





CleanTech Energy

FINAL REPORT
2017 Performance Audit
CleanTech Energy Pty Ltd
Retail Licence ERL24

Audit Report	Authorisation	Name	Position	Date
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1. CleanTech Energy Pty Ltd Performance Audit November 2017

Glossary of Terms

Contestable Customer – customer consuming more than 50 megawatt hours of electricity a year

CTE – CleanTech Energy Pty Ltd

CTR – Customer Transfer Request

ERA – Economic Regulation Authority

ERL24 – Electricity Retail License 24

ESA – Electricity Supply Agreement

ETAC – Electricity Transfer Access Contract

GES - Geographe Environmental Services Pty Ltd

IMO – Independent Market Operator

NMI – National Metering Identifier

REC – Renewable Energy Credit

RRN – Retailer Reference Number

RFP – Request for Proposal

Small Use Customer – customers with consumption of 160MWh or less per annum

WEM – Wholesale Electricity Market

WPC – Western Power Corporation

WPN – Western Power Networks

This report is prepared by representatives of Geographe Environmental Services Pty Ltd in relation to the above named client's conformance to the nominated audit standard(s). Audits are undertaken using a sampling process and the report and its recommendations are reflective only of activities and records sighted during this audit process. Geographe Environmental Services Pty Ltd shall not be liable for loss or damage caused to or actions taken by third parties as a consequence of reliance on the information contained within this report or its accompanying documentation.

1. EXECUTIVE SUMMARY

CleanTech Energy Pty Ltd is a electricity retailer which sells renewable electricity to customers in Western Australia.

CleanTech Energy Pty Ltd (CleanTech Energy) was founded in 2015 with the goal of:

- advancing the adoption of renewable energy sources in Western Australia,
- providing tailored electricity solutions to large energy users within the SWIS,
- encouraging competition for electricity retailers within the SWIS, and
- minimising the cost of electricity for consumers within the SWIS.

CleanTech Energy has an Electricity Retail Licence (ERL24) issued by the Economic Regulation Authority (ERA) under sections 7 and 15(2) of the *Electricity Industry Act 2004*.

Section 13 of the *Electricity Industry Act 2004* requires as a condition of every licence that the licensee must, not less than once in every period of 24 months (or any longer period that the Authority allows) calculated from the grant of the licence, provide the Authority with a Performance Audit conducted by an independent expert acceptable to the Authority. The Performance Audit has been conducted in order to assess the licensee's level of compliance with the conditions of its licence.

The Authority approved the appointment of Geographe Environmental Services Pty Ltd on the 7th July 2017 (ERA Reference D175859), and subsequently required the development of an audit plan for ERA approval. An audit plan was prepared for the Retail Licence and approval of the audit plan was provided on the 30/10/2017 (ERA Reference D180514).

The Audit has been executed as planned in accordance with the process flowchart for performance/operational audits as detailed in the 2014 Audit Guidelines - Electricity and Gas Licences.

The period for the audit is, 18th August 2015 to 31st August 2017 and the submission of this report as determined with the Authority is evidence of compliance.

AUDIT CONCLUSION

The Performance Audit has been conducted in order to assess the effectiveness of the measures taken by CleanTech Energy Pty Ltd to meet the conditions of its Retail Licence ERL24 and the legislative obligations applicable to its licence. Through the execution of the Audit Plan and assessment and testing of the control environment, the information system, control procedures and compliance attitude, the audit team members have gained reasonable assurance that CleanTech Energy Pty Ltd (CTE Pty Ltd) has complied with its Retail Licence as it applies to its operations and activities during the audit

period, with the exception of non-compliances in relation to late payment of fees and submission of compliance reports. The control environment operated by the licensee is well established, and internal corporate requirements which effectively filter through to the organisations operations. Additionally, areas of improvement that have been raised within the report relate to the systematic storage of required documentation and increased control surrounding verbal contact from customers and the network operator. These issues are further highlighted in table 5 and section 2.4 of the report. This audit report is an accurate representation of the audit teams findings and opinions.

2. PERFORMANCE AUDIT

2.1 Performance Audit Scope

This is the first audit of CTE Pty Ltd compliance with obligations relating to Retail Licence ERL24. As such, the scope of the audit for the period 18th August 2015 to 31st August 2017 is to:

- **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 reporting** – the completeness and accuracy of the compliance and performance reports provided to the Authority; and
- **compliance with any individual licence conditions** – the requirements imposed on the specific licensee by the Authority or specific issues that are advised by the Authority.

There were no performance standards defined within the Retail Licence the Authority's Electricity Compliance Reporting Manual (July 2017).

The following people were interviewed during the Performance Audit;

- Director Commercial Legal
- Commercial Analyst

2.2 Performance Audit Objective

The objective of the performance audit was detailed within the Audit Plan, as required by the Audit Guidelines (refer section 9.2.1). As this is the first audit for the licensee, a review of the actions taken to address the issues and recommendations identified during the audit period was undertaken (i.e. Compliance Reports submitted during the audit period).

