



McGill Engineering Services Pty Ltd

Engineering, Adjudication & Arbitration Services ABN 45 106 691 169

Esperance Gas Distribution Company Pty Ltd

Gas Trading Licence GTL 11
Performance Audit





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Lawrence Teo
Esperance Gas Distribution Company Pty Ltd

Dear Mr Teo

Performance Audit Gas Licences

The fieldwork on the performance audit of Trading Licence GTL 11 for the audit period (14 March 2014 to 31 March 2016) is complete and I am pleased to submit the report to you. The report reflects my findings and opinions.

In my opinion, the Licensee has maintained a high level of compliance with the licence conditions. There were 10 non-compliances.

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the Trading licence (GTL 11) for the audit period on the relevant clauses referred to within the scope section of this report.

Yours sincerely

Kevan McGill
Director
Date 27 June 2016



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1 Gas Trading Licence Audit

2 Executive Summary

This performance audit was conducted in accordance with the guidelines issued by the Economic Regulation Authority (*Authority*) for the audit period (14 March 2014 to 31 March 2016).

2.1 Overall Conclusion

In my opinion, the Licensee has maintained a high level of compliance with the licence conditions. There were 10 non-compliances requiring corrective actions. There are no issues with the integrity of reporting to the *Authority* or other statutory organisations.

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the Trading Licence (GTL 11) for the audit period based on the relevant clauses referred to within the scope section (Page 13) of this report.

2.2 Audit period

This audit covers the period 14 March 2014 to 31 March 2016. The previous audit period was 1 September 2010 to 31 August 2013, but for a different company.

2.3 The Licensee

The licensee (GTL 11) is a small trader (less than 350 customers). The business is as a Gas Trader.

2.4 Previous audit non-compliances and recommendations

Non-compliances from last audits (2011 & 2013):

Table of Previous Non Compliances and Audit Recommendations				
A. Resolved before end of previous audit period				
Reference (no./year) details of the issue)	(Compliance rating/ Legislative Obligation/	Auditors' Recommendation or action taken	Date Resolved	Further action required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if Completed
1/2011 58	<i>Non-compliant – 2 Energy Coordination (Customer Contracts) Regulation 14 AGA Code Clause 4.1.3.1 & 4.1.3.2</i>	Develop scheduled process to insert notice in bill prior to tariff increase of tariff changes	May 2011	Completed



2/2011 60	<i>Energy Coordination (Customer Contracts) Regulation 15(1)</i> AGA Code (AG 755:1998) Clause 4.2.3.1, 4.2.3.2 & 4.2.3.3	Request exemption of explicit compliance with requirement and allow complying with industry standard or if required amend bill format to include required information required by the AGA Gas Customer Code by including a reference to meter testing in standard terms and conditions	Mar 2011	No Completed
3/2011 79	<i>Energy Coordination (Customer Contracts) Regulation 50</i>	Add the required information to the disconnection warnings template	Mar 2011	No Completed
4/2011 82	<i>Energy Coordination Act section 11M Energy Coordination (Customer Contracts) Regulation 45(2)</i>	None as the regulation is due to be repealed.	Mar 2011	No Completed
5/2011 102	<i>Energy Coordination Act section 11M</i>	Develop a compliance manual that has scheduled reminders for regulatory compliance items.	Mar 2011	No Completed
6/2011 115	<i>Energy Coordination Act section 11M</i>	Develop a scheduled procedure to advise Minister of change in tariff at least a month before change	Mar 2011	No Completed
7/2011 124	<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.4(2)</i>	The Licensee should seek an amendment to the licence from providing redundant information and in the interim provide the prescribed information	Mar 2011	No Completed
8/2011 158	<i>Energy Coordination Act section 11M</i>	Amend bill to include TTY service number. Seek an amendment of the licence from providing a bar graph and in the interim investigate methods of providing the prescribed graphical information	Nov 2010	No Completed
9/2011 209	<i>Energy Coordination Act section 11M</i>	Finalise consultation of hardship policy and set up process for scheduled annual consultation.	Mar 2011	No Completed
10/2011 214	<i>Energy Coordination Act section 11M</i>	Finalise the hardship policy including the required consultation	Mar 2011	No Completed
11/2011 215	<i>Energy Coordination Act section 11M</i>	A retailer must ensure that the hardship policy complies with the specified criteria.	Mar 2011	No Completed



12/2011 217	<i>Energy Coordination Act section 11M</i>	Finalise the hardship policy and keep the required records	Mar 2011	No Completed
13/2011 228	<i>Energy Coordination Act section 11M</i>	Develop a scheduled annual procedure to include a notice with the bill prior to a tariff increase.	Mar 2011	No Completed
14/2011 245	<i>Energy Coordination Act section 11M</i>	Add TTY service to bill, and TTY and special information services information on overdue warnings and disconnection notices	Dec 2010	No Completed
15/2011 236	<i>Energy Coordination Act section 11M</i>	Add information on energy efficiency or references to where it may be readily obtained to web site and customer charter. (Non mandatory recommendation audit guidelines 11.4).	Jun 2011	No Completed
16/2011 268	<i>Energy Coordination Act section 11M</i>	Develop a compliance manual with scheduled reminders for regulatory compliance issues.	Dec 2010	No Completed
B. Resolved during current Audit period				
Reference (no./year)	(Compliance rating/ Legislative Obligation/ details of the issue)	Auditors' Recommendation	Date Resolved	Further action required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable
1/2013 82	<i>Non-compliant – 2</i> Energy Coordination Act section 11M Trading Licence Clause 5.1 <i>Energy Coordination Act section 11M Energy Coordination (Customer Contracts) Regulation 45(2).</i> The need for a licensee to provide a customer service charter is voluntary.	Licensee to include this information on or with the bill from time to time	Aug 2014	No Completed
03/2013 155	<i>Not Compliant 1</i> <i>Energy Coordination Act section 11M</i> Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.8(2) 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.	Bill to include a reference to the fact that it is estimated and if requested by the customer the retailer will tell the customer the basis of the estimation and the reason for the estimation as required under clause 4.8 of the Compendium.	April 2014	No Completed
4/2013	<i>Non-compliant – 2</i>	Licensee to include	April 2014	No



222	<p><i>Energy Coordination Act section 11M</i> Trading Licence clause 2.1 and Schedule 2 Compendium clause 7.1 The licensee provides the customer with a reminder notice that includes the licensee's telephone number, advice how the licensee may assist the customer if they are experiencing payment difficulties or financial hardship and giving the customer time to pay. If the bill remains unpaid the licensee will then endeavour to contact the customer by telephone or electronic means and if the matter cannot be resolved this is followed by a final notice of disconnection. Neither of the letters contain information on the complaints handling process of the licensee</p>	information on disconnection correspondence that it has a complaints handling process and how it operates		Completed
5/2013 239	<p><i>Non-compliant – 2</i> <i>Energy Coordination Act section 11M</i> Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.4 The licensee has a publication that is available to customers on general energy efficiency information. However, it does not contain information on 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</p>	Licensee to amend its publication on energy efficiency to include 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	June 2014	No Completed
8/2013 79	<p><i>compliant – 4</i> Trading Licence Clause 5.1 <i>Energy Coordination (Customer Contracts) Regulation 50</i> The disconnection and final notice provides information on the energy ombudsman and contains a comment to contact the licensee if they have a compliant</p>	The notice should be amended to make reference to the complaints handling process	Mar 2014	No Completed
9/2013 81	<p><i>compliant – 4</i> Trading Licence Clause 5.1 <i>Energy Coordination Act section 11M Energy Coordination (Customer Contracts) Regulation 45(1)</i> The charter is available on the website and if requested the licensee would refer the customer to the website. In instances where the customer</p>	The charter needs to be updated as some of the references are not correct if the licensee intends to still make it publicly available	Aug 2014	No Completed



	does not have access to the website the licensee would mail a copy of the charter. One request was received during the audit period and the charter was provided in the required time-frame			
10/2013 181	Compliant-4 <i>Energy Coordination Act section 11M</i> Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.1 After examining a number of bills that were issued during the audit period, the due date on the bill is always more than 12 business days from the date the bill was dispatched.	Bill could be improved if it showed date on which it is dispatched. Shows reading date and due date	April 2014	No Complete (Issue date shown)
C. Unresolved at end of current Audit period				
Reference (no./year)	(Compliance rating/ Legislative Obligation/ details of the issue)	Auditors' Recommendation	Further action required (Yes/No/Not Applicable) & Details of further action	
2/2013 147	<i>Non-compliant – 2</i> <i>Energy Coordination Act section 11M</i> Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.5(1) The licensee has amended the bill to include the TTY service number and a bar graph but still needs to include the national interpreter symbol. The licensee was unable to include the TTY symbol in its off the shelf current billing system but will be incorporating it on the bill when the new software package (ProjectSight) currently being developed in-house is implemented	Include the national interpreter symbol on bill	July 2016	Yes Scheduled for completion July 2016
6/2013 250	<i>Non-compliant – 2</i> <i>Energy Coordination Act section 11M</i> Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.11(2) Examined above documentation. All the information is provided with the exception of the National Interpreter Symbol. The licensee's current billing software does not allow for notifications of this type to be included as part of the bill and on other documentation. The new ProjectSight software under	Include the National Interpreter Symbol on a residential customer's bill and bill related information, reminder notice and disconnection warning	July 2016	Advised as complete at plan stage but carried over to new item on this audit. Yes To be Completed Unable to incorporate in current off the shelf billing software. New in-house developed billing system (AssetSight) to incorporate symbol, due on line in July 2016



	development by the licensee will provide this feature and allow the required information to be included			
7/2013 72	<p><i>compliant – 3</i></p> <p>Trading Licence Clause 5.1 <i>Energy Coordination (Customer Contracts) Regulation 20(2)</i> AGA Code Clause 4.3.5.1</p> <p>Licensee provides a number of options including those required under regulation 20(2) and works with the customer to assist them in managing payment of their account. Record of action taken contained in metering database. The action taken is left to the discretion of Esperance Business Support Officer after discussion with the customer and when possible in line with their wishes. The hardship policy provides information on the action that can be taken. At the time of the audit 10 customers were subject to an instalment plan. However, none had their bill redirected to a third person or had requested information or referral to government assistance programs; or requested information on independent financial counselling services</p>	The process for assisting customers, needs to be documented together with the action taken. A checklist would assist and could be used as a record.		Yes Being considered by Licensee
11/2013 204	<p>Compliant-4</p> <p><i>Energy Coordination Act section 11M</i></p> <p>Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.3(1)</p> <p>Alternative payment arrangements are offered and customers are if appropriate referred to Centrelink and other organisations that may be able to assist the customer in managing the debt. The licensee will after discussion with the customer accept payment arrangements nominated by the customer. Currently 66 customers are on a CentrePay arrangement</p>	Although the licensee complies with this obligation no documented process for staff to follow exists. Consideration to be given to documenting the process to be followed including a check list that needs to be completed for record purposes	Aug 2015	<p>Advised as complete at plan stage but carried over to new item on this audit.</p> <p>Yes Incomplete</p> <p>Expected August 2016</p>

2.5 Issues from current audit

There are 11 issues from current audit.



2.5.1 Compliance elements requiring corrective measures

The actions requiring corrective measures are:

Table of Current Audit Non Compliances/Recommendations			
Unresolved at end of current Audit period			
Reference (no./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
1/2016 1	<i>Non-compliant – A2</i> Energy Coordination Act section 11Q(1-2) Fees not all paid on time	Control process to be amended to allow for processing time for payment to be made before one month after anniversary date.	Complete July 2016
2/2016 60	<i>Non-compliant – B2</i> Energy Coordination (Customer Contracts) Regulation 15(1) AGA Code (AG 755:1998) Clause 4.2.3.1, 4.2.3.2 & 4.2.3.3 The telephone number for financial difficulties is not included.	Add telephone number for financial difficulties to bill notice area	Complete July 2016 Yes - in new AssetSight billing statement
3/2016 102	<i>Non-compliant – B2</i> Energy Coordination Act Section 11M Trading Licence Clause 21 Compliance report was Late in 2014. Both reports should have shown incomplete type 2 items.	Improve compliance manual for regulatory items	Completed –Compliance Manual completed in 8 Sep 2011 and revised in 16 March 2016, further revision by July 2016 Satisfies time obligations but declaration of incomplete Type 2 items not included in report.
4/2016 147	<i>Non-compliant – B2</i> Energy Coordination Act section 11M Schedule 2 Compendium 4.5(1) Advice of payment options, interpreter symbol not on bill.	Implement new software that has all the provisions	Complete July 2016 Yes - in new AssetSight billing statement
5/2016 250	<i>Non-compliant – B2</i> Energy Coordination Act section 11M Schedule 2 Compendium clause 10.11(2) Need to add the National Interpreter Symbol to bill, on overdue warnings and disconnection notices	Add the National Interpreter Symbol to bill, on overdue warnings and disconnection notices.	Complete July 2016 Yes - in new AssetSight billing statement
6/2016 283	<i>Non-compliant – B2</i> Energy Coordination Act section 11M Schedule 2 Compendium clause 13.3(2) Must retain the dates regulatory reports are posted.	Improve compliance manual of regulatory requirements. Widen scope and add extra controls.	Complete August 2016.
7/2016 277	<i>Non-compliant – B2</i> Energy Coordination Act section 11M Schedule 2 Compendium clause 13.17(2) [2013] Must retain the dates regulatory reports are posted.	Improve compliance manual of regulatory requirements. Widen scope and add extra controls	Complete August 2016.
8/2016 278	<i>Non-compliant – B2</i> Energy Coordination Act section 11M Schedule 2 Compendium clause 13.17(2) [2013] Must retain the dates regulatory	Improve compliance manual of regulatory requirements. Widen scope and add extra controls	Complete August 2016.



	reports are posted.		
9/2016 279	<i>Non-compliant – B2</i> <i>Energy Coordination Act section 11M</i> <i>Schedule 2 Compendium clause 13.3(2)</i> The reports were prepared and 2014 delivered on time. The 2015 report was submitted 5 days before being published on the web site.	This requirement is no longer a requirement being subsumed by the reporting dates specified by the Authority. As it is no longer required, no corrective action is necessary.	N/A.
10/2016 82	<i>Non-compliant – B2</i> <i>Energy Coordination Act section 11M</i> <i>Energy Coordination (Customer Contracts) Regulation 45(2)</i> Bill needs to advise of availability of charter from time to time.	Implement notice as shown in draft bill in new billing system.	Complete July 2016

2.5.2 Opportunities for improvement

Table of Current Audit Non Compliances/Controls Improvement/ Recommendations			
Unresolved at end of current Audit period			
Reference (no./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
11/2016 204	<i>Compliant – B1</i> <i>Energy Coordination Act section 11M</i> Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.3(1) New staff to be trained as induction issue.	Add training for CentrePay and HUGS to induction process.	Complete August 2016



3 Performance Audit

3.1 Performance Audit Objectives

Under section 13 of the *Gas Industry Act 2004* (the Act), it is a requirement that every Licensee provide the Economic Regulation Authority (*Authority*) not less than once in every period of 2 years with a performance audit conducted by an independent expert acceptable to the *Authority*.

The primary objective of the audit is to audit the effectiveness of measures taken by the Licensee to maintain quality and performance standards. The Act states a performance audit is an audit of the effectiveness of measures taken by the Licensee to meet the performance criteria specified in the licence. The licence states that performance standards are contained in *applicable legislation*. Performance criteria are defined in the licence as:

- (a) the terms and conditions of the *licence*; and
- (b) any other relevant matter in connection with the *applicable legislation* that the *Authority* determines should form part of the *performance audit*.

The licence also provides for individual licence conditions namely - the *Authority* may prescribe *individual performance standards* in relation to the *Licensee* of its obligations under this *licence* or the *applicable legislation* (the Act and subordinate legislation).

The audit was done in compliance with prevailing ERA documents “Audit and Review Guidelines: Gas and Gas Licences (hereinafter “Guidelines”) and the Gas Compliance Reporting Manual (hereinafter “Manual”).

The Licensee appointed McGill Engineering Services Pty Ltd to conduct the audit of its Trading Licence with approval from the Authority. A preliminary assessment was conducted with the Licensee’s management to determine the inherent risk and the state of control for each compliance element of the Licence obligation. McGill Engineering Services Pty Ltd then prioritised the audit coverage based on the risk profile of the Licensee with an emphasis on providing greater focus and depth of testing for areas of higher risk to provide reasonable assurance that the Licensee had complied with the standards, outputs and outcomes under the Licence obligations.

The audit was conducted in a manner consistent with Australian Auditing Standards (AUS) 808 “Planning Performance Audits” and AUS 806 “Performance Auditing”. McGill Engineering Services Pty Ltd evaluated the adequacy and effectiveness of the controls and performance by the Licensee relative to the standards referred in the Trading Licence through a combination of enquiries, examination of documents and detailed testing for Gas Trading Licence GTL 11 for the Licensee.

This is the fourth audit of Esperance Gas. This is the first audit for this Licensee and the remainder were with the previous Licensee (WorleyParsons Asset Management Pty Ltd).

3.2 Scope Limitation

The review was undertaken by examination of documents, interviews with key persons and observations and is not a detailed inspection of physical items.

3.3 Inherent Limitations

Because of the inherent limitations of any internal control structure, it is possible that fraud, error or non-compliance with laws and regulations may occur and not be detected.



An audit is not designed to detect all weaknesses in compliance measures as an audit is not performed continuously throughout the period and the audit procedures performed on the compliance measures are undertaken on a test basis.

Any projection of the evaluation of the operating licences to future periods is subject to the risk that the compliance measures in the plans may become inadequate because of changes in conditions or circumstances, or that the degree of compliance with them may deteriorate.

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

3.4 Statement of Independence

To the best of my knowledge and belief, there is no basis for contraventions of any professional code of conduct in respect of the audit.

I have not done or contemplate undertaking any other work with the Licensee.

There are no independence threats due to:

- self-interest – as the audit company or a member of the audit team have no financial or non-financial interests in the Licensee or a related entity;
- self-review – no circumstance has occurred:
 - where the audit company or a member of the audit team has undertaken other non-audit work for the Licensee that is being evaluated in relation to the audit/review; or
 - when a member of the audit team was previously an officer or director of the Licensee; or
 - where a member of the audit team was previously an employee of the Licensee who was in a position to exert direct influence over material that will be subject to audit during an audit/review.

