✓					

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Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)						
				A	B	C	D	NP	1	2	3	4	NR	NA	
		clause 6.10(1)													
215	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(2)	5		✓					✓					
216	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(3)	5	✓						✓					
217	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(4)	5	✓						✓					
218	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(5)	5	✓						✓					
219	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium	5	✓						✓					

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Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)						
				A	B	C	D	NP	1	2	3	4	NR	NA	
		clause 6.10(6)													
220	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(7)	5	✓						✓					
221	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.11	5	✓						✓					
222	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 7.1	2		✓					✓					
223	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 7.2(1)	5		✓					✓					
224	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 7.3	NA												✓

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Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)						
				A	B	C	D	NP	1	2	3	4	NR	NA	
225	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 7.4	NA												✓
227	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Distribution Licence clause 2.1 and Schedule 2 Compendium clause 7.6	5		✓					✓					
228	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 8.1(1)	5		✓					✓					
229	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 8.1(2)	2	✓						✓					
230	Energy Coordination Act section 11M	Distribution Licence clause 2.1 and Schedule 2 Compendium clause 8.2	5		✓					✓					

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Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)						Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA	
231	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.1(1)	2	✓						✓					
232	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.1(2)	NA												✓
233	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.1(3)	NA												✓
234	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.2(1)	5	✓										✓	
235	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.2(2)	5	✓										✓	
236	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.2(3)	5	✓										✓	

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Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)						Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA	
237	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.2(4)	5	✓						✓					
238	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.3	NA												✓
239	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.4	5		✓					✓					
240	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.5	NA												✓
241	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.5A(1)	4	✓										✓	

Appendix 2 – Compliance Summary LPG

Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)						
				A	B	C	D	NP	1	2	3	4	NR	NA	
242	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.5A(2)	4	✓										✓	
243	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.5A(3)	4		✓					✓					
245	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.9	5	✓						✓					
246	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.10(1)	5	✓						✓					
247	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.10(2)	5	✓						✓					

Appendix 2 – Compliance Summary LPG

Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)						Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA	
248	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.10(3)	5	✓						✓					
249	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.11(1)	5	✓						✓					
250	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.11(2)	4	✓						✓					
251	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.1(1)	4	✓						✓					
252	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.1(2)(a) and (b)	4	✓						✓					

Appendix 2 – Compliance Summary LPG

Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)						
				A	B	C	D	NP	1	2	3	4	NR	NA	
253	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium Clause 12.1(2)(c) and (d)	5	✓						✓					
254	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.1(3)(a)	5	✓						✓					
255	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.1(3)(b)	5	✓						✓					
256	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.2	5	✓						✓					
257	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.3	5	✓						✓					

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Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)						
				A	B	C	D	NP	1	2	3	4	NR	NA	
258	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.4	5	✓						✓					
259	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.1(1)	5	✓						✓					
260	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.1(2)	5	✓						✓					
262	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.2(a)(i)-(xv)	5	✓						✓					
263	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium Clause 13.2(b)(i)-(ix)	5	✓						✓					

Appendix 2 – Compliance Summary LPG

Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)						
				A	B	C	D	NP	1	2	3	4	NR	NA	
264	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.2(c)	NA												✓
265	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.3(1)	4	✓						✓					
266	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.3(2)	4	✓						✓					
267	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.5	2	✓						✓					
268	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.6	2	✓						✓					

Appendix 2 – Compliance Summary LPG

Compliance Obligation Reference No.(Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)						Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)					
				A	B	C	D	NP	1	2	3	4	NR	NA	
275	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.15	5	✓						✓					
277	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.17(1)	1	✓							✓				
278	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.17(2)	5	✓						✓					
279	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.17(3)	1	✓							✓				

Appendix 2 – Compliance Summary LPG

Compliance Obligation Reference No. (Refer Electricity or Gas Compliance Reporting Manual)	Obligations Under	Licence Conditions	Audit Priority Applied (rated 1 (Highest) to 5 (Lowest))	Adequacy of Controls Rating (Refer to the 4-point rating scale in Table 6 for details) (NP = Not Performed)					Compliance Rating (Refer to the 4-point rating scale in Table 6 for details)							
				A	B	C	D	NP	1	2	3	4	NR	NA		
280	Energy Coordination Act section 11M	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.18	1	✓							✓					

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The following sets out the audit findings as they relate to NG. The obligations are listed as they appear in the May 2014 Gas Compliance Reporting Manual.

Item 1 Trading Licence Clause 4.1		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11Q(1-2)</i> A licensee must pay the applicable fees in accordance with the regulations (Energy Coordination (Licensing Fees) Regulations Clause 4&5).		
Verification/Tests Inquiry with Regulatory Manager Observation of the Regulatory and Compliance Handbook		
Observations Through discussion with the Regulatory Manager and review of section 5.2 of the licensee's Regulatory and Compliance Handbook, it was noted that annual licencing fees are required to be paid during the month of September, on the eve of the issue date of licence. Payment is made following receipt of the applicable invoice from the Authority in accordance with the Licensee's accounts payable process through Oracle. Through inquiry with the Regulatory Manager, it was noted that the licensing fee due during the audit period was paid in accordance with the above. It was further noted that, if the Regulatory Manager had not received an invoice from the Authority by the end of July, the licensee would contact the Assistant Director of Licencing at the Authority to request an invoice. Based on the above, we noted that there were sufficient controls in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 2 Trading Licence Clause 12.1		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11WG(1)</i> A licensee must, subject to the regulations, not supply gas to a customer other than under a standard form or non-standard contract.		
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Move In procedures		
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that documented procedures, the Create a NG Residential Account in Oracle and the Create a New Small and Medium Enterprise ("SME") Account in Oracle procedures, detail the process to be followed when supplying gas to both new residential and SME NG customers. The procedures require a new contract to be created in the Licensee's system which will not allow an account to be created, and gas to therefore be supplied, until a Standard Form Contract or Non-Standard Form Contract has been selected. Training materials provided to customer service team members further state that new customers must choose a supply plan when signing up. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 3 Trading Licence Clause 13.1		Compliance rating –Not Rated
<i>Energy Coordination Act section 11WI(2)</i> A Licensee must comply with a direction given to the licensee under section 11WI.		
Verification/Tests Inquiry with Regulatory Manager		
Observations In accordance with section 11WI, it was noted that, if in the opinion of the Authority, a standard form contract no longer meets the requirements of the regulations or is no longer consistent with the Energy Coordination Act, any written law or any term, condition or provision of the licence concerned, the Authority may direct the holder of the trading licence to submit an appropriate amendment to the form for approval by the Authority within a specified period. Through inquiry with the Regulatory Manager, there were no requests for amendments to the standard form contract during the audit period, however, in the event that there is a request for amendments, the licensee will review and make amendments for any directions from the Authority to submit an amendment to the standard form contract within a specified period. It was further noted that, for communication purposes, a list of contacts of the licensee is maintained with the Authority and any key contacts at the Authority is conversely listed in the licensee's Regulatory and Compliance Handbook.		

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Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 4 Trading Licence Clause 5.1	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11WK(1-2)</i> Gas is deemed to be supplied under the standard form contract if a customer commences to take a supply of gas at premises without entering into a contract with the holder of a trading licence.	
Verification/Tests Inquiry with Regulatory Manager	
Observations Through inquiry with the Regulatory Manager, it was noted that during the audit period, all customers entered into contracts for supply of gas. It was noted that if a customer does not sign up under a standard form contract and there have been gas meter readings indicating a supply of gas, the Customer Service Team would create an owner/occupier account in Oracle, thus automatically setting these customers up under standard form contracts. Gas will then be deemed to be supplied under the standard form contract until the customer requests otherwise.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 5 Trading Licence Clause 5.1	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11Wk(1-2)</i> A standard form contract continues in force until it is terminated or supply becomes subject to a non-standard contract with the supplier.	
Verification/Tests Inquiry with Regulatory Manager Observation of NG disconnection procedures	
Observations Through inquiry with the Regulatory Manager, it was noted that standard form contracts continue in force until a disconnection strategy is in place to terminate gas or when supply becomes subject to a non-standard contract. The licensee's gas disconnection procedures specify the types of disconnection strategies and these include disconnections that can be requested by the customer or initiated by the licensee due to customer non-payment, denying of access to meters by customers and where properties are vacant but gas has been used. Based on discussions and confirmed through our walk through procedures, we noted that there are controls in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 6 Trading Licence Clause 5.1	Compliance rating –Not Rated
<i>Energy Coordination Act section 11X(3)</i> A licensee must take reasonable steps to minimise the extent of the duration of any interruption, suspension or restriction of the supply of gas due to an accident, emergency, potential danger or other unavoidable cause.	
Verification/Tests Discussion with Regulatory Manager Observation of the Gas Continuation Policy	
Observations The Regulatory Manager informed that, where possible, the licensee will take reasonable steps to minimise the interruption, suspension or restriction through the guidance set out in the licensee's Gas Continuation Policy. The policy is available to Customer Service Team members via the licensee's intranet and describes the necessary actions in the event of an unplanned shutdown or when gas supply is curtailed. It includes the use of banking provisions and trades to minimise overall charges and maximise future supply opportunities. Specifically, the policy provides for actions in relation to supply interruptions including curtailment, out of specification gas, force majeure and plant shutdown. Further, all interruptions, suspensions or restrictions will be communicated to the leadership team and the progress of reconnection would be monitored. The Regulatory Manager confirmed that there were no unavoidable causes, accidents, emergencies or potential dangers during the	

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audit period that caused interruption, suspension or restriction of gas supplies, however, should there be any cases, the licensee's Gas Continuation Policy sets out the procedures for the management of interruptions.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 10 Trading Licence Clause 16.1	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11ZA(1)</i> A licensee must provide the Authority with a performance audit by an independent expert acceptable to the Authority within 24 months of commencement and every 24 months thereafter (or longer if the Authority allows).	
Verification/Tests Inquiry with Regulatory Manager Observation of the Regulatory and Compliance Handbook	
Observations Through discussion with the Regulatory Manager, it was noted that the Authority sends the licensee letters outlining the requirements for audits a few months prior to audits. The licensee also maintains logs with details of the next audit required and any findings identified during the period audit. The licensee works towards complying with the guidelines set by the Authority and submissions of performance audit reports are made at the end of November, following the finalising of the report. The licensee's Regulatory and Compliance Handbook includes the requirement to conduct a performance audit every 24 months or unless otherwise notified by the Authority and makes reference to the Audit and Review Guidelines: Electricity and Gas Licence. KPMG was appointed with the Authority's approval to undertake the performance audit for the period 1 September 2012 to 31 August 2014. Based on the above observations, it was concluded that there are sufficient processes currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 19 Trading Licence Clause 18.1	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11ZOR(2)</i> A licensee that sells gas that is transported through a distribution system must be a member of an approved retail market scheme if a scheme is in force.	
Verification/Tests Inquiry with Regulatory Manager Observation of REMCo website	
Observations Through inquiry with the Regulatory Manager and observation of the REMCo's Gas Retail Market Participant's site, it was noted that the licensee is a member of REMCo WA Gas Market Operator. Additionally, on an annual basis, the licensee engages an independent audit firm to undertake a negative assurance audit of the licensee's compliance with the REMCo rules. Based on the above observation, it was concluded that the licensee is a member of an approved retail market scheme.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 20 Trading Licence Clause 5.1	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11ZOV(1)</i> A licensee must not engage in prohibited conduct relating to the operation of a retail market scheme.	
Verification/Tests Inquiry with Regulatory Manager	
Observations Through inquiry with the Regulatory Manager, it was noted that there have been no previous breaches against the licensee in relation to prohibited conduct. Any activities not covered by the licensee's procedures are referred to team leaders. Should team leaders not be able to make a determination based on a review of the Compendium, these activities will be escalated to the Regulatory Manager. The Regulatory Manager of the licensee also sits on the Rule Change Committee, chaired by the CEO of REMCo, where the meeting is used as a forum to discuss or report on any breaches. Therefore, it was concluded that adequate controls are in place.	

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Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 21	Compliance rating
Trading Licence Clause 5.1	1 - Compliant
<i>Energy Coordination Act section 11ZOV(2)</i> A licensee must not assist another party to engage in prohibited conduct relating to the operation of a retail market scheme.	
Verification/Tests Inquiry with Regulatory Manager	
Observations Through inquiry with the Regulatory Manager, it was noted that there have been no breaches against the licensee in relation to prohibited conduct. Any activities not covered by the licensee's procedures are referred to team leaders. Should team leaders not be able to make a determination based on a review of the Compendium, these activities will be escalated to the Regulatory Manager. It was further noted that the Regulatory Manager of the licensee also sits on the Rule Change Committee, chaired by the CEO of REMCo, where the meeting is used as a forum to discuss or report on any breaches. Therefore, it was concluded that adequate controls are in place.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 22	Compliance rating
Trading Licence Clause 5.1	-Not Rated
<i>Energy Coordination Act section 11ZOZ(3)</i> A licensee, as a member of a retail scheme, must comply with a direction given to it by the Authority to amend the scheme, and to do so within a specified time.	
Verification/Tests Inquiry with Regulatory Manager	
Observations Through inquiry with the Regulatory Manager, it was noted that, as a member of the REMCo WA Gas Market Operator, all directions from the Authority to amend the scheme will be done accordingly and within the specified timeframe. Additionally, on an annual basis, the licensee engages an independent audit firm to undertake a negative assurance audit of the licensee's compliance with the REMCo rules. It was noted that there has been no direction from the Authority to amend the scheme during the audit period, however, there is adequate controls in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 24	Compliance rating
Trading Licence Clause 18.1	1 - Compliant
<i>Energy Coordination Act section 11ZQH</i> The licensee must not supply gas to customers unless the licensee is a member of an approved Gas Industry Ombudsman Scheme and is bound by any decision or direction of the ombudsman under the Scheme.	
Verification/Tests Interviewed Customer Advocacy Manager Examined payment ledger for annual levy payment Customer Advocacy Procedure	
Observations The Licensee is a member of the Energy Industry Ombudsman Western Australia. Payment ledger entries were obtained and it was confirmed that the licensee has paid the required fee. The Licensee automatically renews their yearly membership through the standard bill payment process to ensure currency of their membership. The Licensee has strict Customer Advocacy policies that are adhered to by the Customer Advocacy Team.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

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Item 29 Trading Licence Clause 5.1		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M; Energy Coordination (Gas Tariffs) Regulations 2000 reg. 5 (1)</i> A licensee supplying gas in an area referred to in Regulation 3(a), (b), or (c) is required to have at least one capped tariff for any supply of gas in that area.		
Verification/Tests Inquiry with the Regulatory Manager Observation of Standard Form Contract Prices and Capped Tariffs		
Observations Through inquiry with the Regulatory Manager, it was noted that the licensee does not supply gas to Albany and the Kalgoorlie- Boulder areas. Therefore, Regulation 3(b) and (c) are not applicable to the licensee. In accordance with Regulation 3(a) and through observation of the licensee's standard form contract pricing and the capped tariffs set by the Department of Finance, it was noted that the licensee's standard form contract prices for the supply of NG in Mid-West and South West areas are at the capped tariffs. Tariffs cannot be amended within the licensee's system without the appropriate approval. It was noted that the Sales Online and Oracle systems do not cap tariffs. The licensee's pricing team will update tariffs in the system upon receiving approval from the appropriate manager. If the documentation received by the pricing team does not have the appropriate approvals, no updates are made until approvals have been obtained. It was concluded, therefore, that the licensee has supplied gas in the Mid-West and South West areas at a capped tariff.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 30 Trading Licence Clause 5.1		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M; Energy Coordination (Gas Tariffs) Regulations 2000 reg. 6(2)</i> A licensee is required to offer to supply gas to each of its existing standard contract customers under the terms of the customer's existing contract but at a capped tariff unless the existing contract already entitles the customer to be supplied at a capped tariff.		
Verification/Tests Inquiry with the Regulatory Manager Observation of Standard Form Contract Prices and Capped Tariffs		
Observations Through inquiry with the Regulatory Manager and observation of the licensee's standard form contract pricing and the capped tariffs set by the Department of Finance, it was noted that the licensee's standard form contract prices for the supply of NG to existing standard contract customers in Mid-West and South West areas are at the capped tariffs. Based on the above, it was concluded that the licensee has supplied gas to standard contract customers at a capped tariff.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 31 Trading Licence Clause 5.1		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M; energy Coordination (Gas Tariffs) Regulations 2000 reg. 6(4)</i> When offering to supply gas to a new customer under a standard form contract, a licensee is to offer to supply gas at a capped tariff.		
Verification/Tests Inquiry with the Regulatory Manager Observation of Standard Form Contract Prices and Capped Tariffs		
Observations Through inquiry with the Regulatory Manager and observation of the licensee's standard form contract pricing and the capped tariffs set by the Department of Finance, it was noted that the licensee's standard form contract prices for the supply of NG to new standard contract customers in Mid-West and South West areas are at the capped tariffs. Based on the above observations, it was concluded that there are sufficient processes currently in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 32 Trading Licence clause 5.1		Compliance rating Not Rated
<i>Energy Coordination (Customer Contracts) Reg 12 (2)</i> Except in prescribed circumstances, a licensee must not disconnect or cause disconnection to occur if — (a) a customer has provided		

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to the licensee a written statement from a medical practitioner to the effect that supply is necessary in order to protect the health of a person who lives at the customer's supply address; and (b) the customer has entered into arrangements acceptable to the licensee in relation to payment for gas supplied.	
Verification/Tests Discussion with the Credit Team Leader Review of the NG Disconnection Procedure	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee will not disconnect supply if a written statement from a medical practitioner has been supplied or if the customer has entered into arrangements that the licensee deems acceptable. A copy of the NG Disconnection Procedure was also provided by the Credit Team Leader, it includes the circumstances that may allow exceptions to customer disconnections due to non-payment. These include: payment difficulty, financial hardship, complaint, medical statement selected on the account and valid payment arrangements. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 33 Trading Licence Clause 5.1	Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 12 (4)(a)</i> Before disconnecting supply for non-payment of a bill, a licensee must give a written reminder notice to a customer not less than 14 business days after the day on which a bill was issued advising the customer that payment is overdue and requiring payment to be made on or before the day specified in the reminder notice (being a day not less than 20 business days after the billing day).	
Verification/Tests Discussion with the Credit Team Leader Review of NG Written Reminder Notice	
Observations Through inquiry with the Credit Team Leader, it was noted that before disconnecting the supply of a customer due to non-payment the licensee will send a reminder notice to the customer using their preferred contact method either by mail or email. The reminder notice is issued on the first day the bill is deemed to be overdue. The reminder notice states that the overdue payment needs to be made within 7 days of the date that the notice is received. Automated time schedules are set in the system which will trigger a reminder notice if the bill is still outstanding after 25 days from the date of issue (4 days after the due date) unless the system is updated with alternate payment arrangements. Automated time schedules are set in the system which will trigger a disconnection notice if the bill is still outstanding after 36 days from the date of issue (11 days after the reminder notice is issued) unless the system is updated with alternate payment arrangements. A copy of the NG Written Reminder Notice was provided by the Credit Team Leader, it includes the requirement for payment within 7 days of the notice being received. Based on discussions and through sample testing of 20 items, it was noted that the licensee gives written reminder notice to customers not less than 14 business days after the day on which the bill was issued advising the customers that payments are overdue and specifying that payments are to be made on or before the day specified in the reminder notice i.e. a day not less than 20 business days after the billing day Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 34 Trading Licence Clause 5.1	Compliance rating 1 – Compliant
<i>Energy Coordination (Customer Contracts) Reg 12 (4)(b)</i> Before disconnecting supply for non-payment of a bill, a licensee must give a disconnection warning to a customer not less than 22 business days after the billing day advising the customer that disconnection will occur unless payment is made on or before the day specified in the disconnection warning (being a day not less than 10 business days after the day on which the disconnection warning is given).	
Verification/Tests Discussion with the Credit Team Leader Review of the NG Disconnection Notice	
Observations Through inquiry with the Credit Team Leader, it was noted that prior to disconnection of supply due to non-payment of a bill, the licensee will issue a disconnection notice to the customer not less than 22 business days after the billing day advising the customer	

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that disconnection will occur. The Credit Team Leader provided us with a copy of the NG Disconnection Notice, it includes the requirement that disconnection will occur unless payment is made on or before the day specified in the disconnection warning (being a day not less than 10 business days after the day on which the disconnection warning is given. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 35	Compliance rating
Trading Licence Clause 5.1	1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 12 (5)(a)</i> A licensee must reconnect supply to a customer within 10 business days after disconnection for non-payment of a bill if the customer pays the overdue amount or makes an arrangement for its payment and the customer has paid any applicable reconnection fee.	
Verification/Tests Discussion with the Credit Team Leader Review of the NG Reconnection Procedure	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee reconnects supply to the customer within 10 business days after the customer pays the overdue amount or agrees on a payment arrangement. The Credit Team Leader also provided us with a copy of the NG Reconnection Procedure, this includes the requirement to request for reconnection of supply no later than the next business day after payment has been received, and ATCO must then reconnect the customer's supply. There have been 106 reconnections during the period. Based on a testing of one item, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 36	Compliance rating
Trading Licence Clause 5.1	–Not Rated
<i>Energy Coordination (Customer Contracts) Reg 12 (5)(b)</i> A licensee must reconnect supply to a customer within 10 business days after disconnection for denial of access to a meter, if the customer provides access to the meter and the customer has paid any applicable reconnection fee.	
Verification/Tests Discussion with the Credit Team Leader Observation of the NG Reconnection Procedure	
Observations Through inquiry with the Credit Team Leader, it was noted that no meters were disconnected due to denial of meter access during the audit period. Should the distributor intend to perform a special read, the licensee would need to be contacted first. The Credit Team Leader provided a copy of the NG Reconnection Procedure, it was noted this requirement was not stated in the licensee's NG Reconnection Procedure.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	Not Rated
Opportunity for Improvement The NG Reconnection Procedure should be updated to include the requirement to reconnect supply to a customer within 10 business days after disconnection for denial of access to a meter, if the customer provides access to the meter and the customer has paid any applicable reconnection fee. This will ensure the licensee operates within the requirements of the obligation and no customer is incorrectly left disconnected.	

Item 37	Compliance rating
Trading Licence Clause 5.1	1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 12 (5)(c)</i> A licensee must reconnect supply to a customer within 10 business days after disconnection for unlawful consumption of gas, if the customer pays for the gas consumed and the customer has paid any applicable reconnection fee.	
Verification/Tests Discussion with Credit Team Leader Observation of NG Reconnection Procedure	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee reconnects the customer's supply within 10 business days once the customer has paid for the unlawful gas they consumed and any applicable fees. The Credit Team Leader provided a copy of the NG Reconnection Procedure, it was noted this requirement was not stated in the licensee's NG Reconnection Procedure.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed

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Rating	
Compliance Rating	1 – Compliant
Opportunity for Improvement	
The NG Reconnection Procedure should be updated to include the requirement to reconnect supply to a customer within 10 business days after disconnection for unlawful consumption of gas, if the customer pays for the gas consumed and the customer has paid any applicable reconnection fee. This will ensure the licensee operates within the requirements of the obligation and no customer is incorrectly left disconnected.	

Item 39	Compliance rating
Trading Licence Clause 5.1	–Not Rated
<i>Energy Coordination (Customer Contracts) Reg 12 (5)(e)</i>	
A licensee must reconnect supply to a customer within 20 business days after disconnection in an emergency situation or for health, safety or maintenance reasons if the situation or problem giving rise to the need for disconnection has been rectified and if the customer has paid any applicable reconnection fee.	
Verification/Tests	
Discussion with the Customer Service Team Leader and Customer Service Supervisor	
Observations	
Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that no instances of NG reconnections after an emergency disconnection have yet occurred. As a result, no procedures have yet been developed that detail the action to be taken in these circumstances, however reconnection would generally commence as soon as payment has been made along with any reconnection fee.	
Adequacy of Controls Rating	C – Inadequate controls – significant improvement required
Compliance Rating	Not Rated
Corrective Action	
Procedures should be created that detail the process to be followed in regards to reconnections occurring after a disconnection in an emergency situation or for health, safety or maintenance reasons.	

Item 40	Compliance rating
Trading Licence Clause 5.1	1 – Compliant
<i>Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.1.2 AGA Code</i>	
A licensee must not disconnect supply to a customer who is unable to pay until: alternative payment options have been offered to the customer; the customer is given information on government funded concessions; it has used its best endeavours to contact the customer; and it has provided the customer a written notice of its intention to disconnect at least 5 business days prior to the disconnection date, and the customer has refused to accept the alternative payment option or failed to make payments under it.	
Verification/Tests	
Discussion with the Credit Team Leader Review of the NG Disconnection Procedure Review of the NG Disconnection Notice	
Observations	
Through inquiry with the Credit Team Leader, it was noted that the licensee will not disconnect a customer due to non-payment until alternative payment options have been offered. The Licensee will use their best endeavours to contact the customer over the phone and inform them of government concession and alternative payment options. The Credit Team Leader provided a copy of the NG Disconnection Notice, this notice includes the options to contact the licensee to arrange alternative options if payment cannot be made on time. The Disconnection Notice is issued to the customer 10 days prior to the disconnection date. The Credit Team Leader also provided a copy of the NG Disconnection Procedure, this includes all the consideration that are to be taken into account, and that disconnection is not made if the customer has applied for financial hardship or payment difficulty. There were 196 disconnections due to failure to pay during the period. Based on our sample testing it was noted that the licensee is compliant. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 41	Compliance rating
Trading Licence Clause 5.1	1 – Compliant
<i>Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.1.3 AGA Code</i>	
A licensee must not disconnect supply to a business customer until: it has used its best endeavours to contact the customer; it has offered the customer an extension of time to pay the bill; and it has provided the customer a written notice of its intention to disconnect at least 5 business days' notice prior to the disconnection date, and the customer has refused to accept the alternative payment option or failed to make payments under it.	
Verification/Tests	
Discussion with the Credit Team Leader Review of the NG Disconnection Procedure	

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Review of the NG Disconnection Notice	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee will not disconnect a customer until they have made their best efforts to contact the customer over the phone and that all alternate payment options have been discussed. This includes offering extension of time to make payments if the customer is experiencing payment difficulties or financial hardship. The Credit Team Leader provided a copy of the NG Disconnection Procedure, it states that the licensee will not disconnect a customer if they have been contacted and are considered to be in financial hardship, payment difficulties or in a complaint process. The Credit Team Leader also provided a copy of the NG Disconnection Notice, it states the licensee's intentions to carry out a disconnection if payment is not made within the 10 days following the issue of the notice. There were 196 disconnections due to failure to pay during the period. Based on our sample testing it was noted that the licensee is compliant. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 42 Trading Licence Clause 5.1	Compliance rating –Not Rated
<i>Energy Coordination (Customer Contracts) Reg 12 (6), Clauses 5.1.2.1 & 5.1.2.2 AGA Code</i> A licensee must not disconnect supply to a customer who denies access to a meter until: the customer has refused access on at least 3 concurrent billing cycles, the customer is given the option to offer alternative access arrangements, the customer is provided written advice on each occasion access was denied, the licensee has used its best endeavours to contact the customer and the licensee has provided the customer a written notice of its intention to disconnect at least 5 business days prior to the disconnection date.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that the licensee has not yet issued a disconnection notice as a result of being denied access to a meter. As a result, no procedures have yet been developed that detail the action to be taken in these circumstances, however the distributor would generally contact the licensee to arrange a special read.	
Adequacy of Controls Rating	C – Inadequate controls – significant improvement required
Compliance Rating	Not Rated
Corrective Action Procedures should be created that detail the process to be followed in regards to disconnecting supply to a customer who denies access to a meter.	

Item 43 Trading Licence Clause 5.1	Compliance rating –Not Rated
<i>Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.1.3 AGA Code</i> A licensee who disconnects in the event of an emergency must provide a 24 hour information service, estimate the time when gas supply will be restored and use best endeavours to restore supply when the emergency is over.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that no disconnections in the event of an emergency have yet occurred. As a result, no procedures have yet been developed that cover off the obligations. The licensee has advised that if an emergency disconnection were to occur, appropriate action would be taken as necessary.	
Adequacy of Controls Rating	C – Inadequate controls – significant improvement required
Compliance Rating	Not Rated
Corrective Action Procedures should be created that detail the process to be followed in regards to disconnections in the event of an emergency.	

Item 44 Trading Licence Clause 5.1	Compliance rating –Not Rated
<i>Energy Coordination (Customer Contracts) Reg 12 (6), Clauses 5.1.4.1 & 5.1.4.2 AGA Code</i> A licensee who disconnects supply for health and safety reasons must provide the customer written notice of the reason, allow the customer 5 business days to remove the reason where the customer is able to and after the 5 business days issue a notice to the customer of its intention to disconnect supply at least 5 business days' notice prior to the disconnection date.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that no supply disconnections for health and safety reasons have yet occurred. As a result, no procedures have yet been developed that cover off the obligations.	

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The licensee has advised that if a disconnection for health and safety reasons were to occur, appropriate action would be taken as necessary.	
Adequacy of Controls Rating	C – Inadequate controls – significant improvement required
Compliance Rating	Not Rated
Corrective Action Procedures should be created that detail the process to be followed in regards to disconnections for health and safety reasons.	

Item 45 Trading Licence Clause 5.1	Compliance rating –Not Rated
<i>Energy Coordination (Customer Contracts) Reg 12 (6), Clauses 5.1.5.1 & 5.1.5.2 AGA Code</i> A licensee who disconnects supply for planned maintenance must provide the customer 4 days written notice and have endeavoured to minimise disruption and restore supply.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that no supply disconnections for planned maintenance have yet occurred. As a result, no procedures have yet been developed that cover off the obligations. The licensee has advised if a disconnection for planned maintenance were to occur, appropriate action would be taken as necessary.	
Adequacy of Controls Rating	C – Inadequate controls – significant improvement required
Compliance Rating	Not Rated
Corrective Action Procedures should be created that detail the process to be followed in regards to disconnections for planned maintenance.	

Item 47 Trading Licence Clause 5.1	Compliance rating 1 – Compliant
<i>Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.8.1(a) AGA Code</i> A licensee must not disconnect supply where the bill owing is less than the average bill over the past 12 months and the customer has agreed to pay.	
Verification/Tests Discussion with the Credit Team Leader	
Observations The Credit Team Leader confirmed that the Licensee will not disconnect a customer when the bill owing is less than the average bill over the past 12 months and the customer has agreed to pay. Disconnection will not occur until the licensee has used all means to contact the customer and payment arrangements have been offered. Disconnection will not occur if a payment arrangement has been agreed. The licensee also will not disconnect is the debt owing is under \$100. The requirements of this obligation are documented in the procedures manual that staff refer to when liaising with customers. There were 196 disconnections due to failure to pay during the period. Based on our sample testing it was noted that the licensee is compliant. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 48 Trading Licence Clause 5.1	Compliance rating Not Rated
<i>Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.8.1(a) AGA Code</i> A licensee must not disconnect supply where the issue is the subject of complaint by the customer and is being reviewed externally and is not resolved.	
Verification/Tests Discussion with the Credit Team Leader Review of the NG Disconnection Procedure Review of the Complaints Handling Procedure	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee will not disconnect a customer under circumstances where the issue is the subject of a complaint that is currently being processed and is pending resolution. The Credit Team Leader provided a copy of the NG Disconnection Procedure, this states that customers should not have their supply disconnected when their credit status or credit rating is listed as a complaint in Oracle. A copy of the Complaint Handling Procedure was also provided by the Credit Team Leader, this includes the requirement that the licensee must not arrange for the disconnection of a customer who has a complaint that has gone to an external dispute resolution body which has not yet been resolved. There has been no activity during the audit period to test compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed

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Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 50	Compliance rating
Trading Licence Clause 5.1	Not Rated
<i>Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.8.1(d) 5AGA Code</i> A licensee must not disconnect supply where a customer has failed to pay a debt that is not a direct service charge.	
Verification/Tests Discussion with the Credit Team Leader Review of the NG Disconnection Procedure	
Observations Through inquiry with the Credit Team Leader, it was noted that the Licensee does not disconnect customers that have failed to pay a debt that is not a direct service charge. The Credit Team Leader provided a copy of the NG Disconnection Procedure, which includes this requirement. There has been no activity during the audit period to test compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 51	Compliance rating
Trading Licence Clause 5.1	1 – Compliant
<i>Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.8.1(e) and (f) AGA Code</i> A licensee must not disconnect supply after 3pm on any day; and not on a Friday, weekend or public holiday or on a day before a public holiday unless it is a planned interruption.	
Verification/Tests Discussion with the Credit Team Leader Review of the NG Disconnection Procedure	
Observations Through inquiry with the Credit Team Leader, it was verified that the licensee does not disconnect customers after 3pm on any day; and not on a Friday, weekend or public holiday or on a day before a public holiday unless it is a planned interruption. The Credit Team Leader provided a copy of the NG Disconnection Procedure, and it was noted that this obligation was included. Based on our sample testing of one item it was noted that the licensee is compliant. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 52	Compliance rating
Trading Licence Clause 5.1	2 – Non-compliant
<i>Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.2.2.2 AGA Code</i> If a licensee is under an obligation to reconnect supply and the customer makes a request for reconnection after 3pm on a business day, the licensee shall use best endeavours to reconnect the customer as soon as possible on the next business day.	
Verification/Tests Discussion with the Credit Team Leader Testing of 20 reconnection requests Review of the NG Reconnection Procedure	
Observations Through inquiry with the Credit Team Leader, it was noted that as the licensee is not the distributor, reconnection requests received by customers are forwarded to the distributor for reconnection of supply of gas. Where the customer makes a request for reconnection after 3pm on a business day, the licensee shall use best endeavours to reconnect the customer as soon as possible on the next business day. A copy of the NG Reconnection Procedure was provided for review. It was noted that the specification to reconnect the customer the same business day as the request is received if received before 3pm or as soon as possible the next business day if the request is received after 3pm was included in the document. There have been 106 reconnections during the audit period. 20 samples of reconnection requests were tested and the following were noted: -12 instances where a reconnection request was made before 3pm, however, the reconnection only occurred the next business day. It is acknowledged that the licensee has used best endeavours to communicate the need for a reconnection to the distributor. -One instance where the customer requested a reconnection after 3pm, however, the reconnection was completed 2 business days following the initial request. We acknowledge that whilst the licensee is not the distributor, the licensee did not forward the reconnection request to the distributor until 2 business days later, thus the reconnection was not completed until then. This represents a breach.	
Adequacy of Controls	B – Generally adequate controls – improvement needed

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Rating	
Compliance Rating	2 – Non-compliant – minor impact on customers or third parties
Corrective Action	
It is recommended that the licensee reinforces the requirement to forward reconnection requests to the distributor to ensure that supply of gas is reconnected within the specified timeframe. This can be done via automated reminders or notifications on the system.	

Item 57	Compliance rating
Trading Licence Clause 5.1	1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 14 (3), Clauses 4.1.2.1 & 4.1.2.2 AGA Code</i>	
A licensee must give notice of the tariffs charged and provide these notices to customers without charge upon request.	
Verification/Tests	
Inquiry with Regulatory Manager Observation of notification letters to the customers of tariff charges Observation of tariffs on licensee's website Observation of example of article in the West Australian newspaper	
Observations	
Through inquiry with the Regulatory Manager, it was noted that there were two tariff changes during the audit period, effective 1 July 2013 and 1 August 2014 respectively. This was evidenced in the notifications to customers through the licensee's website, article in the West Australian and by way of letters and/or emails. It was further noted that the notifications are provided to customers upon request at no charge and through observation of the tariff pricing on the licensee's website as well as an example of the posted article in the West Australian newspaper, it was concluded that there are sufficient processes currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 58	Compliance rating
Trading Licence Clause 5.1	1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 14, Clause 4.1.3.1 & 4.1.3.2 AGA Code</i>	
A licensee must give notice of a variation in tariffs charged and provide these notices to customers affected by the change no later than the next bill.	
Verification/Tests	
Inquiry with Regulatory Manager Observation of notification letters to the customers of tariff charges Observation of tariffs on licensee's website Observation of example of article in the West Australian newspaper	
Observations	
Through inquiry with the Regulatory Manager, it was noted that there were two tariff changes during the audit period, effective 1 July 2013 and 1 August 2014 respectively. When the licensee receives notification from the distributor regarding a change in tariffs, the Regulatory Manager gives the Minister 30 days' notice of the increase in tariffs. Customers are notified of changes through the pricing section of the licensee's website, an article in the West Australian and by way of letters and/or emails. These are provided to customers at no charge by no later than the next bill. Through observation of the examples of an article posted in the West Australian, emails and letters sent to the Minister and customers for NG, it was concluded that there are sufficient processes currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 59	Compliance rating
Trading Licence Clause 5.1	1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.1 AGA Code</i>	
A licensee must issue a bill to a customer at least once every 3 months, unless agreed otherwise.	
Verification/Tests	
Inquiry with Credit Team Leader Testing of 20 samples of customer invoice history	
Observations	
Through testing of 20 sample customer invoices, it was noted that there were 19 NG customers who did not receive invoices within 3 months. After discussion with the Credit Team Leader it was noted that all invoices are triggered by meter reads carried out by the distributor and the distributor's obligation is that meter reads must be performed once every 100 days, therefore it is seen that the requirements of the licensee and the distributor are misaligned. A Discoverer Report was provided to us by the Credit Team Leader. It was noted that the licensee runs this exception report monthly to indicate any customers who have not received an invoice within 3	

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months. An additional step when the exception report is run is to investigate any customers who have not received an invoice within 3 months to determine the reason. Based on our sample testing we noted that the licensee issues a bill to a customer at least once every 3 months, unless agreed otherwise. Therefore, it was concluded the licensee is compliant.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement The licensee has noted that this misalignment has been identified as an issue. Therefore, it is recommended that the licensee adjust the terms and conditions to more closely reflect the process carried out by the distributor.	

Item 60 Trading Licence Clause 5.1	Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.3.1, 4.2.3.2 & 4.2.3.3 AGA Code</i> A licensee must prepare a bill in accordance with the terms specified in the AGA code, including the inclusion of any refundable advance.	
Verification/Tests Discussion with the Credit Team Leader Sample testing of 20 NG invoices	
Observations A sample of 20 NG customer invoices were randomly selected. Of the 20 invoices tested, it was noted that NG invoices are in accordance with the requirements of the AGA code. It was noted, that the licensee's Oracle system is configured to print bills containing all of the requirements stipulated in the AGA code. Two samples were noted to not contain previous meter readings (in the form of graphs) on the bill, however, it was noted that these two samples were both business (SME) customers with multiple sites listed on the one account. Through further discussions with the Credit Team Leader, it was noted that graphs showing previous meter readings are not for multi-site invoices. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 61 Trading Licence Clause 5.1	Compliance rating -Not Rated
<i>Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.3.2 AGA Code</i> A licensee must apply payments received from a customer as directed by the customers (if the bill includes charges for other goods and services).	
Verification/Tests Discussion with the Credit Team Leader	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee does not currently offer other goods and services not relating to gas services. However, the Credit Team Leader noted, if in the future the licensee wishes to offer other goods and services, its Oracle systems has the ability to apply received payments as the customers directs them to. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 64 Trading Licence Clause 5.1	Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.4.1 AGA Code</i> A licensee must base a customer's bill on a meter reading and meters must be read at least once per year.	
Verification/Tests Discussion with Credit Team Leader	
Observations Through inquiry with the Credit Team Leader, it was noted that a customer's bill is based on a meter reading performed by the distributor and the distributor aims to perform at least once every 100 days. It was noted, however, that this process is not documented in a policy document. During the audit period, 322 meters were not read: <ul style="list-style-type: none">• Unable to access meter = 188• Savage dog = 81• Other = 53 The licensee advised that there has been instances where they have not received an actual meter read at least annually. This is generally due to denial of access to a meter. The licensee does generate a report to monitor these instances. The licensee staff	

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members have been trained and are aware of the obligation requirements.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement Develop and implement a NG Billing/Invoicing Procedure	

Item 66 Trading Licence Clause 5.1	Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.4.4 AGA Code</i> A licensee, who provides a customer with an estimated bill and is subsequently able to read the meter, must adjust the estimated bill in accordance with the meter reading.	
Verification/Tests Discussion with Credit Team Leader	
Observations Through inquiry with the Credit Team Leader, it was noted that estimated invoices are calculated based on usage during the period of the previous year. This process is managed through the licensee's Oracle system, the amount charged to the customer during the billing period of the previous year is the amount included in the estimated bill. The estimated bills are then adjusted in accordance with the next meter reading. ATCO calculates all NG estimated reads and provides these to the licensee. For existing connections, new customers, ATCO would estimate the read using the historical usage for the property. For new connections, ATCO will use an average gas consumption of 100 mj per day for B3 meters or 550 mj per day for B2 meters to estimate the read. Based on our sample testing, the licensee is compliant. However, there is currently no policy or procedure outlining this process. The licensee staff members have been trained and are aware of the obligation requirements.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement Develop and implement a NG Estimated Billing Procedure	

Item 67 Trading Licence Clause 5.1	Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.4.5 AGA Code</i> A licensee must read a customer's meter upon request and may impose a fee for doing so.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of Special Meter Read procedures	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that documented procedures, the Requesting a Special Meter Read via Oracle, Meter Test and the Requesting a Special Meter Read via Flowtalk procedures, detail the process to be followed when a customer requests a special meter read. As documented, a Special Read Service Request is generated, which triggers the licensee's system to add a fee to the customer's account. There 134 meter read requests during the audit period. Based on the above observations and from testing one sample, it was concluded that processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 68 Trading Licence Clause 5.1	Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.3.2.1</i> AGA Code A licensee must offer payment in person and payment by mail.	
Verification/Tests Discussion with the Credit Team Leader Review of an invoice Review of the Customer Charter	
Observations Through inquiry with the Credit Team Leader, we noted the various payment methods available to customers. Of these methods payments in person at a payment outlet or payment via mail are acceptable. The Credit Team Leader also provided a copy of the Customer Charter which lists all the payment methods, including via mail or in person at payment outlet. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed

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Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 69 Trading Licence Clause 5.1	Compliance rating –Not Rated
<i>Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.3.2.2 AGA Code</i> A licensee must offer customers who are absent for a long period, payment in advance facilities and the option of redirecting the bill.	
Verification/Tests Discussion with the Credit Team Leader	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee provides options to customers for redirection of payment and payment in advance when requested. It was noted that no advance payments were made by any customers this audit period. The requirements of this obligation are documented in the procedures manual that staff refer to when liaising with customers. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 70 Trading Licence Clause 5.1	Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 16 (3)</i> A licensee must not terminate a contract if a customer commits a breach of the contract (other than a substantial breach) unless; (a) the licensee has a right to disconnect supply under the contract, a written law or a relevant code; and (b) the licensee has disconnected supply at all supply addresses of the customer covered by the contract.	
Verification/Tests Inquiry with Regulatory Manager	
Observations Through inquiry with the Regulatory Manager, it was noted that there was one instance where a customer committed a breach of contract this audit period, however, this resulted in a change to Standard Form Contract. The customer breached the Monthly Smart Saver contract by not wanting to be migrated to a Direct Debit plan, despite it being a requirement to maintain a Monthly Smart Saver contract. Based on advice from the licensee's legal counsel, the customer was issued with a written letter providing notice of breach and giving notice that contract would be changed to a Standard Form Contract if they continue to substantially breach the Non-Standard Form Contract. As there was only one instance of breach during the audit period, it was noted that the licensee has complied with this obligation, however, should establish a formal template letter for breaches and ensure that the process for handling customer breaches is formally documented.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement It is recommended that the licensee create a template letter for breaches and formalise the breach of contract process into a procedural document.	

Item 72 Trading Licence Clause 5.1	Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 20 (2) Clause 4.3.5.1 AGA Code</i> A licensee must offer a customer who is experiencing payment difficulties: instalment plan options; right to have bill redirected to third person; information or referral on government assistance programs; and information on independent financial counselling services.	
Verification/Tests Discussion with the Credit Team Leader Review of the Financial Hardship Policy	
Observations Through inquiry with the Credit Team Leader, it was noted that customers experiencing payment difficulties are offered options such as instalment plan options; right to have bill redirected to third person; information or referral on government assistance programs; and information on independent financial counselling services. The Credit Team Leader provided a copy of the Financial Hardship Policy, it was noted that these options are included in the policy. Based on a sample testing of one item it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

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Item 74 Trading Licence Clause 5.1		Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 20 (3) and 48</i> A licensee must not commence legal action in relation to a customer debt if the customer has entered into arrangements to pay and is maintaining this arrangement.		
Verification/Tests Discussion with the Credit Team Leader Review of the Financial Hardship Policy		
Observations Through inquiry with the Credit Team Leader, it was noted that where an alternative payment arrangement is made with a customer, the account is placed 'on-hold' and no legal action commences without a review of the account status. The Credit Team Leader provided a copy of the Financial Hardship Policy, after review, we noted it states that a customer may be shielded from legal action, additional recovery costs and restriction of supply as long as they have agreed to an arrangement and are meeting their commitment to it. Therefore, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 75 Trading Licence Clause 5.1		Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 22 and 49 (2)</i> A licensee must only provide a credit reporting agency with default information relevant to one of their bills.		
Verification/Tests Discussion with the Credit Team Leader Review of Payment Default Procedure		
Observations Through review of the Payment Default Procedure, it was noted that a default is defined as when a debtor has not paid a debt which they are required to have paid and the payment default is listed on a customer's credit file for 5 years. Through discussion with the Credit Team Leader it was noted that when a customer's default is required to be listed on the customer's account then the information relevant to one of their bills must be updated on Veda Advantage, the licensee's credit reporting agency. Therefore, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 76 Trading Licence Clause 5.1		Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 49 (3)</i> A licensee must notify a credit reporting agency immediately if a customer has cleared their debt.		
Verification/Tests Discussion with the Credit Team Leader Review of Payment Default Procedure		
Observations Through review of the Payment Default Procedure and discussion with the Credit Team Leader it was noted that if a full or even partial payment has been made on an account, employees are required to log into Veda Advantage and update the default with the payment amount, which must be updated within 24 hours of receiving payment notification. During our sample testing identified one instance where a customer made partial payment and the Veda Advantage system updated accordingly. Therefore, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 77 Trading Licence Clause 5.1		Compliance rating –Not Rated
<i>Energy Coordination (Customer Contracts) Reg 49 (4)</i> If a customer remedies a default and demonstrates extenuating circumstances, a licensee must request the credit reporting agency remove the default record.		