The Audit was conducted in three phases as defined by the Audit Guidelines. The phases and the appropriate audit guide/tool are detailed in Table 1 below;

Table 1: Performance Audit Methodology and Allocated Hours

Phase	Auditor	Hours	Relevant Auditing Standard
1. Risk & Materiality Assessment Outcome - Operational/ Performance Audit Plan	Nicole Davies	10	ASAE 3000*: Assurance Engagements Other than Audits or Reviews of Historical Financial Information ASAE 3100*: Compliance Engagements ASA 315*: Identifying and Assessing the Risks of Material Misstatement through Understanding the Entity and Its Environment AS/NZS ISO 31000:2009 Risk Management Principles & Guidelines
2. System Analysis	Nicole Davies	8	AS 3806-2006: Compliance Programs & AS ISO 19600 – 2014 Compliance management systems - Guidelines
3. Fieldwork & Report Preparation Assessment and testing of; <ul style="list-style-type: none"> ▪ The control environment ▪ Information system ▪ Compliance procedures ▪ Compliance attitude 	Nicole Davies	20	ASA 500*: Audit Evidence ASA 530*: Audit Sampling

* Note all Auditing & Assurance Standards sourced from <http://www.auasb.gov.au/>

2.3 Performance Audit Methodology

A risk assessment, assessment of control environment and allocation of audit priority was undertaken in accordance with the 2014 Audit Guidelines - Electricity and Gas Licences on each element relating to Retail licensee's of the Electricity Compliance Reporting Manual (July 2017) issued by the Authority. This approach mandated by the Economic Regulation Authority provides an effective assessment of compliance due to each licence condition being incorporated into document.

The Electricity Compliance Reporting Manual (July 2017) as published on the ERA website specifically classifies each licence condition according to the consequences of non compliance. As a holder of a Retail Licence, CleanTech Energy Pty Ltd results in mainly Minor and Moderate Ratings for non-compliance. The Type 1 obligations are not applicable to CleanTech Energy Pty Ltd as they do not have any small use customers. Additionally, there a number of Type 2 and NR obligations that also do not apply as detailed in the Audit Plan.

In accordance with the Audit Guidelines (April 2014, section 9.4.3), CleanTech Energy Pty Ltd compliance criteria have been assessed for audit priority by the Auditors and agreed by the Authority.

In order to focus the audit effort and identify areas for testing and analysis a preliminary assessment of the risk and materiality of non-compliance with the Retail Licence was undertaken in accordance with the requirements of AS/NZS 31000 Risk Management Section 5.3 and Appendix 1 of the Audit Guidelines. This assessment rating was reviewed during the audit process subject to the verification of control environment.

2.4 Performance Audit Finding & Recommendations

2.4.1 Performance Audit Compliance Summary

The Audit findings are detailed in Table 3 below, which interprets the findings of Appendix 1 against the Retail Licence clauses. The requirements that were determined to be not applicable in the audit plan have been omitted from this report.

A comprehensive report of the audit findings as applicable to the EGL24 is included in Appendix 1.

TABLE: 2 Audit Compliant and Controls Rating Scales

Performance Audit Compliance & 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 needed	3	Non-Compliant – moderate impact on customers or third parties
D	No controls evident	4	Non-Compliant – major impact on customers or third parties
NP	Not Performed	NR	Not rated – Determined Not Applicable during the audit period

Table 3: Compliance Summary Table

Compliance Obligation Reference No.	Licence Reference	Audit Priority	Adequacy of Controls Rating					Compliance Rating				
			A	B	C	D	NP	1	2	3	4	NR
			SECTION 8: TYPE 1 REPORTING REQUIREMENTS									
REF 234-236 & 257 TYPE 1 REPORTING REQUIREMENTS ALL NOT APPLICABLE AS CLEANTECH ENERGY PTY LTD DOES NOT HAVE ANY SMALL USE CUSTOMERS												
SECTION 9: ELECTRICITY INDUSTRY CUSTOMER TRANSFER CODE – LICENCE CONDITIONS AND OBLIGATIONS												
6	Electricity Industry Customer Transfer Code clause 3.2(2)	5	A					1				
7	Electricity Industry Customer Transfer Code clause 3.4(1)	5	A					1				
8	Electricity Industry Customer Transfer Code clause 3.5(3)	4	A									NR
9	Electricity Industry Customer Transfer Code clause 3.6(2)	4	A									NR
16	Electricity Industry Customer Transfer Code clause 3.9(1)	4	A					1				
17	Electricity Industry Customer Transfer Code clause 3.9(2)	4	A									NR
18	Electricity Industry Customer Transfer Code clause 3.9(3)	4	A					1				
19	Electricity Industry Customer Transfer Code clause 3.9(4)	4		B				1				
23	Electricity Industry Customer Transfer Code clause 4.2(2)	5	A					1				
24	Electricity Industry Customer Transfer Code clause 4.3	5	A					1				
25	Electricity Industry Customer Transfer Code clause 4.4(1)	5	A					1				
26	Electricity Industry Customer Transfer Code clause 4.4(2)	5	A									NR