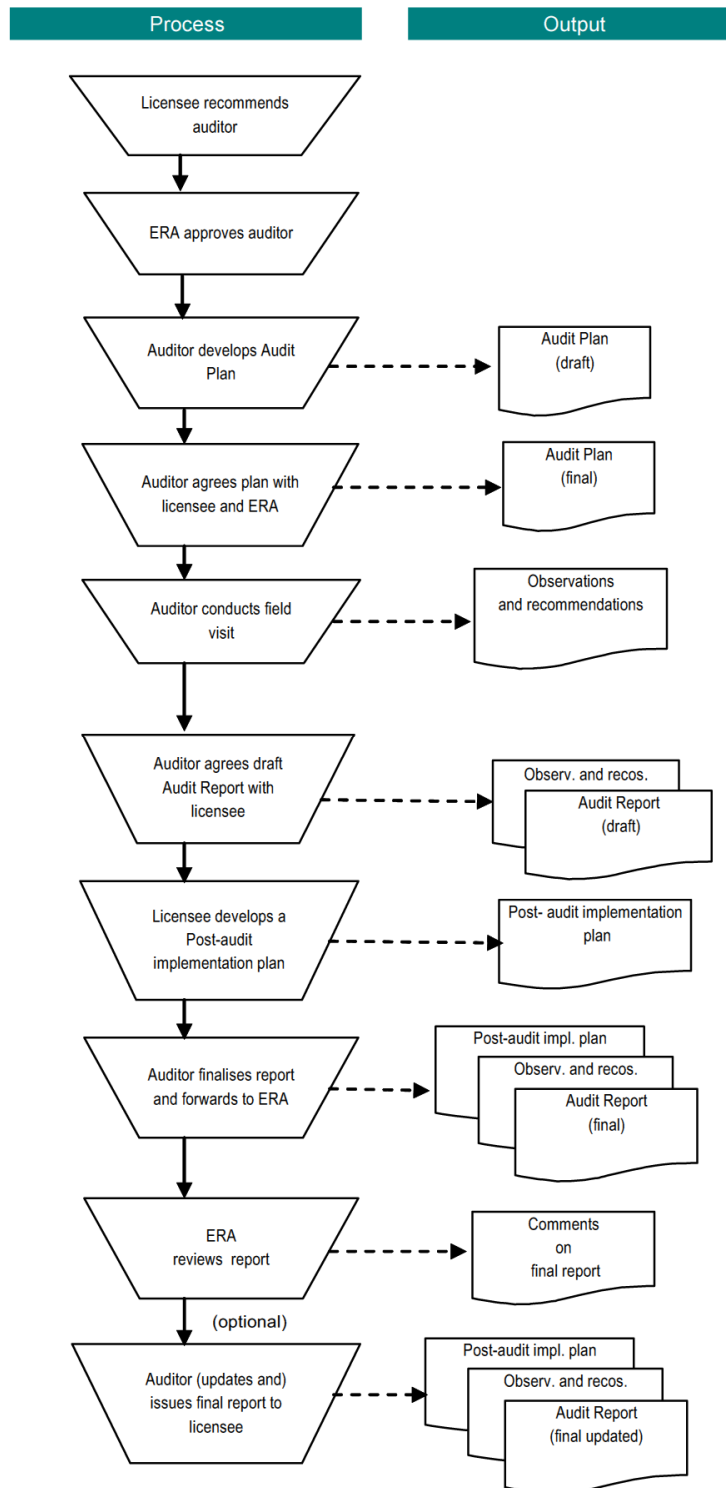
There is no risk of a self-review threat as:

- no work has been undertaken by the auditor, or a member of the audit/review team, for the Licensee within the previous 24 months; or
- the auditor is currently undertaking for the Licensee; or
- the auditor has submitted an offer, or intends to submit an offer, to undertake for the Licensee within the next 6 months; and
- there is no close family relationship with a Licensee, its directors, officers or employees, and
- the auditor is not, nor is perceived to be too sympathetic to the Licensee's interests.

3.5 Scope of the Audit

The audit was conducted in accordance with flow chart:

During this audit the Esperance office was visited.



3.6 Key Contacts Interviewed

The key contacts interviewed were:

- Licensee:



- Lawrence Teo – Business and Regulatory Manager
- Wynand Ferreira – Esperance Area Manager
- Joanna Loffler – Administrative Officer
- McGill Engineering Services Pty Ltd:
 - Kevan McGill.

The audit was conducted during March 2016 to June 2016. Kevan McGill spent about 100 hours on the audit.

3.7 Audit Requirements

Compliance with licence conditions was examined according to the likely inherent risk and the adequacy of controls to manage that risk.

Nature of audit work conducted

The *Authority* guidelines for performance audits require that the audit considers:

- 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 and procedures 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 by the Authority or specific issues for follow-up that are advised by the Authority.

Stage	Auditor	Standard
1. Risk & Materiality Assessment Outcome - Operational/ Performance Audit Plan	K McGill	ASA 300 Planning ASA 315: Risk Assessments and Internal Controls AUS 808: Planning Performance Audits AS/NZS 4360:2004: Risk Management ERA Guidelines
2. System Analysis	K McGill	AUS 810: Special Purpose Reports on Effectiveness of Control Procedures
3. Fieldwork Assessment and testing of; <ul style="list-style-type: none">• The control environment• Information system• Compliance procedures• Compliance attitude	K McGill	AUS 502: Audit Evidence AUS 806: Performance Auditing



4. Reporting	K McGill	ASA 300 Planning AUS 806: Performance Auditing
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3.8 Overall Conclusion

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the Trading (GTL 11) licence for the audit period based on the relevant clauses referred to within the scope section of this report.

There are 10 non-compliances that the licensee required corrective actions.

3.9 Findings

The conclusions of each of the elements of the licence are summarised in the following table. The audit risk as determined for each licence condition is also shown. The details of the audit can be seen in the detailed audit findings section (Page 29).

3.10 Audit compliance and controls rating scales

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



Item	Licence Clause/Condition reference (Cl.=clause, Sch.=schedule)	Obligations under condition	Licence Type (T + Trading)	Type	Audit Priority	Adequacy of Controls (NP=Not Performed)	Compliance Rating (NR = Not Rated)
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Type 1 Reporting Obligations					Priority	Adequacy of controls rating					Compliance Rating				
						A	B	C	D	NP	1	2	3	4	NR
25.	r.5.1	s.11Z	T	1	2					✓					✓
227.	Cl.2.1 Sch 2 Com 7.6	s.11M	T	1	2	✓					✓				

Licence Compliance Requirements Energy Coordination Act 1994					Priority	Adequacy of controls rating					Compliance Rating				
						A	B	C	D	NP	1	2	3	4	NR
1.	Cl 4.1	s.11Q(1-2)	T	2	4	✓						✓			
2.	Cl 12.1	s.11WG(1)	T	2	4	✓					✓				
3.	Cl 13.1	s.11WG(2)	T	2	4					✓					✓
4.	Cl 5.1	s.11WK(1-2)	T	NR	5	✓					✓				
5.	Cl 5.1	s.11WK(3)	T	NR	5	✓					✓				
6.	Cl 5.1	s.11X(3)	T	NR	5	✓					✓				
10.	Cl 15.1	s.11ZA(1)	T	2	4	✓					✓				
13.	Cl 14.1	s.11ZAF(c)	T	2	4					✓					✓
17	Cl 5.1	s.11ZK(3)	T	NR	5					✓					✓
24.	Cl 18.1	s.11ZQH	T	2	4	✓					✓				

Licence Compliance Requirements Gas Standards Act 1972					Priority	Adequacy of controls rating					Compliance Rating				
						A	B	C	D	NP	1	2	3	4	NR
25.	r.5.1	s.11Z	T	1	2					✓					✓

Licence Compliance Requirements Energy Coordination (Customer Contracts) Regulations 2004					Priority	Adequacy of controls rating					Compliance Rating				
						A	B	C	D	NP	1	2	3	4	NR
32.	Cl 5.1	r.12(2)	T	2	4	✓					✓				
33.	Cl 5.1	r.12(4)(a)	T	2	4	✓					✓				
34.	Cl 5.1	r.12(4)(b)	T	2	4	✓					✓				
35.	Cl 5.1	r.12(5)(a)	T	2	4	✓					✓				
36.	Cl 5.1	r.12(5)(b)	T	2	4					✓					✓
37.	Cl 5.1	r.12(5)(c)	T	2	4					✓					✓
38.	Cl 5.1	r.12(5)(d)	T	NR	5					✓					✓
39.	Cl 5.1	r.12(5)(e)	T	NR	5					✓					✓



Licence Compliance Requirements Energy Coordination (Customer Contracts) Regulations 2004					Priority	Adequacy of controls rating					Compliance Rating				
						A	B	C	D	NP	1	2	3	4	NR
40.	CI 5.1	r.12(6) CI 5.1.1.2 AGA Code	T	NR	5	✓					✓				
41.	CI 5.1	r.12(6) CI 5.1.1.3 AGA Code	T	NR	5					✓					✓
42.	CI 5.1	r.12(6) CI 5.1.2.1 & 5.1.2.2 AGA Code	T	NR	5					✓					✓
43.	CI 5.1	r.12(6) CI 5.1.3.1 & 5.1.3.2 AGA Code	T	NR	5					✓					✓
44.	CI 5.1	r.12(6) CI 5.1.4.1 & 5.1.4.2 AGA Code	T	NR	5					✓					✓
45.	CI 5.1	r.12(6) CI 5.1.5.1 & 5.1.5.2 AGA Code	T	NR	5					✓					✓
46.	CI 5.1	r.12(6) CI 5.1.7.2 AGA Code	T	NR	5					✓					✓
47.	CI 5.1	r.12(6) CI 5.1.8.1(a) AGA Code	T	NR	5	✓					✓				
48.	CI 5.1	r.12(6) CI 5.1.8.1(b) AGA Code	T	NR	5					✓					✓
49.	CI 5.1	r.12(6) CI 5.1.8.1(c) AGA Code	T	NR	5					✓					✓
50.	CI 5.1	r.12(6) CI 5.1.8.1(d) AGA Code	T	NR	5					✓					✓
51.	CI 5.1	r.12(6) CI 5.1.8.1(e) & (f) AGA Code	T	NR	5	✓					✓				
52.	CI 5.1	r.12(6) CI 5.2.2.2 AGA Code	T	NR	5	✓					✓				
53.	CI 5.1	r.13(1) CI 4.4.6.2 AGA Code	T	NR	5					✓					✓
54.	CI 5.1	r.13(3)	T	NR	5					✓					✓
55.	CI 5.1	r.13(4)	T	NR	5					✓					✓
56.	CI 5.1	r.14(2)	T	NR	5	✓					✓				
57.	CI 5.1	r.14(3) CI 4.1.2.1 & 4.1.2.2 AGA Code	T	NR	5	✓					✓				
58.	CI 5.1	r.14 CI 4.1.3.1 & 4.1.3.2 AGA Code	T	NR	5	✓					✓				
59.	CI 5.1	r.15(1) CI 4.2.1 AGA Code	T	NR	5	✓					✓				
60.	CI 5.1	r.14(3) CI	T	NR	5		✓					✓			



Licence Compliance Requirements Energy Coordination (Customer Contracts) Regulations 2004					Priority	Adequacy of controls rating					Compliance Rating				
						A	B	C	D	NP	1	2	3	4	NR
		4.2.3.1 & 4.2.3.2 & 4.2.3.3 AGA Code													
61.	CI 5.1	r.15(1) CI 4.2.3.2 AGA Code	T	NR	5					✓					✓
62.	CI 5.1	r.15(1) & 15(2)	T	NR	5					✓					✓
63.	CI 5.1	r.15(1) & 47(2) & (4) CI 4.2.3.4 AGA Code	T	NR	5	✓					✓				
64.	CI 5.1	r.15(1) CI 4.2.4.1 AGA Code	T	NR	5	✓					✓				
65.	CI 5.1	r.15(1) CI 4.2.4.2 AGA Code	T	NR	5					✓					✓
66.	CI 5.1	r.15(1) CI 4.2.4.4 AGA Code	T	NR	5	✓					✓				
67.	CI 5.1	r.15(1) CI 4.2.4.5 AGA Code	T	NR	5	✓					✓				
68.	CI 5.1	r.15(1) CI 4.3.2.1 AGA Code	T	NR	5	✓					✓				
69.	CI 5.1	r.15(1) CI 4.3.2.2 AGA Code	T	NR	5	✓					✓				
70.	CI 5.1	r.16(3)	T	NR	5	✓					✓				
71.	CI 5.1	r.19	T	NR	5	✓					✓				
72.	CI 5.1	r.20(2) CI 4.3.5.1 AGA Code	T	NR	5	✓					✓				
73.	CI 5.1	r.27(4) & 40(3)	T	NR	5					✓					✓
74.	CI 5.1	r.20(3) & 48	T	NR	5	✓					✓				
75.	CI 5.1	r.22 & 49 (2)	T	NR	5					✓					✓
76.	CI 5.1	r.49(3)	T	NR	5					✓					✓
77.	CI 5.1	r.49(4)	T	NR	5					✓					✓
78.	CI 5.1	r.49(5)	T	NR	5					✓					✓
79.	CI 5.1	r.50	T	NR	5	✓					✓				
80.	CI 5.1	r.44	T	NR	5					✓					✓
81.	CI 5.1	r.45(1)	T	NR	5	✓					✓				
82.	CI 5.1	r.45(2)	T	NR	5		✓					✓			
83.	CI 5.1	r.46(1) & (2)	T	NR	5					✓					✓
84.	CI 5.1	r.46(4)	T	NR	5	✓					✓				
85.	CI 5.1	r.28 CI 3.1.1(a) AGA Code	T	NR	5	✓					✓				
86.	CI 5.1	r.28 CI 3.1.1(b) AGA Code	T	NR	5	✓					✓				
90.	CI 5.1	r.33(3) CI 3.5.2.2 AGA Code	T	NR	5	✓					✓				



Licence Compliance Requirements Energy Coordination (Customer Contracts) Regulations 2004					Priority	Adequacy of controls rating					Compliance Rating				
						A	B	C	D	NP	1	2	3	4	NR
91.	CI 5.1	r.42	T	NR	5					✓					✓

Licence Compliance Requirements Licence Requirements					Priority	Adequacy of controls rating					Compliance Rating				
						A	B	C	D	NP	1	2	3	4	NR
96.	CI 16.2	s.11M	T	2	4	✓					✓				
97.	CI 16.4	s.11M	T	NR	5	✓					✓				
98.	CI 16	s.11M	T	NR	5					✓					✓
99.	CL 20	s.11M	T	NR	5	✓					✓				
100.	CL 21.1	s.11M	T	2	4	✓					✓				
101.	CL 22.1	s.11M	T	2	4	✓					✓				
102.	CL 23.1	s.11M	T	2	5		✓					✓			
103.	CL 24	s.11M	T	2	4					✓					✓
106.	CI 12.2	s.11M	T	NR	5					✓					✓
107.	CI 12.3	s.11M	T	NR	5					✓					✓
108.	CL 13.1	s.11M	T	2	4					✓					✓
109.	CL 15.1 & 15.2	s.11M	T	2	4	✓					✓				
110.	Sch 3 CL 1.5	s.11M	T	2	4					✓					✓
111.	Sch 3 CL 1.7	s.11M	T	2	4					✓					✓
112.	Sch 3 CL 2.1 to 2.2	s.11M	T	2	4	✓					✓				
113.	Sch 3 CL 3.1	s.11M	T	2	4	✓					✓				

Licence Compliance Requirements Gas Marketing Code of Conduct (Code of Conduct)					Priority	Adequacy of controls rating					Compliance Rating				
						A	B	C	D	NP	1	2	3	4	NR
114.	CI 19.1	s.11ZPP	T	2	4	✓					✓				
115.	CI 19.2	s.11ZPP & 11M	T	2	4					✓					✓
116.	CI 19.1	s.11ZPP Code CI 2.1	T	2	4					✓					✓
117.	CI 19	s.11ZPP Code CI 2.2(1)	T	2	4					✓					✓
118.	CI 19	s.11ZPP Code CI 2.2(3)	T	2	4					✓					✓
119.	CI 19	s.11ZPP Code CI 2.3(1)	T	2	4					✓					✓
120.	CI 19	s.11ZPP Code CI 2.3(2)	T	2	4					✓					✓
121.	CI 19	s.11ZPP Code CI 2.3(4)	T	2	4					✓					✓
122.	CI 19	s.11ZPP Code CI 2.4(1)	T	2	4					✓					✓
123.	CI 19	s.11ZPP Code CI 2.4(2)	T	2	4					✓					✓



Licence Compliance Requirements Gas Marketing Code of Conduct (Code of Conduct)					Priority	Adequacy of controls rating					Compliance Rating				
						A	B	C	D	NP	1	2	3	4	NR
124.	CI 19	s.11ZPP Code CI 2.5(1)	T	2	4					✓					✓
125	CI 19	s.11ZPP Code CI 2.5(2)	T	2	4					✓					✓
126	CI 19	s.11ZPP Code CI 2.6	T	2	4					✓					✓
127.	CI 19	s.11ZPP Code CI 2.8	T	2	4					✓					✓
128.	CI 19	s.11ZPP Code CI 2.9	T	2	4					✓					✓
129.	CI 19	s.11ZPP Code CI 2.10	T	2	4					✓					✓

Item	Licence Clause/Condition reference (Cl.=clause, Sch.=schedule, Com = compendium)	Obligations under condition	Licence Type (T + Trading)	Type	Audit Priority	Adequacy of Controls (NP=Not Performed)	Compliance Rating (NR = Not Rated)

Licence Compliance Requirements Compendium of Gas Customer Licence Obligations (Compendium)					Priority	Adequacy of controls rating					Compliance Rating				
						A	B	C	D	NP	1	2	3	4	NR
134.	CI 2.1 & Sch 2 Comp CI 3.1(1)	s.11M	T	2	4	✓					✓				
135.	CI 2.1 & Sch 2 Comp CI 3.1(2)	s.11M	T	2	3	✓					✓				
136.	CI 2.1 & Sch 2 Comp CI 4.1(a)	s.11M	T	2	4	✓					✓				
137.	CI 2.1 & Sch 2 Comp CI 4.1(b)	s.11M	T	2	5	✓					✓				
138.	CI 2.1 & Sch 2 Comp CI 4.2(1)	s.11M	T	2	5					✓					✓
139.	CI 2.1 & Sch 2 Comp CI 4.2(2)	s.11M	T	2	4					✓					✓
140.	CI 2.1 & Sch 2 Comp CI 4.2(3)	s.11M	T	2	4					✓					✓
141.	CI 2.1 & Sch 2 Comp CI	s.11M	T	2	4					✓					✓



Licence Compliance Requirements Compendium of Gas Customer Licence Obligations (Compendium)						Priority	Adequacy of controls rating					Compliance Rating						
							A	B	C	D	NP	1	2	3	4	NR		
	4.2(4)																	
142.	CI 2.1 & Sch 2 Comp Cl 4.2(5)	s.11M	T	2	4						✓							✓
143.	CI 2.1 & Sch 2 Comp Cl 4.2(6)	s.11M	T	2	4						✓							✓
144.	CI 2.1 & Sch 2 Comp Cl 4.3(1)	s.11M	T	2	4						✓							✓
145.	CI 2.1 & Sch 2 Comp Cl 4.3(2)	s.11M	T	2	4						✓							✓
146.	CI 2.1 & Sch 2 Comp Cl 4.4	s.11M	T	2	4	✓						✓						
147.	CI 2.1 & Sch 2 Comp Cl 4.5(1)	s.11M	T	2	3		✓						✓					
148.	CI 2.1 & Sch 2 Comp Cl 4.5(2)	s.11M	T	2	4	✓						✓						
149.	CI 2.1 & Sch 2 Comp Cl 4.5(3)	s.11M	T	2	4	✓						✓						
150.	CI 2.1 & Sch 2 Comp Cl 4.6(1)	s.11M	T	2	4	✓						✓						
152.	CI 2.1 & Sch 2 Comp Cl 4.7(1)	s.11M	T	NR	5	✓						✓						
153.	CI 2.1 & Sch 2 Comp Cl 4.7(2)	s.11M	T	NR	5	✓						✓						
154.	CI 2.1 & Sch 2 Comp Cl 4.8(1)	s.11M	T	2	4	✓						✓						
155.	CI 2.1 & Sch 2 Comp Cl 4.8(2)	s.11M	T	2	3						✓							✓
156.	CI 2.1 & Sch 2 Comp Cl 4.8(3)	s.11M	T	2	4						✓							✓
157.	CI 2.1 & Sch 2 Comp Cl 4.9	s.11M	T	2	4	✓						✓						
158.	CI 2.1 & Sch 2 Comp Cl 4.10	s.11M	T	NR	5	✓						✓						
159.	CI 2.1 & Sch 2 Comp Cl 4.11(1)	s.11M	T	2	4						✓							✓
160.	CI 2.1 & Sch 2 Comp Cl 4.11(2)	s.11M	T	2	4						✓							✓
161.	CI 2.1 & Sch 2 Comp Cl 4.12(1)	s.11M	T	2	4						✓							✓
162.	CI 2.1 & Sch 2 Comp Cl 4.12(2)	s.11M	T	NR	5						✓							✓
163.	CI 2.1 & Sch 2 Comp Cl 4.13	s.11M	T	2	4						✓							✓
164.	CI 2.1 & Sch 2 Comp Cl	s.11M	T	2	3	✓						✓						