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Verification/Tests	
Discussion with the Credit Team Leader Review of Payment Default Procedure	
Observations	
Through review of the Payment Default Procedure it was noted that when a default is remedied, employees are required to update payment information listed on the customer's account and Veda Advantage. Additionally through discussion with the Credit Team Leader it was noted that if extenuating circumstances are provided by a customer post-payment, the licensee will request the default information be removed from Veda Advantage records. However, there was no activity during the audit period to test compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement	
N/A	

Item 78	Compliance rating
Trading Licence Clause 5.1	-Not Rated
<i>Energy Coordination (Customer Contracts) Reg 49 (5)</i>	
A licensee must not refer a default to a credit reporting agency that is the subject of a complaint or matter of review.	
Verification/Tests	
Discussion with the Credit Team Leader Review of Payment Default Procedure	
Observations	
Through review of the Payment Default Procedure and discussion with the Credit Team Leader it was noted that if there are any open disputes or complaints on any account, then a default cannot be registered with the licensee's credit reporting agency until it is resolved. However, there was no activity during the audit period to test compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement	
N/A	

Item 79	Compliance rating
Trading Licence Clause 5.1	1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 50</i>	
A licensee must include information about its complaint handling process and contact details of the energy ombudsman on any disconnection warning given to a customer.	
Verification/Tests	
Discussion with the Credit Team Leader Review of NG Disconnection Notice	
Observations	
Through review of the NG Disconnection Notice's it was noted that if a customer is not satisfied, they are directed to contact the Customer Advocate on 132 180 or alternatively refer a complaint to the Energy Industry Ombudsman of Western Australia on 1800 754 004. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 80	Compliance rating
Trading Licence Clause 5.1	1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 44</i>	
When a non-standard contract is due to expire, a licensee must issue a notice in writing to a customer not more than 2 months and not less than one month before the day on which the contract is due to expire (or at the commencement of the contract if the contract is less than 1 month) with information about: the expiry date; alternative supply options, and the terms and conditions for continued supply post contract expiry.	
Verification/Tests	
Inquiry with Regulatory Manager Observation of the Customer Renewal Process document	
Observations	
The licensee's residential customer contracts do not have terms or expiry dates and as such, this item is only applicable to small SME customers. Through observation of the Customer Renewal Process document, it was noted that, every month, a renewal report is sent to the NG business inbox and a Sales Support Officer identifies any SME customers due for renewals within two months. The relevant Outbound Sales Consultant or Business Executive originally assigned to the customer is required to make contact with the customer	

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and present new plan details no longer than two months from current end date and no less than one month from the current end date. Through inquiry with the Regulatory Manager, it was noted that the customer is provided with information such as the expiry date of their current contract, alternative supply options, a welcome letter and a direct debit authorisation form. Based on the above observations and sample testing of one item, it was concluded that there are sufficient processes currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 81 Trading Licence Clause 5.1	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M, Energy Coordination (Customer Contracts) Reg 45 (1)</i> Upon request, a licensee must provide a customer free of charge with a copy of its customer service charter within 2 business days of the request.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Customer Service Charter	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor, it was noted that the Customer Service Charter is available upon request by post or on the licensee’s website. Based on the above observations and sighting of one request, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 82 Trading Licence Clause 5.1	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M, Energy Coordination (Customer Contracts) Reg 45 (2)</i> A licensee must, from time to time, provide the customer with advice with their bill that a customer service charter is available free of charge.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of a customer invoice	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor and review of customer invoices, it was noted that the licensee’s customer invoices state that the Customer Service Charter is available free of charge. The invoices also state that a copy can be obtained from the licensee’s website or by calling their offices. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 84 Trading Licence Clause 5.1	Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 46 (4)</i> A licensee must ensure that a copy of the Energy Coordination (Customer Contract) Regulations 2004 or a relevant code is available for inspection at its offices at no charge and available to customer on request.	
Verification/Tests Examination of a copy of the pack available at Gas Houses	
Observations Through discussion with the Regulatory Manager and examination of the licensee’s ‘Gas House Packs’, it was noted that these packs are available for distribution to customers at no charge at the Head Office and Gas Houses and includes the licensee’s annual report, the Energy Coordination (Customer Contracts) Regulations 2004, other legislative documents and the licensee’s customer charter. Based on the above observations, it was concluded that there are sufficient processes currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

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Item 85 Trading Licence Clause 5.1		Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contract) Reg 28, clause 3.1.1(a) AGA Code</i> A standard form contract must include a provision that the retailer or distributor must provide, install and maintain equipment for the supply of gas up to the point of supply.		
Verification/Tests Inquiry with Regulatory Manager Observation of the Standard Form Contract		
Observations Through discussion with the Regulatory Manager and observation of the licensee's Standard Form Contract, we noted that Clause 2 of the Standard Form Contract states that the licensee will: (a) Arrange for connection of the supply address to the network; (b) Supply gas to the supply address at the delivery point (c) Arrange for the provision and maintenance of the meter equipment; and (d) Provide or arrange the associated services set out in the contract from time to time, including testing of the meter equipment in accordance with the requirements of law, disconnection and reconnection. Based on the above observations, it was concluded that there are sufficient processes currently in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 86 Trading Licence Clause 5.1		Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contract) Reg 28, clause 3.1.1(b) AGA Code</i> A standard form contract must include a provision that the retailer or distributor must provide, install and maintain metering and necessary equipment at the supply address.		
Verification/Tests Inquiry with Regulatory Manager Observation of the Standard Form Contract		
Observations Through inquiry with the Regulatory Manager and observation of the Standard Form Contract, it was noted that Clause 2(c) of the licensee's standard form contract provides that the licensee or the network operator (distributor) will arrange for the provision and maintenance of the meter equipment. Further, clause 11.1 of the Standard Form Contract states that the licensee or the network operator (distributor) will provide, install and maintain meter equipment for the supply of gas up to the point of supply and meter equipment at the supply address. Based on the above observations, it was concluded that there are sufficient processes currently in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 90 Trading Licence Clause 5.1		Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contract) Reg 33 (3), clause 3.5.2.2 AGA Code</i> A licensee must ensure that any representatives seeking access to the supply address on its behalf wear, carry and show official identification.		
Verification/Tests Discussion with the Customer Service Team Leader Discussion with the Customer Service Supervisor Consideration of the Gas Marketing Code of Conduct training module		
Observations Through discussions with the Customer Service Team Leader and the Customer Service Supervisor, it was noted that all personnel are issued with an ID card, an example of which was sighted and included the required information. It was further noted that the Gas Marketing Code of Conduct training module notes the requirement for customer facing staff to wear an identity card. Based on the above observations, it was concluded that the licensee is compliant.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

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Item 91 Trading Licence Clause 5.1		Compliance rating –Not Rated
<i>Energy Coordination (Customer Contract) Reg 42</i> A Licensee must notify customer of any amendment to a non-standard contract.		
Verification/Tests Inquiry with Regulatory Manager Observation of notification letters to the customers of tariff changes Observation of tariffs on licensee's website Observation of example of article in the West Australian newspaper		
Observations Through inquiry with the Regulatory Manager, it was noted that typical amendments made by the licensee relate to pricing or renewal changes. All amendments relating to pricing of non-standard contracts are communicated to customers through notification on the website, an article in the West Australian or by way of letters and/or emails. These were noted through observation of the abovementioned documents. During the audit period, it was noted that there were no amendments to the licensee's non-standard contract. It was further noted that any ad-hoc changes that may arise will be managed by the sales team and communicated to customers. Based on the above observations, it was concluded that there are sufficient processes currently in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	Not Rated	
Corrective Action/Opportunity for Improvement N/A		

Item 96 Trading Licence Clause 16.2		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A licensee must comply and require its expert to comply with the authority's standard guidelines dealing with the performance audit		
Verification/Tests Inquiry with Regulatory Manager Observation of the Regulatory and Compliance Handbook		
Observations Through inquiry with the Regulatory Manager and observation of the licensee's Regulatory and Compliance Handbook, it was noted that the handbook includes the requirement to conduct a performance audit every 24 months or unless otherwise notified by the Authority and makes reference to the Authority's Audit and Review Guidelines: Electricity and Gas Licence. The Handbook also includes a link to the guidelines located on a shared drive to ensure that it can be easily located. Furthermore, where auditors have been engaged to perform the audit, the licensee refers auditors to the guidelines for compliance purposes. KPMG was appointed with the Authority's approval to undertake the performance audit in accordance with the Authority's Audit Guidelines. Based on the above observations, it was concluded that there are sufficient processes currently in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 97 Trading Licence Clause 16.4		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A licensee's independent auditor must be approved by the Authority prior to the audit.		
Verification/Tests Observation of Approval Letter from the Authority		
Observations Through observation of the approval of auditor letter issued by the Authority, it was noted that the independent auditor was approved by the Authority on 10 April 2014, prior to fieldwork for the audit commencing on 30 September 2014. Based on this observation, it was concluded that the licensee complied with this obligation.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 99 Trading Licence Clause 20		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i>		

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Unless otherwise specified, all notices must be in writing and will be regarded as having been sent and received in accordance with defined parameters.	
Verification/Tests Inquiry with Regulatory Manager Observation of Written Correspondence to the Minister and/or customers	
Observations Through discussion with the Regulatory Manager and observation of email and letter notifications, it was noted that all notices under the licence (e.g. tariff changes, supply interruptions, etc.) sent to the Minister and/or customers are in writing and distributed either via mail, e-mail or, in cases where notices are sent to the Minister, in person. Based on the above observations, it was concluded that there are sufficient processes currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 100 Trading Licence Clause 21.1	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A licensee and any related body corporate must maintain accounting records that comply with the Australian Accounting Standards Board or equivalent International Accounting Standards.	
Verification/Tests Inquiry with Regulatory Manager Observation of the 2014 Annual Report	
Observations Through inquiry with the Regulatory Manager, it was noted that accounting records comply with the Australian Accounting Standards as the 2014 annual report of the consolidated group that the licensee is a part of was prepared in accordance with the requirements of the Australian Accounting Standards Board. Based on examination of the group's financial statements, it was noted that the financial statements were issued on the basis that they represented a true and fair view of the company's financial position. Based on the above observations, it was concluded that the licensee has complied with this obligation.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 101 Trading Licence Clause 22.1	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A licensee must report to the Authority if the licensee is under external administration or experiences a significant change in its corporate, financial or technical circumstances that may affect the licensee's ability to meet its obligations under this licence within 10 business days of the change occurring.	
Verification/Tests Inquiry with Regulatory Manager Observation of the Regulatory and Compliance Handbook	
Observations Through inquiry with the Regulatory Manager, the Regulatory and Compliance Handbook requires the licensee to notify the Authority of any material changes to the licensee's corporate, financial or technical circumstance within 10 business days of the change occurring if it will impact its ability to meet its obligations under the GTL10. The Regulatory Manager noted that there were no material changes during the audit period. Based on the above observations, it was concluded that there are sufficient processes currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 102 Trading Licence Clause 24	Compliance rating 2 – Non-compliant
<i>Energy Coordination Act section 11M</i> A licensee must provide to the Authority any information that the Authority may require in connection with its functions under the Energy Coordination Act 1994 in the time, manner and form specified by the Authority.	
Verification/Tests Observation of the Regulatory and Compliance Handbook	

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Examination of the 2013 and 2014 Compliance Report Observation of Cover Letters Inquiry with Regulatory Manager	
Observations The licensee's Regulatory and Compliance Handbook requires compliance with the Gas Compliance Reporting Manual. Through review of submission Cover Letters to the Authority, it was noted that the Trading and Distribution Licences Annual Reports for 2013 and 2014 as well as the 2013 and 2014 Compliance Reports were submitted to the Authority by the timeframe specified by the Authority. The compliance reports were approved by the Senior Executive Officer and includes a schedule of the non-compliance items (such as the ERA obligation reference number, the nature and extent of the breach, reasons for the breach and expectations for remediation). It was noted that there was a known compliance breach in regards to the FY12 Annual, Performance and Compliance reports, however this was resolved during the audit period by the licensee.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	2 – Non-compliant – minor impact on customers or third parties
Corrective Action/Opportunity for Improvement N/A	

Item 103 Trading Licence Clause 24	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A licensee must publish any information it is directed by the Authority to publish, within the timeframes specified.	
Verification/Tests Observation of email and upload onto website Observation of Regulatory and Compliance Handbook	
Observations Based upon discussions with licensee management, it was noted that the licensee will immediately notify the Authority if situations specified under 241a or 241b eventuates. We note the licensee is part of a large Australian corporate with strong market presence and strong financial position.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 106 Trading Licence Clause 12.2	Compliance rating –Not Rated
<i>Energy Coordination Act Section 11M</i> A licensee must, if directed by the Authority, review the standard form contract and submit to the Authority the results of that review within the time specified by the Authority.	
Verification/Tests Discussion with Regulatory Manager Observation of Authority's Website	
Observations Through discussion with the Regulatory Manager it was noted that the licensee has provided primary and secondary contact details to the Authority. Should the Authority request changes to the standard form contract, the licensee would review and progress according to clause 12.2 within a time frame specified by the Authority. It was noted that the licensee's current standard form contract has not been amended since launching the sale of NG. During the audit period, there were no requests for amendments to the standard form contract during the audit period, however, in the event that there is a request for amendments, the licensee will review and make amendments for any directions from the Authority to submit an amendment to the standard form contract within a specified period. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 107 Trading Licence Clause 12.3	Compliance rating –Not Rated
<i>Energy Coordination Act section 11M</i> A licensee must comply with any direction given by the Authority in relation to the scope, process and methodology of the standard form contract review.	
Verification/Tests Discussion with Regulatory Manager Observation of Authority's Website	

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Observations	
<p>Through discussion with the Regulatory Manager, it was noted that the licensee has provided primary and secondary contact details to the Authority. Should the Authority request changes in relation to the scope, process or methodology of the standard form contract review, the licensee would review and progress according to clause 12.3 and within a time frame specified by the authority according to clause 12.2.</p> <p>It was noted that the licensee's current standard form contract has not been amended since launching the sale of NG. During the audit period, there were no requests for amendments to the standard form contract during the audit period, however, in the event that there is a request for amendments, the licensee will review and make amendments for any directions from the Authority to submit an amendment to the standard form contract within a specified period.</p> <p>Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.</p>	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement	
N/A	

Item 108	Compliance rating
Trading Licence Clause 13.1	–Not Rated
<i>Energy Coordination Act section 11M</i>	
A licensee must only amend the standard form contract in accordance with the Energy Coordination Act 1994 and Regulations.	
Verification/Tests	
Discussion with Regulatory Manager Observation of Authority's Website	
Observations	
<p>Through discussion with the Regulatory Manager, it was noted that the licensee complies with the Energy Coordination Act 1994 when amending standard form contracts and reports accordingly to the Authority after legal review and Regulatory Manager sign off. It was noted that the licensee's current standard form contract has not been amended since launching the sale of NG. During the audit period, there were no requests for amendments to the standard form contract during the audit period, however, in the event that there is a request for amendments, the licensee will review and make amendments for any directions from the Authority to submit an amendment to the standard form contract within a specified period.</p> <p>Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.</p>	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement	
N/A	

Item 109	Compliance rating
Trading Licence Clause 15.1 and 15.2	1 - Compliant
<i>Energy Coordination Act section 11M</i>	
A licensee must maintain supply to a customer if it supplies, or within the last 12 months supplied gas to that customer's premises unless another supplier starts supplying the customer.	
Verification/Tests	
Inquiry with Regulatory Manager Observation of disconnection procedures	
Observations	
<p>Through discussion with the Regulatory Manager, it was noted that the licensee maintains supply to all customers until a transfer process is initiated through the distributor, which is detailed in the licensee's disconnection procedures. The licensee also has renewal procedures specifically for small SME customers on a non-standard form contract and will continue to supply gas until transfer or disconnection is requested by the customer. 3,797 transfers took place during the audit period. One transfer was tested and our testing confirmed that supply was maintained to the customer until the transfer was completed. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.</p>	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 110	Compliance rating
Trading Licence Clause 2.1 and Schedule 3; Clause 1.7	–Not Rated
<i>Energy Coordination Act section 11M</i>	
A licensee must provide the Authority within 3 business days of a request by the Authority with reasons for refusing to commence supply to a customer if requested by the Authority.	
Verification/Tests	
Discussion with Regulatory Manager	

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Observations	
Through discussion with the Regulatory Manager, it was noted that the licensee did not refuse commencement of supply to any customers during the audit period. The Licensee has a Policy that stipulates the need to advise the Authority within 3 business days; upon request by the Authority; outlining the reasons for refusing to commence supply to a customer. However, there was no activity during the audit period to test compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement	
N/A	

Item 111		Compliance rating
Trading Licence Clause 2.1 and Schedule 3; Clause 1.7		–Not Rated
<i>Energy Coordination Act section 11M</i>		
A licensee must comply with a direction from the Authority to supply a customer, subject to specified conditions.		
Verification/Tests		
Discussion with Regulatory Manager Observation of Compendium Clauses Observation of Regulatory and Compliance Handbook		
Observations		
Through discussion with the Regulatory Manager, it was noted that the licensee has provided primary and secondary contact details to the Authority to discuss any change in direction to supply a customer. Where applicable, the licensee refers to the Compendium of Gas Customer Licence Obligations to ensure obligations are being complied with. All obligations are tracked by the Regulatory Manager and requirements to comply with the direction of the Authority are set out in the licensee's Regulatory and Compliance Handbook. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	Not Rated	
Corrective Action/Opportunity for Improvement		
N/A		

Item 112		Compliance rating
Trading Licence Clause 2.1 and Schedule 3; Clause 2.1 and 2.2		1 - Compliant
<i>Energy Coordination Act section 11M</i>		
A licensee must provide reasonable information relating to its activities under the licence as requested by the holder of a distribution licence to enable for the safe and efficient operation of the relevant distribution system, provided such disclosure does not prejudice the commercial interests of the licensee.		
Verification/Tests		
Discussion with Regulatory Manager		
Observations		
Through discussion with the Regulatory Manager it was noted that the licensee has not refused information requested by the distributor. The licensee maintains communication with the distributor on a regular basis via face-to-face meetings and email correspondence between the two parties to facilitate the automatic invoice distribution after receiving meter read receipts by the distributor. It was noted that the distributor has not raised complaints about the licensee during the audit period. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		
N/A		

Item 113 / Item 71 / Item 83		Compliance rating
Trading Licence Clause 2.1 and Schedule 3; Clause 3.1		1 - Compliant
<i>Energy Coordination Act section 11M</i>		
A licensee must notify the Minister at least one month before a change to any price, price structure, fee or interest rate under the standard form contract is to come into effect.		
Verification/Tests		
Discussion with Regulatory Manager Observation of letter to the Minister regarding a change in prices		
Observations		
Through discussion with the Regulatory Manager it was noted that a change in the gas price schedule occurred in July 2013 and the Minister was notified and agreed with the change. It was noted that the notification from the licensee was provided at least one month prior to the scheduled increase in prices. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.		

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Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 114 Trading Licence Clause 19.1	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11ZPP</i> A licensee must comply with the Gas Marketing Code of Conduct.	
Verification/Tests Discussion with the Customer Service Team Leader Discussion with the Customer Service Supervisor Consideration of Gas Marketing Code of Conduct training module Sample testing of twenty new starters was performed to test the completion of training	
Observations Through discussion with the Customer Service Team Leader and Supervisor, it was noted that all new employees are required to complete the licensee's induction training (along with the Gas Marketing Code of Conduct module) prior to being issued with a marketing ID number. The Gas Marketing Code of Conduct is subsequently retained by each employee. Through testing of a sample of twenty new starters, results indicated that three employees were not listed on the Gas Marketing Code of Conduct training register, however, upon inquiry, it was noted that two of the employees attended the training module (despite the training register not being updated) and that the remaining employee did not complete training and, as a result, did not take phone calls. The employees have subsequently taken the training. As the licensee has implemented a Gas Marketing Code of Conduct training module and requires all new starters to attend training, it was concluded that there are sufficient controls in place to ensure compliance. This obligation is rated as compliant because the Licensee's enforced its Policy by ensuring if a staff member did not attend training then that employee cannot take calls.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 115 / Item 71 / Item 83 Trading Licence Clause 19.2	Compliance rating 1 - Compliant
<i>Energy Coordination Act sections 11ZPP and 11M</i> A licensee must ensure all agents and employees comply with the Gas Marketing Code of Conduct.	
Verification/Tests Discussion with the Customer Service Team Leader Discussion with the Customer Service Supervisor Consideration of Gas Marketing Code of Conduct training module Sample testing of twenty new starters was performed to test the completion of training	
Observations Through discussion with the Customer Service Team Leader and Supervisor, it was noted that all new employees/agents are required to complete the licensee's induction training (along with the Gas Marketing Code of Conduct module) prior to being issued with a marketing ID number. In addition, as the licensee has two third party marketing agents, it was noted that all third party agents are required to complete the online Gas Marketing Code of Conduct module before a marketing ID is issued to them. The online training covers all aspects of the Gas Marketing Code of Conduct. Through testing of a sample of twenty new starters, results indicated that three employees were not listed on the Gas Marketing Code of Conduct training register, however, upon inquiry, it was noted that two of the employees attended the training module (despite the training register not being updated) and that the remaining employee did not complete training and, as a result, did not take phone calls. As the licensee has implemented a Gas Marketing Code of Conduct training module and requires all new starters to attend training, it was concluded that there are sufficient controls in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 116 Trading Licence Clause 19.1	Compliance rating 2 Non-compliant
<i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.1</i> A retailer must ensure that its gas marketing agents comply with Part 2 of the Code of Conduct.	
Verification/Tests Sample testing of twenty new starters was performed to test the completion of training	

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Verification/Tests	
Tested a sample of 20 new starters to check completion of the Gas Marketing Code of Conduct training	
Observations	
<p>Through discussion with the Customer Service Team Leader and Supervisor, it was noted that all new employees/agents are required to complete the licensee's induction training (along with the Gas Marketing Code of Conduct module) prior to being issued with a marketing ID number. In addition, as the licensee has two third party marketing agents, it was noted that all third party agents are required to complete the online Gas Marketing Code of Conduct module before a marketing ID is issued to them. The online training covers all aspects of the Gas Marketing Code of Conduct.</p> <p>Through testing of a sample of twenty new starters, results indicated that three employees were not listed on the Gas Marketing Code of Conduct training register, however, upon inquiry, it was noted that two of the employees attended the training module (however, the training register not being updated) and that the remaining employee did not complete training and, as a result, did not take phone calls.</p> <p>Due to a minor breach in the previous year (2013) and two further breaches in the current year (2014) whereby two representatives working for one of the licensee's gas marketing agents did not follow the requirements of the Code when setting up two customer accounts, it was concluded that the licensee did not comply with this obligation during the audit period. We acknowledge, however, that the licensee has implemented a control in that all new starters are required to complete the Gas Marketing Code of Conduct training module.</p> <p>It was further noted that as the training register was not completed accurately, the control has been deemed inadequate, requiring significant improvement.</p>	
Adequacy of Controls Rating	C – Inadequate controls – significant improvement required
Compliance Rating	2 – Non-compliant – minor impact on customers or third parties
Corrective Action	
Due to a minor breach in the previous year, and two further breaches in the current year whereby training records were not kept for two marketing agents engaged by the licensee, it is recommended that the process for recording training records be reviewed to ensure that the all new employees attend the required training modules (e.g.: Gas Marketing Code of Conduct) and that the training records be updated for completeness and accuracy. Regular compliance checks needs to be implemented.	

Item 117	Compliance rating
Trading Licence Clause 19	1 - Compliant
<i>Energy Coordination Act section 11zPP, Code of Conduct clause 2.2</i>	
A retailer must ensure that standard and non-standard contracts are entered into in the manner and satisfying the conditions specified.	
Verification/Tests	
Discussion with Regulatory Manager Discussion with Customer Service Team Leader	
Observations	
Through discussion with the Regulatory Manager and the Customer Service Team Leader it was noted that standard and non-standard form contracts are entered into systems through the licensee's sign up process. Welcome Packs (includes a copy of the contract) are sent to NG customers either immediately (on the same business day) or by the second business day after sign-up. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 118	Compliance rating
Trading Licence Clause 19	1 - Compliant
<i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.3(1)</i>	
A gas marketing agent must ensure that the information specified is provided to the customer before arranging a contract and that the customer is provided with a written copy of the contract on request.	
Verification/Tests	
Discussion with the Customer Service Team Leader Discussion with the Customer Service Supervisor Consideration of relevant documentation	
Observations	
<p>The new customer sign up process is outlined in the Create a NG Residential Account in Oracle Procedure document and the New Starter induction. Both include steps to explain the plans and fees, and terms and conditions to new customers, and obtain consent prior to creation of the account. Records of explanation and consent are recorded in the Wave files for phone signups.</p> <p>Customers are also provided with a copy of the contract upon signup, and plan details are available to be emailed or posted at any time upon request from the customer.</p> <p>As the licensee has two third party marketing agents, it was noted that all third party agents are required to complete the online Gas Marketing Code of Conduct module before a marketing ID is issued to them. The online training covers all aspects of the Gas Marketing Code of Conduct.</p> <p>In addition, details of available plans are also available via the website.</p>	

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Based on the above observations, it was concluded that the licensee is compliant.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 119 Trading Licence Clause 19	Compliance rating 1 - Compliant
<p><i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.3(2)</i> For a standard form contract that is not an unsolicited consumer agreement or for a non-standard contract in accordance with clause 2.2(2) of the Code of Conduct, the gas marketing agent must obtain and record the customer's verifiable consent that the specified information was given.</p>	
<p>Verification/Tests Discussion with the Customer Service Team Leader Discussion with the Customer Service Supervisor Consideration of relevant documentation</p>	
<p>Observations Through discussions with the Customer Service Team Leader and the Customer Service Supervisor, the following was noted:</p> <ul style="list-style-type: none"> For residential accounts, consent that the specified information was given is obtained during the customer sign up process. The Create a NG Residential Account in Oracle Procedure document includes a step to obtain Marketing consent from the customer, and this consent is recorded in diary notes and conversation recordings. For sign up of small to medium business customers, consent is obtained either verbally or by email. A marketing consent checkbox must be ticked within the Oracle set up to verify consent. <p>It was noted that induction training includes a section for consent, however does not include the Gas Marketing Code of Conduct as an item. As the licensee has two third party marketing agents, it was noted that all third party agents are required to complete the online Gas Marketing Code of Conduct module before a marketing ID is issued to them. The online training covers all aspects of the Gas Marketing Code of Conduct. Based on the above observations and sample testing of 20 new customer signup records, it was concluded that there are sufficient procedures are currently in place to ensure compliance, however controls could be strengthened through the inclusion of marketing consent in induction training.</p>	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
<p>Opportunity for Improvement Although based on procedural documentation and system controls the licensee is considered compliant, induction training could be updated to include a Marketing consent as a main area of consent required from the customer, thus strengthening controls.</p>	

Item 120 Trading Licence Clause 19	Compliance rating 1 - Compliant
<p><i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.3(3)</i> For a standard form contract that is an unsolicited consumer agreement or a non-standard contract other than in accordance with clause 2.2(2) of the Code of Conduct, the gas marketing agent must obtain the customer's written acknowledgement that the specified information was given.</p>	
<p>Verification/Tests Discussion with the Customer Service Team Leader Discussion with the Customer Service Supervisor Consideration of relevant documentation</p>	
<p>Observations Where a non-standard contract is entered into, plan details are sent to the customer, and require sign off of the customer declaration prior to commencement of the contract. It was noted that only standard contracts are used for residential customers, and thus this obligation is only applicable for non-residential customers. The plan details form is distributed with the standard terms and conditions, and includes in the declaration that the non-standard form contract details were provided to non-residential (small to medium business) customers. As the licensee has two third party marketing agents, it was noted that all third party agents are required to complete the online Gas Marketing Code of Conduct module before a marketing ID is issued to them. The online training covers all aspects of the Gas Marketing Code of Conduct. Based on the above observations and sample testing of 20 new customer signup records, it was concluded that there are sufficient processes are currently in place to ensure compliance.</p>	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed

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Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 121	Compliance rating
Trading Licence Clause 19	1 – Compliant
<i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.4(1)</i> When a customer enters into a new contract that is not an unsolicited consumer agreement with a retailer or gas marketing agent, a retailer or gas marketing agent must, at the time the contract is entered into, offer to give or make available to the customer a copy of the contract. If the customer accepts the offer, the retailer or gas marketing agent must, at the time the contract is entered into, or as soon as possible thereafter, but no more than 28 days later, give or make available to the customer a copy of the contract.	
Verification/Tests Discussion with the Customer Service Team Leader Discussion with the Customer Service Supervisor Consideration of relevant documentation	
Observations As the licensee has two third party marketing agents, it was noted that all third party agents are required to complete the online Gas Marketing Code of Conduct module before a marketing ID is issued to them. The online training covers all aspects of the Gas Marketing Code of Conduct. Residential: Through discussions with the aforementioned personnel, it was noted that contracts are made available to customers upon request, and that plan details are sent to the customer upon signup. Welcome Packs are sent out 2 days after sign up which include the licensee’s Terms & Conditions. Non-residential: Plan details are also sent to the customer in order to sign the customer declaration prior to sign up, and a copy of plan details are made available to the customer upon request. In addition, it was noted that for larger business customers, a discussion is held to explain the terms and conditions of the contract. Based on a sample of 20, we noted that customers were provided with a copy of the contract within 28 days. It was concluded that there are sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 122 / Item 56 / Item 71	Compliance rating
Trading Licence Clause 19	1 – Compliant
<i>Energy Coordination Act section 11ZPP; Code of Conduct clause 2.4 (2)</i> Where the customer has entered into a new contractual relationship with a retailer, a retailer or gas marketing agent must give the information specified to the customer.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Customer Welcome Pack	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor, it was noted that a welcome pack is sent to all new customers. The pack includes a copy of the contract, which details all terms and conditions. By way of sample testing 5 items, it was noted that all applicable information per clause 2.4(2) are included within the welcome pack. As the licensee has two third party marketing agents, it was noted that all third party agents are required to complete the online Gas Marketing Code of Conduct module before a marketing ID is issued to them. The online training covers all aspects of the Gas Marketing Code of Conduct. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 123	Compliance rating
Trading Licence Clause 19	1 – Compliant
<i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.4 (3)</i> For a standard form contract, the retailer must give the information specified to the customer no later than with the customer’s first bill. For a non-standard form contract or a standard form contract that is an unsolicited consumer agreement, the specified information must be given before the customer has entered into the contract. The gas marketing agent must obtain the customer’s written acknowledgement that the specified information has been given.	

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Verification/Tests	
Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Customer Welcome Pack and Consent Forms for New Customers	
Observations	
Through inquiry with the Customer Service Team Leader and Customer Service Supervisor, it was noted that the Welcome Pack sent to all new customers prior to their first bill includes a copy of the contract, which details all terms and conditions. Plan details and the Licensee's contact details are also included. Consent forms are provided to customers during sign-up for non-standard form contracts, which include a customer declaration and signature stating that the specified information has been provided. As the licensee has two third party marketing agents, it was noted that all third party agents are required to complete the online Gas Marketing Code of Conduct module before a marketing ID is issued to them. The online training covers all aspects of the Gas Marketing Code of Conduct. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 124	Compliance rating
Trading Licence Clause 19	1 - Compliant
<i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.4 (4)</i>	
The retailer is not obliged to provide the information to a customer if the retailer has provided the information to that customer within the preceding 12 months; or if the retailer informs the customer how the customer may obtain the information and, if requested, gives the information to the customer.	
Verification/Tests	
Discussion with the Customer Service Team Leader and Customer Service Supervisor	
Observations	
Through inquiry with the Customer Service Team Leader and Customer Service Supervisor, it was noted that the licensee will provide this information if requested by the customer, regardless of when it was previously provided. Based on our sample testing of one item, it was observed that the Licensee provided the information to a customer who previously requested the same information.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 125	Compliance rating
Trading Licence Clause 19	1 - Compliant
<i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.5(1)</i>	
A gas marketing agent must ensure that the inclusion of concessions is made clear to residential customers and any prices that exclude concessions are disclosed.	
Verification/Tests	
Discussion with the Credit Team Leader	
Observations	
Through inquiry with the Credit Team Leader, it was noted that the licensee does not offer concessions on plans offered. Prices on the licensee's website and customer bills represent prices excluding concessions.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 126	Compliance rating
Trading Licence Clause 19	1 - Compliant
<i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.5 (2)</i>	
A gas marketing agent must ensure that all non-standard contracts that are not unsolicited consumer agreements are in writing.	
Verification/Tests	
Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Consent Forms for New Customers	
Observations	
Through inquiry with the Customer Service Team Leader and Customer Service Supervisor, it was noted that consent forms are provided to customers during sign-up for non-standard form contracts. The forms include a customer declaration and signature stating that the specified information has been provided. The licensee only accepts consent forms in writing (electronic signatures are not accepted). As the licensee has two third party marketing agents, it was noted that all third party agents are required to complete the online Gas Marketing Code of Conduct module before a marketing ID is issued to them. The online training covers all aspects of the Gas Marketing	

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Code of Conduct.	
Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 127	Compliance rating
Trading Licence Clause 19	1 - Compliant
<i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.5 (3)</i>	
A retailer or other party must ensure that a customer is able to contact the retailer or other party on the retailer's or other party's telephone number during the normal business hours of the retailer or other party for the purposes of enquiries, verifications and complaints.	
Verification/Tests	
Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of a customer invoice and the Licensee's website	
Observations	
Through inquiry with the Customer Service Team Leader and Customer Service Supervisor, it was noted that the licensee's phone number is published on their website, correspondence and advertisements. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 128	Compliance rating
Trading Licence Clause 19	1 - Compliant
<i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.6 (1)</i>	
A gas marketing agent must, on request, provide the customer with its and the retailer's complaints telephone number and marketing identification number.	
Verification/Tests	
Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Complaint Handling procedure, staff training materials, a customer invoice and the Licensee's website	
Observations	
Through inquiry with the Customer Service Team Leader and Customer Service Supervisor, it was noted that the licensee's phone number is published on their website, correspondence and advertisements. Procedures to be taken when a complaint is received are documented within the Complaint Handling procedure. As the licensee has two third party marketing agents, it was noted that all third party agents are required to complete the online Gas Marketing Code of Conduct module before a marketing ID is issued to them. The online training covers all aspects of the Gas Marketing Code of Conduct. Further, training materials provided to marketing agents state that the complaints telephone number, ombudsman's telephone number or a person's marketing identification number must be provided if requested by the customer. Based on discussions, it was noted that no complaints have been received (from customers) relating to the marketers' failing to produce ID numbers when requested by customers. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 129	Compliance rating
Trading Licence Clause 19	1 - Compliant
<i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.6 (2)</i>	
A gas marketing agent who meets with a customer face to face must: as soon as practicable tell the customer the purpose of the visit; wear a clearly visible and legible identity card showing the information specified; and as soon as practicable provide the information specified in writing to the customer.	
Verification/Tests	
Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of staff training materials	
Observations	
Through inquiry with the Customer Service Team Leader and Customer Service Supervisor, it was noted that the Gas Marketing Code of Conduct training materials state that any person meeting with a customer must wear a clearly visible and legible identity card with the	

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<p>information specified as well as provide this in a written format. As the licensee has two third party marketing agents, it was noted that all third party agents are required to complete the online Gas Marketing Code of Conduct module before a marketing ID is issued to them. The online training covers all aspects of the Gas Marketing Code of Conduct. . Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.</p>	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 130		Compliance rating
Trading Licence Clause 19		1 - Compliant
<i>Energy Coordination Act section 11ZPP; Code of Conduct clause 2.6(3)</i>		
A retailer or other party must keep the specified records each time it initiates contact with a customer for the purposes of marketing		
Verification/Tests		
Discussion with Customer Service Team Leader and Customer Service Supervisor Observation of the Sales Online system and Oracle		
Observations		
Through discussion with the Customer Service Team Leader and Supervisor, it was noted that the licensee maintains records of customer contact within the Sales Online system. In regards to the maintenance of records for NG, a report is generated daily to identify customers to be contacted. This is generated to prevent duplication and contact to the same person twice. Any supporting documents received or completed as a result are uploaded by either the Sales Support personnel, the sales representative or a pricing team member.		
Based on the above observations, it was concluded that there are sufficient processes currently in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		
N/A		

Item 131		Compliance rating
Trading Licence Clause 19		1 - Compliant
<i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.7</i>		
A person who carries out any marketing activity in the name of or for the benefit of a retailer or a gas marketing agent is to be taken to have been employed or authorised by the retailer or gas marketing agent, unless the contrary is proved.		
Verification/Tests		
Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of staff training materials		
Observations		
Through inquiry with the Customer Service Team Leader and Customer Service Supervisor, it was noted that the Gas Marketing Code of Conduct training materials state that any person meeting with a customer must wear a clearly visible and legible identity card, which shows their name, photograph, marketing identification number and the Licensee's logo. As the licensee has two third party marketing agents, it was noted that all third party agents are required to complete the online Gas Marketing Code of Conduct module before a marketing ID is issued to them. The online training covers all aspects of the Gas Marketing Code of Conduct. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		
N/A		

Item 132		Compliance rating
Trading Licence Clause 19		1 - Compliant
<i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.8(1)</i>		
A gas marketing agent must:		
<ul style="list-style-type: none"> • keep a record of each complaint made by a customer, or person contacted for the purposes of marketing, about the marketing carried out by or on behalf of the gas marketing agent; and • on request by the gas ombudsman in relation to a particular complaint, give to the gas ombudsman all information that the gas marketing agent has relating to the complaint within 28 days of receiving the request. 		
Verification/Tests		
Interviewed Customer Service Team Leader and Customer Advocacy Manager Sample of customer complaints selected and reviewed		
Observations		
The Licensee, through their dedicated Customer Advocacy team, maintains and records detailed notes of customer complaints through		

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their electronic customer management system. In accordance with internal policy any information that relates to a complaint is retained and provided when requested by the ombudsman within 28 days of receiving the request. A dedicated customer advocate has been appointed to record and assist in resolving disputes through the Licensee's internal complaints resolution process. The procedure and process documents are available to all staff and are reviewed yearly. A sample of 10 customer complaints were extracted from Oracle and reviewed with no exceptions being noted. Detailed notes were maintained for each complaint and where a request for information was made by a customer all were fulfilled within the 28 day timeframe (often being completed by the next business day).	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 133	Compliance rating
Trading Licence Clause 19	1 - Compliant
<i>Energy Coordination Act section 11ZPP; Code of Conduct clause 2.8(2)</i> Any record that a gas marketing agent is required to keep by the Code of Conduct, must be kept for at least 2 years after the last time the person to whom the information relates was contacted by or on behalf of the gas marketing agent.	
Verification/Tests Discussion with Customer Service Team Leader and Customer Service Supervisor Observation of a customer file	
Observations Through discussion with the Customer Service Team Leader and Customer Service Supervisor, it was noted that the licensee maintains records of information relating to NG on the Sales Online system from March 2013 (when the licensee commenced selling of NG). Through observation of a customer file on the Sales Online system, it was noted that the licensee has stored all records since March 2013. As the licensee has two third party marketing agents, it was noted that all third party agents are required to complete the online Gas Marketing Code of Conduct module before a marketing ID is issued to them. The online training covers all aspects of the Gas Marketing Code of Conduct. Based on the above observations, it was concluded that there are sufficient processes currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 134	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 3.1(1)	2 – Noncompliant
<i>Energy Coordination Act section 11M</i> If a retailer agrees to sell gas to a customer or arrange for the connection of the customer's supply address, the retailer must forward the customer's request for the connection to the relevant distributor.	
Verification/Tests Discussion with the Customer Service Team Leader Discussion with the Customer Service Supervisor Sample testing of 20 customer Requests for Gas	
Observations Service requests for new connections are raised by the Licensee through Oracle, in accordance with the New Connection Service Request Oracle Procedure. The raising of a service request automatically notifies the distributor through a system interface with the marketplace, Flowtalk. The licensee can then check the status of the service request within Flowtalk to ensure the upload has been successful, however this has not been clearly documented within the New Connection Service Request Oracle Procedure. Furthermore, it was noted that there is currently no automatic system notification to alert the licensee when a request has failed, which resulted in a previously known compliance breach. Through inquiry it was noted that a request has been logged to implement an automatic system notification to alert the licensee to any unsuccessful uploads. In addition, testing performed over a sample of 20 customer request for gas forms processed during the audit period showed that all requests have been successfully forwarded to the distributor through Flowtalk, resulting in no further breaches. Based on the above, it was noted that improvement could be made to existing controls to ensure ongoing compliance.	
Adequacy of Controls Rating	C – Inadequate controls – significant improvement required
Compliance Rating	2 – Non-compliant – minor impact on customers or third parties
Corrective Action Whilst a request has been logged with IT to implement an automatic notification when the upload of the service requests is not successful, a step should also be added to Procedural documentation to check the status of the service requests. This will ensure that the request is uploaded successfully within the recommended time.	

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Item 135 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 3.1(2)	Compliance rating 3 – Non-compliant
<p><i>Energy Coordination Act section 11M</i> Unless the customer agrees otherwise, a retailer must forward the customer's request for the connection to the relevant distributor that same day, if the request is received before 3pm on a business day; or the next business day, if the request is received after 3pm or on a weekend or public holiday.</p>	
<p>Verification/Tests Discussion with the Customer Service Team Leader Discussion with the Customer Service Supervisor Consideration of relevant procedural documentation Sample testing of 20 customer Requests for Gas</p>	
<p>Observations Service requests for new connections are raised by the Licensee through Oracle, in accordance with the New Connection Service Request Oracle Procedure. The raising of a service request automatically notifies the distributor through a system interface with the marketplace, Flowtalk. Testing of 20 customer requests was performed to test compliance, and seven breaches were identified, all of which were processed prior to April 2014. It was noted through inquiry that four of the breaches were attributable to there being no control in place to check whether upload to Flowtalk had been successful, as there is no automatic system notification currently in place to alert the licensee to any unsuccessful lodgement attempts. The remaining three breaches are due to non-timely raising of service requests in Flowtalk. The New Connection Procedure Service Request Oracle procedure highlights the requirement for the request to be completed that same day, if the request is received before 3pm on a business day; or the next business day, if the request is received after 3pm or on a weekend or public holiday, however does not include a step to check that upload to Flowtalk was successful. Based on the above, it was the Licensee was found to be non-compliant, with inadequate controls in place to ensure compliance.</p>	
Adequacy of Controls Rating	C – Inadequate controls – significant improvement required
Compliance Rating	3 – Non-compliant – moderate impact on customers or third parties
<p>Corrective Action A request has been logged with IT to implement an automatic notification when the upload of the service requests is not successful. Prior to the implementation of the above, a step should be added to Procedural documentation to check the status of the service requests. This will ensure that the request is uploaded successfully within the recommended time. The licensee also needs to implement a control to monitor the timely raising of service requests in Flowtalk.</p>	
Item 136 Trading Licence Clause 2.1 and Schedule 2 Compendium Clause 3.1(2)	Compliance rating 2 – Non-compliant
<p><i>Energy Coordination Act section 11M</i> A retailer must issue a bill no more than once a month unless the conditions specified in subclause 4.1(a)(i)(ii) are met.</p>	
<p>Verification/Tests Inquiry with Credit Team Leader Testing of 20 samples of customer invoice history</p>	
<p>Observations Through discussion with the Credit Team Leader it was noted that the licensee does not issue bills more than once a month unless specific exceptions require them to do so. A sample of 20 customers were selected from the customer invoice history for testing and it was noted that, based on the invoice history, customers have been billed no more than once a month. It was noted that there was a known compliance breach during FY14 with regards to 36 SME customers being billed more than once in a month, however this was resolved during the audit period by the licensee. The SME billing has been driven by the receipt of meter reads from the network operator and the that the licensee has indicated it will review its systems to assess if it is practical to hold these reads and delay the issue of invoices. Additionally 213 residential accounts received more than one bill in a calendar month, however this was also resolved during the audit period by the licensee through reviewing various read scenarios to assess necessary actions for read timing, while also considering changes to standard form contracts to accommodate events outside of its control in regards to the frequency of invoicing, which will be subject to the Authorities review and approval.</p>	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	2 – Non-compliant – minor impact on customers or third parties
<p>Opportunity for Improvement While the licensee has remediated the breach, we recommend the following improvement opportunity. In regards to residential customers, the licensee is reviewing the various read scenarios to assess necessary action. The licensee will consider proposed changes to its Standard Form Contract to accommodate events outside of its controls in regards to frequency. The licensee should continue to monitor this review and approval from the Authorities must be received before implementing any changes.</p>	
Item 137 Trading Licence Clause 2.1 and Schedule 2 Compendium Clause 4.1(b)	Compliance rating 1 – Compliant
<p><i>Energy Coordination Act section 11M</i> A retailer must issue a bill at least every 3 months unless the conditions specified in subclause 4.1(b)(i)-(iii) are met.</p>	
<p>Verification/Tests</p>	

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Inquiry with Credit Team Leader Testing of 20 samples of customer invoice history	
Observations Through testing of 20 customer invoice history samples, it was noted that there were 19 NG customers who did not receive invoices within 3 months. As all invoices are triggered by meter reads carried out by the distributor and the distributor's obligation is that meter reads must be performed once every 100 days, it is noted that the requirements of the licensee and the distributor are misaligned. As per the subclause, an invoice does not need to be issued every 3 months if meter data is not supplied.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement The licensee has noted that this misalignment has been identified as an issue. Therefore, it is recommended that the licensee adjust the terms and conditions to more closely reflect the process carried out by the distributor.	