Compliance Obligation Reference No.	Licence Reference	Audit Priority	Adequacy of Controls Rating					Compliance Rating				
			A	B	C	D	NP	1	2	3	4	NR
			27	Electricity Industry Customer Transfer Code clause 4.5(1)	5	A					1	
28	Electricity Industry Customer Transfer Code clause 4.6(3)	4	A									NR
29	Electricity Industry Customer Transfer Code clause 4.7	5	A					1				
30	Electricity Industry Customer Transfer Code clause 4.8(2)	4	A									NR
34	Electricity Industry Customer Transfer Code clause 4.9(6)	4	A									NR
39	Electricity Industry Customer Transfer Code clause 4.11(3)	4	A									NR
40	Electricity Industry Customer Transfer Code clause 4.12(3)	5	A					1				
43	Electricity Industry Customer Transfer Code clause 4.15	5	A									NR
44	Electricity Industry Customer Transfer Code clause 4.16	4		B				1				
45	Electricity Industry Customer Transfer Code clause 4.17	4	A									NR
48	Electricity Industry Customer Transfer Code clause 5.2	4	A					1				
48A	Electricity Industry Customer Transfer Code clause 6.1	4	A					1				
49	Electricity Industry Customer Transfer Code clause 6.2	5	A					1				
52	Electricity Industry Customer Transfer Code clause 6.4(1)	4	A									NR

Compliance Obligation Reference No.	Licence Reference	Audit Priority	Adequacy of Controls Rating					Compliance Rating				
			A	B	C	D	NP	1	2	3	4	NR
			53	Electricity Industry Customer Transfer Code clause 6.4(2)	4	A						
54	Electricity Industry Customer Transfer Code clause 6.6	4	A					1				
55	Electricity Industry Customer Transfer Code clause 7.1(1)	4	A									NR
56	Electricity Industry Customer Transfer Code clause 7.1(2)	4	A									NR
57	Electricity Industry Customer Transfer Code clause 7.1(3)	4	A									NR
58	Electricity Industry Customer Transfer Code clause 7.2(4)	5	A									NR
59	Electricity Industry Customer Transfer Code clause 7.3(2)	5	A									NR
68*	Electricity Industry Customer Transfer Code Annex 6 clause A6.2(a)	5	A					1				
69*	Electricity Industry Customer Transfer Code Annex 6 clause A6.2(b)	5	A					1				
70*	Electricity Industry Customer Transfer Code Annex 6 clause A6.6	5	A					1				
71*	Electricity Industry Customer Transfer Code Annex 6 clause A6.7	5	A					1				

*Note: Applicable from 18 August 2015 to 31 October 2016. Obligation then removed from Electricity Compliance Reporting Manual due to the removal of Annex 6.

SECTION 11 : ELECTRICITY INDUSTRY (CUSTOMER CONTRACTS) REGULATIONS - LICENCE CONDITIONS AND OBLIGATIONS

REF 78-100 ALL NOT APPLICABLE AS CLEANTECH ENERGY PTY LTD DOES NOT HAVE ANY SMALL USE CUSTOMERS

SECTION 12: ELECTRICITY INDUSTRY ACT - LICENCE CONDITIONS AND OBLIGATIONS

Compliance Obligation Reference No.	Licence Reference	Audit Priority	Adequacy of Controls Rating					Compliance Rating				
			A	B	C	D	NP	1	2	3	4	NR
			101	Electricity Industry Act section 13(1)	4	A						
105	Electricity Industry Act section 17(1)	4		B					2			
106	Electricity Industry Act section 31(3)	4					NP					NR
113	Electricity Industry Act section 115(2)	4	A					1				
SECTION 13: ELECTRICITY LICENCES - LICENCE CONDITIONS AND OBLIGATIONS												
REF 114-118 ALL NOT APPLICABLE AS CLEANTECH ENERGY PTY LTD DOES NOT HAVE ANY SMALL USE CUSTOMERS												
119	Electricity Industry Act section 11 Retail Licence condition 12.1	4		B					2			
121	Electricity Industry Act section 11 Retail Licence condition 14.2	4	A					1				
123	Electricity Industry Act section 11 Retail Licence condition 15.1	4	A									NR
124	Electricity Industry Act section 11 Retail Licence condition 16.1	2		B					2			
125	Electricity Industry Act section 11 Retail Licence condition 17.1 & 17.2	4	A									NR
126	Electricity Industry Act section 11 Retail Licence condition 18.1	4	A					1				
SECTION 14: CODE OF CONDUCT – LICENCE CONDITIONS AND OBLIGATIONS												
THIS SECTION IS ALL NOT APPLICABLE AS CLEANTECH ENERGY PTY LTD DOES NOT HAVE ANY SMALL USE CUSTOMERS												