Licence Compliance Requirements Compendium of Gas Customer Licence Obligations (Compendium)					Priority	Adequacy of controls rating					Compliance Rating							
						A	B	C	D	NP	1	2	3	4	NR			
	4.14(1)																	
165.	CI 2.1 & Sch 2 Comp Cl 4.14(2)	s.11M	T	2	4	✓					✓							
165A.	CI 2.1 & Sch 2 Comp Cl 4.14(3)	s.11M	T	2	5					✓								✓
166.	CI 2.1 & Sch 2 Comp Cl 4.15	s.11M	T	2	5					✓								✓
167.	CI 2.1 & Sch 2 Comp Cl 4.16(1)(a)	s.11M	T	2	4					✓								✓
168.	CI 2.1 & Sch 2 Comp Cl 4.16(1)(b)	s.11M	T	2	4					✓								✓
169.	CI 2.1 & Sch 2 Comp Cl 4.16(2)	s.11M	T	2	4					✓								✓
170.	CI 2.1 & Sch 2 Comp Cl 4.16(3)	s.11M	T	2	4					✓								✓
171.	CI 2.1 & Sch 2 Comp Cl 4.17(2)	s.11M	T	2	4					✓								✓
172.	CI 2.1 & Sch 2 Comp Cl 4.18(2) & 18(5))	s.11M	T	2	4					✓								✓
173.	CI 2.1 & Sch 2 Comp Cl 4.18(3)	s.11M	T	2	4					✓								✓
174.	CI 2.1 & Sch 2 Comp Cl 4.18(4)	s.11M	T	2	4					✓								✓
175.	CI 2.1 & Sch 2 Comp Cl 4.18(6)	s.11M	T	2	4					✓								✓
175A.	CI 2.1 & Sch 2 Comp Cl 4.18(7)	s.11M	T	2	4					✓								✓
176.	CI 2.1 & Sch 2 Comp Cl 4.19(1)	s.11M	T	2	4					✓								✓
177.	CI 2.1 & Sch 2 Comp Cl 4.19(2) & 19(6)	s.11M	T	2	4					✓								✓
178.	CI 2.1 & Sch 2 Comp Cl 4.19(3)	s.11M	T	NR	5					✓								✓
179.	CI 2.1 & Sch 2 Comp Cl 4.19(4)	s.11M	T	NR	5					✓								✓
180.	CI 2.1 & Sch 2 Comp Cl 4.19(5)	s.11M	T	2	4					✓								✓
180A.	CI 2.1 & Sch 2 Comp Cl 4.19(7)	s.11M	T	2	4					✓								✓
181.	CI 2.1 & Sch 2 Comp Cl 5.1	s.11M	T	2	3	✓					✓							
182.	CI 2.1 & Sch 2 Comp Cl 5.2	s.11M	T	2	4	✓					✓							



Licence Compliance Requirements Compendium of Gas Customer Licence Obligations (Compendium)						Priority	Adequacy of controls rating					Compliance Rating				
							A	B	C	D	NP	1	2	3	4	NR
183.	CI 2.1 & Sch 2 Comp CI 5.3	s.11M	T	2	4					✓						✓
184.	CI 2.1 & Sch 2 Comp CI 5.4	s.11M	T	2	4	✓					✓					
185.	CI 2.1 & Sch 2 Comp CI 5.5	s.11M	T	2	4					✓						✓
186.	CI 2.1 & Sch 2 Comp CI 5.6(1)	s.11M	T	2	4	✓					✓					
186A.	CI 2.1 & Sch 2 Comp CI 5.6(2)	s.11M	T	2	4	✓					✓					
187.	CI 2.1 & Sch 2 Comp CI 5.6(3)	s.11M	T	2	4	✓					✓					
188.	CI 2.1 & Sch 2 Comp CI 5.6(4)	s.11M	T	2	4	✓					✓					
189.	CI 2.1 & Sch 2 Comp CI 5.6(5)	s.11M	T	2	5	✓					✓					
190.	CI 2.1 & Sch 2 Comp CI 5.7(1)	s.11M	T	2	4	✓					✓					
191.	CI 2.1 & Sch 2 Comp CI 5.7(2)	s.11M	T	2	4	✓					✓					
192.	CI 2.1 & Sch 2 Comp CI 5.7(3)	s.11M	T	2	4	✓					✓					
193.	CI 2.1 & Sch 2 Comp CI 5.7(4)	s.11M	T	2	4	✓					✓					
195.	CI 2.1 & Sch 2 Comp CI 5.8(1)	s.11M	T	2	4	✓					✓					
196.	CI 2.1 & Sch 2 Comp CI 5.8(2)	s.11M	T	2	4	✓					✓					
197.	CI 2.1 & Sch 2 Comp CI 5.9	s.11M	T	2	4					✓						✓
198.	CI 2.1 & Sch 2 Comp CI 6.1(1)	s.11M	T	2	4	✓					✓					
198A.	CI 2.1 & Sch 2 Comp CI 6.1(2)	s.11M	T	NR	5	✓					✓					
199.	CI 2.1 & Sch 2 Comp CI 6.1(3)	s.11M	T	NR	5	✓					✓					
200.	CI 2.1 & Sch 2 Comp CI 6.1(4)	s.11M	T	2	4					✓						✓
200A.	CI 2.1 & Sch 2 Comp CI 6.2(1)	s.11M	T	2	4	✓					✓					
201.	CI 2.1 & Sch 2 Comp CI 6.2(2)	s.11M	T	2	4	✓					✓					
202.	CI 2.1 & Sch 2 Comp CI 6.2(3)	s.11M	T	2	4	✓					✓					



Licence Compliance Requirements Compendium of Gas Customer Licence Obligations (Compendium)						Priority	Adequacy of controls rating					Compliance Rating					
							A	B	C	D	NP	1	2	3	4	NR	
203.	CI 2.1 & Sch 2 Comp CI 6.2(4)	s.11M	T	NR	5					✓							✓
204.	CI 2.1 & Sch 2 Comp CI 6.3(1)	s.11M	T	2	3		✓				✓						
205.	CI 2.1 & Sch 2 Comp CI 6.4(1)	s.11M	T	2	4	✓					✓						
206.	CI 2.1 & Sch 2 Comp CI 6.4(2)	s.11M	T	2	4	✓					✓						
206A.	CI 2.1 & Sch 2 Comp CI 6.4(3)	s.11M	T	2	4	✓					✓						
207.	CI 2.1 & Sch 2 Comp CI 6.4(4)	s.11M	T	2	4					✓							✓
208.	CI 2.1 & Sch 2 Comp CI 6.6(1)	s.11M	T	NR	5					✓							✓
209.	CI 2.1 & Sch 2 Comp CI 6.6(2)	s.11M	T	2	4					✓							✓
210.	CI 2.1 & Sch 2 Comp CI 6.7	s.11M	T	NR	5	✓					✓						
211.	CI 2.1 & Sch 2 Comp CI 6.8	s.11M	T	2	4	✓					✓						
212.	CI 2.1 & Sch 2 Comp CI 6.9(1)	s.11M	T	2	4	✓					✓						
213.	CI 2.1 & Sch 2 Comp CI 6. 9(2)	s.11M	T	NR	5					✓							✓
214.	CI 2.1 & Sch 2 Comp CI 6. 10(1)	s.11M	T	2	4	✓					✓						
215.	CI 2.1 & Sch 2 Comp CI 6. 10(2)	s.11M	T	2	4	✓					✓						
215A.	CI 2.1 & Sch 2 Comp CI 6. 10(3)	s.11M	T	2	4	✓					✓						
216.	CI 2.1 & Sch 2 Comp CI 6. 10(4)	s.11M	T	2	4					✓							✓
217.	CI 2.1 & Sch 2 Comp CI 6. 10(5)	s.11M	T	2	4	✓					✓						
219.	CI 2.1 & Sch 2 Comp CI 6. 10(6)	s.11M	T	2	4	✓					✓						
220.	CI 2.1 & Sch 2 Comp CI 6. 10(7)	s.11M	T	2	4	✓					✓						
220A.	CI 2.1 & Sch 2 Comp CI 6. 10(8)	s.11M	T	2	4	✓					✓						
221.	CI 2.1 & Sch 2 Comp CI 6. 11	s.11M	T	2	4					✓							✓
222.	CI 2.1 & Sch 2 Comp CI 7.1	s.11M	T	2	3	✓					✓						



Licence Compliance Requirements Compendium of Gas Customer Licence Obligations (Compendium)						Priority	Adequacy of controls rating					Compliance Rating					
							A	B	C	D	NP	1	2	3	4	NR	
223.	CI 2.1 & Sch 2 Comp CI 7.2(1)	s.11M	T	2	4	✓					✓						
224.	CI 2.1 & Sch 2 Comp CI 7.3	s.11M	T	2	4					✓							✓
225.	CI 2.1 & Sch 2 Comp CI 7.4	s.11M	T	2	4	✓					✓						
227.	CI 2.1 & Sch 2 Comp CI 7.6	s.11M	T	1	2	✓					✓						
228.	CI 2.1 & Sch 2 Comp CI 8.1(1)	s.11M	T	2	4	✓					✓						
229.	CI 2.1 & Sch 2 Comp CI 8.1(1)	s.11M	T	2	4	✓					✓						
230.	CI 2.1 & Sch 2 Comp CI 8.2(1)-(3)	s.11M	T	2	4	✓					✓						
231.	CI 2.1 & Sch 2 Comp CI 10.1(1)	s.11M	T	2	4	✓					✓						
232.	CI 2.1 & Sch 2 Comp CI 10.1(2)	s.11M	T	2	4	✓					✓						
233.	CI 2.1 & Sch 2 Comp CI 10.1(3)	s.11M	T	2	4					✓							✓
234.	CI 2.1 & Sch 2 Comp CI 10.2(1)	s.11M	T	2	4	✓					✓						
235.	CI 2.1 & Sch 2 Comp CI 10.2(2)	s.11M	T	2	4	✓					✓						
236.	CI 2.1 & Sch 2 Comp CI 10.2(3)	s.11M	T	2	4	✓					✓						
237.	CI 2.1 & Sch 2 Comp CI 10.2(4)	s.11M	T	2	4	✓					✓						
238.	CI 2.1 & Sch 2 Comp CI 10.3	s.11M	T	2	4					✓							✓
239.	CI 2.1 & Sch 2 Comp CI 10.4	s.11M	T	2	3					✓							✓
240.	CI 2.1 & Sch 2 Comp CI 10.5	s.11M	T	2	4					✓							✓
241.	CI 2.1 & Sch 2 Comp CI 10.5A(1)	s.11M	T	2	4	✓					✓						
242.	CI 2.1 & Sch 2 Comp CI 10.5A(2)	s.11M	T	2	4	✓					✓						
243.	CI 2.1 & Sch 2 Comp CI 10.5A(3)	s.11M	T	2	5	✓					✓						
245.	CI 2.1 & Sch 2 Comp CI 10.9	s.11M	T	NR	5	✓					✓						
246.	CI 2.1 & Sch 2 Comp CI 10.10(1)	s.11M	T	2	4					✓							✓
249.	CI 2.1 & Sch 2 Comp CI 10.11(1)	s.11M	T	2	4	✓					✓						



Licence Compliance Requirements Compendium of Gas Customer Licence Obligations (Compendium)						Priority	Adequacy of controls rating					Compliance Rating				
							A	B	C	D	NP	1	2	3	4	NR
250.	CI 2.1 & Sch 2 Comp CI 10.11(2)	s.11M	T	2	3		✓					✓				
251.	CI 2.1 & Sch 2 Comp CI 12.1(1)	s.11M	T	2	4	✓					✓					
252.	CI 2.1 & Sch 2 Comp CI 12.1(2)(a),(b) & (d)	s.11M	T	2	4	✓					✓					
253.	CI 2.1 & Sch 2 Comp CI 12.1(2)(c)	s.11M	T	2	4	✓					✓					
254.	CI 2.1 & Sch 2 Comp CI 12.1(3)(a)	s.11M	T	2	4					✓						✓
255.	CI 2.1 & Sch 2 Comp CI 12.1(3)(b)	s.11M	T	2	4					✓						✓
255A	CI 2.1 & Sch 2 Comp CI 12.1(4)	s.11M	T	2	4					✓						✓
256.	CI 2.1 & Sch 2 Comp CI 12.2	s.11M	T	2	4	✓					✓					
257.	CI 2.1 & Sch 2 Comp CI 12.3	s.11M	T	2	4					✓						✓
258.	CI 2.1 & Sch 2 Comp CI 12.4	s.11M	T	2	4					✓						✓
281.	CI 2.1 & Sch 2 Comp CI 13.1	s.11M	T	2	4	✓					✓					
282.	CI 2.1 & Sch 2 Comp CI 13.2	s.11M	T	2	4	✓					✓					
283.	CI 2.1 & Sch 2 Comp CI 13.3	s.11M	T	2	4		✓					✓				

Item	Licence Clause/Condition reference (Cl.=clause, Sch.=schedule, Com = compendium)	Obligations under condition	Licence Type (T + Trading)	Type	Audit Priority	Adequacy of Controls (NP=Not Performed)	Compliance Rating (NR = Not Rated)

Licence Compliance Requirements Compendium of Gas Customer Licence Obligations (Compendium) 2013 Version						Priority	Adequacy of controls rating					Compliance Rating				
							A	B	C	D	NP	1	2	3	4	NR
248.	CI 2.1 & Sch 2 Comp CI 10.10(3)	s.11M	T	2	4	✓					✓					
259.	CI 2.1 & Sch 2 Comp CI 13.1(1)	s.11M	T	2	3	✓					✓					



Licence Compliance Requirements Compendium of Gas Customer Licence Obligations (Compendium) 2013 Version					Priority	Adequacy of controls rating					Compliance Rating				
						A	B	C	D	NP	1	2	3	4	NR
260.	CI 2.1 & Sch 2 Comp CI 13.1(2)	s.11M	T	2	4	✓					✓				
261.	CI 2.1 & Sch 2 Comp CI 13.1(3)	s.11M	T	2	3	✓					✓				
262.	CI 2.1 & Sch 2 Comp CI 13.2(a)(i)-(xv)	s.11M	T	2	4	✓					✓				
263.	CI 2.1 & Sch 2 Comp CI 13.2(b)(i)-(ix)	s.11M	T	2	3	✓					✓				
264.	CI 2.1 & Sch 2 Comp CI 13.2(c)	s.11M	T	2	4	✓					✓				
265.	CI 2.1 & Sch 2 Comp CI 13.3(1)	s.11M	T	2	3	✓					✓				
266.	CI 2.1 & Sch 2 Comp CI 13.3(2)	s.11M	T	2	4					✓					✓
267.	CI 2.1 & Sch 2 Comp CI 13.5	s.11M	T	2	3					✓					✓
268.	CI 2.1 & Sch 2 Comp CI 13.6	s.11M	T	2	3	✓					✓				
275.	CI 2.1 & Sch 2 Comp CI 13.15	s.11M	T	2	4	✓					✓				
277.	CI 2.1 & Sch 2 Comp CI 13.17(1)	s.11M	T	2	3		✓					✓			
278.	CI 2.1 & Sch 2 Comp CI 13.17(2)	s.11M	T	2	4		✓					✓			
279.	CI 2.1 & Sch 2 Comp CI 13.17(3)	s.11M	T	2	4		✓					✓			
280.	CI 2.1 & Sch 2 Comp CI 13.18	s.11M	T	2	4	✓					✓				

3.11 Establishing the Context

The key legislation that governs the licensing of providers of Gas is the Energy Coordination Act 2004. In turn, the compliance elements in the organization's Operating Licence were examined and referred to throughout the audit process.

3.11.1 Audit Results and Recommendations

Summary of significant results

There are 10 non-compliances.

3.11.2 Compliance elements requiring Corrective measures

There are 10 Issues requiring corrective action:

3.11.3 Suggestions for improvement

There is 1 suggestion for improvement.

3.11.4 Post Audit Implementation Plan

The Licensee will address any post audit actions.



3.12 Detailed findings

The following sets out the audit findings

3.12.1 Audit work undertaken

We conducted interviews and enquiries to:

- Understand the control environment by determining the responsibility matrix and key control points
- Obtain the policies and procedures for managing licensed areas; and
- Identify the information systems and processes employed to manage licensed areas
- Determine the level of understanding of the systems and processes for managing licensed areas
- In reviewing the procedures and protocols for managing provision of services within a licensed area, where applicable, we obtained flowcharts of the processes and assessed the reasonableness of the decision matrix and the adequacy of the control points implemented by the Licensee.

3.12.2 Further Control Strategies

The Licensee has a compliance manual to assist compliance with regulatory items.

3.13 Audit evidence

- Trading Licence
- Financial statement
- Licence fee invoices, journal entries
- ERA annual returns
- Ministerial returns (including performance reports) and tariff notifications
- Post audit implementation plan
- Sample bills, Billing database by statistical sample, warning and disconnection notices,
- Bill template
- Financial hardship policy
- Standard form contract
- Energy Efficiency information
- Customer safety awareness program
- Customer services charter
- Switched on pamphlet
- Customer notification process
- Complaints handling process
- Complainers handling process feedback
- Compliance manual
- Compliance reports
- ERA Approval of auditor –
- Letter from ERA Approving Audit Plan



3.14 Audit Findings - Details

The following sets out the audit findings

3.14.1 Gas Industry Customer Transfer Code – Licence Conditions and Obligations

Item 1	Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 2
Licence: Trading			
<i>Energy Coordination Act section 11Q(1-2)</i>			
The requirement is that a Licensee must pay the applicable fees in accordance with the Regulations. (Energy Coordination (Licensing Fees) Regulations Clause 4 & 5).			
Observations			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Licence fee invoices and receipts.			
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
The fees have been paid but one (2014) was 2 days late. The account was paid in accordance with the terms given on the ERA invoice (30 days) which unfortunately did not relate to one month of the anniversary date. While the ERA invoice was misleading, the obligation to comply is a regulatory matter.			
Issues			
Pay fees on time			
Recommendations			
Control process to be amended to allow for processing time for payment to be made before one month after anniversary date.			
Item 2	Trading Licence Clause 12.1	Adequacy of controls rating A	Compliance rating 1
Licence: Trading			
<i>Energy Coordination Act section 11WG(1)</i>			
The requirement is that a Licensee must, subject to the regulations, not supply gas to a customer other than under a standard form or non-standard contract.			
Observations			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Standard form contract.			
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
There are no small use customers that are not on a standard contract. The standard form contract is that approved by ERA.			
Issues			
None			
Recommendations			
None			



Item 3 Trading Licence Clause 13.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: Trading									
<i>Energy Coordination Act section 11WG(2)</i>									
The requirement is that a Licensee must comply with a direction given to the Licensee under section 11WI.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Not applicable.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The <i>Authority</i> has not required any amendments to the standard form contract and compliance with a direction could not be tested.									
Issues									
None									
Recommendations									
None									
Item 4 Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 1							
Licence: Trading									
<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.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Not applicable.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
No supply has been provided to uncontracted customers. All customers are on standard form contracts. No complaints have been received about gas contracts									
Issues									
None									
Recommendations									
None									
Item 5 Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 1							
Licence: Trading									



<p><i>Energy Coordination Act section 11WK(3)</i></p> <p>A standard form contract continues in force until it is terminated or supply becomes subject to a non-standard contract with the supplier.</p>		
<p>Observations</p>		
Documents	<input checked="" type="checkbox"/>	Compliance
		<input checked="" type="checkbox"/>
<p>Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Standard form contract.</p>		
Process	<input checked="" type="checkbox"/>	Outcome
		<input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Reporting
		<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>	
		<input checked="" type="checkbox"/>
<p>There are no small use customers with a non-standard contract. No complaints have been received about gas contracts.</p>		
<p>Issues</p>		
<p>None</p>		
<p>Recommendations</p>		
<p>None</p>		
<p>Item 6 Trading Licence Clause 5.1</p>		
<p>Adequacy of controls rating A</p>		<p>Compliance rating 1</p>
<p>Licence: <i>Trading</i></p>		
<p><i>Energy Coordination Act section 11X (3)</i></p> <p>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.</p>		
<p>Observations</p>		
Documents	<input checked="" type="checkbox"/>	Compliance
		<input checked="" type="checkbox"/>
<p>Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Not applicable.</p>		
Process	<input checked="" type="checkbox"/>	Outcome
		<input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Reporting
		<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>	
		<input checked="" type="checkbox"/>
<p>There have been no interruptions and no complaints have been received about gas interruptions. The Licensee has information advising of Distributor's contact details for emergencies (they are the same organization).</p>		
<p>Issues</p>		
<p>None</p>		
<p>Recommendations</p>		
<p>None</p>		
<p>Item 10 Trading Licence Clause 18.1</p>		
<p>Adequacy of controls rating A</p>		<p>Compliance rating 1</p>
<p>Licence: <i>Trading</i></p>		
<p><i>Energy Coordination Act section 11ZA(1)</i></p> <p>The requirement is that a Licensee must provide the <i>Authority</i> with a performance audit by an independent expert acceptable to the <i>Authority</i> within 24 months of commencement and every 24 months thereafter (or longer if the <i>Authority</i> allows).</p>		



Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: The Licensee provided documents with the approval of the auditor.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input type="checkbox"/>
This audit satisfies the requirement. The last audit also satisfied the requirements.									
Issues									
None									
Recommendations									
None									

Item 13 Trading Licence Clause 16.1	Adequacy of controls rating Not Performed	Compliance rating Not Applicable
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Licence: <i>Trading</i>
<i>Energy Coordination Act section 11ZAF(c)</i>
The requirement is that a Licensee must carry out the arrangements and other provisions in the approved last resort supply plan if it comes into operation.

Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Not applicable.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There has been no order declaring a last resort supply coming into effect and no designation as supplier of last resort. There has been no plan submitted and none has been requested by the Authority.									
Issues									
None									
Recommendations									
None									

Item 17 Trading Licence Clause 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: <i>Trading</i>
<i>Energy Coordination Act section 11ZK (3)</i>
A licensee must pay the costs and expenses incurred in the taking of an interest or easement in respect of land held by a public authority.

Observations							
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>				
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Not applicable.							



Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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This licensee has no assets. There is no land held by a public authority.

Issues

None

Recommendations

None

Item 24 Trading Licence Clause 20	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11ZQH

The requirement is that 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.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Energy ombudsman fee receipts.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The Licensee is a member of an approved Gas Industry Ombudsman Scheme and there are no complaints about not meeting by any decision or direction of the ombudsman under the Scheme.

Issues

None

Recommendations

None

Item 25 Trading Licence Clauses 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11Z

The requirement is that a Licensee must comply with the standards of the *Gas Standards Act 1972*.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: sample gas quality analysis data.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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The standards in the *Gas Standards Act 1972* are contained in regulations, principally the *Gas Standards (Gas Supply and System Safety) Regulations 2000*.

Issues



The *Gas Standards (Gas Supply and System Safety) Regulations 2000* are managed by EnergySafety and there are no reported non-compliances from EnergySafety.
 EnergySafety have not reported any deviations from the required gas quality specifications. This licensee has no control over gas standards/quality

Recommendations
 None

Item 32 Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination (Customer Contracts) Regulation 12(2)
 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.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
 Documents: sample default and disconnection documents.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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There have been no disconnections outside the requirements. There have been no disconnections where medical grounds may apply. There have been no disconnections where acceptable arrangements have been made. There have been disconnections for non-payment.

Issues

None

Recommendations

None

Item 33 Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination (Customer Contracts) Regulation 12 (4)(a)
 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).

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.



Documents: sample bills, default and disconnection documents (12% sample)

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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There have been no disconnections outside the requirements. There have been no complaints about disconnections. Eight disconnections had been made for non-payment. Sampling showed all the notice/timings comply. A further 9 disconnections were made where the premises was abandoned (and bill not paid).

Issues

None

Recommendations

None

Item 34 Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 1
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Licence: *Trading*

Energy Coordination (Customer Contracts) Regulation 12 (4)(b)

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).

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: sample bills, default and disconnection documents (12% sample)

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
---------	-------------------------------------	---------	-------------------------------------	--------	-------------------------------------	-----------	-------------------------------------	------------	-------------------------------------

There have been no disconnections outside the requirements. There have been no complaints about disconnections. Eight disconnections had been made for non-payment. Sampling showed all the notice/timings comply. A further 9 disconnections were made where the premises was abandoned (and bill not paid).

Issues

None

Recommendations

None

Item 35 Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 1
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Licence: *Trading*

Energy Coordination (Customer Contracts) Regulation 12 (5)(a)

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.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
-----------	-------------------------------------	------------	-------------------------------------



Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: sample bills, default and disconnection documents

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input type="checkbox"/>
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All reconnections satisfy the requirements. Typical reconnections are next business day. There have been no complaints about reconnections. Disconnected services were reconnected within 24 hours when suitable arrangements were made.

Issues

None

Recommendations

None

Item 36 Trading Licence Clause 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: *Trading*

Energy Coordination (Customer Contracts) Regulation 12.(5)(b)

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.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: sample bills, default and disconnection documents.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
---------	--------------------------	---------	--------------------------	--------	--------------------------	-----------	--------------------------	------------	--------------------------

There have been no disconnections for denial of access to meter and therefore no reconnections.

Issues

None

Recommendations

None

Item 37 Trading Licence Clause 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: *Trading*

Energy Coordination (Customer Contracts) Regulation 12 (5)(c)

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.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Not applicable.



Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no disconnections for unlawful use of gas and therefore no reconnections.									
Issues									
None									
Recommendations									
None									

Item 38 Trading Licence Clause 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: *Trading*

Energy Coordination (Customer Contracts) Regulation 12(5)(d)
 A licensee must reconnect supply to a customer within 10 business days after disconnection for refusal to pay a refundable advance, if the customer pays the refundable advance and the customer has paid any applicable reconnection fee.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
-----------	--------------------------	------------	--------------------------

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
 Documents: Not applicable.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There have been no disconnections for refusal to pay a refundable advance and therefore no reconnections.

Issues

None

Recommendations

None

Item 39 Trading Licence Clause 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: *Trading*

Energy Coordination (Customer Contracts) Regulation 12.1.5(e)
 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.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
 Documents: Not applicable.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There have been no disconnections in an emergency situation or for health, safety or maintenance reasons and therefore no reconnections.



Issues		
None		
Recommendations		
None		
Item 40 Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 1
Licence: Trading		
<i>Energy Coordination (Customer Contracts) Regulation 12(6) AGA Code Clause 5.1.1.2</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.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance
	<input checked="" type="checkbox"/>	
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Introductory pack (includes standard form contract, customer service charter and fees and charges). sample bills, default and disconnection documents (12% sample)		
Process	<input checked="" type="checkbox"/>	Outcome
	<input checked="" type="checkbox"/>	Output
	<input checked="" type="checkbox"/>	Reporting
	<input checked="" type="checkbox"/>	Compliance
	<input checked="" type="checkbox"/>	
There are no disconnections outside requirements. There is information on payment options available in the customer service charter. Customers are telephoned and advised of their options. The Sampling showed disconnected services were provided the required information and given the required notices/timing. Disconnections were made when customers refused to accept the alternative payment option and failed to make payments. There have been no complaints about disconnections.		
Issues		
None		
Recommendations		
None		
Item 41 Trading Licence Clause 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Trading		
<i>Energy Coordination (Customer Contracts) Regulation 12(6) AGA Code Clause 5.1.1.3</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 day's notice prior to the disconnection date, and the customer has refused to accept the alternative payment option or failed to make payments under it.		
Observations		
Documents	<input type="checkbox"/>	Compliance
	<input type="checkbox"/>	
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.		



Documents: Not applicable.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no disconnections for business customers. There have been no complaints about disconnections.									
Issues									
None									
Recommendations									
None									

Item 42 Trading Licence Clause 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination (Customer Contracts) Regulation 12(6) AGA Code Clause 5.1.2.1 & 5.1.2.2

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; 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.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Not applicable.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There have been no disconnections for denial of access to meter. There have been no complaints about disconnections.

Issues

None

Recommendations

None

Item 43 Trading Licence Clause 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination (Customer Contracts) Regulation 12(6) AGA Code Clause 5.1.3.1 & 5.1.3.2

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.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.



Documents: Not applicable.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no disconnections in the event of an emergency. There is a 24 information service. A gas service was disconnected because of house fire but not because of a gas system emergency. The house has not been rebuilt so no reconnection. There have been no complaints about disconnections.									
Issues									
None									
Recommendations									
None									

Item 44 Trading Licence Clause 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination (Customer Contracts) Regulation 12(6) AGA Code Clause 5.1.4.1 & 5.1.4.2
 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 issued a notice to the customer of its intention to disconnect supply at least 5 business days notice prior to the disconnection date.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
 Documents: Not applicable.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There have been no disconnections for health or safety reasons. There have been no complaints about disconnections.

Issues

None

Recommendations

None

Item 45 Trading Licence Clause 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination (Customer Contracts) Regulation 12(6) AGA Code Clause 5.1.5.1 & 5.1.5.2
 A licensee who disconnects supply for planned maintenance must provide the customer 4 days written notice; and used best endeavours to minimise disruption and restore supply.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.



Documents: Not applicable.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no disconnections for planned maintenance. There have been no complaints about disconnections.									
Issues									
None									
Recommendations									
None									
Item 46 Trading Licence Clause 5.1				Adequacy of controls rating Not Performed			Compliance rating Not Rated		
Licence: Trading									
<i>Energy Coordination (Customer Contracts) Regulation 12(6) AGA Code Clause 5.1.7.2</i>									
A licensee must not disconnect supply for failure by a customer to pay a refundable advance without giving a written notice to the customer of its intention to disconnect at least 5 business days prior to the disconnection date.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Not applicable.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no disconnections for failure by a customer to pay a refundable advance. Refundable advances had not been used. There have been no complaints about disconnections.									
Issues									
None									
Recommendations									
None									
Item 47 Trading Licence Clause 5.1				Adequacy of controls rating A			Compliance rating 1		
Licence: Trading									
<i>Energy Coordination (Customer Contracts) Regulation 12(6) AGA Code Clause 5.1.8.1(a)</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.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Introductory pack.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been no disconnections outside requirements. There have been no complaints									



about disconnections. The disconnected customers had not agreed to pay.
Issues
None
Recommendations
None

Item 48 Trading Licence Clause 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading
Energy Coordination (Customer Contracts) Regulation 12(6) AGA Code Clause 5.1.8.1(b)
 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.

Observations			
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
 Documents: Not applicable.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There have been no disconnections where the issue is the subject of complaint by the customer and is being reviewed externally and is not resolved. There have been no complaints externally reviewed. There have been no complaints about disconnections.

Issues
None
Recommendations
None

Item 49 Trading Licence Clause 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading
Energy Coordination (Customer Contracts) Regulation 12(6) AGA Code Clause 5.1.8.1(c)
 A licensee must not disconnect supply where an application for a government concession has not been decided.

Observations			
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
 Documents: Not applicable.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There are no government concessions for gas. There have been no complaints about disconnections.

Issues
None



Recommendations		
None		

Item 50 Trading Licence Clause 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading
Energy Coordination (Customer Contracts) Regulation 12(6) AGA Code Clause 5.1.8.1(d)
 A licensee must not disconnect supply where a customer has failed to pay a debt that is not a direct service charge.

Observations			
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
 Documents: Introductory pack.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There have been no disconnections where a customer has failed to pay a debt that is not a direct service charge. There have been no complaints about disconnections.

Issues
None

Recommendations		
None		

Item 51 Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading
Energy Coordination (Customer Contracts) Regulation 12(6) AGA Code Clause 5.1.8.1(e)&(f)
 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.

Observations			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
 Documents: Introductory pack.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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There have been no disconnections outside requirements. Disconnection policy is in introductory pack. The disconnections were on a weekday (not Friday) before 3pm and not a public holiday or on a day before a public holiday. Disconnections are usually done on a Monday. There have been no complaints about disconnections.

Issues
None

Recommendations		
None		



Item 52 Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 1							
Licence: Trading									
<i>Energy Coordination (Customer Contracts) Regulation 12(6)</i> AGA Code Clause 5.2.2.2									
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 use best endeavours to reconnect the customer as soon as possible on the next business day.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Introductory pack. Sample bills (12% sample)									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Reconnections have been in accordance with requirements. Reconnections are usually done on same day and all by next day. Reconnection policy is in introductory pack. There have been no complaints about reconnections.									
Issues									
None									
Recommendations									
None									
Item 53 Trading Licence Clause 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated							
Licence: Trading									
<i>Energy Coordination (Customer Contracts) Regulation 13(1)</i> AGA Code Clause 4.4.6.2									
If a licensee uses a refundable advance to offset an amount owed, it must provide to the customer an account of its use and pay any balance within 10 business days to the customer.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Introductory pack.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
While able to charge a refundable advance they have not been charged during the audit period. There have been no complaints about refundable advances.									
Issues									
None									
Recommendations									
None									



Item 54 Trading Licence Clause 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Trading</i>		
<i>Energy Coordination (Customer Contracts) Regulation 13(3)</i>		
A licensee must place refundable advances in separate trust accounts and separately identify the amounts in its accounting records.		
Observations		
Documents <input type="checkbox"/>	Compliance <input type="checkbox"/>	
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Introductory pack.		
Process <input type="checkbox"/>	Outcome <input type="checkbox"/>	Output <input type="checkbox"/>
Reporting <input type="checkbox"/>	Compliance <input type="checkbox"/>	
While able to charge a refundable advance they have not been charged during the audit period. There have been no complaints about refundable advances.		
Issues		
None		
Recommendations		
None		
Item 55 Trading Licence Clause 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Trading</i>		
<i>Energy Coordination (Customer Contracts) Regulation 13(4)</i>		
A licensee must return interest earned on refundable advances accounts to customers.		
Observations		
Documents <input type="checkbox"/>	Compliance <input type="checkbox"/>	
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Introductory pack.		
Process <input type="checkbox"/>	Outcome <input type="checkbox"/>	Output <input type="checkbox"/>
Reporting <input type="checkbox"/>	Compliance <input type="checkbox"/>	
While able to charge a refundable advance they have not been charged during the audit period. There have been no complaints about refundable advances.		
Issues		
None		
Recommendations		
None		
Item 56 Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 1
Licence: <i>Trading</i>		
<i>Energy Coordination (Customer Contracts) Regulation 14(2)</i>		
A licensee must inform customers that the supply charge is either for residential or non-		



residential supply; includes a specified fixed component and specified usage component; and describes the circumstances a customer needs to meet to qualify for residential tariffs.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Introductory pack.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Customers are given the complying information in the introductory pack and the definition of residential is also in the pack. There have been no complaints about supply charges.

Issues

None

Recommendations

None

Item 57 Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 1
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Licence: *Trading*

Energy Coordination (Customer Contracts) Regulation 14(3) AGA Code Clause 4.1.2.1 & 4.1.2.2

A licensee must give notice of the tariffs charged and provide these notices to customers without charge upon request.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Introductory pack.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Notices of tariffs charged have been given in the introductory pack free and free on line. There have been no requests.

Issues

None

Recommendations

None

Item 58 Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 1
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Licence: *Trading*

Energy Coordination (Customer Contracts) Regulation 14 AGA Code Clause 4.1.3.1 & 4.1.3.2

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.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Introductory pack. Sample bills with advice of increase, advice to Minister									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The introductory pack includes advice that tariffs are subject to annual CPI increases, on web site and on bill prior to bill with increased tariff.									
Issues									
None.									
Recommendations									
None									

Item 59 Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading
<i>Energy Coordination (Customer Contracts) Regulation 15(1) AGA Code Clause 4.2.1</i> A licensee must issue a bill to a customer at least once every 3 months, unless agreed otherwise

Observations								
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>					

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Introductory pack, sample bills (10%confidence sample).								
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Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Bills are issued every month for business customers and 3 monthly for residential. There were none more than 3 months during the audit period.									

Issues								
None								
Recommendations								
None								

Item 60 Trading Licence Clause 5.1	Adequacy of controls rating B	Compliance rating 2
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Licence: Trading
<i>Energy Coordination (Customer Contracts) Regulation 15(1) AGA Code (AG 755:1998) Clause 4.2.3.1, 4.2.3.2 & 4.2.3.3</i> A licensee must prepare a bill in accordance with the terms specified in the AGA code, including the inclusion of any refundable advance.

Observations								
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>					

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Introductory pack. Sample bills.								
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Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Bill contents are compliant but the required information for 4.2.3.3 (p) in Code is provided in the									



terms and conditions which are referenced on the bill and in the introductory pack. This indirect coverage of meter testing appears to be industry practice. There are no refundable advances.

Issues

Bill does not cover telephone for financial difficulties (AGA Code 4.2.3.3(r)). The provision is in the draft bill sighted as part of new billing system.

Recommendations

Add telephone number for financial difficulties to bill notice area.

Item 61 Trading Licence Clause 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination (Customer Contracts) Regulation 15(1) AGA Code Clause 4.2.3.2

A licensee must apply payments received from a customer as directed by the customers (if the bill includes charges for other goods and services).

Observations

Documents Compliance

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Introductory pack. Sample bills.

Process Outcome Output Reporting Compliance

There are no charges for goods and services on bills in audit period.

Issues

None

Recommendations

None

Item 62 Trading Licence Clause 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination (Customer Contracts) Regulation 15(1) & 15(2)

If a customer does not direct how a payment is to be allocated, a licensee must apply the payment —

(i) to charges for the supply of gas before applying any portion of it to such goods or services; or

(ii) if such goods or services include electricity, to the charges for gas and the charges for electricity in equal proportion before applying any portion of it to any other such goods or services.

Observations

Documents Compliance

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Introductory pack. Sample bills.

Process Outcome Output Reporting Compliance



There are no charges for goods and services on bill in audit period.
Issues
None
Recommendations
None

Item 63 Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading
<i>Energy Coordination (Customer Contracts) Regulation 15(1), 47(2) & (4) AGA Code Clause 4.2.3.4</i>
A licensee must provide available bill data to customers upon request free of charge subject to clause 47 (2) and (4) of the Energy Coordination (Customer Contracts) Regulations 2004.

Observations			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Introductory pack. Sample bills.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Bill data is provided free of charge. Customers have requested bill clarification and copies of bills for identification purposes and all have been provided free of charge.

Issues
None
Recommendations
None

Item 64 Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading
<i>Energy Coordination (Customer Contracts) Regulation 15(1) AGA Code Clause 4.2.4.1</i>
A licensee must base a customer's bill on a meter reading and meters must be read at least once per year.

Observations			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Introductory pack. Sample bills.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Meters were all read monthly (business) or 3 monthly (residential). All meters have been read at least once per year.