Item 146 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.4		Compliance rating 1 – Compliant
<i>Energy Coordination Act section 11M</i> A retailer must issue a bill to a customer at the customer's supply address, unless the customer has nominated another address or an electronic address.		
Verification/Tests Discussion with the Customer Service Team Leader Discussion with the Customer Service Supervisor Consideration of relevant procedural documentation		
Observations Through inquiry and consideration of procedural documentation the following was noted: <ul style="list-style-type: none"> -In accordance with the <i>Create a NG Residential Account</i> procedure supply and billing details must be added entered into Oracle at the time of customer sign-up. -The customer service officer must select from a drop down menu whether the billing address is the same as the supply address, or if a new address needs to be added. -Customer bills are generated and sent to the billing address that has been entered in SAP. <p>It was noted that the <i>Maintain and Update a NG Customer Account Procedure</i> is also in place and outlines how to update the billing address should address details need to be updated.</p> <p>Based on the above observations, it was concluded that there are sufficient processes are currently in place to ensure compliance.</p>		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 147 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.5(1)		Compliance rating 2 – Non-compliant
<i>Energy Coordination Act section 11M</i> Unless the customer agrees otherwise, a retailer must include the minimum prescribed information in subclause 4.5(1)(a)-(cc) on the customer's bill.		
Verification/Tests Discussion of the process with the Credit Team Leader Sample testing of 20 randomly selected samples		
Observations A sample of 20 NG customer invoices were randomly selected. Of the 20 invoices tested, it was noted that NG invoices are in accordance with the requirements of the AGA code. It was noted, that the licensee's Oracle system is configured to print bills containing all of the requirements stipulated in the AGA code. Two samples were noted to not contain previous meter readings (in the form of graphs) on the bill, however, it was noted that these two samples were both SME accounts with multiple sites listed on the one account. Through further discussions with the Credit Team Leader, it was noted that graphs showing previous meter readings are not required for multi-site invoices. It was also noted that there was a known compliance breach, this breach was due to an account set up error resulting in incorrect billing format to four customers. The set up error has been corrected and procedures reviewed and updated to ensure graphs will be displayed on future invoices.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	2 – Non-compliant – minor impact on customers or third parties	
Corrective Action/Opportunity for Improvement N/A		

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Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.5(2)		1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer is not obliged to include a graph or bar chart on the bill, if the bill is not indicative of the customer's actual consumption or based upon a meter reading.		
Verification/Tests Inquiry with Credit Team Leader Observation of customer bill		
Observations Through discussion with the Credit Team Leader and observation of a NG customer bill, it was noted that the licensee includes graphs on all bills, even if the consumption is based on an estimated read. Where estimated readings are used as a basis for invoices, this is clearly noted on the invoice. As graphs are used on all bills, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 149		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.5(3)		3 – Non-compliant
<i>Energy Coordination Act section 11M</i> If a retailer identifies and wishes to bill a customer for a historical debt, the retailer must advise the customer of the amount of the historical debt and its basis, before, with or on the customer's next bill.		
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor		
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that there is currently no procedure in place with regards to billing for historical debt. However, this control gap has been identified and the Customer Service and Credit teams are currently collaborating to develop a solution. Based on the above observations, it was concluded that sufficient processes are not currently in place and compliance with the obligation has not been met.		
Adequacy of Controls Rating	D – No controls evident	
Compliance Rating	3 – Non-compliant – moderate impact on customers or third parties	
Corrective Action Procedures should be created that detail the process to be followed in regards to billing a customer for a historical debt.		

Item 150		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.6(1)		1 – Complaint
<i>Energy Coordination Act section 11M</i> A retailer must base a customer's bill on the distributor's or metering agent's reading of the meter at the customer's supply address, or the customer's reading of the meter in the circumstances specified in subclause 4.6(1)(a)(b).		
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor		
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that invoices for NG are automatically generated when meter read files are received from the distributor. These are received in the form of data files that are sent through Flowtalk and uploaded to Oracle. Customer reads are not accepted for NG and any inquiries regarding meter reads are forwarded to the distributor. Based on the above observation, it was concluded that compliance has been met.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 151 / Item 65		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.6(2)		1 - Compliant
<i>Energy Coordination Act section 11M</i> Prior to a customer reading a meter, a retailer must give the customer information that explains how to read a meter correctly in clear, simple and concise language.		
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor		
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that customer readings are not accepted for NG except if the customer is querying a high bill. In this instance, a meter data verification will be sent to the distributor for them to confirm or amend the reading. Based on the above observations, it was concluded that compliance has been met as NG customer readings are not currently accepted.		

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Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 152 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.7 (1)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must use its best endeavours to ensure that metering reading data is obtained as frequently as is required to prepare its bills.	
Verification/Tests Discussion with the Credit Team Leader	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee issues bills no more than once a month and no less than once in three months. Invoices are automatically triggered when metering data is provided to the licensee by the distributor. It was noted that the licensee aims to send an invoice that has been triggered by a meter reading every 3 months. If no meter reading was performed within the 3 month period, an estimated bill is generated and sent to the customer. It was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 153 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.7(2)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must ensure that at least once every 12 months it obtains metering data in accordance with clause 4.6(1)(a).	
Verification/Tests Discussion with Credit Team Leader	
Observations Compendium clause 4.7(2) states that a customer's meter data must be obtained at least once every 12 months. Through inquiry with the Credit Team Leader, it was noted that the licensee is reliant on the distributor to provide information on meter reads. Once the distributor performs a read, an invoice is automatically generated. The licensee aims to bill customers no more than once a month and no less than once in three months. However it was noted that the requirement for the distributor is at a minimum they must conduct a read once every 100 days. As such there is a misalignment between the licensee billing requirements and the distributor requirements. It should be noted that, regardless of this, the licensee still meets the requirements of the clause as it is the licensee's standard procedure to raise a bill for all customers – actual invoice based on meter read data or estimated bill in the event of not receiving meter read data. The licensee advised that there have been instances where they have not received an actual meter read at least annually. This is generally due to denial of access to a meter. The licensee does generate a report to monitor these instances. Sample of 15 items noted that the licensee was compliant with the obligations.	
Adequacy of Controls Rating	C – Inadequate controls – significant improvement required
Compliance Rating	1 – Compliant
Corrective Action It is recommended that the licensee implement a control around ensuring that metering data is obtained within a timely manner. This can be done through automated reminders being issued to the licensee. Additionally, the licensee needs to implement a measure to ensure it receives at least one meter read per annum from the distributor.	

Item 154 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.8(1)	Compliance rating 1 – Compliant
<i>Energy Coordination Act section 11M</i> A retailer must give the customer an estimated bill in the manner specified, if the retailer is unable to reasonably base a bill on a reading of the meter.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that estimated reads are submitted to the licensee by the distributor, based on historical data. If an estimated read is submitted, the corresponding invoice will clearly state that the invoice is based on estimated usage. Based on the above observation, it was concluded that compliance has been met.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	

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N/A	
Item 155	
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.8(2)	Compliance rating 1 – Compliant
<i>Energy Coordination Act section 11M</i> In circumstances where the customer's bill is estimated, a retailer must specify in a visible and legible manner the information specified in subclause 4.8(2)(a)-(c) The customer may request a verification of a meter reading and a meter reading.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that estimated reads are submitted by the distributor. If an estimated read is submitted, the corresponding invoice will clearly state that the invoice is based on estimated usage as stated in subclause 4.8(2)(a). The licensee's customer service number is included for further information regarding the estimate, such as if the customer wishes to request a meter reading or request the reason for the estimation as stated in subclause 4.8(2)(b)-(c). Based on the above observation, it was concluded that compliance has been met.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	
Item 156	
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.8(3)	Compliance rating 1 – Compliant
<i>Energy Coordination Act section 11M</i> Upon request, a retailer must inform a customer of the basis and the reason for the estimation.	
Verification/Tests Discussion with the Customer Service Team Leader Discussion with the Customer Service Supervisor	
Observations Based on inquiry, it was noted that estimated reads based on historical meter data are provided by the distributor where they have been unable to obtain an actual meter read. When a customer request is received by the Licensee regarding the estimation, the licensee will forward any queries to the distributor, and provide the customer with information based on the distributor's response. Based on the above, it was noted that information regarding the basis of estimation is provided to the customer as soon as practicable given the need to consult the distributor and that the meter read data is available from the distributor. It was further noted that the next invoice provided to the customer contains the actual meter read.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	
Item 157	
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.9	Compliance rating 1 – Compliant
<i>Energy Coordination Act section 11M</i> If a retailer gives a customer an estimated bill, and the meter is subsequently read, the retailer must include an adjustment on the next bill to take account of the actual meter reading.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of customer invoices	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that where an estimated invoice has been provided to the customer, the next invoice will include the actual meter read as well as factors in any under/over charge. Based on the above observation, it was concluded that compliance has been met.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	
Item 158	
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.10	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> If a retailer has based a bill upon an estimation because the customer failed to provide access to the meter, and the customer subsequently requests the retailer to provide a bill based on a reading of the meter and provides access to the meter, and pays the	

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retailer's reasonable charge for reading the meter (if any), the retailer must do so.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Special Meter Read procedures	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that documented procedures, the Requesting a Special Meter Read via Oracle procedure, state that a special read can be arranged with the Licensee to be performed at an agreed date. The procedures also detail how to organise and perform a special meter read. The licensee advised that if the reading received is higher than the estimate, but in line with daily usage, then the distributor will not change the estimated read. If the actual read is lower than the estimate, then a read amendment will be sent through from the distributor. Based on the above observations, it was concluded that while sufficient processes are currently in place to ensure compliance, the relevant procedures should be updated to reflect the process currently followed.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement The Special Meter Read procedures should be updated to include the procedures followed subsequent to the special meter read and the responsibilities of the Licensee in these circumstances. This will ensure the licensee continues to operate within the requirements of the obligation.	

Item 159	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.11 (1)	–Not Rated
<i>Energy Coordination Act section 11M</i> If a customer requests the meter to be tested and pays a retailer's reasonable charge (if any) for doing so, a retailer must request the distributor or metering agent to do so.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Meter Test procedures	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that documented procedures, the Meter Test procedure, state how the licensee is to arrange a meter test. This is completed by the licensee contacting the distributor via a service request. Only one meter test has been performed to date and this was paid for by the licensee. However, there was no activity during the audit period to test compliance. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 160	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.11 (2)	1 - Compliant
<i>Energy Coordination Act section 11M</i> If the meter is tested and found to be defective, the retailer's reasonable charge for testing the meter (if any) is to be refunded to the customer.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Meter Test procedures	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that documented procedures, the Meter Test procedure, detail how the Licensee is to arrange a meter test. However, the procedure does not specifically state the process to be followed if the meter is found to be defective. The licensee will, in these circumstances, arrange a credit of the fee charged for the meter test if the meter is found to be defective. Only one meter test has been performed to date and this was paid for by the licensee. Based on the above observations, it was concluded that while sufficient processes and controls are currently in place to ensure compliance, the relevant procedures should be updated to reflect the process currently followed.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement The Meter Test procedure should be updated to include the process followed if the meter is found to be defective. This will ensure the licensee continues to operate within the requirements of the obligation.	

Item 161	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.12 (1)	2 – Non-compliant
<i>Energy Coordination Act section 11M</i>	

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<p>If a retailer offers alternative tariffs and a customer applies to receive an alternate tariff (and demonstrates to the retailer that they satisfy the conditions of eligibility), a retailer must change the customer to an alternate tariff within 10 business days of the customer satisfying those conditions.</p>	
<p>Verification/Tests Discussion with Customer Service Team Leader and Customer Service Supervisor Testing of samples of changes to plans Examination of emails and Wav file recordings for plan change requests</p>	
<p>Observations Through discussion with the Customer Service Team Leader and Supervisor, it was noted that any plan change requests by customers (where the customer choose to receive an alternative tariff) are made by phone calls or emails. It was noted that the licensee maintains records of requests to changes to plans and actions requests within 10 business days. It was further noted that there was a known compliance breach in that a customer was offered an additional discount under a Non-Standard Form Contract, however, the discount was not applied to his account within 10 business days. The licensee has since resolved the breach. Testing of a sample of ten requests for plan changes showed that requests for changes (via phone calls or emails) were recorded and maintained within the Sales Online system and that these requests were actioned within 10 business days. Based on the testing, it was concluded that there are sufficient processes currently in place.</p>	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	2 – Non-compliant – minor impact on customers or third parties
Corrective Action/Opportunity for Improvement	
N/A	

<p>Item 162 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.12 (2)</p>		<p>Compliance rating 1 - Compliant</p>
<p><i>Energy Coordination Act section 11M</i> For the purpose of subclause 4.12(1), the effective date of change in the tariff will be the date on which the last meter reading at the previous tariff was obtained; or, if the change requires an adjustment to the meter at the customer’s supply address, the date the meter adjustment is completed.</p>		
<p>Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor</p>		
<p>Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that any plan change is effective from the date of the last meter read. This is based on the Licensee’s system design, which automatically applies the change in plan from the date of the last meter read when the plan is altered in the system. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.</p>		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		
N/A		

<p>Item 164 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.14 (1)</p>		<p>Compliance rating 1 - Compliant</p>
<p><i>Energy Coordination Act section 11M</i> If a customer requests a retailer to issue a final bill at the customer’s supply address, a retailer must use reasonable endeavours to arrange for that final bill in accordance with the customer’s request.</p>		
<p>Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Move Out procedures</p>		
<p>Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that documented procedures, the NG Customer Move Out via Oracle and NG Customer Move Out/Move In Online procedures, detail how customers can submit a Move Out request via the ‘My Account’ section of the Licensee’s website. This is completed when a customer is moving out of their property. Procedures detailing the required steps by the Customer Service Team to process a Move Out in the licensee’s system are also documented. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.</p>		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		
N/A		

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Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.14(2)		1 - Compliant
<i>Energy Coordination Act section 11M</i>		
If the customer's account is in credit at the time of the account closure, the retailer must repay the amount to the customer.		
Verification/Tests		
Discussion with Credit Team Leader Review of the Refund Payment By EFT & Cheque Procedure		
Observations		
A copy of the Refund Payment By EFT & Cheque Procedure was reviewed, and it was noted that it outlined the refund process. Through inquiry with the Credit Team Leader, it was noted Final bills are issued to customers including a note to contact the licensee to arrange for settlement of accounts if there is credit balance and a refund is provided to customers with credit balances on their closed accounts. As stated in the Refund Payment By EFT & Cheque procedure, all NG customers that have credits due for refund are tracked in a NG refund spreadsheet. Before closing an account, a Credit officer will review the refund spreadsheet to check if the customer has any credits that are outstanding. If so, the customer will be contacted for repayment. Therefore, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		
N/A		

Item 167 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.16 (1)(a)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i>		
If a retailer is satisfied after conducting a review of a bill that the bill is correct, the retailer may require a customer to pay the unpaid amount; must advise the customer that the customer may request the retailer to arrange a meter test in accordance with applicable law; and must advise the customer of the existence and operation of the retailer's internal complaints handling processes and details of any applicable external complaints handling processes.		
Verification/Tests		
Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Complaint Handling procedure, Meter Test procedure and a customer invoice		
Observations		
Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that customer invoices detail who the customer can call if they have a complaint, both internal and external to the licensee. The Complaint Handling procedure outlines the steps to be followed if a complaint is registered. The customer invoices also advise the customer that they may request a meter accuracy test, with the fee for the test refundable if the meter is found to be faulty. The Meter Test procedure is followed by the licensee when the customer requests a meter test. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		
N/A		

Item 168 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.16 (1)(b)		Compliance rating –Not Rated
<i>Energy Coordination Act section 11M</i>		
If a retailer is satisfied after conducting a review of a bill that the bill is incorrect, the retailer must adjust the bill in accordance with clauses 4.17 and 4.18.		
Verification/Tests		
Discussion with the Customer Service Team Leader and Customer Service Supervisor		
Observations		
Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that incorrect bills have been a rare occurrence. As a result, no procedures have yet been developed that detail the action to be taken in these circumstances, however the invoice would generally be adjusted appropriately by the licensee's IT team within the system with credits or debits then raised to correct the invoice. Based on the above observations, it was concluded that while sufficient processes are currently in place to ensure compliance, these procedures should be appropriately documented. Compliance has been met as no bill adjustments have been made during the audit period.		
Adequacy of Controls Rating	C – Inadequate controls – significant improvement required	
Compliance Rating	Not Rated	
Corrective Action		
Procedures followed when adjustment for an incorrect bill is required should be documented so that all staff continue to follow established procedures, ensuring the licensee continues to operate within the requirements of the obligation.		

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Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.16 (2)		-Not Rated
<i>Energy Coordination Act section 11M</i>		
The retailer must inform a customer of the outcome of the review (of the bill) as soon as practicable.		
Verification/Tests		
Discussion with the Customer Service Team Leader and Customer Service Supervisor		
Observations		
Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that the licensee's NG Administration team or Credit team liaises with the customer directly to inform them of the outcome of their bill review. This will be done as soon as the bill review has been completed. However, due to the rare occurrence of incorrect bills, a documented procedure in relation to review of customer bills is yet to be established. Having said that, staff are fully trained and are proficient in understanding the procedures that needs to be followed. On this basis we have considered the control environment to be generally adequate. However, there was no activity during the audit period to test compliance.		
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed	
Compliance Rating	Not Rated	
Opportunity for Improvement		
Procedures followed when review of a customer bill is required should be documented so that all staff continue to follow established procedures, ensuring the licensee continues to operate within the requirements of the obligation.		
Item 170		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.16 (3)		-Not Rated
<i>Energy Coordination Act section 11M</i>		
If the retailer has not informed a customer of the outcome of the review within 20 business days from the date of receipt of the request for review under clause 4.15, the retailer must provide the customer with notification of the status of the review as soon as practicable.		
Verification/Tests		
Discussion with the Customer Service Team Leader and Customer Service Supervisor		
Observations		
Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that the licensee's NG Administration team will provide notification of the bill review status as soon as possible, with the team tracking customers not yet informed so that they may be notified when viable. However, due to the rare occurrence of incorrect bills, a documented procedure in relation to review of customer bills is yet to be established. Having said that, staff are fully trained and are proficient in understanding the procedures that needs to be followed. On this basis we have considered the control environment to be generally adequate. However, there was no activity during the audit period to test compliance.		
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed	
Compliance Rating	Not Rated	
Opportunity for Improvement		
Procedures followed when review of a customer bill is required should be documented so that all staff continue to follow established procedures, ensuring the licensee continues to operate within the requirements of the obligation.		
Item 171		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.17(2)		1 - Compliant
<i>Energy Coordination Act section 11M</i>		
If a retailer proposes to recover an amount undercharged as a result of an error, defect or default for which the retailer or distributor is responsible (including where a meter has been found to be defective), the retailer must follow the procedure specified in sub-clauses 4.17(2)(a)-(e).		
Verification/Tests		
Discussions with the Credit Team Leader Observation of NG Undercharging Procedure Observation of Payment Arrangement Guidelines		
Observations		
Through inquiry with the Credit Team Leader, it was noted that the licensee limits the amount to be adjusted to no more than the amount undercharged in the last 12 months with the licensee notifying the customer. If the undercharge occurs due to incorrect information being provided by the customer and a change to the customer's alternative tariff is caused, the licensee can undercharge the amount no more than 12 months from when the customer was notified of the tariff change. The amount to be recovered is also listed in a separate bill with an explanation and the customer is not to be charged late payment fees. The customer must also be offered time to pay the amount by means of an instalment plan. These requirements and specifications are covered within the licensee's NG Undercharging Procedure and the Payment Arrangement Guidelines, which were provided to us by the Credit Team Leader. Therefore, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		
N/A		

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Item 172 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.18(2)		Compliance rating 1 – Compliant
<i>Energy Coordination Act section 11M</i> If a customer (including a customer who has vacated the supply address) has been overcharged as a result of an error, defect or default for which a retailer or distributor is responsible (including where a meter has been found to be defective), the retailer must use its best endeavours to inform the customer accordingly within 10 business days of the retailer becoming aware of the error, defect or default and ask the customer for instructions as to whether the amount should be credited to the customer's account; or repaid to the customer.		
Verification/Tests Discussion with the Credit Team Leader Review of NG Overcharging Procedure Review of NG Refund Payments by EFT & Cheque Procedure		
Observations Through inquiry with the Credit Team Leader and review of the Policy, it was noted that the licensee will contact the customer within 10 days when overcharging has occurred and checks if the customer wishes to have the amount credited to their account or repaid. The licensee's Overcharging Procedure and NG Refund Payments by EFT & Cheque Procedure were provided by the Credit Team Leader, it states that all overcharging refunds must be processed within 12 business days of the customer's request, however the procedures do not refer to the requirement to inform the customer within 10 business days of the licensee becoming aware.		
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed	
Compliance Rating	1 – Compliant	
Opportunity for Improvement The licensee's Overcharging Procedure and/or NG Refund Payments by EFT & Cheque Procedure should be updated to include the timeframe in which the licensee aims to inform the customer about the overcharging and ask whether they wish to have their account credited or receive a repayment. This will help in guiding the overcharging process carried out by staff at the licensee.		

Item 173 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.18(3) and 4.18(5)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> If a retailer receives instructions under subclause 4.18(2), the retailer must pay the amount in accordance with the customer's instructions within 12 business days of receiving the instructions. No interest shall accrue to a credit card or refund referred to in the subclause.		
Verification/Tests Discussion with the Credit Team Leader Review of NG Overcharging Procedure Review of NG Refund Payments by EFT & Cheque Procedure		
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee aim to process the amount overcharged in accordance with the customer's instructions within 12 business days of receiving the instructions. And no interest shall accrue to a credit card or refund referred to in the subclause. This is reflected in the NG Overcharging Procedure and the NG Refund Payments by EFT & Cheque Procedure which was provided to us by the Credit Team Leader. Therefore, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 174 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.18(4) and 4.18(5)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> If a retailer does not receive instructions under subclause 4.18(2) within 20 business days of making the request, the retailer must use reasonable endeavours to credit the amount overcharged to the customer's account. No interest shall accrue to a credit or refund referred to in this subclause.		
Verification/Tests Discussion with the Credit Team Leader Review of the NG Overcharging Procedure Review of the Unapplied Payment Report		
Observations Through inquiry with the Credit Team Leader, it was noted that if the licensee does not receive instructions on what to do with the overcharged amount within 20 business days, the licensee will use reasonable endeavours to credit the amount to the customer's account. At the end of every month, an Unapplied Payment Report is generated to identify outstanding payments to customers. A Credit team member will then follow up with the customer, the Credit Team Leader provided a copy of this report. The Credit Team Leader provided a copy of the NG Overcharging Procedure, it was noted that this requirement was not found within the procedure.		
Adequacy of Controls	B – Generally adequate controls – improvement needed	

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Rating	
Compliance Rating	1 – Compliant
Opportunity for Improvement	
The licensee should include this requirement in the NG Overcharging Procedure. The procedures are communicated to staff and will provide them guidance on what to do in these situations and will allow for a consistent process.	

Item 175	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.18(6)	1 - Compliant
<i>Energy Coordination Act section 11M</i>	
Where the overcharged amount is less than \$75 the retailer may notify the customer of the overcharge by no later than the next bill after the retailer became aware of the error, and ask the customer for instructions in accordance with subclause 4.18(2); or credit the amount to the customer's account.	
Verification/Tests	
Discussion with the Credit Team Leader Review of NG Overcharging Procedure	
Observations	
Through inquiry with the Credit Team Leader, it was noted that where the amount owing to an overcharged customer is less than \$75, the customer is notified by the next bill invoiced after the licensee became aware of the error. A copy of the NG Overcharging Procedure was provided and this requirement is stated within it. The licensee is currently in the process of developing an NG overcharging procedural document as there is no formalised document yet.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement	
An NG Overcharging Procedure is currently being developed. The licensee should include the requirement in this obligation in the procedural document.	

Item 176	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.19 (1)	1 - Compliant
<i>Energy Coordination Act section 11M</i>	
If a retailer proposes to recover an amount of an adjustment which does not arise due to any act or omission of the customer, the retailer must follow the procedure specified in subclause 4.19(1) (a)-(d).	
Verification/Tests	
Inquiry with Credit Team Leader Observation of the payment arrangement guidelines	
Observations	
Through inquiry with the Credit Team Leader, it was noted that the licensee has not undercharged a customer during the audit period. Despite that, the Credit team is responsible for:	
<ul style="list-style-type: none"> (a) Limiting the amount of the adjustment for the 12 months from the date the Credit team member contacts the customer (b) Including the adjustment on the next bill (c) Not charging interest of late fees on the adjustment (d) Offering the customer time to pay by way of instalment plans covering a period at least equal to the period over which the adjustment occurred. 	
Through observation of the licensee's payment arrangement guidelines, it was noted that "in the event where a customer has been undercharged as a result of an error, defect or default for which the licensee or the network operator is responsible, the customer can choose to pay the correcting payment by instalments. The licensee cannot charge interest or late fees on the instalment. The Credit team must offer the customer time to pay by instalment plan covering a period at least equal to the period over which the undercharging occurred".	
It was noted, however, that the licensee currently does not have a consolidated procedure document for the adjustment process for NG.	
Adequacy of Controls Rating	C – Inadequate controls – significant improvement required
Compliance Rating	1 – Compliant
Corrective Action	
It is recommended that the licensee formalise the adjustment process in a centralised document.	

Item 177	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.19 (2)	-Not Rated
<i>Energy Coordination Act section 11M</i>	
If after the meter reading a retailer becomes aware of an amount owing to the customer, the retailer must use its best endeavours to inform the customer accordingly within 10 business days of the retailer becoming aware of the adjustment and, subject to subclause (5), ask the customer for instructions as to whether the amount should be credited to the customer's account; repaid to the customer; or included as a part of the new bill smoothing arrangement where the adjustment arises under clause 4.3(2)(a)-(b).	
Verification/Tests	
Discussion with the Customer Service Team Leader and Customer Service Supervisor	
Observations	

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Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that the instance detailed in the obligation has not yet occurred. As a result, no procedures have yet been developed that detail the action to be taken in these circumstances, however the licensee has advised that the prior estimated read would generally be disabled within the system and the customer account rebilled. If the customer is in credit as a result, the customer would be advised of the options available to receive the amount owing. Based on the above observations, it was concluded that while sufficient processes are not currently in place, compliance has been met because no instances of an amount being owed to the customer have occurred during the audit period.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	Not Rated
Opportunity for Improvement Procedures should be created that detail the process to be followed in situations when an amount is owed to the customer.	

Item 178 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.19 (3) and 4.19 (6)	Compliance rating Not Rated
<i>Energy Coordination Act section 11M</i> If a retailer received instructions under subclause 4.19 (2), the retailer must pay the amount in accordance with the customer's instructions within 12 business days of receiving the instructions. No interest shall accrue to an adjustment amount.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Refund procedures	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that, in this case, a refund email would be sent to the licensee's Credit team, who would complete the transaction. This email sent uses the standard NG Refund Request template. The Refund Payments by EFT and Cheque procedures state the process to be followed when making a refund payment and that refunds must be processed within 12 business days of receiving instructions from the customer. There has been no activity during the audit period.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 179 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.19 (4) and 4.19 (6)	Compliance rating –Not Rated
<i>Energy Coordination Act section 11M</i> If a retailer does not receive instructions under subclause 4.19 (2) within 20 business days of making the request, the retailer must use reasonable endeavours to credit the amount of the adjustment to the customer's account. No interest shall accrue to an adjustment amount.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Refund procedures	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that documented procedures, the Refund Payments by EFT and Cheque procedure, detail how the Licensee is to refund money to customers. However, the procedure does not specifically state the process to be followed if refund instructions are not received within 20 business days of making the request. Having said that, we observed that all staff have received training on this obligation and fully understand the procedure that needs to be followed. The licensee has advised that if no refund has been instructed by the customer, the credit would remain on the account until the next billing cycle. No instances of an amount being owed to the customer have occurred during the audit period.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	Not Rated
Opportunity for Improvement The refund procedures should be updated to include the process to be followed if refund instructions from the customer are not received within 20 business days of making the request.	

Item 180 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.19 (5)	Compliance rating –Not Rated
<i>Energy Coordination Act section 11M</i> Where the adjustment amount owing to the customer is less than \$75, the retailer may notify the customer of the adjustment by no later than the next bill after the meter is read, and:	
<ul style="list-style-type: none"> • Ask the customer for instructions in accordance with subclause 4.19 (2); or • Credit the amount to the customer's account. 	
Verification/Tests	

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Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Refund procedures	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that documented procedures, the Refund Payments by EFT and Cheque procedure, detail how the Licensee is to refund money to customers. However, the procedure does not specifically state the process to be followed if the amount owing is less than \$75. Having said that, we observed that all staff have received training on this obligation and fully understand the procedure that needs to be followed. The licensee has advised that customers would be notified of any amounts owing to them as well as the refund options available. Any credit amount not refunded would show as a credit on the next invoice. No instances of an amount being owed to the customer have occurred during the audit period.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	Not Rated
Opportunity for Improvement The refund procedures should be updated to include the process to be followed when the amount owing to a customer is less than \$75. The adjustment must be notified to the customer no later than the next bill and the Licensee should ask the customer for instructions in accordance with subclause 4.19 (2); or credit the amount to the customer's account.	

Item 181 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.1		Compliance rating 3 - Non-compliant
<i>Energy Coordination Act section 11M</i> The due date on the bill must be at least 12 business days from the date of that bill. Unless a retailer specifies a later date, the date of dispatch is the date of the bill.		
Verification/Tests Discussion with Credit Team Leader Testing of Sample of 20 Invoices		
Observations Through discussion with the Credit Team Leader it was noted that the licensee has an automated process in their Oracle system whereby terms of payment are set within the system for 21 days from the invoice date. This configuration in the system will create invoices that will list a due date 21 days from the invoice date. A previous breach occurred where 12 non-residential customers were identified as having payment terms of 14 days. This has identified a system set up issue as payment terms are being automatically driven by plan type entered into Oracle. The problem was identified during the audit period by the licensee, since then these customers have been set up on a more favourable price plan, normally only offered to large use customers. Testing was conducted on a sample of 20 customers, and 2 of these customers had less than 12 days between billing date and due date.		
Adequacy of Controls Rating	C – Inadequate controls – significant improvement required	
Compliance Rating	3 – Non-compliant – moderate impact on customers or third parties	
Corrective Action The licensee should review the protocol set within the system to ensure that due dates of bills are at least 12 business days from issue dates.		

Item 182 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.2		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must offer a customer at least the following payment methods: in person at 1 or more payment outlets located within the Local Government District of the customer's supply address; by mail; for residential customers, by Centrepay; and either electronically or by telephone by means of a debit facility or a credit card.		
Verification/Tests Discussion with Credit Team Leader Review of the Customer Charter Review of an Invoice		
Observations Through review of an invoice and customer charter and inquiry with the Credit Team Leader, it was noted that the following payment methods are available to customers: -EFT -BPay -Mail -Telephone -Direct Debit -In person at a local Gas House, Australian Post Branch or Agency -Australia Post Customers communicate the need for Centrepay directly with Centrelink and any further information is available upon request however, while Centrepay is a payment option available to customers the Customer Charter and the invoice do not include payment method via Centrepay.		
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed	

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Compliance Rating	1 – Compliant
Opportunity for Improvement Include payment method of Centrepay in the Customer Charter and invoice	

Item 183		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.3		2 – Non-compliant
<i>Energy Coordination Act section 11M</i> Prior to commencing a direct debit, a retailer must obtain the customer's verifiable consent and agree with the customer, wherever possible, on the amount to be debited, and the date and frequency of the direct debit.		
Verification/Tests Inquiry with Customer Service Team Leader and Customer Service Supervisor Testing of twenty direct debit authorisations Examination of Wav file recordings for direct debit authorisations		
Observations Through inquiry with the Customer Service Team Leader and Supervisor, it was noted that the licensee obtains direct debit authorisation from NG customers via phone calls. As part of the authorisation process, the licensee reads out a script and agrees details of direct debit payments with the customer. The telephone conversations are recorded on the licensee's CISCO systems in Wav files. Through testing of a sample of twenty recordings, one sample was identified to not have a recording. The call was made by a new starter in October 2013. Since then (approximately January 2014), the licensee has implemented a control whereby calls are tested with CISCO for new starters or current staff changing desk locations to test whether the recording is functioning correctly. Due to the breach in October 2013, it was concluded that there was non-compliance, however, given that the licensee has implemented a control to test calls with CISCO, controls have been deemed generally adequate.		
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed	
Compliance Rating	2 – Non-compliant – minor impact on customers or third parties	
Opportunity for Improvement The licensee has implemented a control whereby calls are tested with CISCO for new starters or current staff changing desk locations since a breach was identified. It is recommended that the licensee continue monitoring the testing of calls to ensure that all calls are appropriately recorded.		

Item 184		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.4		1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must accept payment in advance from a customer on request. Acceptance of an advance payment will not require a retailer to credit any interest to the amounts paid in advance. The minimum amount for which a retailer will accept an advance payment is \$20.		
Verification/Tests Discussion with the Credit Team Leader		
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee accepts payment in advance from customers. There is no minimum pay in advance amount set. It was also noted that no payments in advance had been made by customers this audit period. The requirements of this obligation are documented in the procedures manual that staff refer to when liaising with customers.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 185		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.5		1 - Compliant
<i>Energy Coordination Act section 11M</i> If a customer is unable to pay by way of the methods described in clause 5.2, due to illness or absence, a retailer must offer a residential customer a redirection of the customer's bill to a third person, at no charge.		
Verification/Tests Discussion with the Credit Team Leader Review of the Financial Hardship Policy		
Observations Through inquiry with the Credit Team Leader, it was noted that if the customer is unable to pay via the methods listed in clause 5.2 (in person at a payment outlet, by mail, Centrepay, or debit facility/credit card via phone or electronically). A copy of the Financial Hardship Policy was provided, after review of the document it was noted that that customers experiencing financial hardship or payment difficulty may nominate to have bills redirected at no charge to a third party or an alternative postal address as required by clause 5.5. Therefore, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		

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N/A	
Item 186	
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.6(1)	
Compliance rating 1 - Compliant	
<i>Energy Coordination Act section 11M</i> A retailer must not charge a residential customer a late payment fee in the circumstances specified in subclause 5.6(1)(a)-(d)	
Verification/Tests Discussion with the Credit Team Leader Review of the Financial Hardship Policy Statement	
Observations Subclause 5.6(1)(a)-(d) states that a late fee must not be charged if; -The customer receives a concession, provided they did not receive 2 or more reminder notices; -The customer has agreed to a payment extension or instalment plan; -The customer has a complaint currently being processed; or; -The customer is determined to be experiencing financial hardship. Through discussion with the Credit Team Leader, it was noted that, the above requirements are met by the licensee. Further, it was noted that the licensee does not provide concessions to customers and also does not charge late penalty fees on complaints. A copy of the Financial Hardship Policy was reviewed and it was noted that all customers experiencing financial hardship are entitled to instalment plans and immediate waiver of late payment fees. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	
Item 187	
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.6(2)	
Compliance rating 1 - Compliant	
<i>Energy Coordination Act section 11M</i> If a retailer has charged a residential customer a late fee, a retailer must not charge an additional late payment fee in relation to the same bill within 5 business days from the date of receipt of the previous late payment fee notice.	
Verification/Tests Discussion with the Credit Team Leader Review of the Monthly Compliance Report	
Observations During FY14; 131 customers received more than 3 late fees per invoice, 1 customer has had > 12 Late Fees raised on the account during the year and 75 accounts had late fees issued within 5 business days of a previous late fee. Through inquiry with the Credit Team Leader, it was noted that previous breaches occurred due to errors caused by manual manipulation. The licensee resolved this issue during the audit period by implementing an automated system to prevent manual manipulation. The system does now not allow a customer to be charged any additional late payment fees in relations to a bill that is within 5 business day from the date of receipt of the previous late payment fee notice. The Credit Team Leader also noted that weekly reporting is now run and reported on a monthly basis. A copy of a compliance report was provided as verification that it is completed and communicated. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	2 – Non-compliant – minor impact on customers or third parties
Corrective Action/Opportunity for Improvement N/A	
Item 188	
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.6(3)	
Compliance rating 2 – Non-compliant	
<i>Energy Coordination Act section 11M</i> A retailer must not charge a residential customer more than 3 late payment fees in relation to the same bill, and 12 late payment fees in a year.	
Verification/Tests Inquiry with Credit Team Leader Review of the Monthly Compliance Report	
Observations During FY14; 131 customers received more than 3 late fees per invoice, 1 customer has had > 12 Late Fees raised on the account during the year and 75 accounts had late fees issued within 5 business days of a previous late fee. Through inquiry with the Credit Team Leader, it was noted that previous breaches occurred due to errors caused by manual manipulation. The licensee resolved this issue during the audit period by implementing an automated system to prevent manual manipulation. The system is now configured to the point where it does not allow 3 late payment fees in relation to the same bill and does not allow more than 12 late payment fees in a year. The Credit Team Leader also noted that weekly reporting is now run and reported on a monthly basis. A copy of a compliance report was provided as verification that it is completed and communicated. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed

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Rating	
Compliance Rating	2 – Non-compliant – minor impact on customers or third parties
Corrective Action/Opportunity for Improvement N/A	

Item 189		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.6(4)		1 - Compliant
<i>Energy Coordination Act section 11M</i> If a residential customer has been assessed by a retailer as being in financial hardship, a retailer must retrospectively waive any late payment fee charged to the residential customer's last bill prior to the assessment being made.		
Verification/Tests Discussion with the Credit Team Leader Review of the Financial Hardship Policy Review of the Financial Hardship Training		
Observations Through discussion with the Credit Team Leader, it was noted that under financial hardship circumstances late payment fees charged to the customer's last bill are waived. The Credit Team Leader provided a copy of the Financial Hardship Policy, it includes the requirement to waive fees in this circumstance. The Financial Hardship Training was also provided, and it states that licensee's employees should refer to the Financial Hardship Policy when dealing with customers experiencing these difficulties. Therefore, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 190		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.7(1)		1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must not require a customer who has vacated a supply address, and who has given the retailer notice, to pay for gas consumed at the customer's supply address in the circumstances specified in subclause 5.7(1).		
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Move Out procedures		
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that documented procedures, the NG Customer Move Out via Oracle procedure and the NG Customer Move Out/Move In Online procedure, detail the process to be followed when a customer is leaving a NG supplied property. Following notification from a customer of moving out of a property, which may include walking a customer through the process of submitting a move out through the 'My Account' section of the licensee's website, the licensee will arrange for a special meter read to invoice the customer a final read for the property. The final bill will be issued following the move out process and the final meter read received from the distributor. 246 customers moved out without notifying the licensee. Based on sample testing of one item it was concluded that sufficient processes are currently in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 191		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.7(2)		1 - Compliant
<i>Energy Coordination Act section 11M</i> If a customer reasonably demonstrates to a retailer that the customer was evicted or otherwise required to vacate a supply address, a retailer must not require a customer to pay for gas consumed at the customer's supply address from the date the customer gave the retailer notice.		
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Move Out procedures		
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that documented procedures, the NG Customer Move Out via Oracle procedure and the NG Customer Move Out/Move In Online procedure, detail the process to be followed when a customer is leaving a NG supplied property. If the customer was evicted or required to vacate a supply address, Customer Service will request a copy of evidence of vacating the supply address from the customer. Following notification from the customer, the licensee will arrange for a special meter read to invoice the customer a final read for the property. The final bill will be issued following the move out process and the final meter read received from the distributor and will not include gas consumed at the supply address subsequent to the date the customer notified the licensee. Based on the above observations, it was concluded that		

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sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 192	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.7(3)	1 - Compliant
<i>Energy Coordination Act section 11M</i> Notice is given if a customer informs a retailer of the date on which the customer intends to vacate, or has vacated the supply address, and gives the retailer a forwarding address to which a final bill may be sent.	
Verification/Tests Discussion with Customer Service Team Leader	
Observations Through inquiry with the Customer Service Team Leader, it was noted that notice is deemed to have been given by a customer if the customer informs the licensee of the date on which the customer intends to vacate, or has vacated the supply and provides a forwarding address to the licensee. If these conditions are met, the licensee will not require the customer to pay for gas consumed at the supply address from: <ul style="list-style-type: none">the date the customer vacated the supply address if the customer has given at least 3 business days' notice; or5 days after the customer gave notice. These instructions are documented in the licensee's procedures manual and staff have received training to ensure they understand the obligations. Based on our discussions and confirmed through our testing of one item, we conclude that the licensee is compliant with the obligations.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 193	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.7(4)	1 - Compliant
<i>Energy Coordination Act section 11M</i> If a retailer and a customer enter into a new contract for the supply address, a retailer must not require the previous customer to pay for gas consumed at the customer's supply address from the date the new contract becomes effective and in circumstances specified in subclause 5.7(4).	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Move In and Move Out procedures	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that the Move In and Move Out procedures, including the Create a NG Residential Account in Oracle procedure and the NG Customer Move Out/Move In Online procedure, detail the process to be followed when a customer enters into a new contract for the supply address. The NG Move In process triggers a forced move out and a special read request. A Customer Service team member will call the previous customer to confirm the move out and the licensee arranges for a special meter read to invoice the previous customer a final read for the property. The final bill for the previous account will be issued following the final meter read received from the distributor. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 194	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.8(1)	1 -Compliant
<i>Energy Coordination Act section 11M</i> A retailer must comply with the Conduct Principles set out in the debt collection guideline issued by the Australian Competition and Consumer Commission concerning section 50 of the Australian Consumer Law (WA).	
Verification/Tests Discussion with the Credit Team Leader	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee ensure their employees are operating in compliance with the Australian Competition and Consumer Commission standards. Copies of the Australian Competition and Consumer Commission debt	

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collection guidelines book are provided to all debt collectors at induction. Additionally internal debt collection training is also provided during team meetings. Therefore it was concluded that the process in place was adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 195 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.8(2)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must not commence proceedings for recovery of a debt from a residential customer who has informed a retailer that the customer is experiencing payment difficulties or financial hardship; or while a residential customer continues to make payments under an alternative payment arrangement.	
Verification/Tests Discussion with the Credit Team Leader Review of the Financial Hardship Policy Review of the Financial Hardship/Payment Difficulty Procedure	
Observations Through inquiry with the Credit Team Leader, it was noted that customers in financial hardship are placed on the 'on-hold' strategy in the ORACLE system. This status prevents further collection of debt. If other payment arrangements have been agreed upon and entered into the system, this will also prevent requests for further debt collection. This system process is also documented in the Financial Hardship/Payment Difficulty Procedure, copies of these documents were provided by the Credit Team Leader. The Financial Hardship Policy also states that if customers are in financial hardship they will be shielded from debt collection and recovery costs. All debt collection staff are provided with a copy of the Financial Hardship Policy and additionally they receive training on how to handle customers experiencing financial hardship. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 196 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.8(3)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must not recover or attempt to recover a debt relating to a supply address from a person other than the customer with whom the retailer has or had entered into a contract for the supply of gas to that supply address.	
Verification/Tests Discussion with the Credit Team Leader	
Observations Through inquiry it was noted that debt collection is only performed by contacting the individual listed as the primary contact in the Oracle system. The secondary contact listed on the customer's account has no financial responsibility for any debt incurred, and therefore is not contacted during debt collection. All staff are aware of this requirement and have had recent training in this area. Therefore it was concluded that the process in place was adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 198 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.1(1)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must assess whether a residential customer is experiencing payment difficulties or financial hardship, within 3 business days from when the residential customer informs a retailer that the customer is experiencing payment problems.	
Verification/Tests Discussion with the Credit Team Leader Review of the Financial Hardship Questionnaire Review of the Financial Hardship/Payment Difficulties Outline	
Observations Through inquiry with the Credit Team Leader, it was noted that the customer is assessed on financial hardship through the Financial Hardship Questionnaire. This questionnaire lists 9 questions that a Credit officer is to ask a customer over the phone to determine if they are experiencing financial hardship or payment difficulties. The Credit Team Leader also noted that, the licensee aims to inform the customer of the results / outcome of the assessment within the same business day that the questionnaire was completed. A copy of the Financial Hardship Questionnaire was provided by the Credit Team Leader and it included the questions that are used to assess the	