Compliance Obligation Reference No.	Licence Reference	Audit Priority	Adequacy of Controls Rating					Compliance Rating				
			A	B	C	D	NP	1	2	3	4	NR
			SECTION 15: ELECTRICITY INDUSTRY METERING CODE - LICENCE CONDITIONS AND OBLIGATIONS									
324	Electricity Industry Metering Code clause 3.3B	4	A						1			
339	Electricity Industry Metering Code clause 3.11(3)	4		B								NR
354	Electricity Industry Metering Code clause 3.18(1)	NA	NOT APPLICABLE - ONLY APPLICABLE TO SYNERGY AS THE ELECTRICITY RETAIL CORPORATION									
364	Electricity Industry Metering Code clause 3.27	4					NP					NR
371	Electricity Industry Metering Code clause 4.4(1)	5	A									NR
372	Electricity Industry Metering Code clause 4.5(1)	5	A									NR
373	Electricity Industry Metering Code clause 4.5(2)	4		B					1			
388	Electricity Industry Metering Code clause 5.4(2)	5	A									NR
401	Electricity Industry Metering Code clause 5.16	4						NP				NR
402	Electricity Industry Metering Code clause 5.17(1)	4	A									NR
405	Electricity Industry Metering Code clause 5.18	4	A									NR
406	Electricity Industry Metering Code clause 5.19(1)	5	A									NR
407	Electricity Industry Metering Code clause 5.19(2)	5	A						1			
408	Electricity Industry Metering Code clause 5.19(3)	4		B								NR

Compliance Obligation Reference No.	Licence Reference	Audit Priority	Adequacy of Controls Rating					Compliance Rating				
			A	B	C	D	NP	1	2	3	4	NR
			410	Electricity Industry Metering Code clause 5.19(6)	5	A						
416	Electricity Industry Metering Code clause 5.21(5)	4	A									NR
417	Electricity Industry Metering Code clause 5.21(6)	4	A									NR
435	Electricity Industry Metering Code clause 5.27	4	A									NR
448	Electricity Industry Metering Code clause 6.1(2)	4	A					1				
451	Electricity Industry Metering Code clause 7.2(1)	5	A					1				
453	Electricity Industry Metering Code clause 7.2(4)	4	A									NR
454	Electricity Industry Metering Code clause 7.2(5)	4	A					1				
455	Electricity Industry Metering Code clause 7.5	4	A					1				
456	Electricity Industry Metering Code clause 7.6(1)	4	A									NR
457	Electricity Industry Metering Code clause 8.1(1)	5	A									NR
458	Electricity Industry Metering Code clause 8.1(2)	5	A									NR
459	Electricity Industry Metering Code clause 8.1(3)	5	A									NR
460	Electricity Industry Metering Code clause 8.1(4)	4	A									NR

Compliance Obligation Reference No.	Licence Reference	Audit Priority	Adequacy of Controls Rating					Compliance Rating				
			A	B	C	D	NP	1	2	3	4	NR
			461	Electricity Industry Metering Code clause 8.3(2)	5	A						
SECTION 17: ELECTRICITY LICENCES - LICENSEE SPECIFIC CONDITIONS AND OBLIGATIONS												
THIS SECTION IS NOT APPLICABLE TO CLEANTECH ENERGY PTY LTD AS THERE HAVE BEEN NO SPECIFIC CONDITIONS AND OBLIGATIONS ATTACHED TO THE RETAIL LICENCE												

2.4.2 Previous Audit Findings and Recommendations

This is the first Performance Audit for ERL24 as such there are no previous audit findings

Table 4 : Previous audit non compliances and recommendations

Table of Previous Non-Compliances & Audit Recommendations				
A Resolved before end of previous audit period				
Reference (no./year)	(Compliance rating/ Legislative Obligation/ details of the issue)	Auditors' Recommendation or action taken	Date Resolved	Further action required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable
Not applicable as this is the first Performance Audit.				

2.4.3 Performance Audit Summary of Current Audit Non-Compliances & Recommendations

Table 5 below details the Summary Current Audit Non-Compliances and Recommendations as required by the Authority (Section 11.6 of Audit & Review Guidelines).

Table 5: Current Audit Non-Compliances and Recommendations

TABLE OF CURRENT AUDIT NON COMPLIANCES/RECOMMENDATIONS				
B. RESOLVED DURING CURRENT AUDIT PERIOD				
Reference (no./year)	(Compliance rating/ Legislative Obligation/ details of the issue)	Auditors' Recommendation or action taken	Date Resolved	Further action required (Yes/No/Not Applicable) & Details of further action required including current recommendation reference if applicable
Recommendation 1/2017 Ref 19 44	CONTROLS IMPROVEMENT / B 1 / Electricity Industry Customer Transfer Code clause 3.9(4)/4.16 A retailer must keep a copy of the verifiable consent received from a contestable customer for two years.	Formalise processes surrounding the location of VC storage within the dropbox. Specification of a common location is required to ensure ease of retrieval. Action Taken: Establish processes to ensure VC stored in customer files in dropbox in same form. Representative: Commercial Analyst	Date: 6/07/2017	No Further Action Required
Recommendation 2/2017 Ref 119	NON COMPLIANCE/ B 2/ Retail Licence condition 12.1/ A licensee and any related body corporate must	Ensure Annual Reports specifically refer to compliance with AUASB and are certified accordingly.	Date: 2016-2017 Financial Statement	Further Action Required. Action: Ensure that future Annual Reports prepared by