Issues
None



Recommendations
None

Item 65 Trading Licence Clause 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination (Customer Contracts) Regulation 15(1) AGA Code Clause 4.2.4.2

A licensee, who accepts a customer reading of the meter, must not adjust the bill in favour of the licensee if the licensee subsequently discovers the reading was incorrect in favour of the customer.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Introductory pack. Sample bills.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There have been no corrections in favour of the Licensee from meter reads by customers in the audit period.

Issues

None

Recommendations

None

Item 66 Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination (Customer Contracts) Regulation 15(1) AGA Code Clause 4.2.4.4

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.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Introductory pack. Sample estimated bills.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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There were two estimated readings in the audit period and that complied with requirements.

Issues

None

Recommendations

None

Item 67 Trading Licence Clause 5.1	Adequacy of controls rating	Compliance rating
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		A	1
Licence: Trading			
<i>Energy Coordination (Customer Contracts) Regulation 15(1) AGA Code Clause 4.2.4.5</i> A licensee must read a customer's meter upon request and may impose a fee for doing so.			
Observations			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Introductory pack. Sample bills.			
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>
	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>
	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>
	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
There have been meter reads when customers move from premises. There are no charges for extra meter reads.			
Issues			
None			
Recommendations			
None			

Item 68 Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 1
Licence: Trading		
<i>Energy Coordination (Customer Contracts) Regulation 15(1) AGA Code Clause 4.3.2.1</i> A licensee must offer payment in person and payment by mail.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance
	<input checked="" type="checkbox"/>	
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Introductory pack. Sample bills.		
Process	<input checked="" type="checkbox"/>	Outcome
	<input checked="" type="checkbox"/>	Output
	<input checked="" type="checkbox"/>	Reporting
	<input checked="" type="checkbox"/>	Compliance
Compliant - options on bill.		
Issues		
None		
Recommendations		
None		

Item 69 Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 1
Licence: Trading		
<i>Energy Coordination (Customer Contracts) Regulation 15(1) AGA Code Clause 4.3.2.2</i> A licensee must offer customers who are absent for a long period, payment in advance facilities and the option of redirecting the bill.		
Observations		



Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>	
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Introductory pack. Sample bills.				
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Payment in advance or redirection is offered. Information is in introductory pack and on request.				
Issues				
None				
Recommendations				
None				

Item 70 Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 1
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Licence: *Trading*

Energy Coordination (Customer Contracts) Regulation 16(3)

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.

Observations				
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>	
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Introductory pack. Sample bills.				
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input type="checkbox"/>
No contracts have been terminated other than for non-payment reasons and there is a right to disconnect for this purpose. The only disconnections are for customers with one supply address only. The disconnected customers were terminated and then recontracted.				
Issues				
None				
Recommendations				
None				

Item 71 Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 1
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Licence: *Trading*

Energy Coordination (Customer Contracts) Regulation 19

A licensee must provide a customer

(a) a copy of their customer service charter;

(b) copies of regulations or any relevant code;



(c) information about fees and charges payable under the contract;
 (d) with information on energy efficiency;
 (e) billing data; and
 (f) with information on Government Assistance Programs and Financial Counselling Services if requested by the customer.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
 Documents: Introductory pack.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The required information is provided on request.

Issues

None

Recommendations

None

Item 72 Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination (Customer Contracts) Regulation 20(2) AGA Code Clause 4.3.5.1
 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.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
 Documents: Introductory pack.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Payment options are offered for those with payment difficulties. Instalment plans, redirection of bills to third parties and information on financial counselling is offered. Centrepay and Hardship Utility Grant Scheme are offered to Centrelink customers. There are no government assistance programs available.

Issues

None

Recommendations

None

Item 73 Trading Licence Clause 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination (Customer Contracts) Regulation 27(4) & 40(3)



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.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Not applicable

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There has been no door to door contracts.

Issues

None

Recommendations

None

Item 74 Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination (Customer Contracts) Regulation 20(3) & 48

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.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Introductory pack.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Legal action has not been commenced in audit period.

Issues

None

Recommendations

None

Item 75 Trading Licence Clause 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination (Customer Contracts) Regulation 22 & 49(2)

A licensee must only provide a credit reporting agency with default information relevant to one of their bills.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Introductory pack.



Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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A credit reporting agency has not been used in the audit period. There have been no complaints about credit agency information.

Issues

None

Recommendations

None

Item 76 Trading Licence Clause 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination (Customer Contracts) Regulation 49(3)

A licensee must notify a credit reporting agency immediately if a customer has cleared their debt.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Introductory pack.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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A credit reporting agency has not been used in the audit period. There have been no complaints about credit agency information.

Issues

None

Recommendations

None

Item 77 Trading Licence Clause 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination (Customer Contracts) Regulation 49(4)

If a customer remedies a default and demonstrates extenuating circumstances, a licensee must request the credit reporting agency to remove the default record.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Introductory pack.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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A credit reporting agency has not been used in the audit period. There have been no complaints about credit agency information.

Issues



None

Recommendations

None

Item 78 Trading Licence Clause 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination (Customer Contracts) Regulation 49(5)

A licensee must not refer a default to a credit reporting agency that is the subject of a complaint or matter of review.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Introductory pack.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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No references were made to a credit reporting agency in the audit period. There have been no complaints about credit agency information.

Issues

None

Recommendations

None

Item 79 Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination (Customer Contracts) Regulation 50

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.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Introductory pack. Disconnection notices

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Information is provided as required.

Issues

None.

Recommendations

None.

Item 80 Trading Licence Clause 5.1	Adequacy of	Compliance rating
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		controls rating Not Performed	Not Rated
Licence: Trading			
<i>Energy Coordination (Customer Contracts) Regulation 44</i>			
When a non-standard contract is due to expire a licensee must issue a notice in writing to a customer at least 2 months prior to the expiry date (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.			
Observations			
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Not applicable			
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>
Compliance	<input type="checkbox"/>		<input type="checkbox"/>
There are no non-standard contracts.			
Issues			
None			
Recommendations			
None			
Item 81 Trading Licence Clause 14.1		Adequacy of controls rating A	Compliance rating 1
Licence: Trading			
<i>Energy Coordination Act section 11M Energy Coordination (Customer Contracts) Regulation 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.			
Observations			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Introductory pack.			
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
Provided immediately when requested. Information is in introductory pack and on web site.			
Issues			
None			
Recommendations			
None			
Item 82 Trading Licence Clause 14.1		Adequacy of controls rating B	Compliance rating 2
Licence: Trading			
<i>Energy Coordination Act section 11M Energy Coordination (Customer Contracts) Regulation</i>			



45(2) 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.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Introductory pack. Sample bill.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Advice is not on bill but charter is on web site and in introductory pack. The frequency is not specified but annually is reasonable.									
Issues									
Bill needs to advise of availability of charter from time to time									
Recommendations									
Implement notice as shown in draft bill in new billing system.									

Item 83 Trading Licence Clause 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading
<i>Energy Coordination (Customer Contracts) Regulation 46(1) & (2)</i>
Upon request, a licensee must provide a customer with a copy of the <i>Gas Industry (Customer Contract) Regulations 2004</i> or a relevant code.

Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Not applicable									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input type="checkbox"/>
No requests for codes or regulations have been received.									
Issues									
None									
Recommendations									
None									

Item 84 Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading
<i>Energy Coordination (Customer Contracts) Regulation 46(4)</i>
A licensee must ensure that a copy of the <i>Energy Coordination (Customer Contract) Regulations 2004</i> or a relevant code is available for inspection at its offices at no charge.

Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						



Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Regulations.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Available at Esperance office on request.

Issues

None

Recommendations

None

Item 85 Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 1
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Licence: *Trading*

Energy Coordination (Customer Contracts) Regulation 28 AGA Code 3.1.1(a)

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..

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The licensee.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The standard form contract contains the required provisions.

Issues

None

Recommendations

None

Item 86 Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 1
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Licence: *Trading*

Energy Coordination (Customer Contracts) Regulation 28 AGA Code 3.1.1(b)

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.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The licensee.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The standard form contract contains the required provisions. There has been no interruption or reports from EnergySafety of defects. The meters are still 3 years from requiring a calibration, let alone replacement so maintenance requirement is met.

Issues

None



Recommendations
None

Item 90 Trading Licence Clause 5.1	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination (Customer Contracts) Regulation 33(3) AGA Code 3.5.2.2

A licensee must ensure that any representatives seeking access to the supply address on its behalf wear, carry and show official identification.

Observations

Documents	<input type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Not applicable.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The licensee's employee occasionally attends site and wears identification when attending.

Issues

None

Recommendations

None

Item 91 Trading Licence Clause 5.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination (Customer Contracts) Regulation 42

A licensee must notify a customer of any amendment to a non-standard contract.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Not applicable.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There are no non-standard contracts.

Issues

None

Recommendations

None

3.14.2 Licence requirements

Item 96 Trading Licence Clause 16.2.	Adequacy of controls rating A	Compliance rating 1
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Performance Audit Report GTL: 11

Licence: Trading	
<i>Energy Coordination Act section 11M</i>	
The requirement is that a Licensee must comply and require its expert to comply with the Authority's standard guidelines dealing with the performance audit.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: The licensee provided documents to the Authority on approval of the auditor.	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The audit meets the requirements. The previous audits also met the requirement.	
Issues	
None	
Recommendations	
None	

Item 97 Trading Licence Clause 16.4	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading	
<i>Energy Coordination Act section 11M</i>	
A licensee's independent auditor must be approved by the Authority prior to the audit.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: The licensee provided documents to the Authority on approval of the auditor.	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input type="checkbox"/>
This audit meets the requirements. The previous audits also met the requirement.	
Issues	
None	
Recommendations	
None	

Item 98 Trading Licence Clause 17	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading	
<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.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.	



Documents: Not applicable									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There are no individual performance standards.									
Issues									
None									
Recommendations									
None									
Item 99 Trading Licence Clause 20					Adequacy of controls rating A			Compliance rating 1	
Licence: Trading									
<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.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: sample communication.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
All notices are in writing. All material communication with the Authority is in writing.									
Issues									
None									
Recommendations									
None									
Item 100 Trading Licence Clause 21.1					Adequacy of controls rating A			Compliance rating 1	
Licence: Trading									
<i>Energy Coordination Act section 11M</i>									
The requirement is that a Licensee and any related body corporate must maintain accounting records that comply with the Australian Accounting Standards Board or equivalent International Accounting Standards.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff and financial controller. Documents: annual report.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The financial controller confirms compliance with the required accounting standards.									
Issues									
None									



Recommendations			
None			

Item 101	Trading Licence Clause 24	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

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.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>	
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Not applicable.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The administration status of the Licensee and in its corporate, financial or technical circumstances has not had any significant change.

Issues

None

Recommendations

None

Item 102	Trading Licence Clause 21.	Adequacy of controls rating B	Compliance rating 2
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Licence: Trading

Energy Coordination Act section 11M

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*.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>	
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: compliance and statistical information returns.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The Licensee has provided the information returns required by the *Authority* in the manner and form required but 2014 compliance report was late (performance report was in time). Consistent with the scope limitation, the performance reports and the indicators are accurate. Both compliance reports should have shown incomplete type 2 items. 2014 report to show items 147, 181, 204 and 250 and 2015 report item 147 and 250. While there has been ongoing discussion with ERA on the post audit implementation plan items, this has not been included in the compliance report.

Issues



One of the compliance reports was late. The reports omitted incomplete type 2 items.

Recommendations

Amend compliance manual for regulatory items to show time and content requirements.

Item 103	Trading Licence Clause 24	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M

The requirement is that a Licensee must publish any information it is directed by the Authority to publish, within the timeframes specified.

Observations

Documents Compliance

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Not applicable

Process Outcome Output Reporting Compliance

The Authority has not required any information to be published.

Issues

None

Recommendations

None

Item 106	Trading Licence Clause 12.2	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M

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.

Observations

Documents Compliance

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Not applicable.

Process Outcome Output Reporting Compliance

There has been no direction to review the standard form contract.

Issues

None

Recommendations

None

Item 107	Trading Licence Clause 12.3	Adequacy of controls rating	Compliance rating
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		Not Performed	Not Rated
Licence: Trading			
<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.			
Observations			
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Not applicable.			
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>
Compliance	<input type="checkbox"/>		
There has been no direction to review the standard form contract.			
Issues			
None			
Recommendations			
None			
Item 108	Trading Licence Clause 13.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Trading			
<i>Energy Coordination Act section 11M</i>			
The requirement is that a Licensee must only amend the standard form contract in accordance with the Energy Coordination Act 1994 and Regulations.			
Observations			
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Not applicable.			
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>
Compliance	<input type="checkbox"/>		
The standard form contract has been amended as requested and approved by the Authority on change of the Licensee. There has been no subsequent review.			
Issues			
None			
Recommendations			
None			
Item 109	Trading Licence Clause 15.1 & 15.2	Adequacy of controls rating A	Compliance rating 1
Licence: Trading			
<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.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Supply has been maintained. There is no other supplier.									
Issues									
None									
Recommendations									
None									

Item 110 clause 1.5	Trading Licence Schedule 3	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M
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.

Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There has been no refusal to supply or request by the Authority.									
Issues									
None.									
Recommendations									
None.									

Item 111 clause 1.7	Trading Licence Schedule 3	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M
A licensee must comply with a direction from the Authority to supply a customer, subject to specified conditions.

Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Introductory pack.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>



There has been no direction.
Issues
None
Recommendations
None

Item 112 Trading Licence Schedule 3 Clause 2.1 to 2.2	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M
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.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Not applicable.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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All required information has been provided. The distribution licensee is a related party and they have common staff so information share is natural

Issues

None

Recommendations

None

Item 113 Trading Licence Schedule 3 Clause 3.1	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M
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.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Annual Advice to Minister (22 January / 2 February / 9 February for February advice on bill to apply in May bill).

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The Minister has been advised at least one month before a change of each change in price under the standard form contract before they came into effect. The standard form contract has not been reviewed.



Issues
None
Recommendations
None

3.14.3 Gas Marketing Code of Conduct

Item 114	Trading Licence Clause 19.1	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading
Energy Coordination Act section 11ZPP
 A licensee must comply with the *Gas Marketing Code of Conduct*.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
 Documents: Not applicable.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The requirement is satisfied. There has been no marketing in the audit period.

Issues
None
Recommendations
None

Item 115	Trading Licence 19.2	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading
Energy Coordination Act section 11M & 11ZPP
 A licensee must ensure all agents and employees comply with the *Gas Marketing Code of Conduct*.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
 Documents: Introductory pack.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Marketing agents are not used. No marketing by employees has occurred in the audit period.

Issues
None
Recommendations
None.



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Item 116 Trading Licence 19.1 Code of Conduct clause 2.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Trading</i>		
<i>Energy Coordination Act section 11ZPP</i>		
A retailer must ensure that its gas marketing agents comply with Part 2 of the Code of Conduct.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Not applicable.		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting <input type="checkbox"/>
Compliance	<input type="checkbox"/>	
There has been no marketing in the audit period. There have been no complaints received about gas marketing.		
Issues		
None		
Recommendations		
None		
Item 117 Trading Licence Clause 19	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Trading</i>		
<i>Energy Coordination Act section 11ZPP Code of Conduct clause 2.2(1)</i>		
A retailer or gas marketing agent must ensure that standard form contracts that are not unsolicited consumer agreements are entered into in the manner and satisfying the conditions specified.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Not applicable.		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting <input type="checkbox"/>
Compliance	<input type="checkbox"/>	
There has been no marketing in the audit period. There have been no complaints received about gas marketing.		
Issues		
None		
Recommendations		
None		
Item 118 Trading Licence Clause 19	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Trading</i>		
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.2(2) & 2.2(3)</i>		



A retailer or gas marketing agent must ensure that the information specified in clause 2.2(2) is given to the customer no later than on or with the customer's first bill, unless the retailer or gas marketing agent has provided the information to the customer in the preceding 12 months or informed the customer how the information may be obtained (unless the customer has requested to receive the information)..

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Not applicable.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There has been no marketing in the audit period. There have been no complaints received about gas marketing.

Issues

None

Recommendations

None

Item 119	Trading Licence Clause 19	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: *Trading*

Energy Coordination Act section 11ZPP Code of Conduct Clause 2.3(1)

A retailer or gas marketing agent must ensure that non- standard contracts that are not unsolicited consumer agreements are entered into in the manner and satisfying the conditions specified.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Not applicable.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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There are no non-standard contracts.

Issues

None

Recommendations

None

Item 120	Trading Licence Clause 19	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: *Trading*

Energy Coordination Act section 11ZPP Code of Conduct Clause 2.3(2)

A retailer or gas marketing agent must ensure that the information specified is provided to the customer before entering into a non-standard contract.



Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Not applicable.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There are no non-standard contracts.									
Issues									
None									
Recommendations									
None									

Item 121	Trading Licence Clause 19	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: *Trading*

Energy Coordination Act section 11ZPP Code of Conduct Clause 2.3(3) & 2.3(4)

A retailer or gas marketing agent must obtain a customer's verifiable consent that the information specified in clause 2.3(2) has been given, unless the retailer or gas marketing agent provided the information to the customer in the preceding 12 months or informed the customer how the information may be obtained (unless the customer requested to receive the information).

Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Not applicable.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There are no non-standard contracts.									
Issues									
None									
Recommendations									
None									

Item 122	Trading Licence Clause 19	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: *Trading*

Energy Coordination Act section 11ZPP Code of Conduct Clause 2.4(1)

A retailer or gas marketing agent must ensure that the inclusion of concessions is made clear to residential customers and any prices that exclude concessions are disclosed.

Observations							
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>				
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Not applicable.							



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Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There are no concessions available and this advice is given to customers. There has been no marketing in the audit period. There have been no complaints received about gas marketing.									
Issues									
None									
Recommendations									
None									
Item 123	Trading Licence Clause 19				Adequacy of controls rating Not Performed			Compliance rating Not Rated	
Licence: <i>Trading</i>									
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.4(2)</i>									
A retailer or gas marketing agent must ensure that a customer is able to contact the retailer or gas marketing agent on the retailer's or gas marketing agent's telephone number during the normal business hours of the retailer or gas marketing agent for the purposes of enquiries, verifications and complaints.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Introductory pack.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
This requirement is about marketing conduct and there has been no marketing in the audit period. Even so, the introductory pack contains the contract which is given to all new customers and this provides the traders contact details.									
Issues									
None									
Recommendations									
None									
Item 124	Trading Licence Clause 19				Adequacy of controls rating Not Performed			Compliance rating Not Rated	
Licence: <i>Trading</i>									
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.5(1)</i>									
A retailer or gas marketing agent who contacts a customer for the purposes or marketing must, on request, provide the customer with the retailer's complaints telephone number, the gas ombudsman's telephone number and, for contact by a gas marketing agent, the gas marketing agent's marketing identification number.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Introductory pack.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>



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There has been no marketing in the audit period. So the circumstances did not arise
Issues
The information pack is provided to all new customers. The pack has the required information but no marketing occurred.
Recommendations
None.

Item 125	Trading Licence Clause 19	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: <i>Trading</i>
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.5(2)</i>
A retailer or gas marketing agent who meets with a customer face to face for the purposes of marketing must: <ul style="list-style-type: none"> wear a clearly visible and legible identity card showing the information specified; and as soon as practicable provide the customer, in writing, the information specified and as soon as practicable provide the customer, in writing, the information specified.

Observations			
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Introductory pack.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output
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There has been no marketing in the audit period so the circumstances did not arise. There have been no complaints received about gas marketing.

Issues
None
Recommendations
None

Item 126	Trading Licence Clause 19	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: <i>Trading</i>
<i>Energy Coordination Act section 11ZPP Code of Conduct Clause 2.6</i>
A retailer or gas marketing agent who visits a person's premises for the purposes of marketing, must comply with any clearly visible signs at the premises indicating that canvassing is not permitted or no advertising material is to be left at the premises

Observations			
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Introductory pack.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There has been no marketing in the audit period so the circumstances did not arise. There



have been no complaints received about gas marketing.