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customer's situation. The Credit Team Leader also provided a copy of the Financial Hardship/Payment Difficulties Outline, it was noted that this is communicated to the licensee's staff, it states that the licensee must assess whether a residential customer is experiencing payment difficulties or financial hardship, within 3 business days from when the residential customer informs the licensee. Therefore, based on one sample item, it was concluded the above observations were adequate and the licensee was compliant.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 199	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.1(2)	1 - Compliant
<i>Energy Coordination Act section 11M</i> When undertaking an assessment regarding payment difficulties or financial hardship, a retailer must give reasonable consideration to the information given by the residential customer and requested or held by the retailer; or advice given by an independent financial counsellor or relevant consumer representative organisation.	
Verification/Tests Discussion with Credit Team Leader Review of the Financial Hardship Questionnaire	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee conducts an assessment to determine if the customer is experiencing financial hardship over the phone. This assessment is facilitated through the use of the Financial Hardship Questionnaire, which lists 9 questions the Credit officer needs to ask during the assessment process. Examples of these questions include; <ul style="list-style-type: none"> • Have you missed payments on your utility bills? • Do you have any savings/deposits? If yes, approximately how much? • Assessment of billing and payment history and; • Have you contacted or seen a financial counsellor? The Credit Team aims to inform the customer of the results / outcome of the assessment on the same day the customer undergoes the assessment. Reasonable consideration is given to all relevant information provided by the customer. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 200	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.1(3)	1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must advise a residential customer on request of the details of an assessment.	
Verification/Tests Discussion with the Credit Team Leader	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee provides details of an assessment to the customer when requested. Credit Team staff are advised to provide this information to customers when it is requested. From our sampling of one item, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 201	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.2(1)	–Not Rated
<i>Energy Coordination Act section 11M</i> A retailer must not unreasonably deny a residential customer's request for a temporary suspension of actions, if the customer demonstrates to the retailer that the customer has an appointment with a relevant consumer representative organisation to assess the customer's capacity to pay.	
Verification/Tests Discussion with the Credit Team Leader Review of the Financial Hardship/Payment Difficulty Procedure	
Observations Through inquiry with the Credit Team Leader, it was noted that the once the licensee has been notified by the customer that the situation	

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has escalated to the relevant consumer representative organisation and that the customer has an appointment with that organisation, the collection strategy is placed 'on-hold' in the licensee's Oracle system to suspend credit actions. The Credit Team Leader provided a copy of the Financial Hardship/Payment Difficulty Procedure, and it was noted that this process is outlined within the document. Therefore, it was concluded the above observations were adequate. However, there was no activity during the audit period to test compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 202	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.2(2)	1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must allow a temporary suspension of actions for a period of at least 15 business days.	
Verification/Tests Discussion with the Credit Team Leader Review of the Financial Hardship/Payment Difficulties Outline	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee allows a temporary suspension of actions of at least 15 business days if the customer satisfies the criteria of Compendium clause 6.2. This is done by updating the customer's account status with 'on-hold' status. This will then ensure that the licensee does not carry out / procedure with any further debt collection activities for that period. Where there has been no contact from the customer, a calendar reminder is set for 3 weeks to confirm the appointment status and outcome with the customer. A copy of the Financial Hardship/Payment Difficulties Outline was provided and after review it was noted that the requirement to suspend actions for at least 15 business days was included in the document. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 203	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.2(3)	1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must give reasonable consideration to a request by a residential customer or relevant consumer representative organisation in the manner specified to allow a relevant consumer representative organisation additional time to assess a residential customer's capacity to pay.	
Verification/Tests Discussion with Credit Team Leader	
Observations Through inquiry with the Credit Team Leader, it was noted that reasonable consideration is given as the licensee will seek advice from the customer's financial counsellor regarding the current wait time for an appointment. Thereafter, the Credit officer amends the 'on-hold' status in the Oracle system and calendar reminder accordingly. Based on a sample of one item, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 204	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.3(1)	1 - Compliant
<i>Energy Coordination Act section 11M</i> If the assessment carried out under clause 6.1 indicates to the retailer that the residential customer is experiencing payment difficulties or financial hardship, the retailer must follow the procedure specified in subclause 6.3(1). - offer alternative payment arrangements referred to in clause 6.4 (1) (additional time to pay bill or interest free Instalment), advise of what assistance is available	
Verification/Tests Discussion with the Credit Team Leader Review of the Financial Hardship Policy Review of the Financial Hardship/Payment Difficulties Outline	
Observations As stated in Compendium clause 6.1, where a residential customer informs the retailer of payment problems, they must perform an assessment within 3 business days and assess whether the customer is experiencing payment difficulties or financial hardship. Through inquiry with the Credit Team Leader, it was noted that where an assessment has deemed a residential customer to be experiencing payment difficulties or financial hardship, the licensee offers customers alternative payment arrangements, additional time to pay bills	

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(including waiving of interests and late fees) and provides advice on types of assistance available. These requirements are also stated within the Financial Hardship Policy and the Financial Hardship/Payment Difficulties Outline, copies of these were provided to us upon request. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 205	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.4(1)	1 – Compliant
<i>Energy Coordination Act section 11M</i> A retailer must offer a residential customer who is experiencing payment difficulties or financial hardship at least the payment arrangements that are specified in subclause 6.4(1).	
Verification/Tests Discussion with Credit Team Leader Review of the Financial Hardship Policy	
Observations As stated in Compendium clause 6.4(1), where a residential customer is deemed to be experiencing payment difficulties or financial hardship they must be offered the following arrangements; (a) additional time to pay and (b) an interest free and fee-free instalment plan. Through inquiry with the Credit Team Leader, it was noted that the licensee offers customers experiencing payment difficulties or financial hardship alternative payment arrangements including additional time to pay bills, interest-free and fee-free instalment plans and immediate waivers of late payment fees. A copy of the Financial Hardship Policy was provided by the Credit Team Leader, and it was noted that these arrangements are included in the document. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 206	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.4(2)	1 - Compliant
<i>Energy Coordination Act section 11M</i> When offering an instalment plan to a residential customer experiencing payment difficulties or financial hardship, a retailer must take into account the information and take the specified actions detailed in subclause 6.4(2).	
Verification/Tests Discussion with the Credit Team Leader Review of the Financial Hardship Policy Review of the Financial Hardship/Payment Difficulties Outline	
Observations Compendium Subclause 6.4(2), states that when offering an instalment plan to a customer, the licensee must allow the customer the specifications stated in 6.4(2)(a)-(h). Through inquiry with the Credit Team Leader, it was noted that the licensee allows for all these specification 6.4(2)(a)-(h) when offering an instalment plan to a customer experiencing payment difficulties or financial hardship. A copy of the Financial Hardship/Payment Difficulties Outline was provided, and it was noted within it was the process used to assess capacity to pay and how the instalment plan is calculated. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 207	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.4(3)	1 – Compliant
<i>Energy Coordination Act section 11M</i> If a residential customer has in the previous 12 months had 2 instalment plans cancelled due to non-payment, a retailer does not have to offer that residential customer another instalment plan, unless the retailer is satisfied that the residential customer will comply with the proposed plan.	
Verification/Tests Discussion with the Credit Team Leader Review of the Payment Arrangement Guidelines	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee meets the requirement of Compendium subclause 6.4(3); if a customer has in the previous 12 months had 2 instalment plans cancelled due to non-payment, the licensee does not have to offer that residential customer another instalment plan, unless the retailer is satisfied that the residential customer will comply with the proposed plan. Therefore, if this scenario occurs, the licensee will only offer another instalment plan if the licensee is satisfied payment instalments	

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can be met. A copy of the Payment Arrangement Guidelines was provided, it was noted this requirement is stated in the Broken Arrangements section of the Payment Arrangement Guidelines. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 208 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.6(1)	Compliance rating 1 – Compliant
<i>Energy Coordination Act section 11M</i> A retailer must give reasonable consideration to the request by a customer; or a relevant consumer representative organisation, for a reduction of the customer's fees, charges or debt.	
Verification/Tests Discussion with Credit Team Leader Review of the Financial Hardship Policy Review of the Payment Arrangement Guidelines	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee may, under circumstances of financial hardship or payment difficulty, reduce the customer's fees, debt or charges. The licensee will assess each customer's situation on a case by case basis and staff are instructed to refer to the Financial Hardship Policy and Payment Arrangement Guidelines when dealing with customers in this situation. These two documents outline the process and requirements required when assessing a customer's situation. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 209 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.6(2)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> In giving reasonable consideration under clause 6.6(1), a retailer should refer to the guidelines in its hardship policy referred to in clause 6.10(2)(d).	
Verification/Tests Discussion with the Credit Team Leader Review of the Financial Hardship Policy	
Observations As required by Compendium clause 6.10, the licensee must advise the customer of the specifications in subclause 6.10(2)(d). Through inquiry with the Credit Team Leader, a copy of the Financial Hardship Policy was provided and it was noted that the licensee develops the Financial Hardship Policy in accordance with the requirements of clause 6.10(2)(d) and it is submitted to the Authority for approval. All debt collection staff are provided with a copy of the Financial Hardship Policy and additionally they receive training on how to handle customers experiencing financial hardship. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 210 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.7	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> Where it is reasonably demonstrated to the retailer that the customer, experiencing financial hardship, is unable to meet the customers obligations under the previously elected payment arrangement, a retailer must give reasonable consideration to offering to revise an existing instalment plan.	
Verification/Tests Discussion with the Credit Team Leader Review of the Financial Hardship Policy Review of the Financial Hardship/Payment Difficulties Outline	
Observations Through inquiry with the Credit Team Leader, it was noted that that the licensee endeavours to revise existing instalment plans if the customer experiencing financial hardship is finding difficulty to meet the payments of the previously elected arrangement, each case is assessed on a case by case basis. These provisions are also included in the Financial Hardship Policy and the Financial Hardship/Payment Difficulties Outline, copies of these were provided. All debt collection staff are provided with a copy of the Financial	

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Hardship Policy and additionally they receive training on how to handle customers experiencing financial hardship. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 211 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.8	Compliance rating 1 - Compliant
Energy Coordination Act section 11M A retailer must advise a customer experiencing financial hardship of the options specified in subclause 6.8.	
Verification/Tests Inquiry with Credit Team Leader Review of the Financial Hardship Policy Review of the Financial Hardship/Payment Difficulties Outline	
Observations As stated in Compendium clause 6.8, where a customer is experiencing financial hardship, the licensee offers the option to have the bill redirected to a third person at no charge, alternative payment methods, relevant consumer representative organisations available and availability of other financial assistance and grants schemes. Through inquiry with the Credit Team Leader, it was noted that the licensee advises the customer of all the above options if they are experiencing financial hardship. A copy of the Financial Hardship Policy and the Financial Hardship/Payment Difficulties Outline were reviewed, and it was noted that the above options are included within these documents. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 212 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.9(1)	Compliance rating -Not Rated
Energy Coordination Act section 11M A retailer must determine the minimum payment in advance amount for residential customers experiencing payment difficulties or financial hardship in consultation with relevant consumer representative organisations.	
Verification/Tests Discussion with the Credit Team Leader	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee does not set a prescribed minimum payment in advance amount for residential customers experiencing financial hardship or payment difficulties as the amount would vary on a case by case basis. Case Managers negotiate with customers experiencing payment difficulties or financial hardship on a payment arrangement plan, in consultation with relevant consumer representative organisations. There were no payments in advance by a residential customer experiencing payment difficulties or financial hardships during the audit period. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 213 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.9(2)	Compliance rating Not Rated
Energy Coordination Act section 11M A retailer may apply different minimum payment in advance amounts for residential customers experiencing payment difficulties or financial hardship and other customers.	
Verification/Tests Discussion with the Credit Team Leader	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee does not set a prescribed minimum payment in advance amount for residential customers experiencing financial hardship or payment difficulties as the amount would vary on a case by case basis. There were no payments in advance by a residential customer experiencing payment difficulties or financial hardships during the audit period. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement	

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N/A	
Item 214	
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.10(1)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must develop a hardship policy to assist customers experiencing financial hardship in meeting their financial obligations and responsibilities to the retailer.	
Verification/Tests Discussion with the Credit Team Leader Observation of Financial Hardship Policy and its availability on the licensee's website	
Observations Through inquiry with the Credit Team Leader, it was noted that a Financial Hardship Policy is developed and maintained by the licensee and is available on the licensee's website for customers and the general public to view. After viewing the licensee's website, the policy could be found and is therefore accessible to the general public. Additional to the licensee's website, it was noted that a customer can call the licensee and request a hardcopy of the Financial Hardship Policy be sent to their address. The licensee provides a copy of the Policy to all customers who are assessed as being in financial hardship. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	
Item 215	
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.10(2)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must ensure that its hardship policy complies with the criteria specified in subclause 6.10(2).	
Verification/Tests Discussion with the Credit Team Leader Review of the Financial Hardship Policy	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee has established and developed a Financial Hardship Policy that incorporates all the criteria specified in Compendium subclause 6.10(2). A copy of the Financial Hardship Policy was reviewed and it was noted that it contained the requirements of the clause.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement The policy includes the telephone number of FCAWA, however, do not include the telephone numbers of Credit Management Staff and other relevant consumer representative organisations. Therefore, it is recommended that the policy be updated accordingly.	
Item 216	
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.10(3)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must give residential customers, financial counsellors and relevant consumer representative organisations details of the retailer's hardship policy, at no charge. The retailer must provide all residential customers identified as experiencing financial hardship with details of its hardship policy.	
Verification/Tests Discussion with the Credit Team Leader Observation of Financial Hardship Policy and its availability on the licensee's website	
Observations Through inquiry with the Credit Team Leader, it was noted that a Financial Hardship Policy is developed and maintained by the licensee and is available on the licensee's website for customers and the general public to view. After viewing the licensee's website, the policy could be found and is therefore accessible to the general public. This policy contains the contact details of the relevant financial counsellors and consumer representatives. Additionally, residential customer can contact the licensee via telephone and request these details, which are then posted or emailed out, depending on customer preference. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	
Item 217	
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.10(4)	Compliance rating 1 - Compliant

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<i>Energy Coordination Act section 11M</i>	
A retailer must keep a record of the following: the relevant consumer representative organisations consulted on the contents of its hardship policy; the date the hardship policy was established; the dates the hardship policy was reviewed; and the dates the hardship policy was amended.	
Verification/Tests Discussion with the Credit Team Leader Screenshot of Financial Hardship Policy version control	
Observations Through inquiry with the Credit Team Leader and observation of the Financial Hardship Policy version control, it was noted the version control of documentation is maintained on Domino Documents (document management system) which includes the date the hardship policy was established and the amendment dates. The licensee does have a list of relevant consumer representative organisations. Furthermore, this list is made available to the credit team and is available on the customer charter. We noted that the two main consumer representative organisations consulted are Financial Counsellors Association of Western Australia (FCAWA) and Western Australian Council of Social Service (WACOSS). Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 218	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.10(5)	1 - Compliant
<i>Energy Coordination Act section 11M</i>	
Unless otherwise notified in writing by the Authority, a retailer must review its hardship policy at least annually and submit to the Authority the results of that review within 5 business days of its completion.	
Verification/Tests Discussion with the Credit Team Leader and the National Credit Manager	
Observations Through inquiry with the Credit Team Leader and the National Credit Manager, it was noted that the Financial Hardship Policy is reviewed annually and an automatic notification is sent to the National Credit Manager when a review is required. The National Credit Manager then submits results of the review to the Authority within the timeframe specified by the Authority. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 219	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.10(6)	1 - Compliant
<i>Energy Coordination Act section 11M</i>	
The retailer may, at any time, review its hardship policy and submit to the Authority the results of that review within 5 business days after it is completed.	
Verification/Tests Discussion with the Credit Team Leader and the National Credit Manager	
Observations Through inquiry with the Credit Team Leader and the National Credit Manager, it was noted that the Financial Hardship Policy is reviewed annually and an automatic notification is sent to the National Credit Manager when a review is required. The licensee has not had to review its Financial Hardship Policy outside of the annual review. The National Credit Manager then submits results of the annual review to the Authority within the timeframe specified by the Authority. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 220	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.10(7)	1 - Compliant
<i>Energy Coordination Act section 11M</i>	
A retailer must have regard to the Authority's Financial Hardship Policy Guidelines when updating their hardship policy.	
Verification/Tests Discussion with the National Credit Manager	
Observations Through inquiry with the National Credit Manager, it was noted that the licensee reviews its Financial Hardship Policy and as a part of	

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this process, liaises with the Authority to ensure their guidelines are in-line with the Authority's. The Financial Hardship Policy is then submitted to the Authority for approval and any communications in regards to the review is distributed to the National Credit Manager. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 221	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.11	1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must consider any reasonable request for alternative payment arrangements from a business customer who is experiencing payment difficulties.	
Verification/Tests Discussion with Credit Team Leader Review of the Financial Hardship/Payment Difficulties Outline	
Observations Through inquiry with the Credit Team Leader, it was noted that if a customer is deemed to have payment difficulties because they are unable to pay a bill, the customer may be offered a payment extension or payment arrangement plan. All situations are handled on a case by case basis by the Credit team. A copy of the Financial Hardship/Payment Difficulties Outline was provided, and it was noted that it includes consideration of the customer's capacity to pay and negotiation of a payment arrangement with the customer. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 222	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 7.1	2 – Non-compliant
<i>Energy Coordination Act section 11M</i> A retailer must follow the procedures specified in subclause 7.1(1) prior to arranging for disconnection of a customer's supply address for failure to pay a bill. A customer has failed to pay a bill in the circumstances specified in subclause 7.1(2).	
Verification/Tests Discussion with the Credit Team Leader Testing of 9 Monthly Smart Saver disconnections	
Observations Through inquiry with the Credit Team Leader, it was noted that prior to arranging for disconnections due to failure to pay for a bill, the licensee issues reminder notices after 14 business days from the date of dispatch of the bill and disconnects supply of gas after contacting the customer. Disconnection notices are also sent to customers to inform them that supply is to be disconnected. It was also noted that a previous breach occurred due to the disconnection strategy of the licensee's Monthly Smart Saver plan. Following legal advice, the licensee adapted their disconnection strategy to meet the requirements of this obligation. Through testing of a sample of 9 Monthly Smart Saver disconnections, it was noted that there was one instance where a reminder notice was issued one week after the invoice date. This was not picked up in the manual review of disconnections and the account was disconnected.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	2 – Non-compliant – minor impact on customers or third parties
Opportunity for Improvement Continue monitoring the disconnections to ensure that there are no further breaches of subclause 7.1(1). It is noted that the licensee has since implemented a new automated strategy commencing in May 2014 to avoid the manual transfer of accounts and reminder notices being sent out ahead of the required timeframe.	

Item 223	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 7.2(1)	1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must not arrange for disconnection of a customer's supply address for failure to pay a bill in the circumstances specified in subclause 7.2(1).	
Verification/Tests Discussion with the Credit Team Leader Review of the NG Disconnection Procedure	
Observations Compendium clause 7.2(1) sets out a list of specifications that the licensee must meet before disconnection of an NG customer. Through inquiry with the Credit Team Leader, it was noted that when disconnecting an NG customer the licensee follows the requirements listed in subclause 7.2(1) and all accounts are individually reviewed before disconnection. However these requirements are not formally	

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documented in the licensee’s NG Disconnection Procedural document. Having said that, staff are fully trained and are proficient in understanding the procedures that needs to be followed. On this basis we have considered the control environment to be generally adequate.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement The NG Disconnection Procedure should be updated and the list of requirements from subclause 7.2(1) should be added to the document. This ensures that the employees of the licensee are following consistent guidelines and no NG customer is incorrectly disconnected.	

Item 225 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 7.4		Compliance rating –Not Rated
<i>Energy Coordination Act section 11M</i> A retailer must not arrange for disconnection of a customer’s supply address for denying access to the meter unless the conditions specified in subclause 7.4(1) are satisfied. A retailer may arrange for a distributor to carry out 1 or more of the requirements referred to in subclause 7.4(1) on behalf of the retailer.		
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor		
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that the licensee has not issued any disconnection notices under these circumstances. As a result, no procedures have yet been developed that detail the action to be taken in these circumstances, however the distributor would generally contact the licensee to arrange a special read. Based on the above observations, it was concluded that while sufficient processes are not currently in place, compliance has been met because no disconnections as a result of being denied access to a meter have yet occurred. However, there was no activity during the audit period to test compliance.		
Adequacy of Controls Rating	C – Inadequate controls – significant improvement required	
Compliance Rating	Not Rated	
Corrective Action Procedures should be created that detail the process to be followed in regards to disconnecting supply to a customer who denies access to a meter.		

Item 227 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 7.6		Compliance rating 1 – Compliant
<i>Energy Coordination Act section 11M</i> A retailer or a distributor must not arrange for disconnection or disconnect a customer’s supply address in the circumstances specified in clause 7.6.		
Verification/Tests Discussion with the Credit Team Leader Review of NG Disconnection Procedure Review of Complaint Handling Procedure		
Observations As stated in Compendium clause 7.6, the licensee must not arrange for disconnection or disconnect a customer’s supply address in the circumstance specified in clause 7.6. Through inquiry with the Credit Team Leader, it was noted that the licensee takes into account the specifications of 7.6 before disconnecting or arranging to disconnect a customer. After review of the NG Disconnection Procedure and Complain Handling Procedure, it was noted that the licensee’s NG Disconnection Procedure and Complaint Handling Procedure included the requirements of Compendium clause 7.6 (e-g). However the procedure is incomplete as it does not refer to the requirements of Compendium clause 7.6 (a-d); a) disconnection requested by the customer; b) disconnection for emergency reasons; c) disconnection due to planned interruption; d) disconnection in order to prevent unauthorised utilisation. Having said that, staff are fully trained and are proficient in understanding the procedures that needs to be followed. On this basis we have considered the control environment to be generally adequate.		
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed	
Compliance Rating	1 – Compliant	
Opportunity for Improvement The licensee’s NG Disconnection Procedure and/or the Complaint Handling Procedure should be updated to include the requirements in clause 7.6(a-d).		

Item 228 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 8.1(1)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> In the circumstances specified in clause 8.1(1)(a)-(c), a retailer must arrange for reconnection of the customer’s supply address if the customer makes a request for reconnection, and pays the retailer’s reasonable charges for reconnection (if any) or accepts an offer of an instalment plan for the retailer’s reasonable charges for reconnection.		

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Verification/Tests	
Discussion of Credit Team Leader Review of NG Reconnection Procedure	
Observations	
As stated in Compendium clause 8.1(1)(a)-(c), customers can be disconnected due to failure to pay, not providing access to meters for reads and illegal use of gas. Through inquiry with the Credit Team Leader, it was noted that if a customer has been disconnected, but remedies the issue and makes request for reconnection, and additionally pays any reasonable charge for reconnection or accepts an offer of an instalment plan, the licensee will then make arrangements to reconnect the customer. After review of the NG Reconnection Procedure, it was noted that the process as well as all the specifications of 8.1(1) were not clearly outlined. Having said that, staff are fully trained and are proficient in understanding the procedures that needs to be followed. On this basis we have considered the control environment to be generally adequate.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement	
The NG Reconnection Procedure should be updated to more clearly outline the process and all specifications in clause 8.1(1). This will create guidance for employees at the licensee and greater consistency in the disconnection process.	

Item 229	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 8.1(2)	3 – Non-compliant
<i>Energy Coordination Act section 11M</i>	
A retailer must forward the request for reconnection to the relevant distributor that same business day if the request is received before 3pm on a business day; or no later than the next business day if the request is received after 3pm on a business day, or on the weekend or on a public holiday.	
Verification/Tests	
Testing of 20 reconnection requests Discussion with the Credit Team Leader Review of the NG Reconnection Procedure	
Observations	
A sample of 20 reconnection requests was selected for testing and it was noted that two reconnection requests were delayed resulting in the requests not being forwarded to the distributor within the required time guidelines. Based on the above observation, it was concluded that there is not sufficient processes in place to ensure compliance. Through inquiry with the Credit Team Leader, it was noted that the licensee aims to forward the request for reconnection to the relevant distributor that same business day if the request is received before 3pm on a business day; or no later than the next business day if the request is received after 3pm on a business day, or on the weekend or on a public holiday. The Credit Team Leader also provided a copy of the NG Reconnection Procedure, it was noted this clause requirement was included in the procedure.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	3 – Non-compliant – moderate impact on customers or third parties
Corrective Action	
It is recommended that the licensee reinforces the requirement to forward reconnection requests to the distributor to ensure that supply of gas is reconnected within the specified timeframe. This can be done via automated reminders or notifications on the system.	

Item 230	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 8.1	1 - Compliant
<i>Energy Coordination Act section 11M</i>	
A distributor must reconnect the customer's supply address upon the request of a retailer and subject to the retailer complying with the retail market rules, within 2 business days of receipt of the request. This timeframe does not apply in the event of an emergency.	
Verification/Tests	
Discussion with Credit Team Leader Review of Discoverer Report	
Observations	
Through inquiry with the Credit Team Leader, it was noted that the licensee will reconnect the customer's supply address upon request from the customer within 2 business days of receipt of the request. Requests for reconnection are usually received over the phone, and information is logged by the Credit officer within the Oracle system in the customer's diary notes. The licensee will then contact the distributor and request they carry out the reconnection. Additionally, a copy of an Oracle Discoverer Report was provided and reviewed. This report is run for monthly performance reporting to monitor if reconnections and disconnections are performed within the required timeframes. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 231	Compliance rating
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Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.1(1)		1 - Compliant
<i>Energy Coordination Act section 11M</i>		
A retailer must give notice to each of its customers affected by a variation in its tariffs as soon as practicable after the variation is published and no later than the next bill in the customer's billing cycle.		
Verification/Tests		
Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of price notification letters		
Observations		
Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that the licensee notifies the Minister for Energy, Finance, Citizenship and Multicultural Interests of changes to NG prices and fees at least 30 days before the effective date of the tariff variation. This notification is provided via letter and includes explanations for the increases. Notifications are sent to customers no later than the next bill. Customers are then informed of changes to prices via email or written correspondence. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.		
Adequacy of Controls Rating		A – Adequate controls – no improvement needed
Compliance Rating		1 – Compliant
Corrective Action/Opportunity for Improvement		
N/A		

Item 232 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.1(2)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i>		
A retailer must give a customer on request, at no charge, reasonable information on the retailer's tariffs, including any alternative tariffs that may be available to the customer.		
Verification/Tests		
Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the licensee's website		
Observations		
Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that information regarding tariffs is readily available on the licensee's website. The customer is also able to call the customer service line to receive tariff information over the phone or arrange for a written copy to be provided at no charge. Based on the above observations, it was concluded that adequate controls are currently in place to ensure compliance.		
Adequacy of Controls Rating		A – Adequate controls – no improvement needed
Compliance Rating		1 – Compliant
Corrective Action/Opportunity for Improvement		
N/A		

Item 233 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.1(3)		Compliance rating –Not Rated
<i>Energy Coordination Act section 11M</i>		
A retailer must give a customer the information requested on tariffs within 8 business days of the date of receipt of the request and, if requested, a retailer must provide the information in writing.		
Verification/Tests		
Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the licensee's website		
Observations		
Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that information regarding tariffs are readily available on the licensee's website. Where information is requested in writing, the licensee would provide the customer with the information within the 8 business days' timeframe. As no requests for the information in writing have occurred during the audit period, no procedures have yet been developed that detail the action to be taken in these circumstances. Based on the above observations, it was concluded that while the process of providing tariff information in writing requires formalisation, compliance has been met as no such requests have yet occurred.		
Adequacy of Controls Rating		B – Generally adequate controls – improvement needed
Compliance Rating		Not Rated
Opportunity for Improvement		
Tariff review procedures or a tariff review process map should be created that detail the process to be followed in regards to providing tariff information in writing when requested by the customer.		

Item 234 / Item 63 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.2(1)		Compliance rating –Not Rated
<i>Energy Coordination Act section 11M</i>		
A retailer must, on request, give a customer their billing data.		
Verification/Tests		

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Discussion with the Customer Service Team Leader and Customer Service Supervisor	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that no instances of a customer requesting their billing data have occurred during the audit period. However, if this were to occur, billing data would be provided to the customer. It was also noted that NG customers are able to access billing data online through the 'My Account' section of the licensee's website. Based on the above observations, it was concluded that compliance has been met as no requests for billing data have yet occurred.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 235	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.2(2)	–Not Rated
<i>Energy Coordination Act section 11M</i> A retailer must give the requested billing data at no charge if a customer requests their billing data for a period less than the previous 2 years and no more than once a year, or in relation to a dispute with the retailer.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that no instances of a customer requesting their billing data have occurred during the audit period. However, if this were to occur, billing data would be provided to the customer at no charge. It was also noted that NG customers are able to access billing data online through the 'My Account' section of the licensee's website. Based on the above observations, it was concluded that compliance has been met as no requests for billing data have yet occurred.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 236	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.2(3)	Not Rated
<i>Energy Coordination Act section 11M</i> A retailer must give the requested billing data within 10 business days of the date of receipt of either the request, or payment of the retailer's reasonable charge for providing the billing data.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that no instances of a customer requesting their billing data have occurred during the audit period. However, if this were to occur, billing data would be provided to the customer within the specified timeframe. It was also noted that NG customers are able to access billing data online through the 'My Account' section of the licensee's website. Based on the above observations, it was concluded that compliance has been met as no requests for billing data have yet occurred.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 237	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.2(4)	1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must keep a customer's billing data for 7 years.	
Verification/Tests Discussion with the Credit Team Leader	
Observations Through inquiry with the Credit Team Leader, it was noted the licensee stores billing information in its Oracle system for more than 7 years as required. The licensee, being a subsidiary of a larger business group has its data backed up and stored on servers off-site. This data can be retrieved as part of the licensee's business continuity and disaster recovery framework. Periodic testing of backed up data is also performed to ensure the integrity of the data. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant

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Corrective Action/Opportunity for Improvement N/A

Item 238	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.3(a) (i)-(xv)	-Not Rated
<i>Energy Coordination Act section 11M</i> A retailer must give a residential customer on request, at no charge, information on the types of concessions available to the customer, and the names and contact details of the organisation responsible for administering those concessions (if not the retailer).	
Verification/Tests Observation of the licensee's website Discussion with the Credit Team Leader	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee does not offer any concessions to its customers. This is stated in the licensee's Policy. However it was noted that should concessions be available in the future, information relating to concessions will be available to customers at no charge.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 239	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.4	1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must give a customer on request, at no charge, general information on: cost-effective and efficient ways to utilise gas (including referring a customer to a relevant information source); how a customer may arrange for an energy efficiency audit at the customer's supply address; and the typical running costs of major domestic appliances.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Customer Service Charter and the licensee's website	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that energy saving tips are readily available to customers on the licensee's website and within the Customer Charter, also located on the website. These tips include effective ways on saving energy and money. As the licensee does not perform energy efficiency audits, when asked by customers, the licensee refers customers to external companies that perform the audits. Based on the above observations, it was concluded that compliance has been met although the licensee should update their website and Customer Service Charter to include typical running costs of major domestic appliances.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement The licensee's website and Customer Service Charter should be updated to include typical running costs of major domestic appliances.	

Item 240	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.5	1 - Compliant
<i>Energy Coordination Act section 11M</i> If a customer asks for information relating to the distribution of gas, a retailer must give the information to the customer or refer the customer to the relevant distributor for a response.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that where the customer requests for information relating to the distribution of gas, the licensee refers the customer to the distributor. Based on the above observation, it was concluded that compliance has been met.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 241	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.5A(1)	-Not Rated
<i>Energy Coordination Act section 11M</i> The retailer must, within 3 months of being subject to the Compendium, lodge with the Authority, a gas customer safety awareness programme.	

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Verification/Tests	
Discussion with the Regulatory Manager Observation of the Customer Charter	
Observations	
Through discussion with the Regulatory Manager it was noted that an awareness program was lodged with the Authority within 3 months of being subject to the Compendium, which was lodged with the Authority prior to the Audit period. Additionally through observation of the Customer Charter and discussion with the Regulatory Manager it was noted that a safety awareness section is detailed in the Customer Charter, in training programs and on the licensee’s website safety section. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement	
N/A	

Item 242	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.5A(2)	–Not Rated
<i>Energy Coordination Act section 11M</i> The retailer must consult with the Authority when preparing the gas customer safety awareness programme.	
Verification/Tests	
Discussion with the Regulatory Manager Observation of the Customer Charter	
Observations	
Through discussion with the Regulatory Manager it was noted that an awareness program was lodged with the Authority within 3 months of being subject to the Compendium and was constructed in consultation with the Authority prior to the Audit period. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement	
N/A	

Item 243	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.5A(3)	1 - Compliant
<i>Energy Coordination Act 11M</i> The gas customer safety awareness programme is to communicate information to customers regarding safety in the use of gas and must address, at a minimum, the information referred to in clause 10.5A(3)(a)-(e).	
Verification/Tests	
Observation of the Customer Charter Observation of the Health and Safety section of the licensee’s website	
Observations	
Through observation of the Customer Charter and the licensee’s website it was noted that the licensee reports safety information that meets the requirements of clause 10.5A(3)(a)-(e). Information on safety includes properties of gas, a requirement to use approved appliances and licensed gas installers, the procedure for reporting gas leaks and emergency contact numbers. It was noted that there is opportunity for improvement within the health and safety section of the licensee’s website regarding information of procedures to deal with gas leaks and possible emergency contact numbers.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement	
It is recommended that the licensee update the Health and Safety section of the website to include more information such as the proper procedure for reporting gas leaks and emergency contact numbers.	

Item 245	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.9	1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer and distributor must, to the extent practicable, ensure that any written information that must be given to a customer by the retailer, distributor or gas marketing agent under the Gas Marketing Code and the Compendium is expressed in clear, simple and concise language and is in a format that makes it easy to understand.	
Verification/Tests	
Observation of Residential Reminder Notice Observation of NG Invoice	
Observations	
Through review of information sent out to customers from the licensee such as a Residential Reminder Notice and NG Invoice it is evident that written information is expressed to customers in a clear and concise language and a format that is easily interpretable.	

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Additionally, customer support contact information is provided on all communication for further queries. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 246 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.10 (1)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer and distributor must tell a customer on request how the customer can obtain a copy of the Gas Marketing Code of Conduct and the Compendium.	
Verification/Tests Discussion with the Customer Service Team Leader Discussion with the Customer Service Supervisor Consideration of relevant documentation	
Observations It was noted that the Terms and Conditions of the new customer Welcome Pack highlight that the customer may request from the licensee any information regarding any relevant Codes, as well as prices and fees. Through discussions with the Customer Service Team Leader and the Customer Service Supervisor, it was further noted that this information is provided to the customer upon request. The Gas Marketing Code of Conduct is also available to the public through the licensee's website. Based on the above observations, it was concluded that the licensee is compliant.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 247 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.10(2)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer and distributor must make electronic copies of the Gas Marketing Code and the Compendium available, at no charge, on their website.	
Verification/Tests Observation of screenshots of licensee's website Discussion with the Regulatory Manager	
Observations Through observation of the licensee's website, it was noted that the Gas Marketing Code of Conduct and Compendium of Gas Customer Licence Obligations is available for download on the licensee's website. Additionally through discussion with the Regulatory Manager it was noted that for customers without internet access, the licensee provides copies of both documents at all Gas Houses and can distribute copies at no charge upon customer requests. For the period 1/9/2012 to 31/12/2013, we noted that the licensee had the 2012 version of the Code, including the Compendium on its website. While the 2014 version of the Code including the Compendium was on the website for the period 1/1/2014 to 31/8/2014. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 248 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.10(3)	Compliance rating 1 – Compliant
<i>Energy Coordination Act section 11M</i> A retailer and distributor must make a copy of the Gas Marketing Code and the Compendium available for inspection, at no charge, at their offices.	
Verification/Tests Inquiry with Customer Service Team Leader and Customer Service Supervisor Observation of Gas House Packs Observation of the licensee's website including the Gas Marketing Code and the Compendium	
Observations Through observation of the licensee's website and 'Gas House Packs' and inquiry with the Customer Service Team Leader and Supervisor, it was noted that the Gas Marketing Code of Conduct and the Compendium of Gas Customer Licence Obligation are available on the licensee's website and intranet, as well as part of the licensee's 'Gas House packs' at 'Gas Houses'. Based on the above observations, it was concluded that there are sufficient processes currently in place to ensure compliance.	

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Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 249 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.11(1)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer and distributor must make available to a residential customer on request, at no charge, services that assist the residential customer in interpreting information provided by the retailer or distributor (including independent multi-lingual and TTY services, and large print copies).	
Verification/Tests Observation of NG Invoice Discussion with the Regulatory Manager	
Observations Through observation of a NG Invoice it was noted that Interpreter Services, TTY Services and further customer assistance is available at no charge in clear print on customer bills. Through discussion with the Regulatory Manager it was noted that upon request, customers are directed to the TTY and independent multi-lingual services while the licensee also offers TTY services at no charge on the licensee’s website which was sighted. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 250 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.11(2)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer and, where appropriate, a distributor must include on a residential customer’s bill and bill related information, reminder notice and disconnection warning: the telephone number for their TTY services; the telephone number for independent multi-lingual services; the National Interpreter Symbol with the words “Interpreter Services”.	
Verification/Tests Observation of Residential Reminder Notice Observation of NG Invoice Observation of Disconnection Notice	
Observations Through observation of an NG Invoice, Residential Reminder Notice and Disconnection Notice it was noted that contact details for Interpreter Services including the NIS symbol, TTY Services, Independent multi-lingual services and further customer assistance are available in clear print on all the aforementioned forms of communication. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 251 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 12.1(1)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer and distributor must develop, maintain and implement an internal process for handling complaints and resolving disputes.	
Verification/Tests Interviewed Customer Service Team Leader and Customer Advocacy Manager Reviewed internal procedures for handling complaints Reviewed complaints training register	
Observations The Licensee has a “Complaint Handling Procedure” and “Complaint Handling Process” both of which are supported by internal customer advocacy training and a dedicated Customer Advocate. These internal documents are reviewed and updated yearly or as necessary when changes are made to complaint handling guidelines or standards. The procedure details a comprehensive Complaint Handling flowchart which ensures a consistent approach to resolving complaints. The procedure covers points such as: <ul style="list-style-type: none"> • recording a resolution • how to manage a customer’s complaint • managing customers’ behaviour • verbal and written complaints 	

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<ul style="list-style-type: none"> escalating complaint process resolution process 	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 252	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 12.1(2)(a) and (b)	1 - Compliant
<i>Energy Coordination Act section 11M</i>	
The complaints handling process must comply with AS ISO 10002 – 2006 and address, at the least, the criteria specified in clause 10.2(b).	
Verification/Tests	
Interviewed Customer Service Team Leader and Customer Advocacy Manager Examined complaint handling policy and procedure in addition to training material	
Observations	
The Licensee has complied with AS ISO 10002 – 2006 and addressed criteria specified in clause 10.2(b). A review of the Licensees complaints handling process was performed and it was found that the process complies with AS ISO 10002 – 2006 (Customer satisfaction – Guidelines for complaints handling in organisations) and includes all criteria outlines in clause 10.2(b). The Licensees process covers:	
<ul style="list-style-type: none"> complaint handling what is a complaint what is an enquiry why do we have a complaints handling process how can a customer make a complaint why is customer feedback important recording of a complaint (both licensees and non-licensee customers) process for when a customer is not satisfied with the resolution customer advocate ombudsman escalation 	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 253	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 12.1(2)(c) and (d)	1 - Compliant
<i>Energy Coordination Act section 11M</i>	
The complaints handling process must detail how the retailer will handle complaints about a retailer or marketing, and be available at no cost to customers.	
Verification/Tests	
Interviewed Customer Service Team Leader and Customer Advocacy Manager Examined Customer Complaints Brochure, Terms and Conditions, Internet Site, Customer Charter and a sample invoice.	
Observations	
Where applicable the Licensee has ensured that information regarding the complaints handling process has been made available to the customer e.g. on all customer invoices. This information is available at no cost to customers through the Licensee’s website and can also be obtained free of charge via email or in person at their head office.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 254	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 12.1(3)(a)	1 - Compliant
<i>Energy Coordination Act section 11M</i>	
When responding to a customer complaint, advise the customer that the customer has the right to have the complaint considered by a senior employee within the retailer or distributor (in accordance with its complaints handling process)	
Verification/Tests	
Interviewed Customer Service Team Leader and Customer Advocacy Manager	

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Examined complaint handling policy and procedure in addition to training material	
Observations Customers are advised that their complaint can be considered by a senior employee and is outlined in the Licensee's complaints handling process and procedure. A sample of 10 customer complaints were reviewed of which all were advised of their right to have the complaint considered by a senior employee.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 255 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 12.1(3)(b)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> When a complaint has not been resolved internally in a manner acceptable to the customer, a retailer or distributor must advise the customer of the reasons for the outcome (on request, the retailer or distributor must supply such reasons in writing); and that the customer has the right to raise the complaint with the gas ombudsman or another relevant external dispute resolution body and provide the freecall telephone number of the gas ombudsman.		
Verification/Tests Interviewed Customer Service Team Leader and Customer Advocacy Manager Examined customer information regarding the complaints handling and escalation process		
Observations Customers are advised that their complaint can be raised with the Energy & Water Industry Ombudsman Western Australia and the Department of Commerce and Consumer Protection through various means. The ombudsman's freecall number is provided to all customers on their monthly invoice and via the Licensee's website. Customers are always advised of the reason for their dispute outcome (and when requested can be provided in writing) as documented in the licences procedure and process documents. From discussions and a review of one sample item, the licensee is compliant.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 256 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 12.2		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must comply with any guideline developed by the Authority relating to distinguishing customer queries from customer complaints.		
Verification/Tests Interviewed Customer Service Team Leader and Customer Advocacy Manager Examined staff training materials in addition to relevant policy and procedural documents		
Observations Staff training specifically relates to distinguishing customer queries from customer complaints as per the Authority's Customer Complaints Guidelines. This comprehensive training accompanied by procedural documents that are available to all staff in order to ensure that complaints are correctly classified. Procedural documents outline that a complaint is defined by the licensee as "an expression of dissatisfaction with product or service" while an enquiry is defined as "a request by a customer for information about a product or service, which does not reflect any dissatisfaction".		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 257 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 12.3		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer, distributor and gas marketing agent must give a customer on request, at no charge, information that will assist the customer in utilising the respective complaints handling processes.		
Verification/Tests Interviewed Customer Service Team Leader and Customer Advocacy Manager Performed a walkthrough of the complaints handling process and examined information that is provided to customers on request		
Observations Information is provided to customers at no charge when requested. A comprehensive complaints handling process and training ensures that this is adhered to. The Complaints Handling Procedure makes direct reference to providing information to a customer when requested in order to assist them in resolving any complaint.		