	<p>maintain accounting records that comply with the Australian Accounting Standards Board Standards or equivalent International Accounting Standards./ Financial Statements prepared in house lacking specific reference to compliance with AUASB. Discussions with management (Accountants by profession) confirm compliance.</p>	<p>The 2015/2016 Financial Statements were prepared internally using AUASB standards. Both Directors are Certified Practicing Accountants.</p> <p>The 2016/2017 Financial Statements were prepared by Eastman & Co, an external financial and tax accountant, using AUASB standards. These accounts followed on directly from the previous financial year's Financial Statements.</p> <p>The tax returns for both 2015/2016 and 2016/2017 were both prepared by Eastman & Co, and reconcile to the Financial Statements.</p>		<p>Accountants specifically reference the AUASB</p>
<p>Recommendation 3/2017</p> <p>Ref 339 373</p>	<p>CONTROLS IMPROVEMENT- B NR</p> <p>Electricity Industry Metering Code 3.11(3)/ 4.5(2)/5.19(3)</p> <p>A Code participant who becomes aware of an outage or malfunction of a metering installation must advise the network operator as soon as practicable. Ensure dispute resolution processes are supported by initial contact in all instances.</p>	<p>Establish business process to ensure the initial contact made by a customer or contact made by CTE Pty Ltd to customer or WPN is better tracked where the contact is made via telephone or verbal in nature. This will assist in ensuring compliance with clause 4.5(2) & 5.19(3) of the Metering Code.</p>	<p>Date: 15/11/2017</p> <p>Action: Create procedure to ensure all relevant events are advised to the network operator as soon as practicable.</p> <p>Procedure sighted. Document Control processes to be applied to all documents.</p>	<p>Further Action Required.</p> <p>Action: Implement document control to procedures developed to ensure correct version utilised or establish storage process within dropbox to ensure currency maintained.</p> <p>Representative: Director Commercial Legal</p>

Recommendation 4/2017 Ref 408	<p>CONTROLS IMPROVEMENT - B NR Electricity Industry Metering Code clause 5.19(3)</p> <p>Subject to subclauses 5.19(3A) and 5.19(6), the user must, within 1 business day after becoming aware of any change in an attribute described in subclause 5.19(2), notify the network operator of the change.</p>	As above and with specific compliance to the 1 business day rule	As Above	As Above
C. UNRESOLVED AT END OF CURRENT AUDIT PERIOD				
Manual Ref/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	
Recommendation 5/2017 Ref 105	NON-COMPLIANCE/ B 2/ Retail Licence condition 4./ Licence Fees due to be paid by 19 August each year/ During the audit period there were two instances where the licence fees have been paid outside the specified timeframe.	Implementation of a compliance task list and employment of additional resources should adequately address this issue. The organisation is small and a standing agenda or similar business tool may be considered to ensure compliance in the future.	Date: 25/10/2017 Action: Existing regulatory compliance schedule updated to have specific dates for when ERA license fee invoices are due to be obtained and paid. Commercial Analyst to find and pay invoice at that time, regardless of other accounts payable processes. Representative: Commercial Analyst	
Recommendation 6/2017 Ref 124	NON-COMPLIANCE/B 2/Retail Licence condition 16.1/ A licensee must provide the ERA, in the manner prescribed, with any information that the ERA requires in connection with its functions under the Electricity Industry Act./Two occasions reported in the Compliance Report 2017 where information requested was submitted late to the ERA.	The 2017 Report was still submitted close to due date monitor to ensure changes address issues with previous non compliance.	Date: 1/11/2017 Action: Bolstered energy market compliance knowledge in the management team by bringing on board new experienced employee. Further Action: Submit annual compliance reports	

			in timely basis next report due by 31 August 2018. Representative: Director Commercial Legal
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2.4.4 Post Audit Implementation Plan

As stipulated in section 11.8 of the Audit & Review Guidelines (April 2014), the Audit Team notes that the Performance Audit Post Implementation Plan does not form part of the Audit Opinion. It is the responsibility of the licensee to ensure actions are undertaken. A post audit implementation will be submitted separately to this audit report by the Licensee if required.

APPENDIX 1

CLEANTECH ENERGY PTY LTD
PERFORMANCE AUDIT
NOVEMBER 2017

REF*	LICENCE CONDITION	RELATED LEGISLATION	LEGISLATIVE/LICENCE REQUIREMENT	AUDIT PRIORITY	AUDITING FINDING <ul style="list-style-type: none"> ▪ RELATED DOCUMENTATION &/OR CONTROL SYSTEMS/AUDIT EVIDENCE → CORRECTIVE ACTION (CA) OPPORTUNITY FOR IMPROVEMENT 	ADEQUACY OF CONTROLS	COMPLIANCE RATING
SECTION 8: TYPE 1 REPORTING REQUIREMENTS							
CLEANTECH ENERGY PTY LTD DOES NOT HAVE ANY RESIDENTIAL CUSTOMERS THEREFORE OBLIGATIONS NOT APPLICABLE							
SECTION 9: ELECTRICITY INDUSTRY CUSTOMER TRANSFER CODE - LICENCE CONDITIONS AND OBLIGATIONS							
6	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 3.2(2)	A retailer must submit a separate data request for each exit point unless otherwise agreed	5	Compliance is inherent in the Web Portal system design. The system only allows separate data requests. <ul style="list-style-type: none"> ▪ Web Portal system ▪ CTE Pty Ltd Personnel interviewed; <ul style="list-style-type: none"> - Commercial Analyst 	A	1