Issues

None

Recommendations

None

Item 127	Trading Licence Clause 19	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11ZPP Code of Conduct Clause 2.8

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 to carry out that activity, unless the contrary is proved.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Introductory pack.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There has been no marketing in the audit period. There have been no complaints received about gas marketing.

Issues

None

Recommendations

None

Item 128	Trading Licence Clause 192	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11ZPP Code of Conduct Clause 2.9

A gas marketing agent must:

- 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.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Introductory pack.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There has been no marketing in the audit period. There have been no complaints received



about gas marketing, so no requests from gas ombudsman. There are no records to keep.
Issues
None
Recommendations
None

Item 129	Trading Licence Clause 19	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11ZPP Code of Conduct Clause 2.10
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.

Observations			
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Introductory pack.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There has been no marketing in the audit period. There have been no complaints received about gas marketing. There has been no marketing so no records.

Issues
None
Recommendations
None

3.14.4 Compendium

Item 134	Trading Licence Clause 2.1	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M Schedule 2 Compendium 3.1(1)
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.

Observations			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Introductory pack.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The information on connection requests has been provided. The distribution licensee is a related party and they have common staff so information share is natural and immediate as it is



the same person.
Issues
None
Recommendations
None

Item 135	Trading Licence Clause 2.1	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M Schedule 2 Compendium 3.1(2)
 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.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
 Documents: Introductory pack.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The request information has been provided. The distribution licensee is a related party and they have common staff so information share is natural and immediate as it is the same person. Most connections are made on same day and all by next day.

Issues

None

Recommendations

None

Item 136	Trading Licence Clause 2.1	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M Schedule 2 Compendium 4.1(a)
 A retailer must issue a bill no more than once a month unless the conditions specified are met.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
 Documents: Introductory pack, sample bills.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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No bills were issued more than once a month.

Issues

None



Recommendations		
None		

Item 137	Trading Licence Clause 2.1	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M Schedule 2 Compendium 4.1(b)

A retailer must issue a bill at least every 3 months unless the conditions specified are met.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Introductory pack. Sample bills (10% confidence sample)

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Bills are issued every 3 months for small users and monthly for business users.

Issues

None

Recommendations

None

Item 138	Trading Licence Clause 2.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M Schedule 2 Compendium 4.2(1)

Prior to placing the customer on a shortened billing cycle, a retailer is considered to have given a customer notice if the retailer has advised the customer of the information specified in clauses 4.2(1)(a)-(d)..

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Introductory pack.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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No customers were placed on a shortened billing cycle.

Issues

None

Recommendations

None

Item 139	Trading Licence Clause 2.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M Schedule 2 Compendium 4.2(2)
 Notwithstanding clause 4.1(a)(ii), a retailer must not place a residential customer on a shortened billing cycle without the customer's verifiable consent in circumstances specified in clauses 4.2(2)(a)-(b).

Observations

Documents Compliance

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
 Documents: Introductory pack.

Process Outcome Output Reporting Compliance

No customers were placed on a shortened billing cycle.

Issues

None

Recommendations

None

Item 140	Trading Licence Clause 2.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M Schedule 2 Compendium 4.2(3)
 A retailer must give the customer written notice of a decision to shorten the customer's billing cycle within 10 business days of making the decision.

Observations

Documents Compliance

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
 Documents: Introductory pack.

Process Outcome Output Reporting Compliance

No customers were placed on a shortened billing cycle.

Issues

None

Recommendations

None

Item 141	Trading Licence Clause 2.12	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M Schedule 2 Compendium 4.2(4)
 A retailer must ensure that a shortened billing cycle is for a period of at least 10 business days.

Observations

Documents Compliance



Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Introductory pack.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
No customers were placed on a shortened billing cycle.									
Issues									
None									
Recommendations									
None									

Item 142	Trading Licence Clause 2.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence:	<i>Trading</i>
<i>Energy Coordination Act section 11M Schedule 2 Compendium 4.2(5)</i>	
Upon request, a retailer must return a customer who is subject to a shortened billing cycle and has paid 3 consecutive bills by the due date, to the billing cycle that previously applied to the customer.	

Observations			
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Introductory pack.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
No customers were placed on a shortened billing cycle.									
Issues									
None									
Recommendations									
None									

Item 143	Trading Licence Clause 2.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence:	<i>Trading</i>
<i>Energy Coordination Act section 11M Schedule 2 Compendium 4.2(6)</i>	
At least once every 3 months, a retailer must inform a customer who is subject to a shortened billing cycle of the conditions upon which a customer can be returned to the customer's previous billing cycle.	

Observations			
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Introductory pack.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
No customers were placed on a shortened billing cycle.									



Issues

None

Recommendations

None

Item 144	Trading Licence Clause 2.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: *Trading*

Energy Coordination Act section 11M Schedule 2 Compendium 4.3(1)

In respect of any 12-month period, on receipt of a request by a customer, a retailer may provide a customer with estimated bills under a bill smoothing arrangement.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Introductory pack.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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No customers were placed on a bill smoothing arrangement.

Issues

None

Recommendations

None

Item 145	Trading Licence Clause 2.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: *Trading*

Energy Coordination Act section 11M Schedule 2 Compendium 4.3(2)

If a retailer provides a customer with a bill under a bill- smoothing arrangement pursuant to clause 4.3(1), the retailer must ensure that the conditions specified in clauses 4.3(2)(a)-(e) are met.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Introductory pack.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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No customers were placed on a bill smoothing arrangement.

Issues

None

Recommendations

None



Item 146	Trading Licence Clause 2.1	Adequacy of controls rating A	Compliance rating 1
Licence: Trading			
<i>Energy Coordination Act section 11M Schedule 2 Compendium 4.4</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.			
Observations			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Introductory pack, sample bills.			
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
The billing address requirement is satisfied. Bills are sent to supply address or PO box where nominated.			
Issues			
None			
Recommendations			
None			
Item 147	Trading Licence clause 2.1	Adequacy of controls rating B	Compliance rating Not Compliant 2
Licence: Trading			
<i>Energy Coordination Act section 11M Schedule 2 Compendium 4.5(1)</i>			
Unless the customer agrees otherwise, a retailer must include the minimum prescribed information in clauses 4.5(1)(a)-(cc) on the customer's bill.			
Observations			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Introductory pack Sample bills.			
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
The information is provided other than advice of payment options, and interpreter symbol (but all is on draft bill for new billing system).			
Issues			
Missing advice of payment options and interpreter symbol (4.5(1)(q) & (z)). These items are on draft bill for new system. Advice on interpreter is on bill so information is available. Telephone number is given as is information on customer concerns and on CentrePay for those with payment difficulties. Note other matters from previous audit are now resolved.			
Recommendations			
Implement new billing software that has all the provisions.			
Item 148	Trading Licence clause 2.1	Adequacy of controls rating A	Compliance rating 1



Licence:	Trading								
<i>Energy Coordination Act section 11M Schedule 2 Compendium 4.5(2)</i>									
Notwithstanding clause 4.5(1)(bb), a retailer is not obliged to include a graph or bar chart on the bill, if the bill meets the criteria specified in clauses 4.5(2)(a)-(c).									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Not applicable.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Bar Chart is provided meeting 4.5(1)(bb).									
Issues									
None									
Recommendations									
None									

Item 149	Trading Licence clause 2.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence:	Trading								
<i>Energy Coordination Act section 11M Schedule 2 Compendium 4.5(3)</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.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Introductory pack, sample bill									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
No historical debt from previous addresses but some arrears for current address which are clearly shown.									
Issues									
None									
Recommendations									
None									

Item 150	Trading Licence clause 2.1	Adequacy of controls rating A	Compliance rating 1
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Licence:	Trading							
<i>Energy Coordination Act section 11M Schedule 2 Compendium 4.6(1)</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 provided the retailer and the customer agreed that the customer will read the meter.								



Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Sample bill.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Meter reading requirements are satisfied. Two customers were reading because of restrained access. Access is available to all customers now.									
Issues									
None									
Recommendations									
None									

Item 152	Trading Licence clause 2.1	Adequacy of controls rating A	Compliance rating 1
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Licence:	<i>Trading</i>
<i>Energy Coordination Act section 11M Schedule 2 Compendium 4.7(1)</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.	

Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Sample bills.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Meter reading requirements are satisfied. Small use customers are on a 3-month cycle and business customers on a monthly cycle.									
Issues									
None									
Recommendations									
None									

Item 153	Trading Licence clause 2.1	Adequacy of controls rating A	Compliance rating 1
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Licence:	<i>Trading</i>
<i>Energy Coordination Act section 11M Schedule 2 Compendium 4.7(2)</i>	
A retailer must ensure that at least once every 12 months it obtains metering data in accordance with clause 4.6(1)(a).	

Observations							
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>				
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: sample bills.							



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Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Meter reading requirements are satisfied. Small use customers are on a 3-month cycle and business customers on a monthly cycle and all were read at least yearly. Two customers were self-reading because of restrained access and were read yearly. There are no customers with restrained access now.									
Issues									
None									
Recommendations									
None									

Item 154	Trading Licence clause 2.1	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M Schedule 2 Compendium 4.8(1)

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.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: sample bill.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Two customers were self-reading because of restrained access and was read at least yearly. There are no customers with restrained access now. Estimated bills were given in the interim while access to meter was restrained.

Issues

None

Recommendations

None

Item 155	Trading Licence clause 2.1	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M Schedule 2 Compendium 4.8(2)

In circumstances where the customer's bill is estimated, a retailer must specify in a visible and legible manner the information specified in clauses 4.8(2)(a)-(c) The customer may request a verification of a meter reading and a meter reading.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: sample bills.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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The estimation complied with the requirements. The customers were informed that the bill was on



estimated readings. There was no request for verification or the reason for estimate and basis of estimate Note issues from previous audit are now resolved.

Issues

None

Recommendations

None

Item 156 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.8(3)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M

Upon request, a retailer must inform a customer of the basis and the reason for the estimation.

Observations

Documents Compliance

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Sample bills.

Process Outcome Output Reporting Compliance

There has been no request for estimation reasons in the audit period.

Issues

None

Recommendations

None

Item 157 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.9	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

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.

Observations

Documents Compliance

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Sample bills. Customer Code.

Process Outcome Output Reporting Compliance

The estimation process complied with the requirements. The next bill was adjusted for the difference in estimate and actual meter readings for the customers with restrained access.

Issues

None

Recommendations

None



Item 158	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.10	Adequacy of controls rating A	Compliance rating 1
Licence: Trading			
<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..			
Observations			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Sample bills. Customer Code.			
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Process	<input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>
Meters were read when access provided but with no charge made for meter reading and bill provided for the customers with restrained access. There are no customers with restrained access now.			
Issues			
None.			
Recommendations			
None.			
Item 159	Trading Licence clause 2.1 and Schedule 2 Compendium 4.11(1)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Trading			
<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			
Observations			
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer Code.			
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>
Compliance	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no requests for meter tests.			
Issues			
None			
Recommendations			
None			
Item 160	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.11(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated



Licence: Trading									
<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.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer Code.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output
There were no meter tests.									
Issues									
None									
Recommendations									
None									

Item 161	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.12(1)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading									
<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..									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer Code.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output
There are no alternative tariffs to offer and none offered during the audit period.									
Issues									
None									
Recommendations									
None									

Item 162	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.12(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading									
<i>Energy Coordination Act section 11M</i>									
For the purpose of clause 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.

Observations

Documents Compliance

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer Code.

Process Outcome Output Process Outcome Output

There are no alternative tariffs to offer and none offered during the audit period.

Issues

None

Recommendations

None

Item 163 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.13	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M

If a customer's gas use changes and the customer is no longer eligible to continue to receive an existing, more beneficial tariff, a retailer must give the customer written notice prior to changing the customer to an alternative tariff.

Observations

Documents Compliance

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer Code.

Process Outcome Output Process Outcome Output

There are no alternative tariffs to change to during the audit period.

Issues

None

Recommendations

None

Item 164 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.14(1)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

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.

Observations

Documents Compliance

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.



Documents: Customer service charter. Customer Code, sample bills									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Final bills are issued expeditiously and during the audit period, usually the next day. Requests are usually on telephone. There have been no special requests. There have been no complaints received about final bills.									
Issues									
None									
Recommendations									
None									

Item 165	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.14(2)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

If the customer's account is in credit at the time of account closure, the retailer must, subject to clause 4.14(3), at the time of the final bill ask the customer for instructions on where to transfer the amount of credit (based on clauses 4.14(2)(a) or (b)), and pay the credit in accordance with the customer's instructions within 12 business days or another time agreed with the customer.

Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code									

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Credits were returned by cash or bank transfer as advised by the customer within required time frames and usually next day during the audit period. There are no transfers of credits to future accounts. There have been no complaints received about final bills.									
Issues									
None									
Recommendations									
None									

Item 165A	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.14(3)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M

If the customer's account is in credit at the time of account closure and the customer owes a debt to the retailer, the retailer may, with written notice to the customer, use that credit to set off the debt. If after the set off, there remains an amount of credit, the retailer must ask the customer for instructions in accordance with clause 4.14(2).

Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.									



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Documents: Customer Code.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output
There are no debts to offset credits. The accounts were either in credit or in arrears and where in arrears means that it is not in credit so no circumstance arose to offset.									
Issues									
None									
Recommendations									
None									

Item 166	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.15	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence:	<i>Trading</i>
<i>Energy Coordination Act section 11M</i>	
A retailer must review the customer's bill on request by the customer, subject to the customer paying the lesser of the portion of the bill agreed to not be in dispute or an amount equal to the average of the customer's bill over the previous 12 months, and paying any future bills that are properly due.	

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	v
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There have been no requests for a review in the audit period.

Issues

None

Recommendations

None

Item 167	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.16(1)(a)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: *Trading*

Energy Coordination Act section 11M

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

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.



Documents: Customer service charter. Customer Code									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no requests for a review in the audit period.									
Issues									
None									
Recommendations									
None									

Item 168	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.16(1)(b)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M

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..

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There have been no requests for a review in the audit period.

Issues

None

Recommendations

None

Item 169	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.16(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M

The retailer must inform a customer of the outcome of the review (of the bill) as soon as practicable.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There have been no requests for a review in the audit period.

Issues

None



Recommendations
None

Item 170 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.16(3)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M
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.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There have been no requests for a review in the audit period.

Issues

None

Recommendations

None

Item 171 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.17(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M
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 clauses 4.17(2)(a)-(e).

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code, sample bills

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There has been no under charge in the audit period.

Issues

None

Recommendations

None

Item 172 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.18(2) and	Adequacy of controls rating	Compliance rating
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4.18(5)		Not Performed	Not Rated
Licence: Trading			
<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, subject to clauses 4.18(6) and (7) ask the customer for instructions as to whether the amount should be credited to the customer's account; or repaid to the customer. No interest shall accrue to a credit or refund referred to in this clause..			
Observations			
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code, sample bills			
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>
Compliance	<input type="checkbox"/>		<input type="checkbox"/>
There has been no overcharge in the audit period. There have been no complaints.			
Issues			
None			
Recommendations			
None			
Item 173 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.18(3)		Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Trading			
<i>Energy Coordination Act section 11M</i>			
If a retailer receives instructions under clause 4.18(2), the retailer must pay the amount in accordance with the customer's instructions within 12 business days of receiving the instructions.			
Observations			
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code, sample bills			
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>
Output	<input type="checkbox"/>	Process	<input type="checkbox"/>
Output	<input type="checkbox"/>	Outcome	<input type="checkbox"/>
There has been no overcharge in the audit period and no instructions received. There have been no complaints.			
Issues			
None			
Recommendations			
None			
Item 174 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.18(4)		Adequacy of controls rating	Compliance rating



Performance Audit Report GTL: 11

		Not Performed	Not Rated
Licence: Trading			
<i>Energy Coordination Act section 11M</i>			
If a retailer does not receive instructions under clause 4.18(2) within 5 business days of making the request, the retailer must use reasonable endeavours to credit the amount overcharged to the customer's account. .			
Observations			
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code, sample bills			
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>
Output	<input type="checkbox"/>	Process	<input type="checkbox"/>
Output	<input type="checkbox"/>	Outcome	<input type="checkbox"/>
Output	<input type="checkbox"/>		
There has been no overcharge in the audit period and no instructions received. There have been no complaints.			
Issues			
None			
Recommendations			
None			
Item 175 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.18(6)		Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Trading			
<i>Energy Coordination Act section 11M</i>			
Where the overcharged amount is less than \$75 the retailer may, notwithstanding clause 4.18(2), 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 clause 4.18(2), or credit the amount to the customer's account..			
Observations			
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code, sample bills			
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>
Compliance	<input type="checkbox"/>		
There has been no overcharge in the audit period and no instructions received. There have been no complaints.			
Issues			
None			
Recommendations			
None			
Item 175A Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.18(7)		Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Trading			



<p><i>Energy Coordination Act section 11M</i></p> <p>Where the customer has been overcharged by the retailer, and the customer owes a debt to the retailer, then provided the customer is not a residential customer experiencing payment difficulties, financial hardship or subject to an alternative payment arrangement, the retailer may, with written notice to the customer, use the amount of the overcharge to set off the debt owed to the retailer.</p> <p>If, after the set off, there remains an amount of credit the retailer must deal with that amount of credit in accordance with clause 4.18(2) or 4.18(6) where the amount is less than \$75.</p>		
<p>Observations</p>		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
<p>Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code, sample bills</p>		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
<p>There has been no overcharge in the audit period. There have been no complaints.</p>		
<p>Issues</p>		
<p>None</p>		
<p>Recommendations</p>		
<p>None</p>		
<p>Item 176 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.19(1)</p>		
Adequacy of controls rating	Compliance rating	
Not Performed	Not Rated	
<p>Licence: <i>Trading</i></p>		
<p><i>Energy Coordination Act section 11M</i></p> <p>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 clauses 4.19(1)(a)-(d).</p>		
<p>Observations</p>		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
<p>Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code, sample bills</p>		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
<p>There has been no recovery of an amount in the audit period.</p>		
<p>Issues</p>		
<p>None</p>		
<p>Recommendations</p>		
<p>None</p>		
<p>Item 177 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.19(2) and 4.19(6)</p>		
Adequacy of controls rating	Compliance rating	
Not Performed	Not Rated	
<p>Licence: <i>Trading</i></p>		
<p><i>Energy Coordination Act section 11M</i></p> <p>If after the meter reading a retailer becomes aware of an amount owing to the customer, the</p>		



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 clauses 4.19(5) and 4.19(7), 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 clauses 4.3(2)(a)-(b).

No interest shall accrue to a credit or refund referred to in this clause..

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code, sample bills

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There has been no overcharge in the audit period.

Issues

None

Recommendations

None

Item 178	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.19(3)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: *Trading*

Energy Coordination Act section 11M
If a retailer received instructions under clause 4.19(2), the retailer must pay the amount in accordance with the customer's instructions within 12 business days of receiving the instructions..

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code, sample bills

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There has been no overcharge or instructions.

Issues

None

Recommendations

None

Item 179	Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.19(4)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: *Trading*

Energy Coordination Act section 11M



If a retailer does not receive instructions under clause 4.19(2) within 5 business days of making the request, the retailer must use reasonable endeavours to credit the amount of the adjustment to the customer's account.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code, sample bills

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There has been no overcharge or instructions.

Issues

None

Recommendations

None

Item 180 Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.19(5)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M

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

- ask the customer for instructions in accordance with clause 4.19(2); or
- credit the amount to the customer's account. .

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code, sample bills

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There has been no overcharge or instructions.