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<p>Where applicable the Licensee has ensured that information regarding the complaints handling process has been made available to the customer e.g. on all customer invoices. This information is available at no cost to customers through the Licensee's website and can also be obtained free of charge via email or in person at their head office.</p> <p>There has been 89 customer requests. From discussions and a review of one sample item, the licensee is complaint.</p>	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 258		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 12.4		1 - Compliant
<i>Energy Coordination Act section 11M</i>		
When a retailer, distributor or gas marketing agent receives a complaint that does not relate to its functions, it must advise the customer of the entity that it reasonably considers to be the appropriate entity to deal with the complaint (if known).		
Verification/Tests		
Interviewed Customer Service Team Leader, Customer Advocacy Manager and Customer Advocate Performed a walkthrough of the complaints handling process		
Observations		
Information is provided to customers when a complaint does not relate to the Licensee. Important links and documents such as Kleenheat's Gas Customer Charter, Compendium of Gas Customer Licence Obligations, Gas Marketing Code of Conduct 2014 and Financial Hardship Policy are all available online or in person to the customer. Complaints unrelated to the Licensee's function are appropriately referred to in accordance with the complaints handling process to the correct entity (if known). This is documented in module 15 of Complaint Handling which is available to all staff. Detailed steps are also included for recording complaints for customers that do not have an active Oracle account.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		
N/A		

Item 259		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 13.1(1)		1 - Compliant
<i>Energy Coordination Act section 11M</i>		
Unless expressly provided otherwise, a retailer, distributor or gas marketing agent must keep a record or other information as required to be kept by the Code of Conduct and the Compendium for at least 2 years from the last date on which the information was recorded.		
Verification/Tests		
Discussion with the Regulatory Manager		
Observations		
Through discussion with the Regulatory Manager it was noted that the licensee holds all information required by the Code of Conduct and the Compendium for an unlimited timeframe in its Oracle ERP system. Information captured in the ERP system are backed up and stored offsite. This information can be retrieved as and when required. Thus satisfying the required minimum period of 2 years. As the licensee retains all data, there is no document retention policy. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		
N/A		

Item 260		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 13.1(2)		1 - Compliant
<i>Energy Coordination Act section 11M</i>		
For the purposes of clause 13.1(1), a retailer must keep records or other information specified in clause 13.1(2)(a)-(g).		
Verification/Tests		
Observation of Trading and Distribution Licence Annual Report 2013/2014 Observation of customer data Observation of report on call centre performance Inquiry with Regulatory Manager		
Observations		
Through discussion with the Regulatory Manager and review of all relevant documentation it was noted that the licensee maintains records in accordance with Clause 13.1(2)(a)-(g) as follows: a)The licensee maintains a record of customers which can be filtered down to the types of contracts;		

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<p>b)Customer contacts made are recorded via Flowtalk and Oracle’s diary notes; c)Version control of hardship policy maintained on Domino Documents; d)All affordability and access indicators are recorded and reported in the Annual Performance Report; e)Customer complaints are recorded and reported in the Annual Performance Report; f)Monthly reports on call centre performance are generated and stored by the licensee; and g)The total number of residential accounts and non-residential accounts are recorded and reported in the Annual Performance Report.</p> <p>This information is available to all staff. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.</p>	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 262	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 13.2(a) (i)-(xv)	1 - Compliant
<i>Energy Coordination Act section 11M</i>	
A retailer must keep a record of the total number and percentage of its residential customer accounts under the affordability and access indicators specified in clause 13.2(a)(i)-(xv).	
Verification/Tests	
Discussion with Credit Team Leader Review of Trading and Distribution Licence Annual Performance Report 2013/14	
Observations	
Compendium clause 13.2(a)(i)-(xv) states all the required records of its residential customers it is required to be kept. Through inquiry with the Credit Team Leader, it was noted that the licensee maintains records of the total number and percentages of key statistics outlined in Compendium clause 13.2(a)(i)-(ix) of their residential customers in their annual report. A copy of the Trading and Distribution Licence Annual Performance Report 2013/14 was provided and it was noted that all required information per the obligation were included in the report. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 263	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 13.2(b) (i)-(ix)	1 - Compliant
<i>Energy Coordination Act section 11M</i>	
A retailer must keep a record of the total number and percentage of its business customer accounts under the affordability and access indicators specified in clause 13.2(b)(i)-(ix).	
Verification/Tests	
Inquiry with Credit Team Leader Review of Trading and Distribution Licence Annual Performance Report 2013/14	
Observations	
Compendium clause 13.2(a)(i)-(xv) states all the required records of its residential customers it is required to be kept. Through inquiry with the Credit Team Leader, it was noted that the licensee maintains records of the total number and percentages of key statistics outlined in Compendium clause 13.2(a)(i)-(ix) of their residential customers in their annual report. A copy of the Trading and Distribution Licence Annual Performance Report 2013/14 was provided and it was noted that all required information per the obligation were included in the report. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 264	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 13.2(c)	1 - Compliant
<i>Energy Coordination Act section 11M</i>	
A retailer must keep a record of the actions it undertook, and the responses from the distributor to those actions, to obtain metering data where the retailer has issued a bill outside of the time frame set out in clause 4.1(b).	
Verification/Tests	
Discussion with the Credit Team Leader Review of the Discoverer Report	
Observations	
Compendium clause 13.2(c) states that the licensee must keep records of the actions it undertook and the responses it received from the	

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distributor in the event where the licensee has issued a bill outside the timeframe specified in clause 4.1(b). Through inquiry with the Credit Team Leader, it was noted that the licensee generates a monthly Oracle Discoverer Report. This report is run for monthly performance reporting to monitor if a bill has been sent to customer within the required timeframes set out in clause 4.1(b). In situations where no meter read data is provided for an invoice, the licensee will still meet the requirements of obligations 4.1(b) by issuing an estimated bill. Where the Oracle Discoverer Report has identified outstanding meter reading data, the licensee will contact the distributor via email or phone to follow up on the meter reading. Additional to these communications a monthly meeting is held between the licensee and the distributor. Within these monthly meetings any discussions regarding outstanding meter reading data is addressed.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement It is acknowledge as the licensee has now identified delays caused by the misalignment between compliance timeframes for the licensee and the distributor, these will be further discussed with the distributor and a review will be done on the licensee's terms and conditions in line with the Authority review process. It is therefore recommend that the licensee enforce a standing agenda item during meetings with the Authority regarding timeframes.	

Item 265 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 13.3(1)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must keep a record of the total number of complaints received from residential and business customers, as well as keeping a record of the complaint indicators specified in clause 13.3(1)(b)-(f).	
Verification/Tests Interviewed Customer Service Team Leader and Customer Advocacy Manager Examined reporting generated by management for review	
Observations Reporting on customer complaints is in line with Compendium clause 13.3(1)(b)-(f). A record of the total number of customer complaints by residential and business is kept and linked to the indicators outlined in Compendium clause 13.3(1)(b)-(f). Complaints are broken down and categorised by the following: <ul style="list-style-type: none"> • billing/credit complaints • transfer complaints • marketing complaints • other complaints Complaints are extracted form Oracle on a monthly basis by the Customer Advocate with a summary report being provided to management. For the year ended June 2014 a total of 176 complaints were received for NG customers. It was noted that the majority of these complaints related to educating the customer on the Licences' unique monthly billing process.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 266 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 13.3(2)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must keep a record of the details of each complaint referred to in clause 13.3(1)	
Verification/Tests Interviewed Customer Service Team Leader and Customer Advocacy Manager Examined reporting generated by management for review, examined customer complaint recording in Oracle	
Observations Reporting and recording of customer complaints is in line with Compendium clause 13.3(1). The Licensee keeps detailed notes of each complaint by utilising there customer record management system Oracle. A sample of 10 NG customer complaints was extracted to ensure compliance with subsection 13.3(1) of the Compendium clause. The following details were recorded for each complaint which was in line with the complaint handling procedure: <ul style="list-style-type: none"> • action taken by the retailer • time taken for the complaint to be concluded • percentage of complaints from residential customers and business customers and time take to resolve 	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 267 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 13.5	Compliance rating 1 - Compliant
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<i>Energy Coordination Act section 11M</i>	
A retailer must keep a record of the call centre performance indicators specified in clause 13.5(a)-(e).	
Verification/Tests	
Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the call centre performance reports	
Observations	
Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that the licensee generates and records within monthly reports the following as specified within clause 13.5a - e: total number of telephone calls, number of telephone calls answered within 30 seconds, percentage of telephone calls answered within 30 seconds, average wait time before a call is answered, percentage of calls that are unanswered. Based on the above observation, it was concluded that compliance has been met.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 268		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 13.6		1 - Compliant
<i>Energy Coordination Act section 11M</i>		
A retailer must keep a record of the total number of residential accounts held by customers and business customer accounts held by customers. A retailer must keep a record of the total number of residential and business accounts specified.		
Verification/Tests		
Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the customer base report		
Observations		
Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that Customer Service uses the Discoverer tool to extract relevant information from Oracle and then uses Datamart to consolidate into a report format. Reports are customisable and fields can be selected to tailor the purpose of the report. The extraction of data from Oracle is automated, while the selection of fields is carried out by staff. Every Monday, the Customer Service Team generates a Datamart report of the full customer base. This is then filtered according to 'product' to identify residential/non-residential customers. Based on the above observation, it was concluded that compliance has been met.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		
N/A		

Item 275		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 13.15		1 - Compliant
<i>Energy Coordination Act section 11M</i>		
A retailer must prepare a report in respect of each reporting year setting out the information in the records specified in clause 13.15(a)-(d).		
Verification/Tests		
Observation of Trading and Distribution Licence Annual Report 2013/2014		
Observations		
Through observation of the Trading and Distribution Licence Annual Report (2013/14) it was noted that information specified in clause 13.15(a)-(d) is contained in the report in a clear and concise format relating to the following:		
<ul style="list-style-type: none"> a)Records of residential customer accounts, business customer accounts and actions coordinated with the distributor; b)Records of complaints from both residential and business customers; c)Records of call centre performance; and d)Records of the number of residential accounts and business accounts held by customers. 		
Additionally the requirement to prepare this report with the requirements of clause 13.15 is detailed in the Regulatory and Compliance Handbook. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		
N/A		

Item 277		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 13.17(1)		2 – Non-compliant
<i>Energy Coordination Act section 11M</i>		
The annual retailer and distributor reports specified in clauses 13.15 and 13.16 are to be published not later than the following October 1.		
Verification/Tests		
Observation of email and screenshot of upload		

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Observations	
Through observation of internal email correspondence and screenshots of document upload time it was noted that the Annual reports specified in clauses 13.15 and 13.16 were published by October 1 of the following year. It was noted that there was a known compliance breach in regards to the 2011/12 Annual Report which was published after the due date, however, this was resolved during the audit period by the licensee. The licensee has developed a Regulatory and Compliance Handbook which outlines external reporting requirements under the licence.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	2 – Non-compliant – minor impact on customers or third parties
Opportunity for Improvement	
While the licensee has remediated the breach, we recommend the following improvement opportunity. It was noted that there was a known compliance breach with regards to the Annual Retailer Report, however, this was resolved during the audit period by the licensee. The licensee should continue to monitor and ensure that the Report is submitted not later than the following 1 October.	

Item 278		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 13.17(2)		1 - Compliant
<i>Energy Coordination Act 11M</i>		
A report is published for the purposes of clause 13.17(1) if copies of it are available to the public, without cost, at places where the retailer or distributor transacts business with the public, and a copy of it is posted on a website maintained by the retailer or distributor.		
Verification/Tests		
Discussion with the Regulatory Manager Observation of the Gas House Pack		
Observations		
Through discussion with the Regulatory Manager and observation of the Gas House Pack, it was noted that the Trading and Distribution Licence Annual Report is included in the Gas House Pack's. The pack is created and distributed to all licensee 'Gas Houses' where the licensee transacts business with the public and can be distributed to customers upon request. Copies are also maintained by the licensee on their website at no cost to the customer. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		
N/A		

Item 279		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 13.17(3)		2 – Non-compliant
<i>Energy Coordination Act section 11M</i>		
A copy of each report must be given to the Minister and the Authority not less than 7 days before it is published.		
Verification/Tests		
Observation of Cover Letters for Trading and Distribution Licence Annual Report 2012/13 and 2013/14		
Observations		
Through observation of Cover Letters for the Trading and Distribution Licence Annual Reports (2012/13 and 2013/14) it was noted that the Regulatory Manager had submitted these reports to both the Minister and the Authority within the specified timeframes. It was noted that there was a known compliance breach with regards to the 2011/12 Annual Report submission to the Minister and Authority, however, this was resolved during the audit period by the licensee. The licensee has developed a Regulatory and Compliance Handbook which outlines external reporting requirements under the licence.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	2 – Non-compliant – minor impact on customers or third parties	
Opportunity for Improvement		
While the licensee has remediated the breach, we recommend the following improvement opportunity. It was noted that there was a known compliance breach with regards to the 2011/12 Annual Report submission to the Minister and Authority, however, this was resolved during the audit period by the licensee. The licensee should continue to monitor and ensure that the Trading and Distribution Licence Annual Reports are submitted not less than 7 days before it is published.		

Item 280		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 13.18		2 – Non-compliant
<i>Energy Coordination Act section 11M</i>		
A retailer and distributor must provide the information in the records in clauses 13.15 and 13.16 to the Authority in a format acceptable to the Authority no later than the following 23 September.		
Verification/Tests		
Observation of email submission Observation of Gas Trading Licence Performance Reporting Handbook Inquiry with Regulatory Manager		
Observations		

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<p>Review of email submissions it was noted that the licensee has submitted the retail datasheets to the Authority on the 30th of September, in accordance with the Gas Trading Licence Performance Reporting Handbook (dated May 2014). It was noted that the due date of 23 September as per Compendium Clause 13.18 does not agree to the 30 September deadline stated in the Gas Trading Licence Performance Reporting Handbook. It was noted that there was a known compliance breach with regards to the 2011/12 Performance Report, however, this was resolved during the audit period by the licensee. The licensee has developed a Regulatory and Compliance Handbook which outlines external reporting requirements under the licence.</p>	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	2 – Non-compliant – minor impact on customers or third parties
<p>Opportunity for Improvement The due date of 23 September as per Compendium Clause 13.18 does not agree to the 30 September deadline stated in the Gas Trading Licence Performance Reporting Handbook. It was noted that there was a known compliance breach with regards to the 2011/12 Performance Report, however, this was resolved during the audit period by the licensee. The licensee should continue to monitor and ensure that the reports are submitted by the following 23 September.</p>	

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Item 1 Trading Licence Clause 4.1		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11Q(1-2)</i> A licensee must pay the applicable fees in accordance with the regulations (Energy Coordination (Licensing Fees) Regulations Clause 4&5).		
Verification/Tests Inquiry with Regulatory Manager Observation of the Regulatory and Compliance Handbook		
Observations Through discussion with the Regulatory Manager and review of section 5.2 of the licensee's Regulatory and Compliance Handbook, it was noted that annual licencing fees are required to be paid during the month of September, on the eve of the issue date of licence. Payment is made following receipt of the applicable invoice from the Authority in accordance with the Licensee's accounts payable process through Oracle. Through inquiry with the Regulatory Manager, it was noted that the licensing fee due during the audit period was paid in accordance with the above. It was further noted that, if the Regulatory Manager had not received an invoice from the Authority by the end of July, the licensee would contact the Assistant Director of Licencing at the Authority to request an invoice. Based on the above, we noted that there were sufficient controls in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		
Item 2 Trading Licence Clause 12.1		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11WG(1)</i> A licensee must, subject to the regulations, not supply gas to a customer other than under a standard form or non-standard contract.		
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Move In procedures		
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that documented procedures, the Creating a New Contract and the Create Retic Customer (new customer to existing supply address) procedures, detail the process to be followed when supplying gas to a new LPG customer. The procedures require a new contract to be created in the Licensee's system which will not allow an account to be created, and gas to therefore be supplied, until a Standard Form Contract or Non-Standard Form Contract has been selected. Subsequent to the contract being completed, the Reticulated Gas Connection Form is used internally to notify the LPG team of the new customer so that a LPG connection may be established. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		
Item 3 Trading Licence Clause 13.1		Compliance rating –Not Rated
<i>Energy Coordination Act section 11WG(2)</i> A Licensee must comply with a direction given to the licensee under section 11WI.		
Verification/Tests Inquiry with Regulatory Manager		
Observations In accordance with section 11WI, it was noted that, if in the opinion of the Authority, a standard form contract no longer meets the requirements of the regulations or is no longer consistent with the Energy Coordination Act, any written law or any term, condition or provision of the licence concerned, the Authority may direct the holder of the trading licence to submit an appropriate amendment to the form for approval by the Authority within a specified period. Through inquiry with the Regulatory Manager, there were no requests for amendments to the standard form contract during the audit period, however, in the event that there is a request for amendments, the licensee will review and make amendments for any directions from the Authority to submit an amendment to the standard form contract within a specified period. It was further noted that, for communication purposes, a list of contacts of the licensee is maintained with the Authority and any key contacts at the Authority is conversely listed in the licensee's Regulatory and Compliance Handbook.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	

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Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 4 Trading Licence Clause 5.1	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11WK(1-2)</i> Gas is deemed to be supplied under the standard form contract if a customer commences to take a supply of gas at premises without entering into a contract with the holder of a trading licence.	
Verification/Tests Inquiry with Regulatory Manager	
Observations Through inquiry with the Regulatory Manager, it was noted that during the audit period, all customers entered into contracts for supply of gas. It was noted that if a customer does not sign up under a standard form contract and there have been gas meter readings indicating a supply of gas, the Customer Service Team would create an owner/occupier account in Oracle, thus automatically setting these customers up under standard form contracts. Gas will then be deemed to be supplied under the standard form contract until the customer requests otherwise.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 5 Trading Licence Clause 5.1	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11Wk(1-2)</i> A standard form contract continues in force until it is terminated or supply becomes subject to a non-standard contract with the supplier.	
Verification/Tests Inquiry with Regulatory Manager Observation of LPG disconnection procedures	
Observations Through inquiry with the Regulatory Manager, it was noted that standard form contracts continue in force until a disconnection strategy is in place to terminate gas or when supply becomes subject to a non-standard contract. The licensee's gas disconnection procedures specify the types of disconnection strategies and these include disconnections that can be requested by the customer or initiated by the licensee due to customer non-payment, denying of access to meters by customers and where properties are vacant but gas has been used. Based on discussions and confirmed through our walk through procedures, we noted that there are controls in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 6 Trading Licence Clause 5.1	Compliance rating Not Rated
<i>Energy Coordination Act section 11X(3)</i> A licensee must take reasonable steps to minimise the extent of the duration of any interruption, suspension or restriction of the supply of gas due to an accident, emergency, potential danger or other unavoidable cause.	
Verification/Tests Discussion with Regulatory Manager Observation of the Gas Continuation Policy	
Observations The Regulatory Manager informed that, where possible, the licensee will take reasonable steps to minimise the interruption, suspension or restriction through the guidance set out in the licensee's Gas Continuation Policy. The policy is available to Customer Service Team members via the licensee's intranet and describes the necessary actions in the event of an unplanned shutdown or when gas supply is curtailed. It includes the use of banking provisions and trades to minimise overall charges and maximise future supply opportunities. Specifically, the policy provides for actions in relation to supply interruptions including curtailment, out of specification gas, force majeure and plant shutdown. Further, all interruptions, suspensions or restrictions will be communicated to the leadership team and the progress of reconnection would be monitored. The Regulatory Manager confirmed that there were no unavoidable causes, accidents, emergencies or potential dangers during the audit period that caused interruption, suspension or restriction of gas supplies, however, should there be any cases, the licensee's Gas	

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Continuation Policy sets out the procedures for the management of interruptions.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 10	Compliance rating
Trading Licence Clause 16.1	1 - Compliant
<i>Energy Coordination Act section 11ZA(1)</i> A licensee must provide the Authority with a performance audit by an independent expert acceptable to the Authority within 24 months of commencement and every 24 months thereafter (or longer if the Authority allows).	
Verification/Tests Inquiry with Regulatory Manager Observation of the Regulatory and Compliance Handbook	
Observations Through discussion with the Regulatory Manager, it was noted that the Authority sends the licensee letters outlining the requirements for audits a few months prior to audits. The licensee also maintains logs with details of the next audit required and any findings identified during the period audit. The licensee works towards complying with the guidelines set by the Authority and submissions of performance audit reports are made at the end of November, following the finalising of the report. The licensee's Regulatory and Compliance Handbook includes the requirement to conduct a performance audit every 24 months or unless otherwise notified by the Authority and makes reference to the Audit and Review Guidelines: Electricity and Gas Licence. KPMG was appointed with the Authority's approval to undertake the performance audit for the period 1 September 2012 to 31 August 2014. Based on the above observations, it was concluded that there are sufficient processes currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 19	Compliance rating
Trading Licence Clause 18.1	1 - Compliant
<i>Energy Coordination Act section 11ZOR(2)</i> A licensee that sells gas that is transported through a distribution system must be a member of an approved retail market scheme if a scheme is in force.	
Verification/Tests Inquiry with Regulatory Manager Observation of REMCo website	
Observations Through inquiry with the Regulatory Manager and observation of the REMCo's Gas Retail Market Participant's site, it was noted that the licensee is a member of REMCo WA Gas Market Operator. Additionally, on an annual basis, the licensee engages an independent audit firm to undertake a negative assurance audit of the licensee's compliance with the REMCo rules. Based on the above observation, it was concluded that the licensee is a member of an approved retail market scheme.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 20	Compliance rating
Trading Licence Clause 5.1	1 - Compliant
<i>Energy Coordination Act section 11ZOV(1)</i> A licensee must not engage in prohibited conduct relating to the operation of a retail market scheme.	
Verification/Tests Inquiry with Regulatory Manager	
Observations Through inquiry with the Regulatory Manager, it was noted that there have been no previous breaches against the licensee in relation to prohibited conduct. Any activities not covered by the licensee's procedures are referred to team leaders. Should team leaders not be able to make a determination based on a review of the Compendium, these activities will be escalated to the Regulatory Manager. The Regulatory Manager of the licensee also sits on the Rule Change Committee, chaired by the CEO of REMCo, where the meeting is used as a forum to discuss or report on any breaches. Therefore, it was concluded that adequate controls are in place.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed

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Rating	
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 21	Compliance rating
Trading Licence Clause 5.1	1 - Compliant
<i>Energy Coordination Act section 11ZOV(2)</i> A licensee must not assist another party to engage in prohibited conduct relating to the operation of a retail market scheme.	
Verification/Tests Inquiry with Regulatory Manager	
Observations Through inquiry with the Regulatory Manager, it was noted that there have been no breaches against the licensee in relation to prohibited conduct. Any activities not covered by the licensee's procedures are referred to team leaders. Should team leaders not be able to make a determination based on a review of the Compendium, these activities will be escalated to the Regulatory Manager. It was further noted that the Regulatory Manager of the licensee also sits on the Rule Change Committee, chaired by the CEO of REMCo, where the meeting is used as a forum to discuss or report on any breaches. Therefore, it was concluded that adequate controls are in place.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 22	Compliance rating
Trading Licence Clause 5.1	Not Rated
<i>Energy Coordination Act section 11ZOZ(3)</i> A licensee, as a member of a retail scheme, must comply with a direction given to it by the Authority to amend the scheme, and to do so within a specified time.	
Verification/Tests Inquiry with Regulatory Manager	
Observations Through inquiry with the Regulatory Manager, it was noted that, as a member of the REMCo WA Gas Market Operator, all directions from the Authority to amend the scheme will be done accordingly and within the specified timeframe. Additionally, on an annual basis, the licensee engages an independent audit firm to undertake a negative assurance audit of the licensee's compliance with the REMCo rules. It was noted that there has been no direction from the Authority to amend the scheme during the audit period, however, there is adequate controls in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 24	Compliance rating
Trading Licence Clause 18.1	1 - Compliant
<i>Energy Coordination Act section 11ZQH</i> The licensee must not supply gas to customers unless the licensee is a member of an approved Gas Industry Ombudsman Scheme and is bound by any decision or direction of the ombudsman under the Scheme.	
Verification/Tests Interviewed Customer Advocacy Manager Examined payment ledger for annual levy payment Customer Advocacy Procedure	
Observations The Licensee is a member of the Energy Industry Ombudsman Western Australia. Payment ledger entries were obtained and it was confirmed that the licensee has paid the required fee. The Licensee automatically renews their yearly membership through the standard bill payment process to ensure currency of their membership. The Licensee has strict Customer Advocacy policies that are adhered to by the Customer Advocacy Team.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 29	Compliance rating
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Trading Licence Clause 5.1		1 - Compliant
<p><i>Energy Coordination Act section 11M; Energy Coordination (Gas Tariffs) Regulations 2000 reg. 5 (1)</i> A licensee supplying gas in an area referred to in Regulation 3(a), (b), or (c) is required to have at least one capped tariff for any supply of gas in that area.</p>		
<p>Verification/Tests Inquiry with the Regulatory Manager Observation of Standard Form Contract Prices and Capped Tariffs</p>		
<p>Observations In accordance with Regulation 3(a) to (c) and through observation of the licensee’s standard form contract pricing and the capped tariffs set by the Department of Finance, it was noted that the licensee’s standard form contract prices for the supply of LPG in all areas are at the capped tariffs. Tariffs cannot be amended within the licensee’s system without the appropriate approval. It was noted that the Sales Online and Oracle systems do not cap tariffs. The licensee’s pricing team will update tariffs in the system upon receiving approval from the appropriate manager. If the documentation received by the pricing team does not have the appropriate approvals, no updates are made until approvals have been obtained. It was concluded, therefore, that the licensee has supplied gas in the Mid-West and South West areas at a capped tariff.</p>		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		
N/A		

Item 30 Trading Licence Clause 5.1		Compliance rating 1 - Compliant
<p><i>Energy Coordination Act section 11M; Energy Coordination (Gas Tariffs) Regulations 2000 reg. 6(2)</i> A licensee is required to offer to supply gas to each of its existing standard contract customers under the terms of the customer’s existing contract but at a capped tariff unless the existing contract already entitles the customer to be supplied at a capped tariff.</p>		
<p>Verification/Tests Inquiry with the Regulatory Manager Observation of Standard Form Contract Prices and Capped Tariffs</p>		
<p>Observations Through inquiry with the Regulatory Manager and observation of the licensee’s standard form contract pricing and the capped tariffs set by the Department of Finance, it was noted that the licensee’s standard form contract prices for the supply of LPG to existing standard contract customers in all areas are at the capped tariffs. Based on the above, it was concluded that the licensee has supplied gas to standard contract customers at a capped tariff.</p>		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		
N/A		

Item 31 Trading Licence Clause 5.1		Compliance rating 1 - Compliant
<p><i>Energy Coordination Act section 11M; energy Coordination (Gas Tariffs) Regulations 2000 reg. 6(4)</i> When offering to supply gas to a new customer under a standard form contract, a licensee is to offer to supply gas at a capped tariff.</p>		
<p>Verification/Tests Inquiry with the Regulatory Manager Observation of Standard Form Contract Prices and Capped Tariffs</p>		
<p>Observations Through inquiry with the Regulatory Manager and observation of the licensee’s standard form contract pricing and the capped tariffs set by the Department of Finance, it was noted that the licensee’s standard form contract prices for the supply of LPG to existing standard contract customers in all areas are at the capped tariffs. Based on the above observations, it was concluded that there are sufficient processes currently in place to ensure compliance.</p>		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		
N/A		

Item 32 Trading Licence Clause 5.1		Compliance rating 1 – Compliant
<p><i>Energy Coordination (Customer Contracts) Reg 12 (2)</i> Except in prescribed circumstances, a licensee must not disconnect or cause disconnection to occur if — (a) a customer has provided to the licensee a written statement from a medical practitioner to the effect that supply is necessary in order to protect the health of a person who lives at the customer’s supply address; and (b) the customer has entered into arrangements acceptable to the licensee in relation to payment for gas supplied.</p>		

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Verification/Tests	
Discussion with the Credit Team Leader Review of the LPG Disconnection Procedure	
Observations	
Through inquiry with the Credit Team Leader, it was noted that the licensee will not disconnect supply if a written statement from a medical practitioner has been supplied or if the customer has entered into arrangements that the licensee deems acceptable. A copy of the LPG Disconnection Procedure was also provided by the Credit Team Leader, it includes the circumstances that may allow exceptions to customer disconnections due to non-payment. These include: payment difficulty, financial hardship, complaint, medical statement selected on the account and valid payment arrangements. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 33	Compliance rating
Trading Licence Clause 5.1	1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 12 (4)(a)</i>	
Before disconnecting supply for non-payment of a bill, a licensee must give a written reminder notice to a customer not less than 14 business days after the day on which a bill was issued advising the customer that payment is overdue and requiring payment to be made on or before the day specified in the reminder notice (being a day not less than 20 business days after the billing day).	
Verification/Tests	
Discussion with the Credit Team Leader Observation of the LPG Written Reminder Notice Review of the LPG Disconnection Procedure	
Observations	
Through inquiry with the Credit Team Leader, it was noted that the licensee issues a reminder notice to customers prior to disconnecting the supply of a customer due to non-payment. A reminder notice is issued to the customer using their preferred contact method either by mail or email once the account is overdue by greater than 14 days as stated the Compendium requiring that the overdue payment is to be made. The Credit Team Leader provided a copy of an LPG Written Reminder Notice, it includes the request for payment and the requirement for payment to be made within 11 days after the date of issue. The LPG Disconnection Procedure was provided by the Credit Team Leader, within it are the written timeframe requirements as stated above. A sample of 20 items across both NG and LPG was taken as the processes and controls in place are similar. Based on discussions and through sample testing of 20 items, it was noted that the licensee gives written reminder notice to customers not less than 14 business days after the day on which the bill was issued advising the customers that payments are overdue and specifying that payments are to be made on or before the day specified in the reminder notice i.e. a day not less than 20 business days after the billing day. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 34	Compliance rating
Trading Licence Clause 5.1	1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 12 (4)(b)</i>	
Before disconnecting supply for non-payment of a bill, a licensee must give a disconnection warning to a customer not less than 22 business days after the billing day advising the customer that disconnection will occur unless payment is made on or before the day specified in the disconnection warning (being a day not less than 10 business days after the day on which the disconnection warning is given).	
Verification/Tests	
Discussion with the Credit Team Leader Review of the LPG Disconnection Notice	
Observations	
Through inquiry with the Credit Team Leader, it was noted that prior to disconnection of supply due to non-payment of a bill, the licensee will issue a disconnection notice to the customer not less than 22 business days after the billing day advising the customer that disconnection will occur. The Credit Team Leader provided us with a copy of the LPG Disconnection Notice, it includes the requirement that disconnection will occur unless payment is made on or before the day specified in the disconnection warning (being a day not less than 10 business days after the day on which the disconnection warning is given). Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	

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N/A

Item 35 Trading Licence Clause 5.1		Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 12 (5)(a)</i> A licensee must reconnect supply to a customer within 10 business days after disconnection for non-payment of a bill if the customer pays the overdue amount or makes an arrangement for its payment and the customer has paid any applicable reconnection fee.		
Verification/Tests Discussion with the Credit Team Leader Review of the LPG Reconnection Procedure		
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee reconnects supply to the customer within 10 business days after the customer pays the overdue amount or agrees on a payment arrangement. The Credit Team Leader also provided us with a copy of the LPG Reconnection Procedure, this includes the requirement to request for reconnection of supply no later than the next business day after payment has been received, and the distributor then has 2 days to reconnect the customer's supply. There was one reconnection during the audit period. Therefore, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 36 Trading Licence Clause 5.1		Compliance rating –Not Rated
<i>Energy Coordination (Customer Contracts) Reg 12 (5)(b)</i> A licensee must reconnect supply to a customer within 10 business days after disconnection for denial of access to a meter, if the customer provides access to the meter and the customer has paid any applicable reconnection fee.		
Verification/Tests Discussion with the Credit Team Leader Observation of LPG Reconnection Procedure		
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee has not had to disconnect/reconnect any LPG customers due to denial of meter access. If a disconnected customer provided access to their meter, the licensee would have to request the distributor to reconnect the customer's supply. The Credit Team Leader provided a copy of the LPG Reconnection Procedure, it includes the requirement to contact the distributor and request reconnection the same business day if they are informed that access has been provided before 3pm on a business day. If the licensee has been informed that access to the meter has been provided after 3pm on a business day or on Saturday, Sunday or a public holiday then the licensee must request the distributor to reconnect the customer's supply no later than the next business day. Therefore, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	Not Rated	
Corrective Action/Opportunity for Improvement N/A		

Item 37 Trading Licence Clause 5.1		Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 12 (5)(c)</i> A licensee must reconnect supply to a customer within 10 business days after disconnection for unlawful consumption of gas, if the customer pays for the gas consumed and the customer has paid any applicable reconnection fee.		
Verification/Tests Discussion with the Credit Team Leader Observation of the LPG Reconnection Procedure		
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee reconnects the customer's supply within 10 business days once the customer has paid for the unlawful gas they consumed and any applicable fees. The Credit Team Leader also provided us with a copy of the LPG Reconnection Procedure, it includes the requirement for the licensee to reconnect the customer when the customer has remediated that breach of illegal use of gas by establishing an account, and has paid, or has made an arrangement to pay, for the gas obtained. Once this remediation has been made the licensee makes reconnection the same business day if arrangements are made before 3pm on a business day. If the licensee has been informed after 3pm on a business day or on Saturday, Sunday or a public holiday then the licensee will reconnect the customer's supply no later than the next business day. Therefore, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		

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N/A

Item 39 Trading Licence Clause 5.1	Compliance rating –Not Rated
<p><i>Energy Coordination (Customer Contracts) Reg 12 (5)(e)</i> A licensee must reconnect supply to a customer within 20 business days after disconnection in an emergency situation or for health, safety or maintenance reasons if the situation or problem giving rise to the need for disconnection has been rectified and if the customer has paid any applicable reconnection fee.</p>	
<p>Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Reconnection procedures</p>	
<p>Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that procedures, including the Reconnection and Meter Disconnection and Reconnection procedures, document the reconnection of reticulated gas meters to the relevant reticulation network as well as the requirements for disconnecting or reconnecting customers to a metered, reticulated gas system. The procedures, however, do not specifically mention the steps to be taken if the disconnection occurs for an emergency situation or for health, safety or maintenance reasons. No disconnection has yet occurred under these circumstances, but the team would generally liaise with the gas fitter about the reconnection if this were to occur.</p>	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	Not Rated
<p>Opportunity for Improvement The reconnection procedures should be updated to specifically document the process for reconnections made after a disconnection in an emergency situation or for health, safety or maintenance reasons.</p>	

Item 40 Trading Licence Clause 5.1	Compliance rating 1 – Compliant
<p><i>Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.1.2 AGA Code</i> A licensee must not disconnect supply to a customer who is unable to pay until: alternative payment options have been offered to the customer; the customer is given information on government funded concessions; it has used its best endeavours to contact the customer; and it has provided the customer a written notice of its intention to disconnect at least 5 business days prior to the disconnection date, and the customer has refused to accept the alternative payment option or failed to make payments under it.</p>	
<p>Verification/Tests Discussion with the Credit Team Leader Review of the LPG Disconnection Procedure Review of the LPG Disconnection Notice</p>	
<p>Observations Through inquiry with the Credit Team Leader, it was noted that the licensee will not disconnect a customer due to non-payment until alternative payment options have been offered. The Licensee will use their best endeavours to contact the customer over the phone and inform them of government concession and alternative payment options. The Credit Team Leader provided a copy of the LPG Disconnection Notice, this notice includes the options to contact the licensee to arrange alternative options if payment cannot be made on time. The Disconnection Notice is issued to the customer 10 days prior to the disconnection date. The Credit Team Leader also provided a copy of the LPG Disconnection Procedure, this includes all the consideration that are to be taken into account, and that disconnection is not made if the customer has applied for financial hardship or payment difficulty. Two disconnections were performed during the period. Therefore, it was concluded the above observations were adequate.</p>	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
<p>Corrective Action/Opportunity for Improvement N/A</p>	

Item 41 Trading Licence Clause 5.1	Compliance rating 1 – Compliant
<p><i>Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.1.3 AGA Code</i> A licensee must not disconnect supply to a business customer until: it has used its best endeavours to contact the customer; it has offered the customer an extension of time to pay the bill; and it has provided the customer a written notice of its intention to disconnect at least 5 business days' notice prior to the disconnection date, and the customer has refused to accept the alternative payment option or failed to make payments under it.</p>	
<p>Verification/Tests Discussion with the Credit Team Leader Review of the LPG Disconnection Procedure Review of the LPG Disconnection Notice</p>	
<p>Observations Through inquiry with the Credit Team Leader, it was noted that the licensee will not disconnect a customer until they have made their best efforts to contact the customer over the phone and that all alternate payment options have been discussed. This includes offering</p>	

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extension of time to make payments if the customer is experiencing payment difficulties or financial hardship. The Credit Team Leader provided a copy of the LPG Disconnection Procedure, it states that the licensee will not disconnect a customer if they have been contacted and are considered to be in financial hardship, payment difficulties or in a complaint process. The Credit Team Leader also provided a copy of the LPG Disconnection Notice, it states the licensee's intentions to carry out a disconnection if payment is not made within the 10 days following the issue of the notice. Two disconnections were performed during the period. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 42 Trading Licence Clause 5.1	Compliance rating –Not Rated
<i>Energy Coordination (Customer Contracts) Reg 12 (6), Clauses 5.1.2.1 & 5.1.2.2 AGA Code</i> A licensee must not disconnect supply to a customer who denies access to a meter until: the customer has refused access on at least 3 concurrent billing cycles, the customer is given the option to offer alternative access arrangements, the customer is provided written advice on each occasion access was denied, the licensee has used its best endeavours to contact the customer and the licensee has provided the customer a written notice of its intention to disconnect at least 5 business days prior to the disconnection date.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that the licensee does not currently disconnect LPG customers who deny access to a meter, therefore no disconnections have occurred. The licensee has noted that a procedure is to be written as this policy may change. There has been no activity during the audit period to test compliance.	
Adequacy of Controls Rating	C – Inadequate controls – significant improvement required
Compliance Rating	Not Rated
Corrective Action Procedures should be created that detail the process to be followed in regards to disconnecting supply to a customer who denies access to a meter.	

Item 43 Trading Licence Clause 5.1	Compliance rating –Not Rated
<i>Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.1.3 AGA Code</i> A licensee who disconnects in the event of an emergency must provide a 24 hour information service, estimate the time when gas supply will be restored and use best endeavours to restore supply when the emergency is over.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Reconnection procedures	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that procedures, including the Reconnection and Meter Disconnection and Reconnection procedures, document the reconnection of reticulated gas meters to the relevant reticulation network as well as the requirements for disconnecting or reconnecting customers to a metered, reticulated gas system. The procedures, however, do not specifically mention the steps to be taken if the disconnection occurs in the event of an emergency. No disconnection has yet occurred under these circumstances, but the licensee would take appropriate action as necessary if an emergency disconnection were to occur.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	Not Rated
Opportunity for Improvement The reconnection procedures should be updated to specifically document the process for reconnections made after a disconnection in an emergency situation as well as the licensee's responsibilities in the event of an emergency disconnection.	

Item 44 Trading Licence Clause 5.1	Compliance rating –Not Rated
<i>Energy Coordination (Customer Contracts) Reg 12 (6), Clauses 5.1.4.1 & 5.1.4.2 AGA Code</i> A licensee who disconnects supply for health and safety reasons must provide the customer written notice of the reason, allow the customer 5 business days to remove the reason where the customer is able to and after the 5 business days issue a notice to the customer of its intention to disconnect supply at least 5 business days' notice prior to the disconnection date.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Reconnection procedures	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that procedures, including the	

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Reconnection and Meter Disconnection and Reconnection procedures, document the reconnection of reticulated gas meters to the relevant reticulation network as well as the requirements for disconnecting or reconnecting customers to a metered, reticulated gas system. The procedures, however, do not specifically mention the steps to be taken if the disconnection occurs for health or safety reasons. No disconnection has yet occurred under these circumstances, but the licensee would generally receive notice from the gas fitter or meter reader before taking appropriate action. Based on the above observations, it was concluded that while the Reconnection procedures require updating, compliance has been met as no disconnections for health and safety reasons have yet occurred.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	Not Rated
Opportunity for Improvement The reconnection procedures should be updated to specifically document the process for reconnections made after a disconnection for health and safety reasons as well as the licensee’s responsibilities in the event of a disconnection for health and safety reasons.	

Item 45 Trading Licence Clause 5.1	Compliance rating –Not Rated
<i>Energy Coordination (Customer Contracts) Reg 12 (6), Clauses 5.1.5.1 & 5.1.5.2 AGA Code</i> A licensee who disconnects supply for planned maintenance must provide the customer 4 days written notice and have endeavoured to minimise disruption and restore supply.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Reconnection procedures	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that procedures, including the Reconnection and Meter Disconnection and Reconnection procedures, document the reconnection of reticulated gas meters to the relevant reticulation network as well as the requirements for disconnecting or reconnecting customers to a metered, reticulated gas system. The procedures, however, do not specifically mention the steps to be taken if the disconnection occurs for planned maintenance. No disconnection has yet occurred under these circumstances, but the licensee would generally contact the customer with more than four days’ notice. Based on the above observations, it was concluded that while the Reconnection procedures require updating, compliance has been met as no disconnections for planned maintenance have yet occurred.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	Not Rated
Opportunity for Improvement The reconnection procedures should be updated to specifically document the process for reconnections made after a disconnection for planned maintenance as well as the licensee’s responsibilities in the event of a disconnection for planned maintenance.	

Item 47 Trading Licence Clause 5.1	Compliance rating –Not Rated
<i>Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.8.1(a) AGA Code</i> A licensee must not disconnect supply where the bill owing is less than the average bill over the past 12 months and the customer has agreed to pay.	
Verification/Tests Discussion with the Credit Team Leader	
Observations The Credit Team Leader confirmed that the Licensee will not disconnect a customer when the bill owing is less than the average bill over the past 12 months and the customers has agreed to pay. The requirements of this obligation are documented in the procedures manual that staff refer to when liaising with customers. There has been no activity during the audit period to test compliance. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 48 Trading Licence Clause 5.1	Compliance rating Not Rated
<i>Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.8.1(a) AGA Code</i> A licensee must not disconnect supply where the issue is the subject of complaint by the customer and is being reviewed externally and is not resolved.	
Verification/Tests Discussion with the Credit Team Leader Review of the LPG Disconnection Procedure Review of the Complaints Procedure	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee will not disconnect a customers under circumstances	

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where the issue is the subject of a complaint that is currently being processed and is pending resolution. The Credit Team Leader provided a copy of the LPG Disconnection Procedure, this states that customers should not have their supply disconnected when their credit status or credit rating is listed as a complaint in Oracle. A copy of the Complaint Handling Procedure was also provided by the Credit Team Leader, this includes the requirement that the licensee must not arrange for the disconnection of a customer who has a complaint that has gone to an external dispute resolution body which has not yet been resolved. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 50 Trading Licence Clause 5.1	Compliance rating Not Rated
<i>Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.8.1(d) 5AGA Code</i> A licensee must not disconnect supply where a customer has failed to pay a debt that is not a direct service charge.	
Verification/Tests Discussion with the Credit Team Leader Review of the LPG Disconnection Procedure	
Observations Through inquiry with the Credit Team Leader, it was noted that the Licensee does not disconnect customers that have failed to pay a debt that is not a direct service charge. The Credit Team Leader provided a copy of the LPG Disconnection Procedure, this requirement was not included within the document.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	Not Rated
Opportunity for Improvement The LPG Disconnection Procedure should be updated to include this obligation. This will ensure no LPG customer is incorrectly disconnected for not paying a debt that is not a direct service fee.	

Item 51 Trading Licence Clause 5.1	Compliance rating 1 – Compliant
<i>Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.1.8.1(e) and (f) AGA Code</i> A licensee must not disconnect supply after 3pm on any day; and not on a Friday, weekend or public holiday or on a day before a public holiday unless it is a planned interruption.	
Verification/Tests Discussion with the Credit Team Leader Review of the LPG Disconnection Procedure	
Observations Through inquiry with the Credit Team Leader, it was verified that the licensee does not disconnect customers after 3pm on any day; and not on a Friday, weekend or public holiday or on a day before a public holiday unless it is a planned interruption. The Credit Team Leader provided a copy of the LPG Disconnection Procedure, and it was noted that this obligation was included. There were two disconnections during the period. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 52 Trading Licence Clause 5.1	Compliance rating 1 – Compliant
<i>Energy Coordination (Customer Contracts) Reg 12 (6), Clause 5.2.2.2 AGA Code</i> If a licensee is under an obligation to reconnect supply and the customer makes a request for reconnection after 3pm on a business day, the licensee shall use best endeavours to reconnect the customer as soon as possible on the next business day.	
Verification/Tests Inquiry with Credit Team Leader Review of the LPG Reconnection Procedure	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee uses best efforts to reconnect the customer as soon as possible the next business day if they request the reconnection after 3pm. The Credit Team Leader provided a copy of the LPG Reconnection Procedure and it was noted this requirement was included in the document. There has been 1 reconnection during the audit period. From our sample testing, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant

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Corrective Action/Opportunity for Improvement N/A

Item 57 Trading Licence Clause 5.1	Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 14 (3), Clauses 4.1.2.1 & 4.1.2.2 AGA Code</i> A licensee must give notice of the tariffs charged and provide these notices to customers without charge upon request.	
Verification/Tests Inquiry with Regulatory Manager Observation of notification letters to the customers of tariff charges Observation of tariffs on licensee's website Observation of example of article in the West Australian newspaper	
Observations Through inquiry with the Regulatory Manager, it was noted that there were two tariff changes during the audit period, effective 1 July 2013 and 1 August 2014 respectively. This was evidenced in the notifications to customers through the licensee's website, article in the West Australian and by way of letters and/or emails. It was further noted that the notifications are provided to customers upon request at no charge and through observation of the tariff pricing on the licensee's website as well as an example of the posted article in the West Australian newspaper, it was concluded that there are sufficient processes currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 58 Trading Licence Clause 5.1	Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 14, Clause 4.1.3.1 & 4.1.3.2 AGA Code</i> A licensee must give notice of a variation in tariffs charged and provide these notices to customers affected by the change no later than the next bill.	
Verification/Tests Inquiry with Regulatory Manager Observation of notification letters to the customers of tariff charges Observation of tariffs on licensee's website Observation of example of article in the West Australian newspaper	
Observations Through inquiry with the Regulatory Manager, it was noted that there were two tariff changes during the audit period, effective 1 July 2013 and 1 August 2014 respectively. When the licensee receives notification from the distributor regarding a change in tariffs, the Regulatory Manager gives the Minister 30 days' notice of the increase in tariffs. Customers are notified of changes through the pricing section of the licensee's website, an article in the West Australian and by way of letters and/or emails. These are provided to customers at no charge by no later than the next bill. Through observation of the examples of an article posted in the West Australian, emails and letters sent to the Minister and customers for LPG, it was concluded that there are sufficient processes currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 59 Trading Licence Clause 5.1	Compliance rating 1 – Compliant
<i>Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.1 AGA Code</i> A licensee must issue a bill to a customer at least once every 3 months, unless agreed otherwise.	
Verification/Tests Inquiry with Credit Team Leader Review of LPG Invoicing Procedure	
Observations Through inquiry with the Credit Team Leader it was noted that the licensee issues invoices to LPG customers once schedules listing meter reads are received from meter readers. Through review of the LPG Invoice Procedure it was noted that customers are billed on a monthly, bimonthly or quarterly basis which satisfies the requirement to issue a bill at least once every 3 months. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	

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N/A

Item 60 Trading Licence Clause 5.1		Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.3.1, 4.2.3.2 & 4.2.3.3 AGA Code</i> A licensee must prepare a bill in accordance with the terms specified in the AGA code, including the inclusion of any refundable advance.		
Verification/Tests Inquiry with Credit Team Leader Review of an example LPG invoice		
Observations Through inquiry with the Credit Team Leader, it was noted that the bills that are invoiced to LPG customers meet the requirements of Clause 4.2.3.1, 4.2.3.2 & 4.2.3.3 of the AGA Code. The Credit Team Leader provided a copy of an LPG invoice and it was noted that the invoice meets all the requirements. Therefore, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 61 Trading Licence Clause 5.1		Compliance rating –Not Rated
<i>Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.3.2 AGA Code</i> A licensee must apply payments received from a customer as directed by the customers (if the bill includes charges for other goods and services).		
Verification/Tests Discussion with the Credit Team Leader		
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee does not currently offer other goods and services not relating to gas services. However, the Credit Team Leader noted, if in the future the licensee wishes to offer other goods and services, its Oracle systems has the ability to apply received payments as the customers directs them to. There has been no activity during the audit period to test compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	Not Rated	
Corrective Action/Opportunity for Improvement N/A		

Item 64 Trading Licence Clause 5.1		Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.4.1 AGA Code</i> A licensee must base a customer's bill on a meter reading and meters must be read at least once per year.		
Verification/Tests Discussion with the Credit Team Leader Review of Sending Schedules Procedure		
Observations Through inquiry with the Credit Team Leader, it was noted that bills for LPG customers are based on meter reads on a monthly, bi-monthly or quarterly basis depending on the Reticulated Gas area customers reside in. The Credit Team Leader provided a copy of the Sending Schedules Procedure, and this procedure documented the process and requirement. Therefore, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 66 Trading Licence Clause 5.1		Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.4.4 AGA Code</i> A licensee, who provides a customer with an estimated bill and is subsequently able to read the meter, must adjust the estimated bill in accordance with the meter reading.		
Verification/Tests Discussion with Credit Team Leader		
Observations Through inquiry with the Credit Team Leader, it was noted that for existing connections – new customers, the estimated read would be		

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calculated using the historical usage for the property. For new connections, the Retic team will calculate the average gas usage for all meters on that site during the billing period and apply this when billing. However, there is currently no formal procedure in place to outline this process. From our sample testing of 13 items, it was noted that the licensee is compliant with the obligation. The staff have been fully trained on the procedures and understand the requirements of the obligations.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement Develop and implement a LPG Estimated Billing Procedure	

Item 67 Trading Licence Clause 5.1	Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.2.4.5 AGA Code</i> A licensee must read a customer’s meter upon request and may impose a fee for doing so.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor, it was noted that the licensee accepts meter readings from the customer if the customer requests a special read. No fee is charged to the customer in these circumstances. This procedure is yet to be documented. Based on the above observations it was concluded that while sufficient processes are currently in place to ensure compliance, these procedures should be appropriately documented. There has been 15 meter read requests. From our sample testing of one item, it was noted that the licensee is compliant. The staff have been fully trained on the procedures and understand the requirements of the obligations.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement Procedures followed when a LPG customer requests a special meter read should be documented so that all staff continue to follow established procedures, ensuring the licensee continues to operate within the requirements of the obligation.	