7	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 3.4(1)	<p>Unless otherwise agreed with a <i>network operator</i>, a <i>retailer</i>—</p> <p>(a) must submit a <i>data request</i> to the <i>network operator electronically</i>; and</p> <p>(b) must not submit to a <i>network operator</i> in a <i>business day</i>—</p> <p>(i) more than 20 <i>requests for standing data</i>; and</p> <p>(ii) more than 20 <i>requests for historical consumption data</i>.</p>	5	<p>Generally, the system control is the web portal only allows 20 requests for standing data and 20 requests for historical consumption data. An exception message will come back if greater than 20 requests (or the agreed amount) are made. The Web Portal acts as the only access for data. A review of the activity over the audit period indicates that CTE Pty Ltd would not exceed this quota.</p> <ul style="list-style-type: none"> ▪ Web Portal ▪ CTE Pty Ltd Personnel interviewed; <ul style="list-style-type: none"> - Commercial Analyst - Director Commercial & Legal 	A	1
8	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 3.5(3) -	<p>A retailer must withdraw a request for historical consumption data if the contestable customer's verifiable consent ceases to apply before the network operator provides the historical consumption data.</p>	4	<p>During the audit period the withdrawal of the request for historical consumption did not occur as such assessment of compliance with this required cannot be made.</p> <ul style="list-style-type: none"> ▪ Review Web Portal ▪ CTE Pty Ltd Personnel interviewed; <ul style="list-style-type: none"> - Commercial Analyst 	A	NR
9	Electricity Industry	Electricity Industry	<p>A retailer must pay any reasonable costs incurred by the network operator for work</p>	4	<p>There have been no occurrences of costs incurred during the audit period. As such</p>	A	NR

	(Licence Conditions) Regulations r 5(2)	Customer Transfer Code clause 3.6(2)	performed in relation to a request for historical consumption data that has been subsequently withdrawn.		assessment of compliance with this requirement cannot be made <ul style="list-style-type: none"> ▪ Western Power Portal ▪ CTE Pty Ltd Personnel interviewed; <ul style="list-style-type: none"> - Commercial Analyst 		
16	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 3.9(1)	A retailer may only use data relating to a contestable customer to provide a contestable customer with a quotation for the supply of electricity by the retailer to the contestable customer or to initiate a transfer in relation to the contestable customer.	4	Quotations reviewed during the audit included data only from the relevant Contestable Customer. Records of these requests sighted. All CTR were initiated with relevant customer data. Customer files are maintained electronically. <ul style="list-style-type: none"> ▪ WA Customer Contracts ▪ CTE Pty Ltd Personnel interviewed; <ul style="list-style-type: none"> - Commercial Analyst 	A	1
17	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 3.9(2)	A retailer must not aggregate a contestable customer's historical consumption data with that of other contestable customers for the purposes of internal business development, if requested not to do so by the customer.	4	During the audit period there had been no requests to not aggregate a contestable customer's historical consumption data. Data is aggregated as part of normal business procedures. As such this requirement has not been rated. <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed; <ul style="list-style-type: none"> - Commercial Analyst - Director Commercial & Legal 	A	NR
18	Electricity Industry	Electricity Industry	A retailer must not disclose a contestable customer's data to any other person without	4	The organisation maintains copies of verifiable consent (VC) on the Customer	A	1

	(Licence Conditions) Regulations r 5(2)	Customer Transfer Code clause 3.9(3)	the verifiable consent of the contestable customer, except in the circumstances defined.		Files (electronically). The organisation has established processes for managing the obtaining of VC and these have been implemented from the sample of files reviewed. <ul style="list-style-type: none"> ▪ Customers ▪ CTE Pty Ltd Personnel interviewed; <ul style="list-style-type: none"> - Commercial Analyst 		
19	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 3.9(4)	A retailer must keep a copy of the verifiable consent received from a contestable customer for two years.	4	<p>Copies of verifiable consent are maintained in the customer files and in an electronic form. It is noted that the organisation retains records for greater than the 2 year period, as yet no records have been archived or disposed.</p> <p>In all instances reviewed the obligation of verifiable consent was fulfilled and the relevant paperwork located. However, consistent filing and storage in the dropbox folders would ensure more efficient location and verification of compliance. During the audit one customer VC was not located in the Consent to Access Folder but was located in the regulatory folder and all emails and correspondence provided to the auditor.</p> <ul style="list-style-type: none"> ▪ Dropbox ▪ Customer List & Files ▪ CTE Pty Ltd Personnel interviewed; 	B	1