Issues

None

Recommendations

None

Item 180A Trading Licence clause 2.1 and Schedule 2 Compendium clause 4.19(7)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M

Where the amount of the adjustment is an amount owing to the customer, and the customer owes a debt to the retailer, then provided the customer is not a residential customer experiencing payment difficulties, financial hardship or subject to an alternative payment arrangement, the retailer may, with written notice to the customer, use the amount of the



adjustment to set off the debt owed to the retailer.
 If, after the set off, there remains an amount of credit the retailer must deal with that amount of credit in accordance with clauses 4.19(2) or 4.19(5) where the amount is less than \$75.

Observations

Documents Compliance

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
 Documents: Customer service charter. Customer Code, sample bills

Process Outcome Output Process Outcome Output

There is no bill smoothing to create an adjustment and the adjustments for the estimates for restrained access had no debt so no set off. There has been no overcharge to create a debt so the circumstance did not arise.

Issues

None

Recommendations

None

Item 181	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.1	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

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.

Observations

Documents Compliance

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
 Documents: Customer service charter. Customer Code. Sample bills.

Process Outcome Output Reporting Compliance

The due date was greater than 12 business days after issue of bill. Issue (dispatch) date from previous audit is now also shown on bill.

Issues

None

Recommendations

None

Item 182	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.2	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

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;
- electronically by means of BPay or credit card; and
- by telephone by means of credit card or debit card.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee’s supervisory and operational staff.
Documents: Customer service charter. Customer Code. Sample bill.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The required payment methods are offered. There have been no complaints received about payment methods.

Issues

None

Recommendations

None

Item 183	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.3	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M
 A retailer must, prior to commencing a direct debit, obtain the customer’s verifiable consent and agree with the customer the date of commencement of the direct debit facility and the frequency of the direct debits.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee’s supervisory and operational staff.
Documents: Customer service charter. Customer Code. Sample bill.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There are no direct debit facilities offered.

Issues

None

Recommendations

None

Item 184	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.4	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M
 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.



Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Sample bill.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Payments in advance are accepted in all circumstances.									
Issues									
None									
Recommendations									
None									
Item 185 Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.5									
Adequacy of controls rating Not Performed					Compliance rating Not Rated				
Licence: <i>Trading</i>									
<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.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Sample bill.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Free redirections to a third person are offered when requested throughout the audit period.									
Issues									
None									
Recommendations									
None									
Item 186 Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.6(1)									
Adequacy of controls rating A					Compliance rating 1				
Licence: <i>Trading</i>									
<i>Energy Coordination Act section 11M</i>									
A retailer must not charge a residential customer a late payment fee in the circumstances specified in clauses 5.6(1)(a)-(d).									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Sample bill.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>



There are no concessions available to gas customers and no complaints to ombudsman. No fee has been charged where on a payment plan or given an extension to pay or under financial hardship.

Issues

None

Recommendations

None

Item 186A Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.6(2)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

Where the retailer has charged a late payment fee in the circumstances set out in clause 5.6(1)(c) because the retailer was not aware of the complaint, the retailer must refund the late payment fee on the customer's next bill.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code. Sample bill.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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There have been no complaints to gas ombudsman so the circumstance did not arise and no late fee charged. There have been no double late fees.

Issues

None

Recommendations

None

Item 187 Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.6(3)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

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.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code. Sample bill.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Only one late fee has been charged and no additional late payments.

Issues



None

Recommendations

None

Item 188 Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.6(4)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

A retailer must not charge a residential customer more than 3 late payment fees in relation to the same bill, or more than 12 late payment fees in a year.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Sample bills.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Only one late fee has been charged for the same bill and not more than 4 per year (3 monthly bills).

Issues

None

Recommendations

None

Item 189 Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.6(5)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

If a residential customer has been assessed 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

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Sample bills.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Late fees are waived for financial hardship.

Issues

None

Recommendations

None



Item 190	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.7(1)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

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 clause 5.7(1)..

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Sample bills.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Customers have not paid for gas where the required notice had been given.

Issues

None

Recommendations

None

Item 191	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.7(2)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

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..

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Sample bills.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Customers have not paid for gas where the required notice had been given.

Issues

None

Recommendations

None

Item 192	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.7(3)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M



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..

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee’s supervisory and operational staff.
Documents: Customer service charter. Customer Code. Sample bills.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Customers have not paid for gas where the required information had been given

Issues

None

Recommendations

None

Item 193	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.7(4)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

Notwithstanding clauses 5.7(1) and 5.7(2), a retailer must not require a customer to pay for gas consumed at the customer’s supply address in the circumstances specified in clauses 5.7(4)(a)-(c)..

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee’s supervisory and operational staff.
Documents: Customer service charter. Customer Code. Sample bills.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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New contracts are set to commence at end date of previous contract or disconnection sets end date so new customers do not pay for previous gas consumed. There is no other trader. There are no complaints about paying for others gas.

Issues

None

Recommendations

None

Item 195	Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.8(1)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

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..



Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Sample bills.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output
There are no proceedings for recovery of debt in any circumstances.									
Issues									
None									
Recommendations									
None									
Item 196 Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.8(2)									
					Adequacy of controls rating A			Compliance rating 1	
Licence: Trading									
<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. .									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Sample bills.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output
There are no proceedings for recovery of debt in any circumstances.									
Issues									
None									
Recommendations									
None									
Item 197 Trading Licence clause 2.1 and Schedule 2 Compendium clause 5.9									
					Adequacy of controls rating Not Performed			Compliance rating Not Rated	
Licence: Trading									
<i>Energy Coordination Act section 11M</i>									
Where a retailer and residential customer have entered into a dual fuel contract, or separate contracts for the supply of electricity and gas, the retailer must apply a payment received from a residential customer for charges for the sale of electricity or sale and supply of gas in the circumstances specified.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Not applicable.									



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Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There are no dual fuel contracts.									
Issues									
None									
Recommendations									
None									
Item 198 Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.1(1)									
Adequacy of controls rating A						Compliance rating 1			
Licence: Trading									
<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.									
If the retailer cannot make the assessment within 3 business days, they must refer the customer to an independent financial counsellor or consumer representative organisation to make the assessment.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
All assessments of financial difficulties were done on the spot in person or telephone within 1 day and has always accepted that the customer cannot pay. While financial counsellors are available, the Licensee can refer to HUGS (Hardship Utility Grant Scheme) directly on same day. Since the licensee's access to HUGS (December 2015) referrals to financial counsellor have not occurred as the financial counsellor then refers to HUGS and a step is omitted. Prior to gaining access to HUGS customers were all referred to a financial counsellor on same day.									
Issues									
None									
Recommendations									
None									
Item 198A Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.1(2)									
Adequacy of controls rating A						Compliance rating 1			
Licence: Trading									
<i>Energy Coordination Act section 11M</i>									
If the residential customer provides the retailer with an assessment from an independent financial counsellor or relevant consumer representative organisation, the retailer may adopt that assessment as its own assessment for the purposes of clause 6.1(1)(a).									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.									



Documents: Customer service charter. Customer Code.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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All assessments of financial difficulties were done on the spot in person or telephone within 1 day. The licensee has always accepted that the customer cannot pay and adopted the assessments from an independent financial counsellor or relevant consumer representative organisation. Customers are referred to a financial counsellor or the Licensee can refer to HUGS (Hardship Utility Grant Scheme) directly and did so on the same day. Since the licensee's access to HUGS (December 2015) referrals to financial counsellor has not occurred as the financial counsellor then refers to HUGS and a step is omitted. Prior to gaining access to HUGS customers were all referred to a financial counsellor on same day throughout the audit period. The financial counsellors' assessment took time and more than the same day referral of the licensee.

Issues

None

Recommendations

None

Item 199 Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.1(3)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

When undertaking an assessment regarding payment difficulties or financial hardship, a retailer must, unless a retailer adopts an assessment from an independent financial counsellor or consumer representative organisation, 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

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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All assessments of financial difficulties were done on the spot in person or telephone within 1 day and has always accepted that the customer cannot pay (payment difficulties or financial hardship) and adopted the assessments from an independent financial counsellor where available. Customers were referred to a financial counsellor up to December 2015 and the Licensee referred to HUGS (Hardship Utility Grant Scheme) directly since then.

Issues

None

Recommendations

None

Item 200 Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.1(4)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading



<p><i>Energy Coordination Act section 11M</i></p> <p>A retailer must advise a residential customer on request of the details of an assessment.</p>		
<p>Observations</p>		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
<p>Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code.</p>		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
<p>There have been no requests for details of assessment.</p>		
<p>Issues</p>		
<p>None</p>		
<p>Recommendations</p>		
<p>None</p>		
<p>Item 200A Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.2(1)</p>		
<p>Adequacy of controls rating A</p>		<p>Compliance rating 1</p>
<p>Licence: Trading</p>		
<p><i>Energy Coordination Act section 11M</i></p> <p>If a retailer refers a residential customer to an independent financial counsellor or relevant consumer representative organisation under clause 6.1(1)(b) then the retailer must grant the residential customer a temporary suspension of actions.</p>		
<p>Observations</p>		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
<p>Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code.</p>		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/> Output <input type="checkbox"/> Process <input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output
<p>All actions were suspended pending outcome of referral. All assessments of financial difficulties were done on the spot in person or telephone within 1 day. The licensee has always accepted that the customer cannot pay. Customers were referred to a financial counsellor up to December 2015 and the Licensee referred to HUGS (Hardship Utility Grant Scheme) directly since then.</p>		
<p>Issues</p>		
<p>None</p>		
<p>Recommendations</p>		
<p>None</p>		
<p>Item 201 Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.2(2)</p>		
<p>Adequacy of controls rating A</p>		<p>Compliance rating 1</p>
<p>Licence: Trading</p>		
<p><i>Energy Coordination Act section 11M</i></p> <p>If a residential customer informs a retailer that the customer is experiencing payment problems, the 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</p>		



appointment with a relevant consumer representative organisation to assess the customer's capacity to pay or provides the retailer with an assessment from an independent financial counsellor or consumer representative organisation.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output
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All actions were suspended pending outcome of referral. All assessments of financial difficulties were done on the spot in person or telephone within 1 day. The licensee has always accepted that the customer cannot pay when informed. Customers were referred to a financial counsellor up to December 2015 and the Licensee referred to HUGS (Hardship Utility Grant Scheme) directly since then.

None

Recommendations

None

Item 202 Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.2(3)	Adequacy of controls rating A	Compliance rating 1
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Licence: *Trading*

Energy Coordination Act section 11M

A retailer must allow a temporary suspension of actions for a period of at least 15 business days.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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All actions were suspended pending outcome of referral however long that took and not less than 15 days.

Issues

None

Recommendations

None

Item 203 Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.2(4)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: *Trading*

Energy Coordination Act section 11M

A retailer must give reasonable consideration to a request by a residential customer in the manner specified to allow a relevant consumer representative organisation additional time to



assess a residential customer's capacity to pay.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
 Documents: Customer service charter. Customer Code.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There have been no requests from customers for consumer representative organisations to consider additional time to assess customer's capacity to pay.

Issues

None

Recommendations

None

Item 204	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.3(1)	Adequacy of controls rating B	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

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 clause 6.3(1).

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
 Documents: Customer service charter. Customer Code.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Alternative payment options and advice is given such as an instalment plan, financial counselling, Centrepay is used as well as the HUGS system. Staff have been trained in use of these external systems and there are training documents. New staff will need to be trained as an induction issue. Note issues from previous audit are now resolved.

Issues

The obligation is met but controls could be improved by adding training in induction process

Recommendations

Add training for CentrePay and HUGS to induction process.

Item 205	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.4(1)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

A retailer must offer a residential customer who is experiencing payment difficulties or financial hardship at least the payment arrangements specified in clauses 6.4(1)(a) and (b).

Observations



Performance Audit Report GTL: 11

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>	
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code.				
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Time to pay or a complying instalment plan is offered for those is experiencing payment difficulties or financial hardship as per 6.4(1)(a) and (b).				
Issues				
None				
Recommendations				
None				
<hr/>				
Item 206	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.4(2)		Adequacy of controls rating A	Compliance rating 1
Licence: <i>Trading</i>				
<i>Energy Coordination Act section 11M</i>				
When offering or amending an instalment plan to a residential customer a retailer must ensure that the instalment plan is fair and reasonable taking into account the customer's capacity to pay and consumption history, and comply with clause 6.4(3).				
Observations				
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>	
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code.				
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Offered instalment plans meet the requirements i.e. the instalment plan is fair and reasonable taking into account the customer's capacity to pay and consumption history. Those with more than 2 previous plans would be given another plan if the circumstance arose.				
Issues				
None				
Recommendations				
None				
<hr/>				
Item 206A	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.4(3)		Adequacy of controls rating A	Compliance rating 1
Licence: <i>Trading</i>				
<i>Energy Coordination Act section 11M</i>				
If the residential customer accepts an instalment plan offered by the retailer, the retailer must provide the information specified in clauses 6.4(3)(a)(i)-(iii) within 5 business days of the customer accepting the plan and notify the customer of any amendments to the instalment plan at least 5 business days before they come into effect (unless agreed otherwise with the customer) and provide the customer with information explaining the changes.				
Observations				
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>	



Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Offered instalment plans meet the requirements. Contact is usually made on same day.

Issues

None

Recommendations

None

Item 207 Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.4(4)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M

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.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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No customer has had more than 2 instalment plans cancelled. If they did they would still be offered a plan.

Issues

None

Recommendations

None

Item 208 Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.6(1)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M

A retailer must give reasonable consideration to a request by a customer, or a relevant consumer representative organisation, for a reduction of the customer's fees, charges, or debt.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There have been no requests for reduction of the customer's fees, charges, or debt.



Issues

None

Recommendations

None

Item 209 Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.6(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M

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).

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code, Financial Hardship Policy.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There were no considerations rising under 6.6(1) so 6.6(2) not actioned.

Issues

None

Recommendations

None.

Item 210 Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.7	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

Where it is reasonably demonstrated to the retailer that the customer, experiencing financial hardship, is unable to meet the customer's obligations under the previously elected payment arrangement, a retailer must give reasonable consideration to offering the customer an instalment plan or offering to revise an existing instalment plan.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The Licensee always accepted the customers pay (are experiencing hardship) and have been offered new instalment plans or have an existing plan revised.

Issues

None

Recommendations



None

Item 211 Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.8	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

A retailer must advise a customer experiencing financial hardship of the options specified in clause 6.8.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Customers have been advised of complying assistance information. There are no concessions available or different tariffs.

Issues

None

Recommendations

None

Item 212 Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.9(1)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

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.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There have been no requests for advance payment at all and none therefore from those with payment difficulties to determine minimum payments.

Issues

None

Recommendations

None

Item 213 Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.9(2)	Adequacy of controls rating	Compliance rating
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Performance Audit Report GTL: 11

		Not Performed	Not Rated
Licence: Trading			
<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.			
Observations			
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code.			
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>
Compliance	<input type="checkbox"/>		
There have been no requests for advance payment at all and none therefore from those with payment difficulties to apply different minimum payments			
Issues			
None			
Recommendations			
None			
Item 214 Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(1)		Adequacy of controls rating A	Compliance rating 1
Licence: Trading			
<i>Energy Coordination Act section 11M</i>			
A retailer must develop a hardship policy to assist customers in meeting their financial obligations and responsibilities to the retailer.			
Observations			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. hardship policy.			
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>		
A complying policy is in place. The policy has been reviewed and approved by the ERA.			
Issues			
None.			
Recommendations			
None.			
Item 215 Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(2)		Adequacy of controls rating A	Compliance rating 1
Licence: Trading			
<i>Energy Coordination Act section 11M</i>			
A retailer must ensure that the hardship policy complies with the specified criteria.			
Observations			



Performance Audit Report GTL: 11

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>	
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. hardship policy.				
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output
			<input checked="" type="checkbox"/>	Reporting
				<input checked="" type="checkbox"/>
Compliance				
<input checked="" type="checkbox"/>				
The policy complies with the requirements.				
Issues				
None				
Recommendations				
None.				
<hr/>				
Item 215A	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(3)			Adequacy of controls rating A
				Compliance rating 1
Licence: <i>Trading</i>				
<i>Energy Coordination Act section 11M</i>				
A retailer must ensure that its hardship procedures comply with the criteria specified in clause 6.10(3).				
Observations				
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>	
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. hardship policy.				
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output
			<input checked="" type="checkbox"/>	Reporting
				<input checked="" type="checkbox"/>
Compliance				
<input checked="" type="checkbox"/>				
The procedures comply with the requirements.				
Issues				
None				
Recommendations				
None.				
<hr/>				
Item 216	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(4)			Adequacy of controls rating Not Performed
				Compliance rating Not Rated
Licence: <i>Trading</i>				
<i>Energy Coordination Act section 11M</i>				
If requested, a retailer must give residential customers, financial counsellors and relevant consumer representative organisations a copy of the hardship policy, including by post at no charge.				
Observations				
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>	
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. hardship policy.				
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output
			<input type="checkbox"/>	Reporting
				<input type="checkbox"/>
Compliance				
<input type="checkbox"/>				
There has been no request. If requested copies were available free.				



Issues

None

Recommendations

None

Item 217	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(5)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

A retailer must keep a record of the following: the relevant consumer representative organisations consulted on the contents of its hardship policy and hardship procedures; the date the hardship policy and hardship procedures were established; the dates the hardship policy and hardship procedures were reviewed; and the dates the hardship policy and hardship procedures were amended.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. hardship policy. Financial Counsellor Association commentary on Hardship policy.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The records comply.

Issues

None.

Recommendations

None.

Item 219	Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(6)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

The retailer may, at any time, or must if directed by the Authority, review its hardship policy and hardship procedures and submit to the Authority the results of that review within 5 business days after it is completed.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. hardship policy.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The policy and procedures have been approved by the ERA.

Issues

None.



Recommendations
None.

Item 220 Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(7)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

The retailer must comply with the Authority's Financial Hardship Policy Guidelines..

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code. hardship policy.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The policy and procedures have been developed in accordance with guidelines and approved by the ERA.

Issues

None.

Recommendations

None.

Item 220A Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.10(8)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

If the retailer amends their hardship policy, the retailer must submit a copy of the amended policy to the Authority within 5 business days of the amendment.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code. hardship policy.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The amended policy and procedures have been submitted and approved by the ERA.

Issues

None.

Recommendations

None.

Item 221 Trading Licence clause 2.1 and Schedule 2 Compendium clause 6.11	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading			
<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.			
Observations			
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code.			
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>
Compliance	<input type="checkbox"/>		
There have been no requests for alternative payment arrangements from business customers.			
Issues			
None			
Recommendations			
None			

Item 222	Trading Licence clause 2.1 and Schedule 2 Compendium clause 7.1	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading			
<i>Energy Coordination Act section 11M</i>			
A retailer must follow the procedures specified in clause 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 clause 7.1(2)..			
Observations			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Sample bills. (12% sample)			
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>		
The sampling showed complying reminder notice and a complying disconnection warning were issued in the manner and timeframes specified prior to arranging for disconnection. There were 17 disconnections for failure to pay a bill in the audit period. Eight were for non-payment and 9 were where the premises had been abandoned. Note issues from previous audit are now resolved.			
Issues			
None			
Recommendations			
None			

Item 223	Trading Licence clause 2.1 and Schedule 2 Compendium clause 7.2(1)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading			
<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 clause 7.2(1).

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
 Documents: Customer service charter. Customer Code. Sample bills (16% sample).

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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There have been no disconnections where there was compliance with an instalment plan or the bill had been paid. There were 8 disconnections for failure to pay a bill but none which met the requirements of 7.2(1). Note (d) does not apply. This meets the obligation to not disconnect. There have been no complaints received about disconnections.