Item 68 Trading Licence Clause 5.1	Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.3.2.1</i> AGA Code A licensee must offer payment in person and payment by mail.	
Verification/Tests Discussion with the Credit Team Leader Review of an invoice Review of the Customer Charter	
Observations Through inquiry with the Credit Team Leader, we noted the various payment methods available to customers. Of these methods payments in person at a payment outlet or payment via mail are acceptable. The Credit Team Leader also provided a copy of the Customer Charter which lists all the payment methods, including via mail or in person at payment outlet. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 69 Trading Licence Clause 5.1	Compliance rating –Not Rated
<i>Energy Coordination (Customer Contracts) Reg 15 (1), Clause 4.3.2.2 AGA Code</i> A licensee must offer customers who are absent for a long period, payment in advance facilities and the option of redirecting the bill.	
Verification/Tests Discussion with the Credit Team Leader	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee provides options to customers for redirection of payment and payment in advance when requested. It was noted that no advance payments were made by any customers this audit period. The requirements of this obligation are documented in the procedures manual that staff refer to when liaising with customers. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

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Item 70 Trading Licence Clause 5.1		Compliance rating –Not Rated
<i>Energy Coordination (Customer Contracts) Reg 16 (3)</i> A licensee must not terminate a contract if a customer commits a breach of the contract (other than a substantial breach) unless; (a) the licensee has a right to disconnect supply under the contract, a written law or a relevant code; and (b) the licensee has disconnected supply at all supply addresses of the customer covered by the contract.		
Verification/Tests Inquiry with Regulatory Manager		
Observations Through inquiry with the Regulatory Manager, it was noted that for LPG customers, the licensee must not terminate a contract unless the licensee has a right to disconnect supply under the contract, a written law or a relevant code and the licensee has disconnected supply at the supply address. It was noted that there were no instances of breaches during the audit period. t		
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed	
Compliance Rating	Not Rated	
Opportunity for Improvement It is recommended that the licensee create a template letter for breaches and formalise the breach of contract process into a procedural document.		

Item 72 Trading Licence Clause 5.1		Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 20 (2) Clause 4.3.5.1 AGA Code</i> A licensee must offer a customer who is experiencing payment difficulties: instalment plan options; right to have bill redirected to third person; information or referral on government assistance programs; and information on independent financial counselling services.		
Verification/Tests Discussion with the Credit Team Leader Review of the Financial Hardship Policy		
Observations Through inquiry with the Credit Team Leader, it was noted that customers experiencing payment difficulties are offered options such as instalment plan options; right to have bill redirected to third person; information or referral on government assistance programs; and information on independent financial counselling services. The Credit Team Leader provided a copy of the Financial Hardship Policy, it was noted that these options are included in the policy. Based on our sample selection, we noted that one customer was given an instalment option plan. Therefore, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 74 Trading Licence Clause 5.1		Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 20 (3) and 48</i> A licensee must not commence legal action in relation to a customer debt if the customer has entered into arrangements to pay and is maintaining this arrangement.		
Verification/Tests Discussion with the Credit Team Leader Review of the Financial Hardship Policy		
Observations Through inquiry with the Credit Team Leader, it was noted that where an alternative payment arrangement is made with a customer, the account is placed 'on-hold' and no legal action commences without a review of the account status. The Credit Team Leader provided a copy of the Financial Hardship Policy, after review, we noted it states that a customer may be shielded from legal action, additional recovery costs and restriction of supply as long as they have agreed to an arrangement and are meeting their commitment to it. Therefore, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 75 Trading Licence Clause 5.1		Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 22 and 49 (2)</i> A licensee must only provide a credit reporting agency with default information relevant to one of their bills.		
Verification/Tests		

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Discussion with the Credit Team Leader Review of Payment Default Procedure	
Observations Through review of the Payment Default Procedure, it was noted that a default is defined as when a debtor has not paid a debt which they are required to have paid and the payment default is listed on a customer's credit file for 5 years. Through discussion with the Credit Team Leader it was noted that when a customer's default is required to be listed on the customer's account then the information relevant to one of their bills must be updated on Veda Advantage, the licensee's credit reporting agency. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 76 Trading Licence Clause 5.1	Compliance rating 1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 49 (3)</i> A licensee must notify a credit reporting agency immediately if a customer has cleared their debt.	
Verification/Tests Discussion with the Credit Team Leader Review of Payment Default Procedure	
Observations Through review of the Payment Default Procedure and discussion with the Credit Team Leader it was noted that if a full or even partial payment has been made on an account, employees are required to log into Veda Advantage and update the default with the payment amount, which must be updated within 24 hours of receiving payment notification. Our review of one sample item noted that the licensee is compliant with the obligation. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 77 Trading Licence Clause 5.1	Compliance rating –Not Rated
<i>Energy Coordination (Customer Contracts) Reg 49 (4)</i> If a customer remedies a default and demonstrates extenuating circumstances, a licensee must request the credit reporting agency remove the default record.	
Verification/Tests Discussion with the Credit Team Leader Review of Payment Default Procedure	
Observations Through review of the Payment Default Procedure it was noted that when a default is remedied, employees are required to update payment information listed on the customer's account and Veda Advantage. Additionally through discussion with the Credit Team Leader it was noted that if extenuating circumstances are provided by a customer post-payment, the licensee will request the default information be removed from Veda Advantage records. There has been no activity during the audit period to test compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 78 Trading Licence Clause 5.1	Compliance rating –Not Rated
<i>Energy Coordination (Customer Contracts) Reg 49 (5)</i> A licensee must not refer a default to a credit reporting agency that is the subject of a complaint or matter of review.	
Verification/Tests Discussion with the Credit Team Leader Review of Payment Default Procedure	
Observations Through review of the Payment Default Procedure and discussion with the Credit Team Leader it was noted that if there are any open disputes or complaints on any account, then a default cannot be registered with the licensee's credit reporting agency until it is resolved. There has been no activity during the audit period to test compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed

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Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 79	Compliance rating
Trading Licence Clause 5.1	1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 50</i> A licensee must include information about its complaint handling process and contact details of the energy ombudsman on any disconnection warning given to a customer.	
Verification/Tests Discussion with the Credit Team Leader Review of LPG Disconnection Notice	
Observations Through review of the LPG Disconnection Notice's it was noted that if a customer is not satisfied, they are directed to contact the Customer Advocate on 132 180 or alternatively refer a complaint to the Energy Industry Ombudsman of Western Australia on 1800 754 004. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 81	Compliance rating
Trading Licence Clause 5.1	1 - Compliant
<i>Energy Coordination Act section 11M, Energy Coordination (Customer Contracts) Reg 45 (1)</i> Upon request, a licensee must provide a customer free of charge with a copy of its customer service charter within 2 business days of the request.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Customer Service Charter	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor, it was noted that the Customer Service Charter is available upon request by post or on the licensee's website. Based on the above observations and sighting of one request it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 82	Compliance rating
Trading Licence Clause 5.1	1 - Compliant
<i>Energy Coordination Act section 11M, Energy Coordination (Customer Contracts) Reg 45 (2)</i> A licensee must, from time to time, provide the customer with advice with their bill that a customer service charter is available free of charge.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of a customer invoice	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor and review of customer invoices, it was noted that the licensee's customer invoices state that the Customer Service Charter is available free of charge. The invoices also state that a copy can be obtained from the licensee's website or by calling their offices. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 84	Compliance rating
Trading Licence Clause 5.1	1 - Compliant
<i>Energy Coordination (Customer Contracts) Reg 46 (4)</i> A licensee must ensure that a copy of the Energy Coordination (Customer Contract) Regulations 2004 or a relevant code is available for inspection at its offices at no charge and available to customer on request.	

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Verification/Tests	
Examination of a copy of the pack available at Gas Houses	
Observations	
Through discussion with the Regulatory Manager and examination of the licensee's 'Gas House Packs', it was noted that these packs are available for distribution to customers at no charge at Gas Houses and includes the licensee's annual report, the Energy Coordination (Customer Contracts) Regulations 2004, other legislative documents and the licensee's customer charter. The licensee has a dealer in Margaret River and an office in Albany which is a Gas House All administration functions are performed at the head office in Murdoch. Based on the above observations, it was concluded that there are sufficient processes currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 85	Compliance rating
Trading Licence Clause 5.1	1 - Compliant
<i>Energy Coordination (Customer Contract) Reg 28, clause 3.1.1(a) AGA Code</i>	
A standard form contract must include a provision that the retailer or distributor must provide, install and maintain equipment for the supply of gas up to the point of supply.	
Verification/Tests	
Inquiry with Regulatory Manager Observation of the Standard Form Contract	
Observations	
Through discussion with the Regulatory Manager and observation of the licensee's Standard Form Contract, we noted that Clause 2 of the Standard Form Contract states that the licensee will:	
<ul style="list-style-type: none"> (e) Arrange for connection of the supply address to the network; (f) Supply gas to the supply address at the delivery point (g) Arrange for the provision and maintenance of the meter equipment; and (h) Provide or arrange the associated services set out in the contract from time to time, including testing of the meter equipment in accordance with the requirements of law, disconnection and reconnection. 	
Based on the above observations, it was concluded that there are sufficient processes currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 86	Compliance rating
Trading Licence Clause 5.1	1 - Compliant
<i>Energy Coordination (Customer Contract) Reg 28, clause 3.1.1(b) AGA Code</i>	
A standard form contract must include a provision that the retailer or distributor must provide, install and maintain metering and necessary equipment at the supply address.	
Verification/Tests	
Inquiry with Regulatory Manager Observation of the Standard Form Contract	
Observations	
Through inquiry with the Regulatory Manager and observation of the Standard Form Contract, it was noted that Clause 2(c) of the licensee's standard form contract provides that the licensee or the network operator (distributor) will arrange for the provision and maintenance of the meter equipment.	
Further, clause 11.1 of the Standard Form Contract states that the licensee or the network operator (distributor) will provide, install and maintain meter equipment for the supply of gas up to the point of supply and meter equipment at the supply address.	
Based on the above observations, it was concluded that there are sufficient processes currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 90	Compliance rating
Trading Licence Clause 5.1	1 - Compliant
<i>Energy Coordination (Customer Contract) Reg 33 (3), clause 3.5.2.2 AGA Code</i>	
A licensee must ensure that any representatives seeking access to the supply address on its behalf wear, carry and show official identification.	
Verification/Tests	

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Discussion with the Customer Service Team Leader Discussion with the Customer Service Supervisor Consideration of the Gas Marketing Code of Conduct training module	
Observations Through discussions with the Customer Service Team Leader and the Customer Service Supervisor, it was noted that all personnel including third party marketing agents are issued with an ID card, an example of which was sighted and included the required information. All staff and agents are required to wear, carry and show official identification. It was further noted that the Gas Marketing Code of Conduct training module notes the requirement for customer facing staff to wear an identity card. Based on the above observations, it was concluded that the licensee is compliant.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 91 Trading Licence Clause 5.1	Compliance rating –Not Rated
<i>Energy Coordination (Customer Contract) Reg 42</i> A licensee must notify customer of any amendment to a non-standard contract.	
Verification/Tests Inquiry with Regulatory Manager Observation of notification letters to the customers of tariff changes Observation of tariffs on licensee’s website Observation of example of article in the West Australian newspaper	
Observations Through inquiry with the Regulatory Manager, it was noted that typical amendments made by the licensee relate to pricing or renewal changes. All amendments relating to pricing of non-standard contracts are communicated to customers through notification on the website, an article in the West Australian or by way of letters and/or emails. These were noted through observation of the abovementioned documents. During the audit period, it was noted that there were no amendments to the licensee’s non-standard contract. It was further noted that any ad-hoc changes that may arise will be managed by the sales team and communicated to customers. However, there was no activity during the audit period to test compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 96 Trading Licence Clause 16.2	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A licensee must comply and require its expert to comply with the authority’s standard guidelines dealing with the performance audit	
Verification/Tests Inquiry with Regulatory Manager Observation of the Regulatory and Compliance Handbook	
Observations Through inquiry with the Regulatory Manager and observation of the licensee’s Regulatory and Compliance Handbook, it was noted that the handbook includes the requirement to conduct a performance audit every 24 months or unless otherwise notified by the Authority and makes reference to the Authority’s Audit and Review Guidelines: Electricity and Gas Licence. The Handbook also includes a link to the guidelines located on a shared drive to ensure that it can be easily located. Furthermore, where auditors have been engaged to perform the audit, the licensee refers auditors to the guidelines for compliance purposes. KPMG was appointed with the Authority’s approval to undertake the performance audit in accordance with the Authority’s Audit Guidelines. Based on the above observations, it was concluded that there are sufficient processes currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 97 Trading Licence Clause 16.4	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A licensee’s independent auditor must be approved by the Authority prior to the audit.	
Verification/Tests Observation of Approval Letter from the Authority	

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Observations	
Through observation of the approval of auditor letter issued by the Authority, it was noted that the independent auditor was approved by the Authority on 10 April 2014, prior to fieldwork for the audit commencing on 30 September 2014. Based on this observation, it was concluded that the licensee complied with this obligation.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 99	Compliance rating
Trading Licence Clause 20	1 - Compliant
<i>Energy Coordination Act section 11M</i>	
Unless otherwise specified, all notices must be in writing and will be regarded as having been sent and received in accordance with defined parameters.	
Verification/Tests	
Inquiry with Regulatory Manager Observation of Written Correspondence to the Minister and/or customers	
Observations	
Through discussion with the Regulatory Manager and observation of email and letter notifications, it was noted that all notices under the licence (e.g. tariff changes, supply interruptions, etc.) sent to the Minister and/or customers are in writing and distributed either via mail, e-mail or, in cases where notices are sent to the Minister, in person. Based on the above observations, it was concluded that there are sufficient processes currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 100	Compliance rating
Trading Licence Clause 21.1	1 - Compliant
<i>Energy Coordination Act section 11M</i>	
A licensee and any related body corporate must maintain accounting records that comply with the Australian Accounting Standards Board or equivalent International Accounting Standards.	
Verification/Tests	
Inquiry with Regulatory Manager Observation of the 2014 Annual Report	
Observations	
Through inquiry with the Regulatory Manager, it was noted that accounting records comply with the Australian Accounting Standards as the 2014 annual report of the consolidated group that the licensee is a part of was prepared in accordance with the requirements of the Australian Accounting Standards Board. Based on examination of the group's financial statements, it was noted that the financial statements were issued on the basis that they represented a true and fair view of the company's financial position. Based on the above observations, it was concluded that the licensee has complied with this obligation.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 101	Compliance rating
Trading Licence Clause 22.1	1 - Compliant
<i>Energy Coordination Act section 11M</i>	
A licensee must report to the Authority if the licensee is under external administration or experiences a significant change in its corporate, financial or technical circumstances that may affect the licensee's ability to meet its obligations under this licence within 10 business days of the change occurring.	
Verification/Tests	
Inquiry with Regulatory Manager Observation of the Regulatory and Compliance Handbook	
Observations	
Through inquiry with the Regulatory Manager, the Regulatory and Compliance Handbook requires the licensee to notify the Authority of any material changes to the licensee's corporate, financial or technical circumstance within 10 business days of the change occurring if it will impact its ability to meet its obligations under the GTL10. The Regulatory Manager noted that there were no material changes during the audit period. Based on the above observations, it was concluded that there are sufficient processes currently in place to ensure compliance.	

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Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 102	Compliance rating
Trading Licence Clause 24	2 – Non-compliant
<i>Energy Coordination Act section 11M</i>	
A licensee must provide to the Authority any information that the Authority may require in connection with its functions under the Energy Coordination Act 1994 in the time, manner and form specified by the Authority.	
Verification/Tests	
Observation of the Regulatory and Compliance Handbook Examination of the 2013 and 2014 Compliance Report Observation of Cover Letters Inquiry with Regulatory Manager	
Observations	
The licensee's Regulatory and Compliance Handbook requires compliance with the Gas Compliance Reporting Manual. Through review of submission Cover Letters to the Authority, it was noted that the Trading and Distribution Licences Annual Reports for 2013 and 2014 as well as the 2013 and 2014 Compliance Reports were submitted to the Authority by the timeframe specified by the Authority. The compliance reports were approved by the Senior Executive Officer and includes a schedule of the non-compliance items (such as the ERA obligation reference number, the nature and extent of the breach, reasons for the breach and expectations for remediation). It was noted that there was a known compliance breach in regards to the FY12 Annual, Performance and Compliance reports, however this was resolved during the audit period by the licensee.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	2 – Non-compliant – minor impact on customers or third parties
Corrective Action/Opportunity for Improvement	
N/A	

Item 103	Compliance rating
Trading Licence Clause 24	1 - Compliant
<i>Energy Coordination Act section 11M</i>	
A licensee must publish any information it is directed by the Authority to publish, within the timeframes specified.	
Verification/Tests	
Observation of email and upload onto website Observation of Regulatory and Compliance Handbook	
Observations	
Based upon discussions with licensee management, it was noted that the licensee will immediately notify the Authority if situations specified under 241a or 241b eventuates. We note the licensee is part of a large Australian corporate with strong market presence and strong financial position.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 106	Compliance rating
Trading Licence Clause 12.2	–Not Rated
<i>Energy Coordination Act Section 11M</i>	
A licensee must, if directed by the Authority, review the standard form contract and submit to the Authority the results of that review within the time specified by the Authority.	
Verification/Tests	
Discussion with Regulatory Manager Observation of Authority's Website	
Observations	
Through discussion with the Regulatory Manager it was noted that the licensee has provided primary and secondary contact details to the Authority. Should the Authority request changes to the standard form contract, the licensee would review and progress according to clause 12.2 within a time frame specified by the Authority. It was noted that the licensee's current LPG standard form contract has not been amended during the audit period. However, in the event that there is a request for amendments, the licensee will review and make amendments for any directions from the Authority to submit an amendment to the standard form contract within a specified period. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed

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Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 107 Trading Licence Clause 12.3	Compliance rating –Not Rated
<i>Energy Coordination Act section 11M</i> A licensee must comply with any direction given by the Authority in relation to the scope, process and methodology of the standard form contract review.	
Verification/Tests Discussion with Regulatory Manager Observation of Authority’s Website	
Observations Through discussion with the Regulatory Manager, it was noted that the licensee has provided primary and secondary contact details to the Authority. Should the Authority request changes in relation to the scope, process or methodology of the standard form contract review, the licensee would review and progress according to clause 12.3 and within a time frame specified by the authority according to clause 12.2. It was noted that the licensee’s current LPG standard form contract has not been amended during the audit period. However, in the event that there is a request for amendments, the licensee will review and make amendments for any directions from the Authority to submit an amendment to the standard form contract within a specified period. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 108 Trading Licence Clause 13.1	Compliance rating –Not Rated
<i>Energy Coordination Act section 11M</i> A licensee must only amend the standard form contract in accordance with the Energy Coordination Act 1994 and Regulations.	
Verification/Tests Discussion with Regulatory Manager Observation of Authority’s Website	
Observations Through discussion with the Regulatory Manager, it was noted that the licensee complies with the Energy Coordination Act 1994 when amending standard form contracts and reports accordingly to the Authority after legal review and Regulatory Manager sign off. It was noted that the licensee’s current LPG standard form contract has not been amended during the audit period. However, in the event that there is a request for amendments, the licensee will review and make amendments for any directions from the Authority to submit an amendment to the standard form contract within a specified period. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 110 Trading Licence Clause 2.1 and Schedule 3; Compendium Clause 1.7	Compliance rating –Not Rated
<i>Energy Coordination Act section 11M</i> A licensee must provide the Authority within 3 business days of a request by the Authority with reasons for refusing to commence supply to a customer if requested by the Authority.	
Verification/Tests Discussion with Regulatory Manager	
Observations Through discussion with the Regulatory Manager, it was noted that the licensee did not refuse commencement of supply to any customers during the audit period. It was observed that the Licensee has a Policy that stipulates the need to advise the Authority within	

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3 business days; upon request by the Authority; outlining the reasons for refusing to commence supply to a customer. However, there was no activity during the audit period to test compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 111 Trading Licence Clause 2.1 and Schedule 3; Compendium Clause 1.7	Compliance rating –Not Rated
<i>Energy Coordination Act section 11M</i> A licensee must comply with a direction from the Authority to supply a customer, subject to specified conditions.	
Verification/Tests Discussion with Regulatory Manager Observation of Compendium Clauses Observation of Regulatory and Compliance Handbook	
Observations Through discussion with the Regulatory Manager, it was noted that the licensee has provided primary and secondary contact details to the Authority to discuss any change in direction to supply a customer. Where applicable, the licensee refers to the Compendium of Gas Customer Licence Obligations to ensure obligations are being complied with. All obligations are tracked by the Regulatory Manager and requirements to comply with the direction of the Authority are set out in the licensee’s Regulatory and Compliance Handbook. However, there was no activity during the audit period to test compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 113 / Item 71 / Item 83 Trading Licence Clause 2.1 and Schedule 3; Compendium Clause 3.1	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A licensee must notify the Minister at least one month before a change to any price, price structure, fee or interest rate under the standard form contract is to come into effect.	
Verification/Tests Discussion with Regulatory Manager Observation of letter to the Minister regarding a change in prices	
Observations Through discussion with the Regulatory Manager it was noted that a change in the gas price schedule occurred in July 2013 and the Minister was notified and agreed with the change. It was noted that the notification from the licensee was provided at least one month prior to the scheduled increase in prices. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 114 Trading Licence Clause 19.1	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11ZPP</i> A licensee must comply with the Gas Marketing Code of Conduct.	
Verification/Tests Discussion with the Customer Service Team Leader Discussion with the Customer Service Supervisor Consideration of Gas Marketing Code of Conduct training module Sample testing of twenty new starters was performed to test the completion of training	
Observations Through discussion with the Customer Service Team Leader and Supervisor, it was noted that all new employees are required to complete the licensee’s induction training (along with the Gas Marketing Code of Conduct module) prior to being issued with a marketing ID number. The Gas Marketing Code of Conduct is subsequently retained by each employee. Through testing of a sample of twenty new starters, results indicated that three employees were not listed on the Gas Marketing Code of Conduct training register, however, upon inquiry, it was noted that two of the employees attended the training module (despite the training register not being updated) and that the remaining employee did not complete training and, as a result, did not take phone	

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calls. As the licensee has implemented a Gas Marketing Code of Conduct training module and requires all new starters to attend training, it was concluded that there are sufficient controls in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 115 / Item 71 / Item 83 Trading Licence Clause 19.2	Compliance rating 1 - Compliant
<i>Energy Coordination Act sections 11ZPP and 11M</i> A licensee must ensure all agents and employees comply with the Gas Marketing Code of Conduct.	
Verification/Tests Discussion with the Customer Service Team Leader Discussion with the Customer Service Supervisor Consideration of Gas Marketing Code of Conduct training module Sample testing of twenty new starters was performed to test the completion of training	
Observations Through discussion with the Customer Service Team Leader and Supervisor, it was noted that all new employees/agents are required to complete the licensee's induction training (along with the Gas Marketing Code of Conduct module) prior to being issued with a marketing ID number. In addition, as the licensee has two third party marketing agents, it was noted that all third party agents are required to complete the online Gas Marketing Code of Conduct module before a marketing ID is issued to them. The online training covers all aspects of the Gas Marketing Code of Conduct. Through testing of a sample of twenty new starters, results indicated that three employees were not listed on the Gas Marketing Code of Conduct training register, however, upon inquiry, it was noted that two of the employees attended the training module (despite the training register not being updated) and that the remaining employee did not complete training and, as a result, did not take phone calls. As the licensee has implemented a Gas Marketing Code of Conduct training module and requires all new starters to attend training, it was concluded that there are sufficient controls in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 116 Trading Licence Clause 19.1	Compliance rating 2 Non-compliant
<i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.1</i> A retailer must ensure that its gas marketing agents comply with Part 2 of the Code of Conduct.	
Verification/Tests Sample testing of twenty new starters was performed to test the completion of training	
Verification/Tests Tested a sample of 20 new starters to check completion of the Gas Marketing Code of Conduct training	
Observations Through discussion with the Customer Service Team Leader and Supervisor, it was noted that all new employees/agents are required to complete the licensee's induction training (along with the Gas Marketing Code of Conduct module) prior to being issued with a marketing ID number. In addition, as the licensee has two third party marketing agents, it was noted that all third party agents are required to complete the online Gas Marketing Code of Conduct module before a marketing ID is issued to them. The online training covers all aspects of the Gas Marketing Code of Conduct. Through testing of a sample of twenty new starters, results indicated that three employees were not listed on the Gas Marketing Code of Conduct training register, however, upon inquiry, it was noted that two of the employees attended the training module (however, the training register not being updated) and that the remaining employee did not complete training and, as a result, did not take phone calls. Due to a minor breach in the previous year and two further breaches in the current year whereby two representatives working for one of the licensee's gas marketing agents did not follow the requirements of the Code when setting up two customer accounts, it was concluded that the licensee did not comply with this obligation during the audit period. We acknowledge, however, that the licensee has implemented a control in that all new starters are required to complete the Gas Marketing Code of Conduct training module. It was further noted that as the training register was not completed accurately, the control has been deemed inadequate, requiring significant improvement.	
Adequacy of Controls Rating	C – Inadequate controls – significant improvement required
Compliance Rating	2 – Non-compliant – minor impact on customers or third parties
Corrective Action Due to a minor breach in the previous year, and two further breaches in the current year whereby training records were not kept for two	

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marketing agents engaged by the licensee, it is recommended that the process for recording training records be reviewed to ensure that the all new employees attend the required training modules (e.g.: Gas Marketing Code of Conduct) and that the training records be updated for completeness and accuracy. Regular compliance checks needs to be implemented.

Item 117		Compliance rating
Trading Licence Clause 19		1 - Compliant
<i>Energy Coordination Act section 11zPP, Code of Conduct clause 2.2</i>		
A retailer must ensure that standard and non-standard contracts are entered into in the manner and satisfying the conditions specified.		
Verification/Tests		
Discussion with Regulatory Manager Discussion with Customer Service Team Leader		
Observations		
Through discussion with the Regulatory Manager and the Customer Service Team Leader it was noted that standard and non-standard form contracts are entered into systems through the licensee's sign up process. For LPG customers, Welcome Packs are distributed every Friday and hence, within 5 business days. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		
N/A		

Item 118		Compliance rating
Trading Licence Clause 19		N/A
<i>Energy Coordination Act section 11zPP Code of Conduct clause 2.3(1)</i>		
A gas marketing agent must ensure that the information specified is provided to the customer before arranging a contract and that the customer is provided with a written copy of the contract on request.		
Verification/Tests		
Discussion with the Customer Service Team Leader Discussion with the Customer Service Supervisor Consideration of relevant documentation		
Observations		
Note: This obligation was included in the Audit Plan, however, upon discussions it was noted that this is not applicable for LPG, as the obligation refers to the use of non-standard contracts, which are not used for LPG customers.		

Item 121		Compliance rating
Trading Licence Clause 19		1 – Compliant
<i>Energy Coordination Act section 11zPP Code of Conduct clause 2.4(1)</i>		
When a customer enters into a new contract that is not an unsolicited consumer agreement with a retailer or gas marketing agent, a retailer or gas marketing agent must, at the time the contract is entered into, offer to give or make available to the customer a copy of the contract. If the customer accepts the offer, the retailer or gas marketing agent must, at the time the contract is entered into, or as soon as possible thereafter, but no more than 28 days later, give or make available to the customer a copy of the contract.		
Verification/Tests		
Discussion with the Customer Service Team Leader Discussion with the Customer Service Supervisor Consideration of relevant documentation		
Observations		
Following sign-up, LPG customers are sent a welcome letter following signup that includes details of the prices used, the customer charter and where to obtain terms and conditions. Contract details are also provided to the customer upon request. As the licensee has two third party marketing agents, it was noted that all third party agents are required to complete the online Gas Marketing Code of Conduct module before a marketing ID is issued to them. The online training covers all aspects of the Gas Marketing Code of Conduct. Based on a sample of 20, we noted that customers were provided with a copy of the contract within 28 days. Based on the above observations, it was concluded that there are sufficient processes are currently in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		
N/A		

Item 122 / Item 56 / Item 71		Compliance rating
Trading Licence Clause 19		1 - Compliant
<i>Energy Coordination Act section 11zPP; Code of Conduct clause 2.4 (2)</i>		
Where the customer has entered into a new contractual relationship with a retailer, a retailer or gas marketing agent must give the information specified to the customer.		

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Verification/Tests	
Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the LPG Welcome Letter and Customer Service Charter	
Observations	
Through inquiry with the Customer Service Team Leader and Customer Service Supervisor, it was noted that the LPG Welcome Letter is issued to new customers and includes the Customer Service Charter, which can also be obtained from the Licensee's website. The letter further includes current pricing details and the Licensee's contact details. By way of review, it was noted that all applicable information per clause 2.4(2) is included within the welcome pack. As the licensee has two third party marketing agents, it was noted that all third party agents are required to complete the online Gas Marketing Code of Conduct module before a marketing ID is issued to them. The online training covers all aspects of the Gas Marketing Code of Conduct. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 123	Compliance rating
Trading Licence Clause 19	1 - Compliant
<i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.4 (3)</i>	
For a standard form contract, the retailer must give the information specified to the customer no later than with the customer's first bill. For a non-standard form contract or a standard form contract that is an unsolicited consumer agreement, the specified information must be given before the customer has entered into the contract. The gas marketing agent must obtain the customer's written acknowledgement that the specified information has been given.	
Verification/Tests	
Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the LPG Welcome Letter and Customer Service Charter	
Observations	
Through inquiry with the Customer Service Team Leader and Customer Service Supervisor, it was noted that the LPG Welcome Letter issued to new customers includes the Customer Service Charter, which can also be obtained from the Licensee's website. The letter further includes current pricing details and the Licensee's contact details. Non-standard form contracts are not provided to LPG customers and are therefore not applicable. As the licensee has two third party marketing agents, it was noted that all third party agents are required to complete the online Gas Marketing Code of Conduct module before a marketing ID is issued to them. The online training covers all aspects of the Gas Marketing Code of Conduct. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 124	Compliance rating
Trading Licence Clause 19	1 - Compliant
<i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.4 (4)</i>	
The retailer is not obliged to provide the information to a customer if the retailer has provided the information to that customer within the preceding 12 months; or if the retailer informs the customer how the customer may obtain the information and, if requested, gives the information to the customer.	
Verification/Tests	
Discussion with the Customer Service Team Leader and Customer Service Supervisor	
Observations	
Through inquiry with the Customer Service Team Leader and Customer Service Supervisor, it was noted that the licensee will provide this information if requested by the customer, regardless of when it was previously provided. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance. Based on our sample testing of one item, it was observed that the Licensee provided the information to a customer who previously requested the same information.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 125	Compliance rating
Trading Licence Clause 19	1 - Compliant
<i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.5(1)</i>	

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A gas marketing agent must ensure that the inclusion of concessions is made clear to residential customers and any prices that exclude concessions are disclosed.	
Verification/Tests Discussion with the Credit Team Leader	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee does not offer concessions on plans offered. Prices on the licensee's website and customer bills represent prices excluding concessions.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 127 Trading Licence Clause 19		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.5 (3)</i> A retailer or other party must ensure that a customer is able to contact the retailer or other party on the retailer's or other party's telephone number during the normal business hours of the retailer or other party for the purposes of enquiries, verifications and complaints.		
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of a customer invoice and the Licensee's website		
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor, it was noted that the licensee's phone number is published on their website, correspondence and advertisements. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 128 Trading Licence Clause 19		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.6 (1)</i> A gas marketing agent must, on request, provide the customer with its and the retailer's complaints telephone number and marketing identification number.		
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Complaint Handling procedure, staff training materials, a customer invoice and the Licensee's website		
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor, it was noted that the licensee's phone number is published on their website, correspondence and advertisements. Procedures to be taken when a complaint is received are documented within the Complaint Handling procedure. As the licensee has two third party marketing agents, it was noted that all third party agents are required to complete the online Gas Marketing Code of Conduct module before a marketing ID is issued to them. The online training covers all aspects of the Gas Marketing Code of Conduct. Further, training materials provided to marketing agents state that the complaints telephone number, ombudsman's telephone number or a person's marketing identification number must be provided if requested by the customer. Based on discussions, it was noted that no complaints have been received (from customers) relating to the marketers' failing to produce ID numbers when requested by customers. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 129 Trading Licence Clause 19		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.6 (2)</i> A gas marketing agent who meets with a customer face to face must: as soon as practicable tell the customer the purpose of the visit; wear a clearly visible and legible identity card showing the information specified; and as soon as practicable provide the information specified in writing to the customer.		
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of staff training materials		

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Observations	
<p>Through inquiry with the Customer Service Team Leader and Customer Service Supervisor, it was noted that the Gas Marketing Code of Conduct training materials state that any person meeting with a customer must wear a clearly visible and legible identity card with the information specified as well as provide this in a written format. As the licensee has two third party marketing agents, it was noted that all third party agents are required to complete the online Gas Marketing Code of Conduct module before a marketing ID is issued to them. The online training covers all aspects of the Gas Marketing Code of Conduct. Direct marketing is made to customers in the area. Based on discussions, it was noted that no complaints have been received (from customers) relating to the marketers' failing to produce ID numbers when requested by customers. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.</p>	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 130	Compliance rating
Trading Licence Clause 19	1 - Compliant
<i>Energy Coordination Act section 11ZPP; Code of Conduct clause 2.6(3)</i>	
A retailer or other party must keep the specified records each time it initiates contact with a customer for the purposes of marketing	
Verification/Tests	
Discussion with Customer Service Team Leader and Customer Service Supervisor Observation of the Sales Online system and Oracle	
Observations	
<p>Through discussion with the Customer Service Team Leader and Supervisor, it was noted that the licensee maintains records of LPG customer contact within Oracle – “maintain screen”. All discussions / correspondences (letters, emails or calls) are stored in the Diary Note section within Oracle.</p> <p>Based on the above observations and a sample testing of one item, it was concluded that there are sufficient processes currently in place to ensure compliance.</p>	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 131	Compliance rating
Trading Licence Clause 19	1 - Compliant
<i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.7</i>	
A person who carries out any marketing activity in the name of or for the benefit of a retailer or a gas marketing agent is to be taken to have been employed or authorised by the retailer or gas marketing agent, unless the contrary is proved.	
Verification/Tests	
Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of staff training materials	
Observations	
<p>Through inquiry with the Customer Service Team Leader and Customer Service Supervisor, it was noted that the Gas Marketing Code of Conduct training materials state that any person meeting with a customer must wear a clearly visible and legible identity card, which shows their name, photograph, marketing identification number and the Licensee's logo. As the licensee has two third party marketing agents, it was noted that all third party agents are required to complete the online Gas Marketing Code of Conduct module before a marketing ID is issued to them. The online training covers all aspects of the Gas Marketing Code of Conduct. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.</p>	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 132	Compliance rating
Trading Licence Clause 19	1 - Compliant
<i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.8(1)</i>	
A gas marketing agent must:	
<ul style="list-style-type: none"> keep a record of each complaint made by a customer, or person contacted for the purposes of marketing, about the marketing carried out by or on behalf of the gas marketing agent; and on request by the gas ombudsman in relation to a particular complaint, give to the gas ombudsman all information that the gas marketing agent has relating to the complaint within 28 days of receiving the request. 	

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Verification/Tests	
Interviewed Customer Service Team Leader and Customer Advocacy Manager Sample of customer complaints selected and reviewed	
Observations	
The Licensee, through their dedicated Customer Advocacy team, maintains and records detailed notes of customer complaints through their electronic customer management system. In accordance with internal policy any information that relates to a complaint is retained and provided when requested by the ombudsman within 28 days of receiving the request. A dedicated customer advocate has been appointed to record and assist in resolving disputes through the Licensee’s internal complaints resolution process. The procedure and process documents are available to all staff and are reviewed yearly. A sample of 10 customer complaints were extracted from Oracle and reviewed with no exceptions being noted. Detailed notes were maintained for each complaint and where a request for information was made by a customer all were fulfilled within the 28 day timeframe (often being completed by the next business day).	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 133	Compliance rating
Trading Licence Clause 19	1 - Compliant
<i>Energy Coordination Act section 11ZPP; Code of Conduct clause 2.8(2)</i>	
Any record that a gas marketing agent is required to keep by the Code of Conduct, must be kept for at least 2 years after the last time the person to whom the information relates was contacted by or on behalf of the gas marketing agent.	
Verification/Tests	
Discussion with Customer Service Team Leader and Customer Service Supervisor	
Observations	
Through discussion with the Customer Service Team Leader and Supervisor, it was noted that the licensee archives and maintains records of information relating to LPG on the Oracle system, dating back to the first date of sale (approximately 2007). Through observation of a customer file on the Oracle system, it was noted that the licensee has stored all diary notes and records since 2007. As the licensee has two third party marketing agents, it was noted that all third party agents are required to complete the online Gas Marketing Code of Conduct module before a marketing ID is issued to them. The online training covers all aspects of the Gas Marketing Code of Conduct. Based on the above observations, it was concluded that there are sufficient processes currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 134	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium clause 3.1(1)	1 – Complaint
<i>Energy Coordination Act section 11M</i>	
If a retailer agrees to sell gas to a customer or arrange for the connection of the customer’s supply address, the retailer must forward the customer’s request for the connection to the relevant distributor.	
Verification/Tests	
Discussion with the Customer Service Team Leader Discussion with the Customer Service Supervisor Consideration of relevant procedural documentation	
Observations	
Through inquiry it was noted that, following receipt of the customer’s request, email notification for new connections is sent to distributors via email. It was noted through consideration of procedural documents that this step is not clearly documented within the Create Retic Customer procedure. As a result, whilst no breaches were noted during the audit period with regards to LPG, it was concluded that controls are currently inadequate to ensure ongoing compliance. <i>Note: Testing was unable to be completed for LPG, as requests for new connections are emailed to the distributor, and the Retic email account did not save sent items at the time fieldwork was completed. At the time of fieldwork, it was noted that this issue has been logged with IT, however, since completion of fieldwork, it was advised that this issue was resolved in October 2014.</i>	
Adequacy of Controls Rating	C – Inadequate controls – significant improvement required
Compliance Rating	1 – Compliant
Corrective Action	
The requirement to forward customer requests to the distributor be clearly documented in Procedural documentation, and for emails sent to the distributor to be captured within Outlook and retained.	

Item 135	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 3.1(2)	2 – Non-compliant

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<i>Energy Coordination Act section 11M</i>	
Unless the customer agrees otherwise, a retailer must forward the customer's request for the connection to the relevant distributor that same day, if the request is received before 3pm on a business day; or the next business day, if the request is received after 3pm or on a weekend or public holiday.	
Verification/Tests Discussion with the Customer Service Team Leader Discussion with the Customer Service Supervisor Consideration of relevant procedural documentation	
Observations Through inquiry it was noted that, following receipt of the customer's request, email notification for new connections is sent to distributors via email. It was noted through consideration of procedural documents that this step is not clearly documented within the Create Retic Customer procedure. As a result, whilst no breaches were noted during the audit period with regards to LPG, it was concluded that controls are currently inadequate to ensure ongoing compliance. <i>Note: Testing was unable to be completed for LPG, as requests for new connections are emailed to the distributor, and the Retic email account did not save sent items at the time fieldwork was completed. At the time of fieldwork, it was noted that this issue has been logged with IT, however, since completion of fieldwork, it was advised that this issue was resolved in October 2014.</i>	
Adequacy of Controls Rating	D – No controls evident
Compliance Rating	2 – Non-compliant – minor impact on customers or third parties
Corrective Action The requirement to forward customer requests to the distributor to be clearly documented in Procedural documentation, and for emails sent to the distributor to be captured within Outlook and retained.	

Item 136	Compliance rating
Trading Licence Clause 2.1 and Schedule 2 Compendium Clause 3.1(2)	1 - Compliant
<i>Energy Coordination Act section 11M</i>	
A retailer must issue a bill no more than once a month unless the conditions specified in subclause 4.1(a)(i)(ii) are met.	
Verification/Tests Inquiry with Credit Team Leader Review of LPG Invoicing Procedure	
Observations Through discussion with the Credit Team leader it was noted that bills are issued to LPG customers when schedules listing meter reads are received. The frequency of bills varies either on a monthly, bimonthly or quarterly basis depending on when meter reads are conducted. Based on the licensee's LPG Invoice Procedure, customer invoicing only occurs once the schedule has been received. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 137	Compliance rating
Trading Licence Clause 2.1 and Schedule 2 Compendium Clause 4.1(b)	1 - Compliant
<i>Energy Coordination Act section 11M</i>	
A retailer must issue a bill at least every 3 months unless the conditions specified in subclause 4.1(b)(i)-(iii) are met.	
Verification/Tests Inquiry with Credit Team Leader Review of LPG Invoicing Procedure	
Observations Through review of the LPG invoicing procedure, the licensee issues invoices to LPG customers once schedules listing meter reads are received from meter readers. LPG customers are billed on a monthly or bimonthly basis, depending on when meter reads are received, which satisfies the minimum requirements of billing every 3 months. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

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Item 146 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.4		Compliance rating 1 – Compliant
<i>Energy Coordination Act section 11M</i> A retailer must issue a bill to a customer at the customer's supply address, unless the customer has nominated another address or an electronic address.		
Verification/Tests Discussion with the Customer Service Team Leader Discussion with the Customer Service Supervisor Consideration of relevant procedural documentation		
Observations Through inquiry and consideration of procedural documentation the following was noted: <ul style="list-style-type: none"> -In accordance with the <i>Create New Retic Customer</i> procedures supply and billing details must be added entered into Oracle at the time of customer sign-up. -The customer service officer must select from a drop down menu whether the billing address is the same as the supply address, or if a new address needs to be added. -Customer bills are generated and sent to the billing address that has been entered in SAP. <p>It was noted that if a LPG customer requested an address change, this change was initiated directly in Oracle. Oracle tracks all changes, including the date of the change.</p> <p>Based on the above observations, it was concluded that there are sufficient processes are currently in place to ensure compliance.</p>		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 147 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.5(1)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> Unless the customer agrees otherwise, a retailer must include the minimum prescribed information in subclause 4.5(1)(a)-(cc) on the customer's bill.		
Verification/Tests Inquiry with Credit Team Leader Observation of an example of an LPG Invoice		
Observations Through observation of a standard LPG Invoice and discussion with the Credit Team Leader it was noted that the licensee's invoices are based on a template that meets the minimum requirements of subclause 4.5(1)(a)-(cc). It was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 148 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.5(2)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer is not obliged to include a graph or bar chart on the bill, if the bill is not indicative of the customer's actual consumption or based upon a meter reading.		
Verification/Tests Inquiry with Credit Team Leader Observation of bill		
Observations Through discussion with the Credit Team Leader and observation of a LPG customer bill, it was noted that the licensee includes graphs on all bills, even if the consumption is based on an estimated read. Where estimated readings are used as a basis for invoices, this is clearly noted on the invoice. As graphs are used on all bills, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

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Item 149		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.5(3)		3 – Non-compliant
<i>Energy Coordination Act section 11M</i>		
If a retailer identifies and wishes to bill a customer for a historical debt, the retailer must advise the customer of the amount of the historical debt and its basis, before, with or on the customer's next bill.		
Verification/Tests		
Discussion with the Customer Service Team Leader and Customer Service Supervisor		
Observations		
Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that there is currently no procedure in place with regards to billing for historical debt. However, this control gap has been identified and the Customer Service and Credit teams are currently collaborating to develop a solution. Based on the above observations, it was concluded that sufficient processes are not currently in place and compliance with the obligation has not been met.		
Adequacy of Controls Rating	D – No controls evident	
Compliance Rating	3 – Non-compliant – moderate impact on customers or third parties	
Corrective Action		
Procedures should be created that detail the process to be followed in regards to billing a customer for a historical debt.		