					<p>- Commercial Analyst</p> <p>RECOMMENDATION 1/2017</p> <p>REF 19 – CONTROLS IMPROVEMENT → To ensure ongoing compliance with the requirement and ensure effective retrieval of the VC documentation processes surrounding the location of VC storage could be better defined i.e storage has been noted in emails, forms. Standardisation of this requirement may improve compliance.</p>		
23	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 4.2(2)	A retailer must submit a separate customer transfer request for each exit point unless otherwise agreed.	5	<p>Web portal only allows for singular submissions, compliance is inherent in system design.</p> <ul style="list-style-type: none"> ▪ Web Portal ▪ CTE Pty Ltd Personnel interviewed <p>- Commercial Analyst</p>	A	1
24	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 4.3	A retailer's reason for a transfer must be specified in the customer transfer request form as either to transfer a contestable customer to the retailer which submitted the customer transfer request or to reverse an erroneous transfer.	5	<p>Sample of transfers sighted on Web Portal. There were no erroneous transfers observed during the audit period under "Transfer Type".</p> <p>System Control as description of transfer is mandatory field i.e. drop down list</p> <ul style="list-style-type: none"> ▪ Web Portal i.e. system controls 	A	1

					<ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed - Commercial Analyst 		
25	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 4.4(1)	A retailer may only submit a customer transfer request if it has an access contract for the network, unless it is to reverse an erroneous transfer.	5	<p>All transfers conducted on Web Portal. Confirmed CTE Pty Ltd has a valid ETAC. Without which the organisation would not be able to submit customer transfer request forms through network operator's web portal.</p> <p>The CTR details are part of the CTR section of the Web Portal. If the access contract is not specified then Metering will not authorise and will contact the WP Account Manager to liaise for resolution.</p> <ul style="list-style-type: none"> ▪ ETAC ▪ Web Portal ▪ WP Liaison ▪ CTE Pty Ltd Personnel interviewed - Commercial Analyst 	A	1
26	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 4.4(2)	A retailer that submits a customer transfer request to reverse an erroneous transfer must ensure the transfer was made in error and, if it is an incoming retailer, confirm the identity of the previous retailer.	5	<p>All transfers conducted on Web Portal. There were no erroneous transfers observed during the audit period under "Transfer Type". Report provided by the Commercial Analyst. As such this requirement cannot be rated.</p> <ul style="list-style-type: none"> ▪ Web Portal i.e. system controls 	A	NR

					<ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed - Commercial Analyst 		
27	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 4.5(1)	A retailer, unless otherwise agreed, must submit a customer transfer request electronically and must not submit more than a prescribed number of customer transfer requests in a business day or with the same nominated transfer date	5	<p>All transfers are undertaken on Web Portal.</p> <p>Generally, the number of customer transfer requests is inherent in the system design. The web portal only allows 20 transfers per day.</p> <p>Relevant CTE Pty Ltd personnel were all aware of limits, however, during the audit period there were no instances where the system limit of 20 per day was required to be exceeded.</p> <ul style="list-style-type: none"> ▪ Web Portal ▪ CTE Pty Ltd Personnel interviewed - Commercial Analyst 	A	1
28	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 4.6(3)	A retailer must withdraw a customer transfer request if the contestable customer's verifiable consent ceases to apply before the transfer occurs.	4	<p>There were no instances where a customer transfer request was withdrawn due to expirations of verifiable consent.</p> <ul style="list-style-type: none"> ▪ Customer Files ▪ Verifiable Consent ▪ CTE Pty Ltd Personnel interviewed - Commercial Analyst 	A	NR
29	Electricity Industry	Electricity Industry	A retailer must nominate a transfer date in a customer transfer request in accordance	5	Compliance is inherent in system design, date of transfer must be nominated to	A	1

	(Licence Conditions) Regulations r 5(2)	Customer Transfer Code clause 4.7	with specified timeframes, except if the customer transfer request is to reverse an erroneous transfer.		successfully submit transfer. Further, the web portal would automatically reject any nominated transfer dates that exceed the specified timeframes. There have been no erroneous transfers during the audit period. CTE Pty Ltd Personnel interviewed were all aware of system requirements. <ul style="list-style-type: none"> ▪ Web Portal ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Commercial Analyst 		
30	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 4.8(2)	A retailer must pay any reasonable costs incurred by a network operator for providing and/or installing a meter if a customer transfer request is withdrawn.	4	During the audit period there were no instances where costs were incurred by the Network Operator as a result of the CTR being withdrawn. As such assessment of compliance with this requirement cannot be made. <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Commercial Analyst 	A	NR
34	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 4.9(6)	A network operator and retailer must agree to a revised nominated transfer date in certain circumstances.	4	Web portal used for communicating revised transfer dates. Discussion with the Commercial Analyst demonstrated knowledge of the requirement to schedule transfers on a business day. There have been no revised transfer dates during the audit period. As such assessment of compliance with this obligation cannot be made. <ul style="list-style-type: none"> ▪ Web Portal 	A	NR