Issues

None

Recommendations

None

Item 224	Trading Licence clause 2.1 and Schedule 2 Compendium clause 7.3	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M

In relation to dual fuel contracts or separate contracts for the supply of electricity and gas (under which a single bill for energy, or separate simultaneous bills for electricity and gas are issued to the customer), if a retailer is permitted to and wishes to arrange for disconnection of the supply of electricity and gas to the residential customer's supply address for failure to pay a bill, the retailer must arrange for disconnection of the supply of gas in priority to the disconnection of the supply of electricity.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
 Documents: Customer service charter. Customer Code. Sample bills.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There have been no dual fuel contracts.

Issues

None

Recommendations

None

Item 225	Trading Licence clause 2.1 and Schedule 2 Compendium clause 7.4	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

A retailer must not arrange for the disconnection of a customer's supply address for denying access to the meter unless the conditions specified in clause 7.4(1) are satisfied. A retailer may



arrange for a distributor to carry out 1 or more of the requirements referred to in clause 7.4(1) on behalf of the retailer

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code. Sample bills.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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There have been no disconnections for denying access to the meter. This meets the obligation to not disconnect.

Issues

None

Recommendations

None

Item 227	Trading Licence clause 2.1 and Schedule 2 Compendium clause 7.6	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

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.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code. Sample bills.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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There have been no disconnections where there was a complaint or outside the proscribed times. This meets the obligation to not disconnect.

Issues

None

Recommendations

None

Item 228	Trading Licence clause 2.1 and Schedule 2 Compendium clause 8.1(1)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

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.

Observations



Performance Audit Report GTL: 11

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
 Documents: Customer service charter. Customer Code. Sample bills.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The eight disconnections were reconnected in a complying manner when requested. The fee for reconnection was \$66. The fee was waived if payment was made within 24 hours of disconnection. There have been no complaints received about reconnections. The abandoned premises (9) were reconnected as required by a new customer.

Issues

None

Recommendations

None

Item 229	Trading Licence clause 2.1 and Schedule 2 Compendium clause 8.1(2)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

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 3pm on the next business day if the request is received after 3pm on a business day, or on the weekend or on a public holiday.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
 Documents: Customer service charter. Customer Code. Sample bills.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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There trader and distributor are related and have common staff. Communicating with one is communicating with the other as it is the same person. All requests from customers before 4pm are requested that day or next day if after 4pm.

Issues

None

Recommendations

None

Item 230	Trading Licence clause 2.1 and Schedule 2 Compendium clause 8.2(1)-(3))	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

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, or where the retailer has notified the distributor of a later date for reconnection, within 2 business days of that later date.

In the event of an emergency or where access to the customer's supply address has been



restricted or where it is unsafe to reconnect the customer's supply address, the distributor must reconnect the customer's supply address within 2 business days from becoming aware that the relevant issue has been resolved.

Where reconnection requires excavation, the distributor must reconnect the customer's supply address within 10 business days of receipt of the request to reconnect.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code. Sample bills.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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All requests for reconnections were made that day or next day at latest during the audit period. There were none due to emergency or requiring excavation.

Issues

None

Recommendations

None

Item 231	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.1(1)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

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.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code. Sample bills with notice of CPI increase .

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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While the notice that tariffs are subject to annual CPI increases in the information pack customers are told with the prior bill of a pending increase in the next 3 monthly bill.

Issues

None

Recommendations

None

Item 232	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.1(2)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

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.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code. Sample bills.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Tariff information is in the information pack and available free on request. There is no alternative tariff.

Issues

None

Recommendations

None

Item 233	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.1(3)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M

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.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code. Sample bills.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There have been no requests for information. Tariff information is available free on request.

Issues

None

Recommendations

None

Item 234	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.2(1)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

A retailer must, on request, give a customer its billing data.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code. Sample bills.



Performance Audit Report GTL: 11

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Billing information was given free on request. Billing information is also in the information pack.									
Issues									
None									
Recommendations									
None									
Item 235 Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.2(2)									
Adequacy of controls rating A						Compliance rating 1			
Licence: Trading									
<i>Energy Coordination Act section 11M</i>									
A retailer must give the requested billing data at no charge in the circumstances specified.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Sample bills.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Billing data was given free on request.									
Issues									
None									
Recommendations									
None									
Item 236 Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.2(3)									
Adequacy of controls rating A						Compliance rating 1			
Licence: Trading									
<i>Energy Coordination Act section 11M</i>									
A retailer must give the requested billing data within 10 business days of the receipt of the request or payment of the retailer's reasonable charge for providing the billing data.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Sample bills.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Billing information was provided on the same day and free.									
Issues									
None									
Recommendations									
None									



Item 237	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.2(4)	Adequacy of controls rating A	Compliance rating 1
Licence: Trading			
<i>Energy Coordination Act section 11M</i> A retailer must keep a customer's billing data for seven years.			
Observations			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code.			
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
The customer billing data is available on the servers for the 7 years of operation. There have been no deletions at all.			
Issues			
None			
Recommendations			
None			
Item 238	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.3	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Trading			
<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)..			
Observations			
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Sample bills.			
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>
Compliance	<input type="checkbox"/>		<input type="checkbox"/>
There have been no requests for this type of information. There are no concessions for gas customers.			
Issues			
None			
Recommendations			
None			
Item 239	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.4	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Trading			



Energy Coordination Act section 11M

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) and the typical running costs of major domestic appliances.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
 Documents: Customer service charter. Customer Code.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There have been no requests for energy efficiency information. Energy efficiency information is available on request and on the web site. Note issues from previous audit are now resolved.

Issues

None.

Recommendations

None

Item 240	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.5	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M

A retailer must give information to the customer, or refer the customer to the relevant distributor for a response, if asked by a customer for information relating to the distribution of gas.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
 Documents: Customer service charter. Customer Code.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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There have been no requests for gas distribution information. There is information in the customer charter.

Issues

None

Recommendations

None

Item 241	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.5A(1)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

A retailer must lodge with the Authority a gas customer safety awareness program in the manner and timeframes specified.



Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Safety awareness program									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
A gas customer safety awareness program has been lodged as required.									
Issues									
None									
Recommendations									
None									

Item 242	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.5A(2)	Adequacy of controls rating A	Compliance rating 1
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Licence:	<i>Trading</i>
<i>Energy Coordination Act section 11M</i>	
A retailer must consult with the Authority when preparing the gas customer safety awareness programme.	

Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Safety awareness program									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Consultation on Gas customer safety awareness program has taken place as required.									
Issues									
None									
Recommendations									
None									

Item 243	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.5A(3)	Adequacy of controls rating A	Compliance rating 1
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Licence:	<i>Trading</i>
<i>Energy Coordination Act section 11M</i>	
A 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).	

Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Safety awareness program									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>



Gas safety awareness program contains the required information.
Issues
None
Recommendations
None

Item 245 Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.9	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M
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.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Written information that is given to a customer under the Compendium and gas marketing code to the extent that marketing occurs. is complying.

Issues

None

Recommendations

None

Item 246 Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.10(1)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M
A retailer must advise a customer on request how the customer can obtain a copy of the Gas Marketing Code and the Compendium and make a copy of the Gas Marketing Code and the Compendium available on the retailer's website, and the offices of the retailer at no charge.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code. Sample bills.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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There have been no requests for copies of Gas Marketing Code and the Compendium. Information is available on request at the Esperance office and on the web site. Complies with 10.10(1)(b) and (c) but rating is Not performed/Not rated because cannot test for 10.10(1)(a).



Issues

None

Recommendations

None

Item 249	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.11(1)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

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).

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Sample bills.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The information is in the customer charter which is available on the web and in the Esperance office on request free. There has been no request in the office.

Issues

None

Recommendations

None

Item 250	Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.11(2)	Adequacy of controls rating B	Compliance rating 2
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Licence: Trading

Energy Coordination Act section 11M

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 its TTY services; the telephone number for independent multi-lingual services; the National Interpreter Symbol with the words "Interpreter Services"..

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Sample bills.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The interpreter service and TTY are in the customer charter. The translation service and TTY is on the bill, on overdue warnings and disconnection notices but not symbol. Note other matters from previous audit are now resolved.

Issues



Need to add the National Interpreter Symbol to bill, on overdue warnings and disconnection notices.

Recommendations

Add the National Interpreter Symbol to bill, on overdue warnings and disconnection notices.

Item 251	Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.1(1)	Adequacy of controls rating A	Compliance rating 1
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Licence: *Trading*

Energy Coordination Act section 11M

A retailer and distributor must develop, maintain and implement an internal process for handling complaints and resolving disputes.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Complaint process.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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There is a complaints handling process.

Issues

None

Recommendations

None

Item 252	Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.1(2) (a), (b) and (d)	Adequacy of controls rating A	Compliance rating 1
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Licence: *Trading*

Energy Coordination Act section 11M

The complaints handling process under clause 12.1(1) must comply with AS ISO 10002 – 2006 and address, at the least, the criteria specified in clause 10.2(b). The complaints handling process must be available at no cost to customers.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Complaint process.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The complaints process is complying. The process meets 12.2(b) and is available at no cost. There have been no complaints received about complaints process. Clause 10.2(b) is about billing data.

Issues

None

Recommendations

None



Item 253	Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.1(2) (c)	Adequacy of controls rating A	Compliance rating 1
Licence: Trading			
<i>Energy Coordination Act section 11M</i>			
The complaints handling process must detail how the retailer will handle complaints about a retailer, gas marketing agents or marketing, and be available at no cost to customers.			
Observations			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Complaint process.			
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
The complaints process is complying. The process details how the retailer will handle complaints. There is no marketing by agents or employees. There have been no complaints received about complaints process. The complaints handling process was available free.			
Issues			
None			
Recommendations			
None			
Item 254	Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.1(3)(a)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: Trading			
<i>Energy Coordination Act section 11M</i>			
When responding to a customer complaint a retailer or distributor must 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).			
Observations			
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Complaint process.			
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>
Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>
Compliance	<input type="checkbox"/>		<input type="checkbox"/>
The process covers internal escalation. There have been no complaints in audit period to test process. There have been no complaints received about complaint process.			
Issues			
None			
Recommendations			
None			
Item 255	Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.1(3)(b)	Adequacy of controls rating Not Performed	Compliance rating Not Rated



Licence: Trading	
<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.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Complaint process.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
The process covers internal / ombudsman escalation. There have been no complaints in audit period to test process. There have been no complaints received about complaint process.	
Issues	
None	
Recommendations	
None	

Item 255A Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.1(4)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading	
<i>Energy Coordination Act section 11M</i>	
A retailer or distributor must, on receipt of a written complaint by a customer, acknowledge the complaint within 10 business days and respond to the complaint within 20 business days.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Complaint process.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
The process covers response requirements. There have been no complaints in audit period to test process. There have been no complaints received about complaint process.	
Issues	
None	
Recommendations	
None	

Item 256 Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.2	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading	
<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.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee’s supervisory and operational staff.
Documents: Customer service charter. Customer Code. Complaint process.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The complaint process defines a complaint as involving dissatisfaction as required by the guidelines and by exception a query is an enquiry not involving dissatisfaction. As required the complaint process complies with ISO 10002.

Issues

None

Recommendations

None

Item 257	Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.3	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M

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.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee’s supervisory and operational staff.
Documents: Customer service charter. Customer Code. Complaint process.

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	v
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There have been no requests for information on complaints handling.

Issues

None

Recommendations

None

Item 258	Trading Licence clause 2.1 and Schedule 2 Compendium clause 12.4	Adequacy of controls rating Not Performed	Compliance rating Not Rated
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Licence: Trading

Energy Coordination Act section 11M

A retailer, distributor or marketer who receives a complaint that does not relate to its functions, must refer the complaint to the appropriate entity and inform the customer of the referral.

Observations

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee’s supervisory and operational staff.



Performance Audit Report GTL: 11

Documents: Customer service charter. Customer Code.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no complaints not relating to the Licensees function. The distributor and trader are related and have common staff so reference to one is to the other.									
Issues									
None									
Recommendations									
None									
Item 281 Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.1									
				Adequacy of controls rating A			Compliance rating 1		
Licence: Trading									
<i>Energy Coordination Act section 11M</i>									
A retailer and a distributor must prepare a report in respect of each reporting year setting out the information specified by the Authority.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The required reports were prepared.									
Issues									
None									
Recommendations									
None									
Item 282 Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.2									
				Adequacy of controls rating A			Compliance rating 1		
Licence: Trading									
<i>Energy Coordination Act section 11M</i>									
A report referred to in clause 13.1 must be provided to the Authority by the date, and in the manner and form, specified by the Authority.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The performance reports submitted in form required. The 2014 & 2015 reports were submitted on time.									
Issues									



None.

Recommendations

None

Item 283 Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.3	Adequacy of controls rating B	Compliance rating 2
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Licence: Trading

Energy Coordination Act section 11M

A report referred to in clause 13.1 must be published by the date specified by the Authority.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code.

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Published is defined in 13.3(2). Copies were available at the licensee's office by the due dates and therefore comply with that leg of the requirement. The reports were both published on the web site. The 2015 report was published on time. It has not been possible to verify the time the 2014 report was published on the web site. It was on a different server and there is now new web site and the report for 2015 overwrote the 2014 report so it is not possible to verify when the 2014 report was published. The controls could be improved to keep archival posting dates for these regulatory requirements. As compliance could not be verified it is non-complying.

Issues

Must retain the dates regulatory reports are posted.

Recommendations

Improve compliance manual of regulatory requirements. Widen scope and add extra controls.

3.14.5 Items from 2013 manual

Item 248 Trading Licence clause 2.1 and Schedule 2 Compendium clause 10.10(3)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

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.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code. Gas Marketing Code and the Compendium

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The Code and Compendium were available free at the Esperance office.

Issues

None



Recommendations
None

Item 259 Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.1(1)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M
 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.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Gas Marketing Code and the Compendium, performance reports

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The reports are maintained for more than 2 years (not deleted at all).

Issues

None

Recommendations

None

Item 260 Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.1(2)	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M
 For the purposes of clause 13.1(1), a retailer must keep records or other information specified in clause 13.1(2)(a)-(g).

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Gas Marketing Code and the Compendium

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The records were kept. Note (a) & (b) had no data as there had been no marketing. The remaining data is in the annual performance reports.

Issues

None

Recommendations

None

Item 262 Trading Licence clause 2.1 and	Adequacy of	Compliance rating
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Performance Audit Report GTL: 11

Schedule 2 Compendium clause 13.2(a)(i)-(xv)	controls rating A	1
Licence: Trading		
<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).		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance
	<input checked="" type="checkbox"/>	
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Gas Marketing Code and the Compendium		
Process	<input checked="" type="checkbox"/>	Outcome
	<input checked="" type="checkbox"/>	Output
	<input checked="" type="checkbox"/>	Reporting
	<input checked="" type="checkbox"/>	Compliance
	<input checked="" type="checkbox"/>	
The records were kept. The data is in the annual performance reports.		
Issues		
None		
Recommendations		
None		
Item 263	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.2(a)(i)-(xv)	Adequacy of controls rating A
		Compliance rating 1
Licence: Trading		
<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).		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance
	<input checked="" type="checkbox"/>	
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Gas Marketing Code and the Compendium, , performance reports		
Process	<input checked="" type="checkbox"/>	Outcome
	<input checked="" type="checkbox"/>	Output
	<input checked="" type="checkbox"/>	Reporting
	<input checked="" type="checkbox"/>	Compliance
	<input checked="" type="checkbox"/>	
The records were kept. The data is in the annual performance reports.		
Issues		
None		
Recommendations		
None		
Item 264	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.2(c)	Adequacy of controls rating A
		Compliance rating 1
Licence: Trading		
<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).			
Observations			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Gas Marketing Code and the Compendium			
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
The records were kept. (The set is null as no shortened billing cycles were used.)			
Issues			
None			
Recommendations			
None			
Item 265	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.3(1)	Adequacy of controls rating A	Compliance rating 1
Licence: <i>Trading</i>			
<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).			
Observations			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Gas Marketing Code and the Compendium, performance reports			
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
The records were kept. (The set is null as no complaints were received.) The data is in the annual performance reports.			
Issues			
None			
Recommendations			
None			
Item 266	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.3(2)	Adequacy of controls rating Not Performed	Compliance rating Not Rated
Licence: <i>Trading</i>			
<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).			
Observations			
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Gas Marketing Code and the			



Compendium									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There are no records to keep as there was no complaints.									
Issues									
None									
Recommendations									
None									
Item 267 Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.5				Adequacy of controls rating Not Performed			Compliance rating Not Rated		
Licence: Trading									
<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).									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Gas Marketing Code and the Compendium									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The Licensee does not have a call centre or the call centre equipment to gather such statistics.									
Issues									
None									
Recommendations									
None									
Item 268 Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.6				Adequacy of controls rating A			Compliance rating 1		
Licence: Trading									
<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									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Gas Marketing Code and the Compendium, performance reports									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The records were kept. The data is in the annual performance reports.									
Issues									



None

Recommendations

None

Item 275	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.15	Adequacy of controls rating A	Compliance rating 1
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Licence: Trading

Energy Coordination Act section 11M

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).

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code. Gas Marketing Code and the Compendium

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The reports were prepared.

Issues

None

Recommendations

None

Item 277	Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.17(1)	Adequacy of controls rating B	Compliance rating 2
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Licence: Trading

Energy Coordination Act section 11M

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.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code. Gas Marketing Code and the Compendium, web site

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Published is defined in 13.17(2). Copies were available at the licensee's office by the due dates and therefore comply with that leg of the requirement. The reports were both published on the web site. The 2015 report was published on time. It has not been possible to verify the time the 2014 report was published on the web site. It was on a different server and there is now new web site and the report for 2015 overwrote the 2014 report so it is not possible to verify when the 2014 report was published. The controls could be improved to keep archival posting dates for these regulatory requirements. As compliance could not be verified it is non-complying.

Issues

Must retain the dates regulatory reports are posted.



Recommendations
Improve compliance manual of regulatory requirements. Widen scope and add extra controls.

Item 278 Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.17(1)	Adequacy of controls rating B	Compliance rating 2
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Licence: Trading

Energy Coordination Act section 11M

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.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Gas Marketing Code and the Compendium

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Published is defined in 13.17(2). Copies were available at the licensee's office by the due dates and therefore comply with that leg of the requirement. The reports were both published on the web site. The 2015 report was published on time. It has not been possible to verify the time the 2014 report was published on the web site. It was on a different server and there is now new web site and the report for 2015 overwrote the 2014 report so it is not possible to verify when the 2014 report was published. The controls could be improved to keep archival posting dates for these regulatory requirements. As compliance could not be verified it is non-complying.

Issues

Must retain the dates regulatory reports are posted

Recommendations

Improve compliance manual of regulatory requirements. Widen scope and add extra controls

Item 279 Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.17(3)	Adequacy of controls rating B	Compliance rating 2
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Licence: Trading

Energy Coordination Act section 11M

A copy of each report must be given to the Minister and the Authority not less than 7 days before it is published.

Observations

Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff. Documents: Customer service charter. Customer Code. Gas Marketing Code and the Compendium

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
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The reports were prepared and 2014 delivered on time. The 2015 report was submitted 5 days before being published on the web site.

Issues

This requirement is no longer a requirement being subsumed by the reporting dates specified



by the Authority. As it is no longer required, no corrective action is necessary.

Recommendations

None

Item 280- Trading Licence clause 2.1 and Schedule 2 Compendium clause 13.18	Adequacy of controls rating A	Compliance rating 1
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Licence: *Trading*

Energy Coordination Act section 11M

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.

Observations

Documents Compliance

Evidence: interviewed Lawrence Teo, all of licensee's supervisory and operational staff.
Documents: Customer service charter. Customer Code. Gas Marketing Code and the Compendium

Process Outcome Output Reporting Compliance

The reports were prepared and provided on time.

Issues

None

Recommendations

None