Item 150		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.6(1)		1 – Compliant
<i>Energy Coordination Act section 11M</i>		
A retailer must base a customer's bill on the distributor's or metering agent's reading of the meter at the customer's supply address, or the customer's reading of the meter in the circumstances specified in subclause 4.6(1)(a)(b).		
Verification/Tests		
Discussion with the Customer Service Team Leader and Customer Service Supervisor		
Review of Invoicing and Sending Schedules procedures		
Observations		
Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that documented procedures, the Sending Schedules procedure and the Invoicing procedure, detail the process to be followed when generating a customer's bill. The procedures state that meter reads are collected from the distributor within meter read schedules. These meter reads are then entered into customer accounts during invoicing. If the meter is unable to be read by the distributor, a meter reading card is left for the customer, and the invoice is then based on the customer read. It was noted, however, that the Invoicing procedure does not specifically state how to obtain and when to accept customer readings. Based on the above observations, it was concluded that while the Invoicing procedure requires updating, compliance has been met.		
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed	
Compliance Rating	1 – Compliant	
Opportunity for Improvement		
The Invoicing procedure should be updated to include guidance around the acceptance of customer readings.		

Item 151 / Item 65		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.6(2)		1 - Compliant
<i>Energy Coordination Act section 11M</i>		
Prior to a customer reading a meter, a retailer must give the customer information that explains how to read a meter correctly in clear, simple and concise language.		
Verification/Tests		
Discussion with the Customer Service Team Leader and Customer Service Supervisor		
Review of the Customer Charter		
Observations		
Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that instructions regarding how to read the Gas Meter are provided to the customer in the Customer Charter. The Customer Charter is provided to all customers at sign up. Based on the above observation, it was concluded that compliance has been met.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		
N/A		

Item 152		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.7 (1)		1 - Compliant
<i>Energy Coordination Act section 11M</i>		
A retailer must use its best endeavours to ensure that metering reading data is obtained as frequently as is required to prepare its bills.		
Verification/Tests		
Discussion with Credit Team Leader		

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Review of the Sending Schedules Procedure	
Observations Through inquiry with the Credit Team Leader, it was noted that invoices are prepared based on schedules received once meter reads are conducted. Bills are prepared on a monthly, bi-monthly or quarterly basis, depending on the reticulation area they live in. A copy of the Sending Schedules Procedure was provided, and it was noted the process was outlined within the document. Schedules for meter readers are sent on the 22 nd of each month, the reader will perform the read on the last day of the month and return to the licensee by the 5 th of the following month. All schedules are sent from the Retic mailbox and completed schedules should be sent to the Retic mailbox. All schedule date is monitored in an excel spreadsheet, and this spreadsheet shows when each accounts next bill is due. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 153	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.7(2)	1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must ensure that at least once every 12 months it obtains metering data in accordance with clause 4.6(1)(a).	
Verification/Tests Discussion with Credit Team Leader Review of the Sending Schedules Procedure	
Observations Based on discussions with the Credit Team Leader and review of procedures, the licensee ensures that it receives metering data at least once every 12 months so that the licensee can generate a bill in accordance with clause 4.6(1)(a). When an actual meter read is not obtained and an estimate bill is required, the staff member will review the history to check if this is a consecutive estimate. If this is the case, the staff member will contact the customer to arrange an actual meter read to occur. Sample of 15 items noted that the licensee was compliant with the obligations.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 154	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.8(1)	1 – Complaint
<i>Energy Coordination Act section 11M</i> A retailer must give the customer an estimated bill in the manner specified, if the retailer is unable to reasonably base a bill on a reading of the meter.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that where actual meter reads cannot be obtained, estimated invoices are based on the average usage over the preceding 12 months. This is calculated using an excel model. Based on the above observations it was concluded that while sufficient processes are currently in place to ensure compliance, these procedures should be appropriately documented.	
Adequacy of Controls Rating	C – Inadequate controls – significant improvement required
Compliance Rating	1 – Compliant
Corrective Action Procedures followed when estimating gas usage should be documented so that all staff continue to follow established procedures, ensuring the licensee continues to operate within the requirements of the obligation.	

Item 155	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.8(2)	2 – Non-compliant
<i>Energy Coordination Act section 11M</i> In circumstances where the customer’s bill is estimated, a retailer must specify in a visible and legible manner the information specified in subclause 4.8(2)(a)-(c) The customer may request a verification of a meter reading and a meter reading.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Sample testing of 20 estimated invoices	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that where estimated readings are used as a basis for invoices, this is clearly noted on the invoice as stated in subclause 4.8(2)(a). The licensee’s customer service number is included for further information regarding the estimate, such as if the customer wishes to request a meter reading or request	

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the reason for the estimation as stated in subclause 4.8(2)(b)-(c). Due to a breach reported to the Authority, sample testing was performed, which noted nine breaches. Eight of the breaches occurred prior to September 2013 and were reported by the licensee to the regulator. Since then, a process has been implemented to manually review all estimated read invoices to ensure they include information specified in subclause 4.8(2)(a)-(c). However, the ninth breach occurred in November 2013, subsequent to the implementation of the licensee’s process intended to detect potential compliance breaches. Based on the above observations, it was concluded that the licensee’s controls require improvement and that compliance has not been met.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	2 – Non-compliant – minor impact on customers or third parties
Corrective Action The licensee should make changes to the process implemented to detect instances of estimated bills that do not comply with the obligation. The licensee should consider automating this process.	

Item 156	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.8(3)	1 – Compliant
<i>Energy Coordination Act section 11M</i> Upon request, a retailer must inform a customer of the basis and the reason for the estimation.	
Verification/Tests Discussion with the Customer Service Team Leader Discussion with the Customer Service Supervisor	
Observations Based on inquiry, it was noted that, where actual meter reads cannot be obtained, estimated invoices are based on the average usage over the preceding 12 months, and that this basis of estimation is provided to the customer upon request. It was noted however that the calculation procedure is not formally documented and therefore improvement is needed to ensure adequate controls are in place.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement A procedure note be developed and implemented to provide guidance regarding how to estimate usage.	

Item 157	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.9	1 – Compliant
<i>Energy Coordination Act section 11M</i> If a retailer gives a customer an estimated bill, and the meter is subsequently read, the retailer must include an adjustment on the next bill to take account of the actual meter reading.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of customer invoices	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that where an estimated invoice has been provided to the customer, the next invoice will include the actual meter read as well as factors in any under/over charge. Based on the above observation, it was concluded that compliance has been met.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 158	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.10	1 - Compliant
<i>Energy Coordination Act section 11M</i> If a retailer has based a bill upon an estimation because the customer failed to provide access to the meter, and the customer subsequently requests the retailer to provide a bill based on a reading of the meter and provides access to the meter, and pays the retailer’s reasonable charge for reading the meter (if any), the retailer must do so.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that the licensee allows the customer to send through a meter read in the circumstances outlined within the obligation. The customer’s invoice would then be corrected accordingly. Based on the above observations, it was concluded that while sufficient processes are currently in place to ensure compliance, these procedures should be appropriately documented.	
Adequacy of Controls Rating	C – Inadequate controls – significant improvement required
Compliance Rating	1 – Compliant

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<p>Corrective Action Procedures followed subsequent to receiving a LPG customer meter read should be documented so that all staff continue to follow established procedures, ensuring the licensee continues to operate within the requirements of the obligation.</p>
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<p>Item 159 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.11 (1)</p>	<p>Compliance rating 1 - Compliant</p>
<p><i>Energy Coordination Act section 11M</i> If a customer requests the meter to be tested and pays a retailer's reasonable charge (if any) for doing so, a retailer must request the distributor or metering agent to do so.</p>	
<p>Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor</p>	
<p>Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that the procedure followed when LPG customers request a meter to be tested is still to be documented, but staff are informed of the process to be followed. A fee is not charged to the customer in these circumstances. We noted that there were 15 requests during the audit period. Based on the above observations, it was concluded that while sufficient processes are currently in place to ensure compliance, these procedures should be appropriately documented.</p>	
<p>Adequacy of Controls Rating</p>	<p>C – Inadequate controls – significant improvement required</p>
<p>Compliance Rating</p>	<p>1 – Compliant</p>
<p>Corrective Action Procedures followed when a customer requests a meter test should be documented so that all staff continue to follow established procedures, ensuring the licensee continues to operate within the requirements of the obligation.</p>	

<p>Item 162 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.12 (2)</p>	<p>Compliance rating 1 - Compliant</p>
<p><i>Energy Coordination Act section 11M</i> For the purpose of subclause 4.12(1), the effective date of change in the tariff will be the date on which the last meter reading at the previous tariff was obtained; or, if the change requires an adjustment to the meter at the customer's supply address, the date the meter adjustment is completed.</p>	
<p>Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor</p>	
<p>Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that any plan change is effective from the date of the last meter read. This is based on the Licensee's system design, which automatically applies the change in plan from the date of the last meter read when the plan is altered in the system. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.</p>	
<p>Adequacy of Controls Rating</p>	<p>A – Adequate controls – no improvement needed</p>
<p>Compliance Rating</p>	<p>1 – Compliant</p>
<p>Corrective Action/Opportunity for Improvement N/A</p>	

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Item 164 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.14 (1)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> If a customer requests a retailer to issue a final bill at the customer's supply address, a retailer must use reasonable endeavours to arrange for that final bill in accordance with the customer's request.		
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Move Out procedures		
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that documented procedures, the Terminating a Contract procedure, detail the steps to be followed in order to terminate a reticulated gas contract. This is necessary if a customer requests a final bill at their supply address. The Reticulated Gas Disconnection Form is used internally to notify the LPG team of the disconnecting customer so that the LPG supply can be disconnected. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 165 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.14(2)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> If the customer's account is in credit at the time of the account closure, the retailer must repay the amount to the customer.		
Verification/Tests Discussion with Credit Team Leader Review of the Unapplied Payment Report		
Observations Through inquiry with the Credit Team Leader, it was noted that the final bills are issued to customers including a note to contact the licensee to arrange for settlement of accounts if there is credit balance and a refund is provided to customers with credit balances on their closed accounts. All refund for final bills are processed based on the requests by customer. All outstanding credits are monitored and tracked on an Unapplied Payment Report which is run monthly. A Credit team member will then follow up with customers based on this report. Therefore, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 167 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.16 (1)(a)		Compliance rating –Not Rated
<i>Energy Coordination Act section 11M</i> If a retailer is satisfied after conducting a review of a bill that the bill is correct, the retailer may require a customer to pay the unpaid amount; must advise the customer that the customer may request the retailer to arrange a meter test in accordance with applicable law; and must advise the customer of the existence and operation of the retailer's internal complaints handling processes and details of any applicable external complaints handling processes.		
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Complaint Handling procedure and a customer invoice		
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that customer invoices detail who the customer can call if they have a complaint, both internal and external to the licensee. The Complaint Handling procedure outlines the steps to be followed if a complaint is registered. The customer invoices also advise the customer that they may request a meter accuracy test, with the fee for the test refundable if the meter is found to be faulty. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance. There has been no activity during the period to test compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	Not Rated	
Corrective Action/Opportunity for Improvement N/A		

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Item 168 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.16 (1)(b)		Compliance rating Not Rated
<i>Energy Coordination Act section 11M</i> If a retailer is satisfied after conducting a review of a bill that the bill is incorrect, the retailer must adjust the bill in accordance with clauses 4.17 and 4.18.		
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor		
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that invoices can be manually raised by the licensee for LPG customers. Therefore, if a bill requires adjustment as a result of being incorrect, a corrected invoice is able to be reissued. The previous invoice will be kept on the customer's account as reversed and record of the complaint stored within the licensee's system. However, due to the rare occurrence of incorrect bills, a documented procedure in relation to review of customer bills is yet to be established. Based on the above observations, it was concluded that while sufficient processes are currently in place to ensure compliance, these procedures should be appropriately documented. There has been no activity during the period to test compliance.		
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed	
Compliance Rating	Not Rated	
Opportunity for Improvement Procedures followed when adjustment for an incorrect bill is required should be documented so that all staff continue to follow established procedures, ensuring the licensee continues to operate within the requirements of the obligation.		

Item 169 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.16 (2)		Compliance rating Not Rated
<i>Energy Coordination Act section 11M</i> The retailer must inform a customer of the outcome of the review (of the bill) as soon as practicable.		
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor		
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that an invoice can be manually raised by the licensee for LPG customers. This allows for a corrected invoice to be reissued if the bill review concludes finds the original bill to be incorrect. The customer is notified as soon as the outcome of the bill review is known. However, due to the rare occurrence of incorrect bills, a documented procedure in relation to review of customer bills is yet to be established. Based on the above observations, it was concluded that while sufficient processes are currently in place to ensure compliance, these procedures should be appropriately documented. There has been no activity during the period to test compliance.		
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed	
Compliance Rating	Not Rated	
Opportunity for Improvement Procedures followed when review of a customer bill is required should be documented so that all staff continue to follow established procedures, ensuring the licensee continues to operate within the requirements of the obligation.		

Item 170 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.16 (3)		Compliance rating Not Rated
<i>Energy Coordination Act section 11M</i> If the retailer has not informed a customer of the outcome of the review within 20 business days from the date of receipt of the request for review under clause 4.15, the retailer must provide the customer with notification of the status of the review as soon as practicable.		
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor		
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that an invoice can be manually raised by the licensee for LPG customers. This allows for a corrected invoice to be reissued if the bill review concludes finds the original bill to be incorrect. The customer is notified as soon as the outcome of the bill review is known. However, due to the rare occurrence of incorrect bills, a documented procedure in relation to review of customer bills is yet to be established. Based on the above observations, it was concluded that while sufficient processes are currently in place to ensure compliance, these procedures should be appropriately documented. There has been no activity during the period to test compliance.		
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed	
Compliance Rating	Not Rated	
Opportunity for Improvement Procedures followed when review of a customer bill is required should be documented so that all staff continue to follow established procedures, ensuring the licensee continues to operate within the requirements of the obligation.		

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Item 171		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.17(2)		–Not Rated
<i>Energy Coordination Act section 11M</i>		
If a retailer proposes to recover an amount undercharged as a result of an error, defect or default for which the retailer or distributor is responsible (including where a meter has been found to be defective), the retailer must follow the procedure specified in sub-clauses 4.17(2)(a)-(e).		
Verification/Tests		
Discussion with the Credit Team Leader Review of Payment Arrangement Guidelines		
Observations		
Through inquiry with the Credit Team Leader, it was noted that the licensee recover amounts from LPG customers due to undercharging in compliance with Compendium sub-clauses 4.17(2)(a)-(e). The licensee's Payment Arrangement Guidelines was provided by the Credit Team Leader, and it was noted that only subclause 4.17(2)(e) was stated within the document. The Credit Team Leader noted that no undercharging procedure currently exists for LPG. Having said that, staff are fully trained and are proficient in understanding the procedures that needs to be followed. On this basis we have considered the control environment to be generally adequate.		
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed	
Compliance Rating	Not Rated	
Opportunity for Improvement		
An LPG Undercharging Procedure should be developed and it should refer to the requirements in sub-clauses 4.17(2)(a)-(e). This will ensure that staff are attempting to recover undercharged amounts from LPG clients are doing it consistently and are meeting the requirements of the obligation.		

Item 172		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.18(2) and 4.18(5)		1 - Compliant
<i>Energy Coordination Act section 11M</i>		
If a customer (including a customer who has vacated the supply address) has been overcharged as a result of an error, defect or default for which a retailer or distributor is responsible (including where a meter has been found to be defective), the retailer must use its best endeavours to inform the customer accordingly within 10 business days of the retailer becoming aware of the error, defect or default and ask the customer for instructions as to whether the amount should be credited to the customer's account; or repaid to the customer.		
Verification/Tests		
Discussion with the Credit Team Leader Review of the Draft LPG Refunds Procedure		
Observations		
Through inquiry with the Credit Team Leader, it was noted that the licensee uses its best endeavours to contact the customer within 10 days when overcharging has occurred and ask the customer if they wish to have the amount credited to their account or repaid. The Credit Team Leader provided a copy of the draft Refund LPG Refund Procedure, this requirement is not included in the procedure and there is currently no overcharging procedure for LPG. It is acknowledged that the licensee is aware of this issue and is in the process of developing an overcharging procedure for LPG. Having said that, staff are fully trained and are proficient in understanding the procedures that needs to be followed. On this basis we have considered the control environment to be generally adequate.		
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed	
Compliance Rating	1 – Compliant	
Opportunity for Improvement		
Update the Draft LPG Refunds Procedure to include the requirement of this obligation. This will help in guiding the overcharging and refunding process carried out by staff at the licensee for its LPG customers. The licensee should continue developing the LPG overcharging procedure. It is acknowledged that the licensee is aware of this issue and is in the process of developing an overcharging procedure for LPG.		

Item 173		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.18(3) and 4.18(5)		1 - Compliant
<i>Energy Coordination Act section 11M</i>		
If a retailer receives instructions under subclause 4.18(2), the retailer must pay the amount in accordance with the customer's instructions within 12 business days of receiving the instructions. No interest shall accrue to a credit card or refund referred to in the subclause.		
Verification/Tests		
Discussion with the Credit Team Leader Review of Draft LPG Refunds Procedure		
Observations		
Through inquiry with the Credit Team Leader, it was noted that the licensee aims to process the amount overcharged in accordance with the customer's instructions within 12 business days of receiving the instructions and no interest shall accrue to a credit card or refund referred to in the subclause. The Credit Team Leader provided a copy of the draft LPG Refunds Procedure, it was noted that the		

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licensee’s draft procedure did not refer to the requirement to pay the amount in accordance with the customer’s instructions within 12 business days of receiving the instructions. Having said that, staff are fully trained and are proficient in understanding the procedures that needs to be followed. On this basis we have considered the control environment to be generally adequate.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement The licensee’s draft LPG Refunds Procedure should be updated to include a processing timeframe.	

Item 174 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.18(4) and 4.18(5)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> If a retailer does not receive instructions under subclause 4.18(2) within 20 business days of making the request, the retailer must use reasonable endeavours to credit the amount overcharged to the customer’s account. No interest shall accrue to a credit or refund referred to in this subclause.	
Verification/Tests Discussion with the Credit Team Leader Review of the Unapplied Payment Report	
Observations Through inquiry with the Credit Team Leader, it was noted that if the licensee does not receive instructions on what to do with the overcharged amount within 20 business days, the licensee will use reasonable endeavours to credit the amount to the customer’s account. At the end of every month, an Unapplied Payment Report is generated to identify outstanding payments to customers. A Credit team member will then follow up with the customer, the Credit Team Leader provided a copy of this report. It was also noted that there is no formal procedure to document overcharging of LPG customers. However, the licensee is currently developing a procedure.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement An LPG Overcharging Procedure is currently being developed. The licensee should include the requirement in this obligation in the procedural document.	

Item 176 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.19 (1)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> If a retailer proposes to recover an amount of an adjustment which does not arise due to any act or omission of the customer, the retailer must follow the procedure specified in subclause 4.19(1) (a)-(d).	
Verification/Tests Inquiry with Credit Team Leader Observation of the payment arrangement guidelines	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee has not undercharged a customer during the audit period. Despite that, the Credit team is responsible for: (e)Limiting the amount of the adjustment for the 12 months from the date the Credit team member contacts the customer (f)Including the adjustment on the next bill (g)Not charging interest of late fees on the adjustment (h)Offering the customer time to pay by way of instalment plans covering a period at least equal to the period over which the adjustment occurred. Through observation of the licensee’s payment arrangement guidelines, it was noted that “in the event where a customer has been undercharged as a result of an error, defect or default for which the licensee or the network operator is responsible, the customer can choose to pay the correcting payment by instalments. The licensee cannot charge interest or late fees on the instalment. The Credit team must offer the customer time to pay by instalment plan covering a period at least equal to the period over which the undercharging occurred”. It was noted, however, that the licensee currently does not have a consolidated procedure document for the adjustment process for LPG. Having said that, staff are fully trained and are proficient in understanding the procedures that needs to be followed. Furthermore, the LPG business has been in existence longer (relative to NG) with the procedures more bedded down. On this basis we have considered the control environment to be generally adequate.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement It is recommended that the licensee formalise the adjustment process in a centralised document.	

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Item 177 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.19 (2)		Compliance rating –Not Rated
<i>Energy Coordination Act section 11M</i> If after the meter reading a retailer becomes aware of an amount owing to the customer, the retailer must use its best endeavours to inform the customer accordingly within 10 business days of the retailer becoming aware of the adjustment and, subject to subclause (5), ask the customer for instructions as to whether the amount should be credited to the customer's account; repaid to the customer; or included as a part of the new bill smoothing arrangement where the adjustment arises under clause 4.3(2)(a)-(b).		
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor		
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that an invoice can be manually raised by the Licensee for LPG customers. This allows for a corrected invoice to be reissued, with the customer advised of the options available to receive the amount owing. This process would be completed as soon as the outcome of the bill review is known. However, due to the rare occurrence of incorrect bills, this process is yet to be documented. Based on the above observations, it was concluded that while sufficient processes are currently in place to ensure compliance, these procedures should be appropriately documented. There has been no activity during the period to test compliance.		
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed	
Compliance Rating	Not Rated	
Opportunity for Improvement Procedures followed when an amount is owing to the customer should be documented so that all staff continue to follow established procedures, ensuring the licensee continues to operate within the requirements of the obligation.		

Item 178 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.19 (3) and 4.19 (6)		Compliance rating –Not Rated
<i>Energy Coordination Act section 11M</i> If a retailer received instructions under subclause 4.19(2), the retailer must pay the amount in accordance with the customer's instructions within 12 business days of receiving the instructions. No interest shall accrue to an adjustment amount.		
Verification/Tests Discussion with Customer Service Team Leader and Customer Service Supervisor Review of the Refund procedures		
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that, in this case, a refund email would be sent to the licensee's Credit team, who would complete the transaction. This email sent uses the standard LPG Refund Request template. The Refund Payments by EFT and Cheque procedures state the process to be followed when making a refund payment and that refunds must be processed within 12 business days of receiving instructions from the customer. Based on the above observations, it was concluded that sufficient process are currently in place to ensure compliance. There has been no activity during the period to test compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	Not Rated	
Corrective Action/Opportunity for Improvement N/A		

Item 179 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.19 (4) and 4.19 (6)		Compliance rating –Not Rated
<i>Energy Coordination Act section 11M</i> If a retailer does not receive instructions under subclause 4.19 (2) within 20 business days of making the request, the retailer must use reasonable endeavours to credit the amount of the adjustment to the customer's account. No interest shall accrue to an adjustment amount.		
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Refund procedures		
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that documented procedures, the Refund Payments by EFT and Cheque procedure, detail how the Licensee is to refund money to customers. However, the procedure does not specifically state the process to be followed if refund instructions are not received within 20 business days of making the request. The licensee has advised that if no refund has been instructed by the customer, the credit would remain on the account until the next billing cycle. No instances of an amount being owed to the customer have occurred during the audit period. Staff are fully trained and are proficient in understanding the procedures that needs to be followed. On this basis we have considered the control environment to be generally adequate. Based on the above observations, it was concluded that while sufficient processes are currently in place to ensure compliance, the relevant procedures should be updated to reflect the process currently followed.		
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed	

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Rating	
Compliance Rating	Not Rated
Opportunity for Improvement	
The refund procedures should be updated to include the process to be followed if refund instructions from the customer are not received within 20 business days of making the request.	

Item 180	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 4.19 (5)	1 - Compliant
<i>Energy Coordination Act section 11M</i>	
Where the adjustment amount owing to the customer is less than \$75, the retailer may notify the customer of the adjustment by no later than the next bill after the meter is read, and:	
<ul style="list-style-type: none"> • Ask the customer for instructions in accordance with subclause 4.19 (2); or • Credit the amount to the customer's account. 	
Verification/Tests	
Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Refund procedures	
Observations	
Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that documented procedures, the Refund Payments by EFT and Cheque procedure, detail how the Licensee is to refund money to customers. However, the procedure does not specifically state the process to be followed if the amount owing is less than \$75. The licensee has advised that customers would be notified of any amounts owing to them as well as the refund options available. Any credit amount not refunded would show as a credit on the next invoice. No instances of an amount being owed to the customer have occurred during the audit period. Staff are fully trained and are proficient in understanding the procedures that needs to be followed. On this basis we have considered the control environment to be generally adequate. Based on the above observations, it was concluded that while sufficient processes are currently in place to ensure compliance, the relevant procedures should be updated to reflect the process currently followed.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement	
The refund procedures should be updated to include the process to be followed when the amount owing to a customer is less than \$75. The adjustment must be notified to the customer no later than the next bill and the Licensee should ask the customer for instructions in accordance with subclause 4.19 (2); or credit the amount to the customer's account.	

Item 181	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.1	3 - Non-compliant
<i>Energy Coordination Act section 11M</i>	
The due date on the bill must be at least 12 business days from the date of that bill. Unless a retailer specifies a later date, the date of dispatch is the date of the bill.	
Verification/Tests	
Discussion with Credit Team Leader Testing of Sample of 20 Invoices	
Observations	
Through discussion with the Credit Team Leader it was noted that the licensee has an automated process in their Oracle system whereby terms of payment are set within the system for 21 days from the invoice date. This configuration in the system will create invoices that will list a due date 21 days from the invoice date. A previous breach occurred where 12 non-residential customers were identified as having payment terms of 14 days. This has identified a system set up issue as payment terms are being automatically driven by plan type entered into Oracle. The problem was identified during the audit period by the licensee, since then these customers have been set up on a more favourable price plan, normally only offered to large use customers. Given that the processes are the same for NG and LPG, testing was conducted on a sample of 20 NG and LPG customers, and 2 of these customers had less than 12 days between billing date and due date.	
Adequacy of Controls Rating	C – Inadequate controls – significant improvement required
Compliance Rating	3 – Non-compliant – moderate impact on customers or third parties
Corrective Action	
The licensee should review the protocol set within the system to ensure that due dates of bills are at least 12 business days from issue dates.	

Item 182	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.2	1 - Compliant
<i>Energy Coordination Act section 11M</i>	
A retailer must offer a customer at least the following payment methods: in person at 1 or more payment outlets located within the Local Government District of the customer's supply address; by mail; for residential customers, by Centrepay; and either electronically or by telephone by means of a debit facility or a credit card.	
Verification/Tests	
Discussion with Credit Team Leader	

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Review of the Customer Charter Review of an Invoice	
Observations Through review of an invoice and customer charter and inquiry with the Credit Team Leader, it was noted that the following payment methods are available to customers: -EFT -BPay -Mail -Telephone -Direct Debit -In person at a local Gas House, Australian Post Branch or Agency -Australia Post Customers communicate the need for Centrepay directly with Centrelink and any further information is available upon request however, while Centrepay is a payment option available to customers the Customer Charter and the invoice do not include payment method via Centrepay.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement Include payment method of Centrepay in the Customer Charter and invoice	

Item 183 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.3	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> Prior to commencing a direct debit, a retailer must obtain the customer's verifiable consent and agree with the customer, wherever possible, on the amount to be debited, and the date and frequency of the direct debit.	
Verification/Tests Inquiry with Customer Service Team Leader Observation of direct debit consent form	
Observations Through inquiry with the Customer Service Team Leader, it was noted that direct debit consents for LPG customers are built into the sign-up process through the manual direct debit form. Through observation of the direct debit consent form, it was noted that the form includes details on how direct debit works, how customers can control payments and the frequency of the deductions. Customers are required to complete all the details on the authority form and return it to the licensee prior to commencing a direct debit. Based on the above observations, it was concluded that there are sufficient processes currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 184 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.4	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must accept payment in advance from a customer on request. Acceptance of an advance payment will not require a retailer to credit any interest to the amounts paid in advance. The minimum amount for which a retailer will accept an advance payment is \$20.	
Verification/Tests Discussion with the Credit Team Leader	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee accepts payment in advance from customers. There is no minimum pay in advance amount set. It was also noted that no payments in advance had been made by customers this audit period. The requirements of this obligation are documented in the procedures manual that staff refer to when liaising with customers.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 185 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.5	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> If a customer is unable to pay by way of the methods described in clause 5.2, due to illness or absence, a retailer must offer a residential customer a redirection of the customer's bill to a third person, at no charge.	
Verification/Tests	

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Discussion with the Credit Team Leader Review of the Financial Hardship Policy	
Observations Through inquiry with the Credit Team Leader, it was noted that if the customer is unable to pay via the methods listed in clause 5.2 (in person at a payment outlet, by mail, Centrepay, or debit facility/credit card via phone or electronically). A copy of the Financial Hardship Policy was provided, after review of the document it was noted that that customers experiencing financial hardship or payment difficulty may nominate to have bills redirected at no charge to a third party or an alternative postal address as required by clause 5.5. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 186 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.6(1)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must not charge a residential customer a late payment fee in the circumstances specified in subclause 5.6(1)(a)-(d)	
Verification/Tests Discussion with the Credit Team Leader Review of the Financial Hardship Policy Statement	
Observations Compendium subclause 5.6(1)(a)-(d) states that a late fee must not be charged if; <ul style="list-style-type: none"> -The customer receives a concession, provided they did not receive 2 or more reminder notices; -The customer has agreed to a payment extension or instalment plan; -The customer has a complaint currently being processed; or; -The customer is determined to be experiencing financial hardship. Through discussion with the Credit Team Leader, it was noted that, the above requirements are met by the licensee. Further, it was noted that the licensee does not provide concessions to customers and does not charge late penalty fees on complaints. A copy of the Financial Hardship Policy was reviewed and it was noted that all customers experiencing financial hardship are entitled to instalment plans and immediate waiver of late payment fees. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 187 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.6(2)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> If a retailer has charged a residential customer a late fee, a retailer must not charge an additional late payment fee in relation to the same bill within 5 business days from the date of receipt of the previous late payment fee notice.	
Verification/Tests Discussion with the Credit Team Leader Review of the Retic Letter Program	
Observations Through inquiry with the Credit Team Leader, it was noted that late fees for LPG customers are raised once a month. Therefore the licensee does not charge customers any additional late payment fees in relation to a bill that is within 5 business days from the date of receipt of the previous late payment fee notice. The Credit Team Leader provided a copy of the Retic Letter Program which explains the collection process for LPG customers, however there is no mention of how to administer late payment fees within the document.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement The Retic Letter Program should be updated to include a description of late payment fees, including when and why they should be administered. It should also state that the licensee must not charge an additional late payment fee in relation to the same bill within 5 business days from the date of receipt of the previous late payment fee notice.	

Item 188 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.6(3)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must not charge a residential customer more than 3 late payment fees in relation to the same bill, and 12 late payment fees in a year.	
Verification/Tests Discussion with the Credit Team Leader	

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Review of Retic Letter Program	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee does not raise late payment fees more than 3 times in relation to the same bill. It was also noted that the licensee raises late payments fees once a month, and therefore does not raise more than 12 late payment fees a year. These requirements are documented in the Retic procedures. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 189 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.6(4)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> If a residential customer has been assessed by a retailer as being in financial hardship, a retailer must retrospectively waive any late payment fee charged to the residential customer's last bill prior to the assessment being made.		
Verification/Tests Discussion with the Credit Team Leader Review of the Financial Hardship Policy Review of the Financial Hardship Training		
Observations Through discussion with the Credit Team Leader, it was noted that under financial hardship circumstances late payment fees charged to the customer's last bill are waived. The Credit Team Leader provided a copy of the Financial Hardship Policy, it includes the requirement to waive fees in this circumstance. The Financial Hardship Training was also provided, and it states that licensee's employees should refer to the Financial Hardship Policy when dealing with customers experiencing these difficulties. Therefore, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 190 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.7(1)		Compliance rating –Not Rated
<i>Energy Coordination Act section 11M</i> A retailer must not require a customer who has vacated a supply address, and who has given the retailer notice, to pay for gas consumed at the customer's supply address in the circumstances specified in subclause 5.7(1).		
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Move Out procedures		
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that Move Out procedures, including the Terminating a Contract procedure, detail the process to be followed when a customer is leaving a LPG supplied property. This is necessary if a customer requests a final bill at their supply address. The Reticulated Gas Disconnection Form is used internally to notify the LPG team of the disconnecting customer so that the LPG supply can be disconnected. The final bill will then be issued. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance. There has been no activity during the period to test compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	Not Rated	
Corrective Action/Opportunity for Improvement N/A		

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Item 191 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.7(2)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> If a customer reasonably demonstrates to a retailer that the customer was evicted or otherwise required to vacate a supply address, a retailer must not require a customer to pay for gas consumed at the customer's supply address from the date the customer gave the retailer notice.		
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Move Out procedures		
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that Move Out procedures, including the Terminating a Contract procedure, detail the process to be followed when a customer is leaving a LPG supplied property. This is necessary if the customer was evicted or required to vacate a supply address. Customer Service will request a copy of evidence of vacating the supply address from the customer. Charges subsequent to the date of notification by the customer will be made to 'owner/occupier' in Oracle and invoiced under 'owner/occupier' so the evicted or vacating customer is not required to pay for gas consumed after the date of notification. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 192 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.7(3)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> Notice is given if a customer informs a retailer of the date on which the customer intends to vacate, or has vacated the supply address, and gives the retailer a forwarding address to which a final bill may be sent.		
Verification/Tests Discussion with Customer Service Team Leader		
Observations T Through inquiry with the Customer Service Team Leader, it was noted that notice is deemed to have been given by a customer if the customer informs the licensee of the date on which the customer intends to vacate, or has vacated the supply and provides a forwarding address to the licensee. If these conditions are met, the licensee will not require the customer to pay for gas consumed at the supply address from: <ul style="list-style-type: none"> the date the customer vacated the supply address if the customer has given at least 3 business days' notice; or 5 days after the customer gave notice. <p>These instructions are documented in the licensee's procedures manual and staff have received training to ensure they understand the obligations. Based on our sample testing of one item it was noted that the licensee is compliant.</p>		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 193 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.7(4)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> If a retailer and a customer enter into a new contract for the supply address, a retailer must not require the previous customer to pay for gas consumed at the customer's supply address from the date the new contract becomes effective and in circumstances specified in subclause 5.7(4).		
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Move In and Move Out procedures		
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that the Move In and Move Out procedures, including the Terminating a Contract procedure and the Creating a New Contract procedure, detail the process to be followed when a customer enters into a new contract for the supply address. When a customer moves out from the supply address, charges will be made to a new customer or, in the event that the LPG team has not been notified of a new customer, charges will be made to the 'owner/occupier' in Oracle. This ensures the evicted or vacating customer is not required to pay for gas consumed after the date of notification. The new tenant will then have to contact the licensee to set up their own account if they wish to avoid disconnection of the gas meter. However, it is noted that an exception report is not currently run to identify any errors potentially made by the Customer		

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Service team where the contract is not appropriately terminated and, as a result, previous tenants may continue to be billed. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance but that the Terminating a Contract procedure could be improved by running an exception report on a regular basis.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement Management should consider running an exception report on a regular basis to identify potential errors in billing previous tenants.	

Item 194 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.8(1)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must comply with the Conduct Principles set out in the debt collection guideline issued by the Australian Competition and Consumer Commission concerning section 50 of the Australian Consumer Law (WA).	
Verification/Tests Discussion with the Credit Team Leader	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee ensure their employees are operating in compliance with the Australian Competition and Consumer Commission standards. Copies of the Australian Competition and Consumer Commission debt collection guidelines book are provided to all debt collectors at induction. Additionally internal debt collection training is also provided during team meetings. Therefore it was concluded that the process in place was adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 195 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.8(2)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must not commence proceedings for recovery of a debt from a residential customer who has informed a retailer that the customer is experiencing payment difficulties or financial hardship; or while a residential customer continues to make payments under an alternative payment arrangement.	
Verification/Tests Discussion with Credit Team Leader Review of the Financial Hardship Policy	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee does not proceed with collection of debt from customers that are in financial hardship or that are experiencing difficulties is making payments. The Credit Team Leader provided a copy the Financial Hardship Policy, it was noted that if customers are in financial hardship they will be shielded from debt collection and recovery costs. All debt collection staff are provided with a copy of the Financial Hardship Policy and additionally they receive training on how to handle customers experiencing financial hardship. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 196 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 5.8(3)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must not recover or attempt to recover a debt relating to a supply address from a person other than the customer with whom the retailer has or had entered into a contract for the supply of gas to that supply address.	
Verification/Tests Discussion with the Credit Team Leader	
Observations Through inquiry it was noted that debt collection is only performed by contacting the individual listed as the primary contact in the Oracle system. The secondary contact listed on the customer’s account has no financial responsibility for any debt incurred, and therefore is not contacted during debt collection. All staff are aware of this requirement and have had recent training in this area. Therefore it was concluded that the process in place was adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

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Item 198 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.1(1)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must assess whether a residential customer is experiencing payment difficulties or financial hardship, within 3 business days from when the residential customer informs a retailer that the customer is experiencing payment problems.		
Verification/Tests Discussion with the Credit Team Leader Review of the Financial Hardship Questionnaire Review of the Financial Hardship/Payment Difficulties Outline		
Observations Through inquiry with the Credit Team Leader, it was noted that the customer is assessed on financial hardship through the Financial Hardship Questionnaire. This questionnaire lists 9 questions that a Credit officer is to ask a customer over the phone to determine if they are experiencing financial hardship or payment difficulties. The Credit Team Leader also noted that, the licensee aims to inform the customer of the results / outcome of the assessment within the same business day that the questionnaire was completed. A copy of the Financial Hardship Questionnaire was provided by the Credit Team Leader and it included the questions that are used to assess the customer's situation. The Credit Team Leader also provided a copy of the Financial Hardship/Payment Difficulties Outline, it was noted that this is communicated to the licensee's staff, it states that the licensee must assess whether a residential customer is experiencing payment difficulties or financial hardship, within 3 business days from when the residential customer informs the licensee. Therefore, based on one sample item, it was concluded the above observations were adequate and the licensee was compliant.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 199 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.1(2)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> When undertaking an assessment regarding payment difficulties or financial hardship, a retailer must give reasonable consideration to the information given by the residential customer and requested or held by the retailer; or advice given by an independent financial counsellor or relevant consumer representative organisation.		
Verification/Tests Discussion with Credit Team Leader Review of the Financial Hardship Questionnaire		
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee conducts an assessment to determine if the customer is experiencing financial hardship over the phone. When performing the assessment, the licensee takes into consideration billing and payment history. This assessment is facilitated through the use of the Financial Hardship Questionnaire, which lists 9 questions the Credit officer needs to ask during the assessment process. Examples of these questions include; <ul style="list-style-type: none"> • Have you missed payments on your utility bills? • Do you have any savings/deposits? If yes, approximately how much?; and; • Have you contacted or seen a financial councillor? The Credit Team aims to inform the customer of the results / outcome of the assessment on the same day the customer undergoes the assessment. Reasonable consideration is given to all relevant information provided by the customer. Therefore, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 200 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.1(3)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must advise a residential customer on request of the details of an assessment.		
Verification/Tests Discussion with the Credit Team Leader		
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee provides details of an assessment to the customer when requested. Credit Team staff are advised to provide this information to customers when it is requested. There were 23 requests during the audit period. From our sampling of one item, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	

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Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 201	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.2(1)	–Not Rated
<i>Energy Coordination Act section 11M</i> A retailer must not unreasonably deny a residential customer's request for a temporary suspension of actions, if the customer demonstrates to the retailer that the customer has an appointment with a relevant consumer representative organisation to assess the customer's capacity to pay.	
Verification/Tests Discussions with the Credit Team Leader Review of the Financial Hardship Policy	
Observations Through inquiry with the Credit Team Leader, it was noted that the once the licensee has been notified by the customer that the situation has escalated to the relevant consumer representative organisation and that the customer has an appointment with that organisation, they are not denied requests for temporary suspension of collection and disconnection actions. All debt collection staff are provided with a copy of the Financial Hardship Policy and additionally they receive training on how to handle customers experiencing financial hardship. The Credit Team Leader provided a copy of the Financial Hardship/Payment Difficulty Procedure, and it was noted that this process is outlined within the document. Therefore, it was concluded the above observations were adequate. There was no activity during the audit period to test compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 202	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.2(2)	1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must allow a temporary suspension of actions for a period of at least 15 business days.	
Verification/Tests Discussion with the Credit Team Leader Review of the Financial Hardship/Payment Difficulties Outline	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee allows a temporary suspension of actions of at least 15 business days if the customer satisfies the criteria of Compendium clause 6.2. This is done by updating the customer's account status with 'on-hold' status. This will then ensure that the licensee does not carry out / procedure with any further debt collection activities for that period. Where there has been no contact from the customer, a calendar reminder is set for 3 weeks to confirm the appointment status and outcome with the customer. A copy of the Financial Hardship/Payment Difficulties Outline was provided and after review it was noted that the requirement to suspend actions for at least 15 business days was included in the document. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 203	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.2(3)	1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must give reasonable consideration to a request by a residential customer or relevant consumer representative organisation in the manner specified to allow a relevant consumer representative organisation additional time to assess a residential customer's capacity to pay.	
Verification/Tests Discussion with the Credit Team Leader	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee grants a request for additional time when requested by the relevant consumer representative organisation. When this occurs the status is updated and a calendar reminder is set for a follow up date. Therefore it was concluded that the process in place was adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

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Item 204 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.3(1)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> If the assessment carried out under clause 6.1 indicates to the retailer that the residential customer is experiencing payment difficulties or financial hardship, the retailer must follow the procedure specified in subclause 6.3(1). - offer alternative payment arrangements referred to in clause 6.4 (1) (additional time to pay bill or interest free Instalment), advise of what assistance is available		
Verification/Tests Discussion with the Credit Team Leader Review of the Financial Hardship Policy Review of the Financial Hardship/Payment Difficulties Outline		
Observations As stated in Compendium clause 6.1, where a residential customer informs the retailer of payment problems, they must perform an assessment within 3 business days and assess whether the customer is experiencing payment difficulties or financial hardship. Through inquiry with the Credit Team Leader, it was noted that where an assessment has deemed a residential customer to be experiencing payment difficulties or financial hardship, the licensee offers customers alternative payment arrangements, additional time to pay bills (including waiving of interests and late fees) and provides advice on types of assistance available. These requirements are also stated within the Financial Hardship Policy and the Financial Hardship/Payment Difficulties Outline, copies of these were provided to us upon request. Therefore, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		
Item 205 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.4(1)		Compliance rating 1 – Compliant
<i>Energy Coordination Act section 11M</i> A retailer must offer a residential customer who is experiencing payment difficulties or financial hardship at least the payment arrangements that are specified in subclause 6.4(1).		
Verification/Tests Discussion with Credit Team Leader Review of the Financial Hardship Policy		
Observations As stated in Compendium clause 6.4(1), where a residential customer is deemed to be experiencing payment difficulties or financial hardship they must be offered the following arrangements; (a) additional time to pay and (b) an interest free and fee-free instalment plan. Through inquiry with the Credit Team Leader, it was noted that the licensee offers customers experiencing payment difficulties or financial hardship alternative payment arrangements including additional time to pay bills, interest-free and fee-free instalment plans and immediate waivers of late payment fees. A copy of the Financial Hardship Policy was provided by the Credit Team Leader, and it was noted that these arrangements are included in the document. Therefore, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		
Item 206 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.4(2)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> When offering an instalment plan to a residential customer experiencing payment difficulties or financial hardship, a retailer must take into account the information and take the specified actions detailed in subclause 6.4(2).		
Verification/Tests Discussion with the Credit Team Leader Review of the Financial Hardship Policy Review of the Financial Hardship/Payment Difficulties Outline		
Observations Compendium Subclause 6.4(2), states that when offering an instalment plan to a customer, the licensee must allow the customer the specifications stated in 6.4(2)(a)-(h). Through inquiry with the Credit Team Leader, it was noted that the licensee allows for all these specification 6.4(2)(a)-(h) when offering an instalment plan to a customer experiencing payment difficulties or financial hardship. A copy of the Financial Hardship/Payment Difficulties Outline was provided, and it was noted within it was the process used to assess capacity to pay and how the instalment plan is calculated. Therefore, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		

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N/A	
Item 207	
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.4(3)	Compliance rating 1 – Compliant
<i>Energy Coordination Act section 11M</i> If a residential customer has in the previous 12 months had 2 instalment plans cancelled due to non-payment, a retailer does not have to offer that residential customer another instalment plan, unless the retailer is satisfied that the residential customer will comply with the proposed plan.	
Verification/Tests Discussion with the Credit Team Leader Review of the Payment Arrangement Guidelines	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee meets the requirement of Compendium subclause 6.4(3); if a customer has in the previous 12 months had 2 instalment plans cancelled due to non-payment, the licensee does not have to offer that residential customer another instalment plan, unless the retailer is satisfied that the residential customer will comply with the proposed plan. Therefore, if this scenario occurs, the licensee will only offer another instalment plan if the licensee is satisfied payment instalments can be met. A copy of the Payment Arrangement Guidelines was provided, it was noted this requirement is stated in the Broken Arrangements section of the Payment Arrangement Guidelines. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	
Item 208	
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.6(1)	Compliance rating 1 – Compliant
<i>Energy Coordination Act section 11M</i> A retailer must give reasonable consideration to the request by a customer; or a relevant consumer representative organisation, for a reduction of the customer's fees, charges or debt.	
Verification/Tests Discussion with Credit Team Leader Review of the Financial Hardship Policy Review of the Payment Arrangement Guidelines	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee may, under circumstances of financial hardship or payment difficulty, reduce the customer's fees, debt or charges. The licensee will assess each customer's situation on a case by case basis and staff are instructed to refer to the Financial Hardship Policy and Payment Arrangement Guidelines when dealing with customers in this situation. These two documents outline the process and requirements required when assessing a customer's situation. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	
Item 209	
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.6(2)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> In giving reasonable consideration under clause 6.6(1), a retailer should refer to the guidelines in its hardship policy referred to in clause 6.10(2)(d).	
Verification/Tests Discussion with the Credit Team Leader Review of the Financial Hardship Policy	
Observations As required by Compendium clause 6.10, the licensee must advise the customer of the specifications in subclause 6.10(2)(d). Through inquiry with the Credit Team Leader, a copy of the Financial Hardship Policy was provided and it was noted that the licensee develops the Financial Hardship Policy in accordance with the requirements of clause 6.10(2)(d) and it is submitted to the Authority for approval. All debt collection staff are provided with a copy of the Financial Hardship Policy and additionally they receive training on how to handle customers experiencing financial hardship. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

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Item 210 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.7		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> Where it is reasonably demonstrated to the retailer that the customer, experiencing financial hardship, is unable to meet the customers obligations under the previously elected payment arrangement, a retailer must give reasonable consideration to offering to revise an existing instalment plan.		
Verification/Tests Discussion with the Credit Team Leader Review of the Financial Hardship Policy Review of the Financial Hardship/Payment Difficulties Outline		
Observations Through inquiry with the Credit Team Leader, it was noted that that the licensee endeavours to revise existing instalment plans if the customer experiencing financial hardship is finding difficulty to meet the payments of the previously elected arrangement, each case is assessed on a case by case basis. These provisions are also included in the Financial Hardship Policy and the Financial Hardship/Payment Difficulties Outline, copies of these were provided. All debt collection staff are provided with a copy of the Financial Hardship Policy and additionally they receive training on how to handle customers experiencing financial hardship. Therefore, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 211 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.8		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must advise a customer experiencing financial hardship of the options specified in subclause 6.8.		
Verification/Tests Inquiry with Credit Team Leader Review of the Financial Hardship Policy Review of the Financial Hardship/Payment Difficulties Outline		
Observations As stated in Compendium clause 6.8, where a customer is experiencing financial hardship, the licensee offers the option to have the bill redirected to a third person at no charge, alternative payment methods, relevant consumer representative organisations available and availability of other financial assistance and grants schemes. Through inquiry with the Credit Team Leader, it was noted that the licensee advises the customer of all the above options if they are experiencing financial hardship. A copy of the Financial Hardship Policy and the Financial Hardship/Payment Difficulties Outline were reviewed, and it was noted that the above options are included within these documents. Therefore, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 212 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.9(1)		Compliance rating –Not Rated
<i>Energy Coordination Act section 11M</i> A retailer must determine the minimum payment in advance amount for residential customers experiencing payment difficulties or financial hardship in consultation with relevant consumer representative organisations.		
Verification/Tests Discussion with the Credit Team Leader		
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee does not set a prescribed minimum payment in advance amount for residential customers experiencing financial hardship or payment difficulties as the amount would vary on a case by case basis. Case Managers negotiate with customers experiencing payment difficulties or financial hardship on a payment arrangement plan, in consultation with relevant consumer representative organisations. There were no payments in advance by a residential customer experiencing payment difficulties or financial hardships during the audit period. Therefore, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	Not Rated	
Corrective Action/Opportunity for Improvement N/A		

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Item 213 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.9(2)		Compliance rating –Not Rated
<i>Energy Coordination Act section 11M</i> A retailer may apply different minimum payment in advance amounts for residential customers experiencing payment difficulties or financial hardship and other customers.		
Verification/Tests Discussion with the Credit Team Leader		
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee does not set a prescribed minimum payment in advance amount for residential customers experiencing financial hardship or payment difficulties as the amount would vary on a case by case basis. There were no payments in advance by a residential customer experiencing payment difficulties or financial hardships during the audit period. Therefore, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	Not Rated	
Corrective Action/Opportunity for Improvement N/A		

Item 214 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.10(1)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must develop a hardship policy to assist customers experiencing financial hardship in meeting their financial obligations and responsibilities to the retailer.		
Verification/Tests Discussion with the Credit Team Leader Observation of Financial Hardship Policy and its availability on the licensee's website		
Observations Through inquiry with the Credit Team Leader, it was noted that a Financial Hardship Policy is developed and maintained by the licensee and is available on the licensee's website for customers and the general public to view. After viewing the licensee's website, the policy could be found and is therefore accessible to the general public. Additional to the licensee's website, it was noted that a customer can call the licensee and request a hardcopy of the Financial Hardship Policy be sent to their address. Therefore, based on our sample testing of one item, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 215 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.10(2)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must ensure that its hardship policy complies with the criteria specified in subclause 6.10(2).		
Verification/Tests Discussion with the Credit Team Leader Review of the Financial Hardship Policy		
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee has established and developed a Financial Hardship Policy that incorporates all the criteria specified in Compendium subclause 6.10(2). A copy of the Financial Hardship Policy was reviewed and it was noted that it contained the requirements of the clause.		
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed	
Compliance Rating	1 – Compliant	
Opportunity for Improvement The policy includes the telephone number of FCAWA, however, do not include the telephone numbers of Credit Management Staff and other relevant consumer representative organisations. Therefore, it is recommended that the policy be updated accordingly.		

Item 216 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.10(3)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must give residential customers, financial counsellors and relevant consumer representative organisations details of the retailer's hardship policy, at no charge. The retailer must provide all residential customers identified as experiencing financial hardship with details of its hardship policy.		
Verification/Tests Discussion with the Credit Team Leader		

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Observation of Financial Hardship Policy and its availability on the licensee's website	
Observations Through inquiry with the Credit Team Leader, it was noted that a Financial Hardship Policy is developed and maintained by the licensee and is available on the licensee's website for customers and the general public to view. After viewing the licensee's website, the policy could be found and is therefore accessible to the general public. The licensee provides a copy of the Policy to all customers who are assessed as being in financial hardship. This policy contains the contact details of the relevant financial counsellors and consumer representatives. Additionally, residential customer can contact the licensee via telephone and request these details which are then posted or emailed out. From our sample of one item, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 217 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.10(4)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must keep a record of the following: the relevant consumer representative organisations consulted on the contents of its hardship policy; the date the hardship policy was established; the dates the hardship policy was reviewed; and the dates the hardship policy was amended.	
Verification/Tests Discussion with the Credit Team Leader Screenshot of Financial Hardship Policy version control	
Observations Through inquiry with the Credit Team Leader and observation of the Financial Hardship Policy version control, it was noted the version control of documentation is maintained on Domino Documents (document management system) which includes the date the hardship policy was established and the amendment dates. The licensee does have a list of relevant consumer representative organisations. Furthermore, this list is made available to all customer servicing staff and is available on the customer charter. We noted that the two main consumer representative organisations consulted are Financial Counsellors Association of Western Australia (FCAWA) and Western Australian Council of Social Service (WACOSS). Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 218 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.10(5)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> Unless otherwise notified in writing by the Authority, a retailer must review its hardship policy at least annually and submit to the Authority the results of that review within 5 business days of its completion.	
Verification/Tests Discussion with the Credit Team Leader and the National Credit Manager	
Observations Through inquiry with the Credit Team Leader and the National Credit Manager, it was noted that the Financial Hardship Policy is reviewed annually and an automatic notification is sent to the National Credit Manager when a review is required. The National Credit Manager then submits results of the review to the Authority within the timeframe specified by the Authority. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 219 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.10(6)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> The retailer may, at any time, review its hardship policy and submit to the Authority the results of that review within 5 business days after it is completed.	
Verification/Tests Discussion with the Credit Team Leader and the National Credit Manager	
Observations Through inquiry with the Credit Team Leader and the National Credit Manager, it was noted that the Financial Hardship Policy is reviewed annually and an automatic notification is sent to the National Credit Manager when a review is required. The licensee has not had to review its Financial Hardship Policy outside of the annual review. The National Credit Manager then submits results of the annual	

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review to the Authority within the timeframe specified by the Authority. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 220	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.10(7)	1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must have regard to the Authority's Financial Hardship Policy Guidelines when updating their hardship policy.	
Verification/Tests Discussion with the National Credit Manager	
Observations Through inquiry with the National Credit Manager, it was noted that the licensee reviews its Financial Hardship Policy and as a part of this process, liaises with the Authority to ensure their guidelines are in-line with the Authority's. The Financial Hardship Policy is then submitted to the Authority for approval and any communications in regards to the review is distributed to the National Credit Manager. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 221	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 6.11	1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must consider any reasonable request for alternative payment arrangements from a business customer who is experiencing payment difficulties.	
Verification/Tests Discussion with Credit Team Leader Review of the Financial Hardship/Payment Difficulties Outline	
Observations Through inquiry with the Credit Team Leader, it was noted that if a customer is deemed to have payment difficulties because they are unable to pay a bill, the customer may be offered a payment extension or payment arrangement plan. All situations are handled on a case by case basis by the Credit team. A copy of the Financial Hardship/Payment Difficulties Outline was provided, and it was noted that it includes consideration of the customer's capacity to pay and negotiation of a payment arrangement with the customer. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 222	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 7.1	1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must follow the procedures specified in subclause 7.1(1) prior to arranging for disconnection of a customer's supply address for failure to pay a bill. A customer has failed to pay a bill in the circumstances specified in subclause 7.1(2).	
Verification/Tests Inquiry with Credit Team Leader Walkthrough of disconnection process Review of LPG Disconnection Procedure	
Observations Through review of the LPG Disconnection Procedure, the specifications of Compendium clause 7.1(b) are met when disconnecting an LPG customer. After discussion with the Credit Team Leader and a walkthrough of the disconnection process it was noted that the licensee identifies a customer as failing to pay for a bill when the criteria in 7.1(2) is met, however, the process carried out to meet the requirements is not formally documented in the licensee's LPG Disconnection Procedure.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement The LPG Disconnection Procedure should be updated to include all the specifications in 7.1(2).	

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Item 223 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 7.2(1)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must not arrange for disconnection of a customer's supply address for failure to pay a bill in the circumstances specified in subclause 7.2(1).		
Verification/Tests Discussion with Credit Team Leader Review of LPG Disconnection Procedure		
Observations Compendium clause 7.2(1) sets out a list of specifications that the licensee must meet before disconnection an LPG customer. Through inquiry with the Credit Team Leader, it was noted that when disconnecting an LPG customer the licensee follows the requirements listed in Compendium subclause 7.2(1) and all accounts are individually reviewed before disconnection. However these requirements are not formally documented in the licensee's LPG Disconnection Procedural document. Having said that, staff are fully trained and are proficient in understanding the procedures that needs to be followed. On this basis we have considered the control environment to be generally adequate.		
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed	
Compliance Rating	1 – Compliant	
Opportunity for Improvement The LPG Disconnection Procedure should be updated and the list of requirements from subclause 7.2(1) should be added to the document. This ensures that the employees of the licensee are following consistent guidelines and no LPG customer is incorrectly disconnected.		

Item 227 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 7.6		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer or a distributor must not arrange for disconnection or disconnect a customer's supply address in the circumstances specified in clause 7.6.		
Verification/Tests Discussion with Credit Team Leader Review of LPG Disconnection Procedure Review of Complaint Handling Procedure		
Observations As stated in Compendium Clause 7.6, the licensee must not arrange for disconnection or disconnect a customer's supply address in the circumstance specified in clause 7.6. Through inquiry with the Credit Team Leader, it was noted that the licensee takes into account the specifications of 7.6 before disconnecting or arranging to disconnect a customer. After review of the LPG Disconnection Procedure and Complain Handling Procedure, it was noted that the licensee's LPG Disconnection Procedure and Complaint Handling Procedure included the requirements of Compendium clause 7.6 (e-g). However the procedure is incomplete as it does not refer to the requirements of Compendium clause 7.6 (a-d); a) disconnection requested by the customer; b) disconnection for emergency reasons; c) disconnection due to planned interruption; d) disconnection in order to prevent unauthorised utilisation. Having said that, staff are fully trained and are proficient in understanding the procedures that needs to be followed. On this basis we have considered the control environment to be generally adequate.		
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed	
Compliance Rating	1 – Compliant	
Opportunity for Improvement The LPG Disconnection Procedure and/or the Complaint Handling Procedure should be updated to include the requirements in clause 7.6(a-d). This will ensure staff at the licensee follow the requirements of the obligation and make certain that no customer are correctly disconnected.		

Item 228 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 8.1(1)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> In the circumstances specified in clause 8.1(1)(a)-(c), a retailer must arrange for reconnection of the customer's supply address if the customer makes a request for reconnection, and pays the retailer's reasonable charges for reconnection (if any) or accepts an offer of an instalment plan for the retailer's reasonable charges for reconnection.		
Verification/Tests Discussion of Credit Team Leader Review of LPG Reconnection Procedure		
Observations As stated in Compendium clause 8.1(1)(a)-(c), customers can be disconnected due to failure to pay, not providing access to meters for reads and illegal use of gas. Through inquiry with the Credit Team Leader, it was noted that if a customer has been disconnected, but remedies the issue and makes request for reconnection, and additionally pays any reasonable charge for reconnection or accepts an offer of an instalment plan, the licensee will then make arrangements to reconnect the customer. After review of the LPG Reconnection Procedure, it was noted that the process as well as all the specifications of 8.1(1) were not clearly outlined.		

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Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement The LPG Reconnection Procedure should be updated to more clearly outline the process and all specifications in clause 8.1(1). This will create guidance for employees at the licensee and greater consistency in the disconnection process.	

Item 229 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 8.1(2)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must forward the request for reconnection to the relevant distributor that same business day if the request is received before 3pm on a business day; or no later than the next business day if the request is received after 3pm on a business day, or on the weekend or on a public holiday.	
Verification/Tests Discussion with the Credit Team Leader Observation of LPG Reconnection Procedure	
Observations Through discussion with the Credit Team Leader it was noted that the licensee reconnects customers as soon as possible the next business day if they request the reconnection after 3pm. This was stated within the LPG Reconnection procedure so Therefore, it was concluded the above observations were adequate. There was one reconnection during the period. Sample testing of one item noted that the licensee is compliant.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 230 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 8.1	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A distributor must reconnect the customer's supply address upon the request of a retailer and subject to the retailer complying with the retail market rules, within 2 business days of receipt of the request. This timeframe does not apply in the event of an emergency.	
Verification/Tests Discussion with the Credit Team Leader Review of Monthly Compliance Report	
Observations Through inquiry with the Credit Team Leader, it was noted that the licensee will reconnect the customer's supply address upon request of the customer within 2 business days of receipt of the request. Requests for reconnection are usually received over the phone, and information is logged by a Credit officer within the Oracle system in the customer's diary notes. The licensee manually compiles a LPG Reconnection Monthly Compliance Report. This report tracks the reconnection process included the dates when the customer requests reconnection and when the licensee requests the distributor to reconnect the customer. This can be used to monitor performance and ensure reconnections are performed within the specific timeframes. Whilst the reconnection requests have been actioned on the same business day and there is tracking occurring, it is recommended that the licensee ensures records are accurately and periodically updated. A copy of the Monthly Compliance Report was provided to us and it was noted that the report was missing certain fields namely date of request and date of reconnection. The CST Team Leader confirmed this was due to manual error.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement It is recommended that the licensee implement and document formal procedures to monitor and manage the report. As this report is manually created, it is vital that inputs of the report are accurately and consistently entered.	

Item 231 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.1(1)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must give notice to each of its customers affected by a variation in its tariffs as soon as practicable after the variation is published and no later than the next bill in the customer's billing cycle.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of price notification letters	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that the licensee notifies the Minister for Energy, Finance, Citizenship and Multicultural Interests of changes to gas prices and fees at least 30 days before the effective date of the tariff variation. This notification is provided via letter and includes explanations for the increases. Customers are then informed of changes to prices via email or written correspondence. Notifications are sent to customers no later than the next bill. Based	

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on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 234 / Item 63	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium clause 10.2(1)	–Not Rated
<i>Energy Coordination Act section 11M</i> A retailer must, on request, give a customer their billing data.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that no instances of a customer requesting their billing data have occurred during the audit period. However, if this were to occur, billing data would be provided to the customer. Based on the above observations, it was concluded that compliance has been met as no requests for billing data have yet occurred.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 235	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium clause 10.2(2)	–Not Rated
<i>Energy Coordination Act section 11M</i> A retailer must give the requested billing data at no charge if a customer requests their billing data for a period less than the previous 2 years and no more than once a year, or in relation to a dispute with the retailer.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that no instances of a customer requesting their billing data have occurred during the audit period. However, if this were to occur, billing data would be provided to the customer at no charge. Based on the above observations, it was concluded that compliance has been met as no requests for billing data have yet occurred.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 236	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium clause 10.2(3)	–Not Rated
<i>Energy Coordination Act section 11M</i> A retailer must give the requested billing data within 10 business days of the date of receipt of either the request, or payment of the retailer's reasonable charge for providing the billing data.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that no instances of a customer requesting their billing data have occurred during the audit period. However, if this were to occur, billing data would be provided to the customer within the specified timeframe. This is substantiated as the licensee has a LPG Retic inbox that is managed to a 48 hour turnaround. Based on the above observations, it was concluded that compliance has been met as no requests for billing data have yet occurred.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 237	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.2(4)	1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must keep a customer's billing data for 7 years.	

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Verification/Tests	
Discussion with the Credit Team Leader	
Observations	
Through inquiry with the Credit Team Leader, it was noted the licensee stores billing information in its Oracle system for more than 7 years as required. The licensee, being a subsidiary of a larger business group has its data backed up and stored on servers off-site. This data can be retrieved as part of the licensee's business continuity and disaster recovery framework. Periodic testing of backed up data is also performed to ensure the integrity of the data. Therefore, it was concluded the above observations were adequate.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	
N/A	

Item 239	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium clause 10.4	1 - Compliant
<i>Energy Coordination Act section 11M</i>	
A retailer must give a customer on request, at no charge, general information on: cost-effective and efficient ways to utilise gas (including referring a customer to a relevant information source); how a customer may arrange for an energy efficiency audit at the customer's supply address; and the typical running costs of major domestic appliances.	
Verification/Tests	
Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the Customer Service Charter and the licensee's website	
Observations	
Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that energy saving tips are readily available to customers on the licensee's website and within the Customer Charter, also located on the website. These tips include effective ways on saving energy and money. As the licensee does not perform energy efficiency audits, when asked by customers, the licensee refers customers to external companies that perform the audits. Based on the above observations, it was concluded that compliance has been met although the licensee should update their website and Customer Service Charter to include typical running costs of major domestic appliances.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement	
The licensee's website and Customer Service Charter should be updated to include typical running costs of major domestic appliances.	

Item 241	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.5A(1)	-Not Rated
<i>Energy Coordination Act section 11M</i>	
The retailer must, within 3 months of being subject to the Compendium, lodge with the Authority, a gas customer safety awareness programme.	
Verification/Tests	
Discussion with the Regulatory Manager Observation of the Customer Charter	
Observations	
Through discussion with the Regulatory Manager it was noted that an awareness program was lodged with the Authority within 3 months of being subject to the Compendium, which was lodged with the Authority prior to the Audit period. Additionally through observation of the Customer Charter and discussion with the Regulatory Manager it was noted that a safety awareness section is detailed in the Customer Charter, in training programs and on the licensee's website safety section. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement	
N/A	

Item 242	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.5A(2)	-Not Rated

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<i>Energy Coordination Act section 11M</i>	
The retailer must consult with the Authority when preparing the gas customer safety awareness programme.	
Verification/Tests Discussion with the Regulatory Manager Observation of the Customer Charter	
Observations Through discussion with the Regulatory Manager it was noted that an awareness program was lodged with the Authority within 3 months of being subject to the Compendium and was constructed in consultation with the Authority prior to the Audit period. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	Not Rated
Corrective Action/Opportunity for Improvement N/A	

Item 243	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.5A(3)	1 - Compliant
<i>Energy Coordination Act 11M</i>	
The gas customer safety awareness programme is to communicate information to customers regarding safety in the use of gas and must address, at a minimum, the information referred to in clause 10.5A(3)(a)-(e).	
Verification/Tests Observation of the Customer Charter Observation of the Health and Safety section of the licensee's website	
Observations Through observation of the Customer Charter and the licensee's website it was noted that the licensee reports safety information that meets the requirements of clause 10.5A(3)(a)-(e). Information on safety includes properties of gas, a requirement to use approved appliances and licensed gas installers, the procedure for reporting gas leaks and emergency contact numbers. It was noted that there is opportunity for improvement within the health and safety section of the licensee's website regarding information of procedures to deal with gas leaks and possible emergency contact numbers.	
Adequacy of Controls Rating	B – Generally adequate controls – improvement needed
Compliance Rating	1 – Compliant
Opportunity for Improvement It is recommended that the licensee update the Health and Safety section of the website to include more information such as the proper procedure for reporting gas leaks and emergency contact numbers.	

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Item 245 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.9		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer and distributor must, to the extent practicable, ensure that any written information that must be given to a customer by the retailer, distributor or gas marketing agent under the Gas Marketing Code and the Compendium is expressed in clear, simple and concise language and is in a format that makes it easy to understand.		
Verification/Tests Observation of Residential Reminder Notice Observation of LPG Invoice		
Observations Through review of information sent out to customers from the licensee such as a Residential Reminder Notice and LPG Invoice it is evident that written information is expressed to customers in a clear and concise language and a format that is easily interpretable. Additionally, customer support contact information is provided on all communication for further queries. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 246 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.10 (1)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer and distributor must tell a customer on request how the customer can obtain a copy of the Gas Marketing Code of Conduct and the Compendium.		
Verification/Tests Discussion with the Customer Service Team Leader Discussion with the Customer Service Supervisor Consideration of relevant documentation		
Observations It was noted that the Terms and Conditions of the new customer Welcome Pack highlight that the customer may request from the licensee any information regarding any relevant Codes, as well as prices and fees. Through discussions with the Customer Service Team Leader and the Customer Service Supervisor, it was further noted that this information is provided to the customer upon request. The Gas Marketing Code of Conduct is also available to the public through the licensee's website. Based on the above observations, it was concluded that the licensee is compliant.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

Item 247 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.10(2)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer and distributor must make electronic copies of the Gas Marketing Code and the Compendium available, at no charge, on their website.		
Verification/Tests Observation of screenshots of licensee's website Discussion with the Regulatory Manager		
Observations Through observation of the licensee's website, it was noted that the Gas Marketing Code of Conduct and Compendium of Gas Customer Licence Obligations is available for download on the licensee's website. Additionally through discussion with the Regulatory Manager it was noted that for customers without internet access, the licensee provides copies of both documents at all Gas Houses and can distribute copies at no charge upon customer requests. For the period 1/9/2012 to 31/12/2013, we noted that the licensee had the 2012 version of the Code, including the Compendium on its website. While the 2014 version of the Code including the Compendium was on the website for the period 1/1/2014 to 31/8/2014. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement N/A		

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Item 248 Energy Coordination Act section 11M		Compliance rating 1 - Compliant
<p><i>Trading Licence clause 2.1 and Schedule 2 Distribution Licence clause 2.1 and Schedule 2 Compendium clause 10.10(3)</i> A retailer and distributor must make a copy of the Gas Marketing Code and the Compendium available for inspection, at no charge, at their offices.</p>		
Verification/Tests		
<p>Inquiry with Customer Service Team Leader and Customer Service Supervisor Observation of Gas House Packs Observation of the licensee's website including the Gas Marketing Code and the Compendium</p>		
Observations		
<p>Through observation of the licensee's website and 'Gas House Packs' and inquiry with the Customer Service Team Leader and Supervisor, it was noted that the Gas Marketing Code of Conduct and the Compendium of Gas Customer Licence Obligation are available on the licensee's website and intranet, as well as part of the licensee's 'Gas House packs' at 'Gas Houses'. Based on the above observations, it was concluded that there are sufficient processes currently in place to ensure compliance.</p>		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		
N/A		

Item 249 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.11(1)		Compliance rating 1 - Compliant
<p><i>Energy Coordination Act section 11M</i> A retailer and distributor must make available to a residential customer on request, at no charge, services that assist the residential customer in interpreting information provided by the retailer or distributor (including independent multi-lingual and TTY services, and large print copies).</p>		
Verification/Tests		
<p>Observation of LPG Invoice Discussion with the Regulatory Manager</p>		
Observations		
<p>Through observation of a LPG Invoice it was noted that Interpreter Services, TTY Services and further customer assistance is available at no charge in clear print on customer bills. Through discussion with the Regulatory Manager it was noted that upon request, customers are directed to the TTY and independent multi-lingual services while the licensee also offers TTY services at no charge on the licensee's website which was sighted. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.</p>		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		
N/A		

Item 250 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 10.11(2)		Compliance rating 1 - Compliant
<p><i>Energy Coordination Act section 11M</i> A retailer and, where appropriate, a distributor must include on a residential customer's bill and bill related information, reminder notice and disconnection warning: the telephone number for their TTY services; the telephone number for independent multi-lingual services; the National Interpreter Symbol with the words "Interpreter Services".</p>		
Verification/Tests		
<p>Observation of Residential Reminder Notice Observation of LPG Invoice Observation of Disconnection Notice</p>		
Observations		
<p>Through observation of an LPG Invoice, Residential Reminder Notice and Disconnection Notice it was noted that contact details for Interpreter Services including the NIS symbol, TTY Services, Independent multi-lingual services and further customer assistance are available in clear print on all the aforementioned forms of communication. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.</p>		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		
N/A		

Item 251	Compliance rating
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Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 12.1(1)		1 - Compliant
<i>Energy Coordination Act section 11M</i>		
A retailer and distributor must develop, maintain and implement an internal process for handling complaints and resolving disputes.		
Verification/Tests		
Interviewed Customer Service Team Leader and Customer Advocacy Manager Reviewed internal procedures for handling complaints Reviewed complaints training register		
Observations		
The Licensee has a "Complaint Handling Procedure" and "Complaint Handling Process" both of which are supported by internal customer advocacy training and a dedicated Customer Advocate. These internal documents are reviewed and updated yearly or as necessary when changes are made to complaint handling guidelines or standards. The procedure details a comprehensive Complaint Handling flowchart which ensures a consistent approach to resolving complaints. The procedure covers points such as:		
<ul style="list-style-type: none"> • recording a resolution • how to manage a customer's complaint • managing customers' behaviour • verbal and written complaints • escalating complaint process • resolution process 		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		
N/A		

Item 252 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 12.1(2)(a) and (b)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i>		
The complaints handling process must comply with AS ISO 10002 – 2006 and address, at the least, the criteria specified in clause 10.2(b).		
Verification/Tests		
Interviewed Customer Service Team Leader and Customer Advocacy Manager Examined complaint handling policy and procedure in addition to training material		
Observations		
The Licensee has complied with AS ISO 10002 – 2006 and addressed criteria specified in clause 10.2(b). A review of the Licensees complaints handling process was performed and it was found that the process complies with AS ISO 10002 – 2006 (Customer satisfaction – Guidelines for complaints handling in organisations) and includes all criteria outlines in clause 10.2(b). The Licensees process covers:		
<ul style="list-style-type: none"> • complaint handling • what is a complaint • what is an enquiry • why do we have a complaints handling process • how can a customer make a complaint • why is customer feedback important • recording of a complaint (both licensees and non-licensee customers) • process for when a customer is not satisfied with the resolution • customer advocate • ombudsman escalation 		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		
N/A		

Item 253 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 12.1(2)(c) and (d)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i>		
The complaints handling process must detail how the retailer will handle complaints about a retailer or marketing, and be available at no cost to customers.		
Verification/Tests		
Interviewed Customer Service Team Leader and Customer Advocacy Manager Examined Customer Complaints Brochure, Terms and Conditions, Internet Site, Customer Charter and a sample invoice.		
Observations		

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Where applicable the Licensee has ensured that information regarding the complaints handling process has been made available to the customer e.g. on all customer invoices. This information is available at no cost to customers through the Licensee's website and can also be obtained free of charge via email or in person at their head office.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 254	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 12.1(3)(a)	1 - Compliant
<i>Energy Coordination Act section 11M</i> When responding to a customer complaint, advise the customer that the customer has the right to have the complaint considered by a senior employee within the retailer or distributor (in accordance with its complaints handling process)	
Verification/Tests Interviewed Customer Service Team Leader and Customer Advocacy Manager Examined complaint handling policy and procedure in addition to training material	
Observations Customers are advised that their complaint can be considered by a senior employee and is outlined in the Licensee's complaints handling process and procedure. A sample of 10 LPG customer complaints were reviewed of which all were advised of their right to have the complaint considered by a senior employee.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 255	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 12.1(3)(b)	1 - Compliant
<i>Energy Coordination Act section 11M</i> When a complaint has not been resolved internally in a manner acceptable to the customer, a retailer or distributor must advise the customer of the reasons for the outcome (on request, the retailer or distributor must supply such reasons in writing); and that the customer has the right to raise the complaint with the gas ombudsman or another relevant external dispute resolution body and provide the freecall telephone number of the gas ombudsman.	
Verification/Tests Interviewed Customer Service Team Leader and Customer Advocacy Manager Examined customer information regarding the complaints handling and escalation process	
Observations Customers are advised that their complaint can be raised with the Energy & Water Industry Ombudsman Western Australia and the Department of Commerce and Consumer Protection through various means. The ombudsman's freecall number is provided to all customers on their monthly invoice and via the Licensee's website. Customers are always advised of the reason for their dispute outcome (and when requested can be provided in writing) as documented in the licences procedure and process documents. From discussions and a review of one sample item, the licensee is compliant.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 256	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 12.2	1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must comply with any guideline developed by the Authority relating to distinguishing customer queries from customer complaints.	
Verification/Tests Interviewed Customer Service Team Leader and Customer Advocacy Manager Examined staff training materials in addition to relevant policy and procedural documents	
Observations Staff training specifically relates to distinguishing customer queries from customer complaints as per the Authority's Customer Complaints Guidelines. This comprehensive training accompanied by procedural documents that are available to all staff in order to ensure that complaints are correctly classified. Procedural documents outline that a complaint is defined by the licensee as "an expression of dissatisfaction with product or service" while an enquiry is defined as "a request by a customer for information about a product or service, which does not reflect any dissatisfaction".	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed

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Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 257 Energy Coordination Act section 11M	Compliance rating 1 - Compliant
<i>Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.3</i> A retailer, distributor and gas marketing agent must give a customer on request, at no charge, information that will assist the customer in utilising the respective complaints handling processes.	
Verification/Tests Interviewed Customer Service Team Leader and Customer Advocacy Manager Performed a walkthrough of the complaints handling process and examined information that is provided to customers on request	
Observations Information is provided to customers at no charge when requested. A comprehensive complaints handling process and training ensures that this is adhered to. The Complaints Handling Procedure makes direct reference to providing information to a customer when requested in order to assist them in resolving any complaint. Where applicable the Licensee has ensured that information regarding the complaints handling process has been made available to the customer e.g. on all customer invoices. This information is available at no cost to customers through the Licensee's website and can also be obtained free of charge via email or in person at their head office. There has been 7 requests during the audit period. From discussions and a review of one sample item, the licensee is compliant.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 258 Energy Coordination Act section 11M	Compliance rating 1 - Compliant
<i>Compendium clause 12.4</i> When a retailer, distributor or gas marketing agent receives a complaint that does not relate to its functions, it must advise the customer of the entity that it reasonably considers to be the appropriate entity to deal with the complaint (if known).	
Verification/Tests Interviewed Customer Service Team Leader, Customer Advocacy Manager and Customer Advocate Performed a walkthrough of the complaints handling process	
Observations Information is provided to customers when a complaint does not relate to the Licensee. Important links and documents such as Kleenheat's Gas Customer Charter, Compendium of Gas Customer Licence Obligations, Gas Marketing Code of Conduct 2014 and Financial Hardship Policy are all available online or in person to the customer. Complaints unrelated to the Licensee's function are appropriately referred to in accordance with the complaints handling process to the correct entity (if known). This is documented in module 15 of Complaint Handling which is available to all staff. Detailed steps are also included for recording complaints for customers that do not have an active Oracle account.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 259 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 13.1(1)	Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i> Unless expressly provided otherwise, a retailer, distributor or gas marketing agent must keep a record or other information as required to be kept by the Code of Conduct and the Compendium for at least 2 years from the last date on which the information was recorded.	
Verification/Tests Discussion with the Regulatory Manager	
Observations Through discussion with the Regulatory Manager it was noted that the licensee holds all information required by the Code of Conduct and the Compendium for an unlimited timeframe in its Oracle ERP system. Information captured in the ERP system are backed up and stored offsite. This information can be retrieved as and when required. Thus satisfying the required minimum period of 2 years. As the licensee retains all data, there is no document retention policy. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement	

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N/A

Item 260 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 13.1(2)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i>		
For the purposes of clause 13.1(1), a retailer must keep records or other information specified in clause 13.1(2)(a)-(g).		
Verification/Tests		
Observation of Trading and Distribution Licence Annual Report 2013/2014 Observation of customer data Observation of report on call centre performance Inquiry with Regulatory Manager		
Observations		
Through discussion with the Regulatory Manager and review of all relevant documentation it was noted that the licensee maintains records in accordance with Clause 13.1(2)(a)-(g) as follows: h)The licensee maintains a record of customers which can be filtered down to the types of contracts; i)Customer contacts made are recorded via Flowtalk and Oracle's diary notes; j)Version control of hardship policy maintained on Domino Documents; k)All affordability and access indicators are recorded and reported in the Annual Performance Report; l)Customer complaints are recorded and reported in the Annual Performance Report; m)Monthly reports on call centre performance are generated and stored by the licensee; and n)The total number of residential accounts and non-residential accounts are recorded and reported in the Annual Performance Report. This information is available to all staff. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		
N/A		

Item 262 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 13.2(a) (i)-(xv)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i>		
A retailer must keep a record of the total number and percentage of its residential customer accounts under the affordability and access indicators specified in clause 13.2(a)(i)-(xv).		
Verification/Tests		
Discussion with Credit Team Leader Review of Trading and Distribution Licence Annual Performance Report 2013/14		
Observations		
Compendium clause 13.2(a)(i)-(xv) states all the required records of its residential customers it is required to be kept. Through inquiry with the Credit Team Leader, it was noted that the licensee maintains records of the total number and percentages of key statistics outlined in Compendium clause 13.2(a)(i)-(ix) of their residential customers in their annual report. A copy of the Trading and Distribution Licence Annual Performance Report 2013/14 was provided and it was noted that all required information per the obligation were included in the report. Therefore, it was concluded the above observations were adequate.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		
N/A		

Item 263 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 13.2(b) (i)-(ix)		Compliance rating 1 - Compliant
<i>Energy Coordination Act section 11M</i>		
A retailer must keep a record of the total number and percentage of its business customer accounts under the affordability and access indicators specified in clause 13.2(b)(i)-(ix).		
Verification/Tests		
Inquiry with Credit Team Leader Review of Trading and Distribution Licence Annual Performance Report 2013/14		
Observations		
Compendium clause 13.2(a)(i)-(xv) states all the required records of its residential customers it is required to be kept. Through inquiry with the Credit Team Leader, it was noted that the licensee maintains records of the total number and percentages of key statistics outlined in Compendium clause 13.2(a)(i)-(ix) of their residential customers in their annual report. A copy of the Trading and Distribution Licence Annual Performance Report 2013/14 was provided and it was noted that all required information per the obligation were included in the report. Therefore, it was concluded the above observations were adequate.		

Appendix 4 – Performance Audit Details LPG

Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 265 Energy Coordination Act section 11M	Compliance rating 1 - Compliant
<p>Compendium clause 13.3(1) A retailer must keep a record of the total number of complaints received from residential and business customers, as well as keeping a record of the complaint indicators specified in clause 13.3(1)(b)-(f).</p>	
<p>Verification/Tests Interviewed Customer Service Team Leader and Customer Advocacy Manager Examined reporting generated by management for review</p>	
<p>Observations Reporting on customer complaints is in line with Compendium clause 13.3(1)(b)-(f). A record of the total number of customer complaints by residential and business is kept and linked to the indicators outlined in Compendium clause 13.3(1)(b)-(f). Complaints are broken down and categorised by the following:</p> <ul style="list-style-type: none"> • billing/credit complaints • transfer complaints • marketing complaints • other complaints <p>Complaints are extracted from Oracle on a monthly basis by the Customer Advocate with a summary report being provided to management. For the year ended June 2014 a total of 2 complaints were filed relating to LPG. These complaints were successfully resolved within 2 business days.</p>	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 266 Energy Coordination Act section 11M	Compliance rating 1 - Compliant
<p>Compendium clause 13.3(2) A retailer must keep a record of the details of each complaint referred to in clause 13.3(1)</p>	
<p>Verification/Tests Interviewed Customer Service Team Leader and Customer Advocacy Manager Examined reporting generated by management for review, examined customer complaint recording in Oracle</p>	
<p>Observations Reporting and recording of customer complaints is in line with Compendium clause 13.3(1). The Licensee keeps detailed notes of each complaint by utilising their customer record management system Oracle. A sample of 3 LPG customer complaints was extracted to ensure compliance with subsection 13.3(1) of the Compendium clause. The following details were recorded for each complaint which was in line with the complaint handling procedure:</p> <ul style="list-style-type: none"> • action taken by the retailer • time taken for the complaint to be concluded • percentage of complaints from residential customers and business customers and time taken to resolve 	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 267 Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 13.5	Compliance rating 1 - Compliant
<p>Energy Coordination Act section 11M A retailer must keep a record of the call centre performance indicators specified in clause 13.5(a)-(e).</p>	
<p>Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the call centre performance reports</p>	
<p>Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that the licensee generates and records within monthly reports the following as specified within clause 13.5a - e: total number of telephone calls, number of telephone calls answered within 30 seconds, percentage of telephone calls answered within 30 seconds, average wait time before a call is answered, percentage of calls that are unanswered. Based on the above observation, it was concluded that compliance has been met.</p>	

Appendix 4 – Performance Audit Details LPG

Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 268	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 13.6	1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must keep a record of the total number of residential accounts held by customers and business customer accounts held by customers. A retailer must keep a record of the total number of residential and business accounts specified.	
Verification/Tests Discussion with the Customer Service Team Leader and Customer Service Supervisor Review of the customer base report	
Observations Through inquiry with the Customer Service Team Leader and Customer Service Supervisor it was noted that Customer Service uses the Discoverer tool to extract relevant information from Oracle and then uses Datamart to consolidate into a report format. Reports are customisable and fields can be selected to tailor the purpose of the report. The extraction of data from Oracle is automated, while the selection of fields is carried out by staff. Every Monday, the Customer Service Team generates a Datamart report of the full customer base. This is then filtered according to 'product' to identify residential/non-residential customers. Based on the above observation, it was concluded that compliance has been met.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 275	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 13.15	1 - Compliant
<i>Energy Coordination Act section 11M</i> A retailer must prepare a report in respect of each reporting year setting out the information in the records specified in clause 13.15(a)-(d).	
Verification/Tests Observation of Trading and Distribution Licence Annual Report 2013/2014	
Observations Through observation of the Trading and Distribution Licence Annual Report (2013/14) it was noted that information specified in clause 13.15(a)-(d) is contained in the report in a clear and concise format relating to the following: e)Records of residential customer accounts, business customer accounts and actions coordinated with the distributor; f)Records of complaints from both residential and business customers; g)Records of call centre performance; and h)Records of the number of residential accounts and business accounts held by customers. Additionally the requirement to prepare this report with the requirements of clause 13.15 is detailed in the Regulatory and Compliance Handbook. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	1 – Compliant
Corrective Action/Opportunity for Improvement N/A	

Item 277	Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 13.17(1)	2 – Non-compliant
<i>Energy Coordination Act section 11M</i> The annual retailer and distributor reports specified in clauses 13.15 and 13.16 are to be published not later than the following October 1.	
Verification/Tests Observation of email and screenshot of upload	
Observations Through observation of internal email correspondence and screenshots of document upload time it was noted that the Annual reports specified in clauses 13.15 and 13.16 were published by October 1 of the following year. It was noted that there was a known compliance breach in regards to the 2011/12 Annual Report which was published after the due date, however, this was resolved during the audit period by the licensee. The licensee has developed a Regulatory and Compliance Handbook which outlines external reporting requirements under the licence.	
Adequacy of Controls Rating	A – Adequate controls – no improvement needed
Compliance Rating	2 – Non-compliant – minor impact on customers or third parties
Opportunity for Improvement	

Appendix 4 – Performance Audit Details LPG

While the licensee has remediated the breach, we recommend the following improvement opportunity. It was noted that there was a known compliance breach with regards to the Annual Retailer Report, however, this was resolved during the audit period by the licensee. The licensee should continue to monitor and ensure that the Report is submitted not later than the following 1 October.

Item 278		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 13.17(2)		1 - Compliant
<i>Energy Coordination Act 11M</i>		
A report is published for the purposes of clause 13.17(1) if copies of it are available to the public, without cost, at places where the retailer or distributor transacts business with the public, and a copy of it is posted on a website maintained by the retailer or distributor.		
Verification/Tests		
Discussion with the Regulatory Manager Observation of the Gas House Pack		
Observations		
Through discussion with the Regulatory Manager and observation of the Gas House Pack, it was noted that the Trading and Distribution Licence Annual Report is included in the Gas House Pack's. The pack is created and distributed to all licensee 'Gas Houses' where the licensee transacts business with the public and can be distributed to customers upon request. Copies are also maintained by the licensee on their website at no cost to the customer. Based on the above observations, it was concluded that sufficient processes are currently in place to ensure compliance.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	1 – Compliant	
Corrective Action/Opportunity for Improvement		
N/A		

Item 279		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 13.17(3)		2 – Non-compliant
<i>Energy Coordination Act section 11M</i>		
A copy of each report must be given to the Minister and the Authority not less than 7 days before it is published.		
Verification/Tests		
Observation of Cover Letters for Trading and Distribution Licence Annual Report 2012/13 and 2013/14		
Observations		
Through observation of Cover Letters for the Trading and Distribution Licence Annual Reports (2012/13 and 2013/14) it was noted that the Regulatory Manager had submitted these reports to both the Minister and the Authority within the specified timeframes. It was noted that there was a known compliance breach with regards to the 2011/12 Annual Report submission to the Minister and Authority, however, this was resolved during the audit period by the licensee. The licensee has developed a Regulatory and Compliance Handbook which outlines external reporting requirements under the licence.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	2 – Non-compliant – minor impact on customers or third parties	
Opportunity for Improvement		
While the licensee has remediated the breach, we recommend the following improvement opportunity. It was noted that there was a known compliance breach with regards to the 2011/12 Annual Report submission to the Minister and Authority, however, this was resolved during the audit period by the licensee. The licensee should continue to monitor and ensure that the Trading and Distribution Licence Annual Report reports are submitted not less than 7 days before it is published.		

Item 280		Compliance rating
Trading Licence Clause 2.1 and Schedule 2; Compendium Clause 13.18		2 – Non-compliant
<i>Energy Coordination Act section 11M</i>		
A retailer and distributor must provide the information in the records in clauses 13.15 and 13.16 to the Authority in a format acceptable to the Authority no later than the following 23 September.		
Verification/Tests		
Observation of email submission Observation of Gas Trading Licence Performance Reporting Handbook Inquiry with Regulatory Manager		
Observations		
Through observation of email submissions it was noted that the licensee has submitted the retail datasheets to the Authority on the 30 th of September, in accordance with the Gas Trading Licence Performance Reporting Handbook (dated May 2014). It was noted that the due date of 23 September as per Compendium Clause 13.18 does not agree to the 30 September deadline stated in the Gas Trading Licence Performance Reporting Handbook. It was noted that there was a known compliance breach with regards to the 2011/12 Performance Report, however, this was resolved during the audit period by the licensee. The licensee has developed a Regulatory and Compliance Handbook which outlines external reporting requirements under the licence.		
Adequacy of Controls Rating	A – Adequate controls – no improvement needed	
Compliance Rating	2 – Non-compliant – minor impact on customers or third parties	

Appendix 4 – Performance Audit Details LPG

Opportunity for Improvement

It was noted that the due date of 23 September as per Compendium Clause 13.18 does not agree to the 30 September deadline stated in the Gas Trading Licence Performance Reporting Handbook. It was noted that there was a known compliance breach with regards to the 2011/12 Performance Report, however, this was resolved during the audit period by the licensee. The licensee should continue to monitor and ensure that the Gas Trading Licence Performance Reporting Handbook reports are submitted by the following 23 September.