					<ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed - Commercial Analyst 		
39	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 4.11(3)	A network operator and the retailer must take certain action if the contestable customer's meter is not read on the nominated transfer date.	4	<p>Once the CTR is completed with nominated transfer date, meter readings from the network operator are provided in half hour intervals on the nominated transfer date. During the audit period there have been no instances of meter readings not being received on the nominated transfer date.</p> <ul style="list-style-type: none"> ▪ Web Portal ▪ CTE Pty Ltd Personnel interviewed - Commercial Analyst 	A	NR
40	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 4.12(3)	The parties to an access contract must negotiate in good faith any necessary amendments to the access contract arising from certain circumstances.	5	<p>CTE Pty Ltd is currently operating under an ETAC negotiated in July 2015. Amendment to the ETAC has been undertaken. The amendment incorporated the change in address and also notification to WP of the second genset at the Jandakot power plant (Schedule 3), this is outside the scope of the retail licence.</p> <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed - Director Legal & Commercial - Commercial Analyst 	A	1

43	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 4.15	In the case of a transfer to reverse an erroneous transfer, a network operator and all affected retailers (and the independent market operator if applicable) must act in good faith to ensure that the rights and obligations of the affected contestable customer are as they would have been had the erroneous transfer not occurred.	5	During the audit period there were no erroneous transfers. Reviewed web portal for Customers. As such assessment of compliance with this requirement cannot be made. <ul style="list-style-type: none"> ▪ Web Portal ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Commercial Analyst 	A	NR
44	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 4.16	An incoming retailer must retain a copy of a verifiable consent given by a contestable customer in relation to the lodgement of a customer transfer request for two years, except in the case of a customer transfer request to reverse an erroneous transfer.	4	The organisation maintains copies of verifiable consent on the customer files in electronic form in dropbox. This cloud based system is backed up and accessible for all employees. No documents have been destroyed since commencement. <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Commercial Analyst <p>REFER TO RECOMMENDATION 1/2017 & CONTROLS IMPROVEMENT REF 19</p>	B	1
45	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 4.17	A previous retailer must not bill a contestable customer for charges incurred after the transfer time, except in the case of an erroneous transfer.	4	Confirmed through discussion with the Commercial Analyst that billing procedures do not allow the billing of a customer once they transfer to another retailer, primarily because the data is unavailable and customer base is small therefore the licensee has good knowledge regarding billing status. There	A	NR

					<p>were no erroneous transfers during the audit period. As such, assessment of compliance cannot be made.</p> <p>In addition, Web Portal System Control. WP will not send data to CTE Pty Ltd after the transfer date.</p> <ul style="list-style-type: none"> ▪ Customer bills ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Commercial Analyst 		
48	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 5.2	A network's communication rules apply in respect of data and information communication between the network operator and a retailer under this Code.	4	<p>All transfers and data transactions are undertaken electronically through the web Portal and/or via email communication between Western Power Account Manager and CTE Pty Ltd Personnel. No issues were identified.</p> <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Commercial Analyst 	A	1
48A	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Electricity Industry Customer Transfer Code clause 6.1	All notices must be in writing and delivered as described in subclauses 6.1(a)-(c).	4	<p>Communication processes are established between Western Power and CTE Pty Ltd. No issues were identified. The licensee can receive and deliver notices in email, post and fax. Majority of notices are via electronic communication.</p> <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Commercial Analyst 	A	1

49	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 6.2	A licensee's notice in relation to a data request or customer transfer request must identify the exit point to which it relates.	5	Compliance is inherent in system design, specification of the NMI is a mandatory field. <ul style="list-style-type: none"> ▪ Web Portal ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Commercial Analyst 	A	1
52	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 6.4(1)	A retailer must notify its contact details to a network operator within three business days of a request	4	Evidence of communication processes throughout the audit period. There has been no specific request for contact details. Assessment of compliance with this requirement could not be made. <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Director Commercial & Legal 	A	NR
53	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 6.4(2)	A retailer must notify any change in its contact details to a network operator at least three business days before the change takes effect.	4	There have been no changes to contact details during the audit period. <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Director Commercial & Legal 	A	NR
54	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 6.6	A network operator or a retailer must send required electronic communications to the applicable electronic communication address, in accordance with Annex 6.	4	Web Portal design parameters ensure compliance with this requirement. <ul style="list-style-type: none"> ▪ Web Portal ▪ CTE Pty Ltd Personnel interviewed 	A	1

					- Commercial Analyst		
55	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 7.1(1)	For a dispute in respect of a matter under or in connection with the Electricity Industry Customer Transfer Code, any disputing party must meet within five business days of a request from another disputing party and attempt to resolve the dispute by negotiations in good faith.	4	There have been no disputes in respect to a matter under or in connection with this requirement during the audit period. As such assessment of compliance with respect to meeting within 5 business days cannot be made. <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Commercial Analyst - Director Legal & Commercial 	A	NR
56	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 7.1(2)	If the negotiations in 7.1(1) of the Electricity Industry Customer Transfer Code do not resolve the dispute within 10 days after the first meeting, the dispute must be referred to the senior executive officer of each disputing party who must attempt to resolve the dispute by negotiations in good faith	4	There have been no disputes during the audit period that have been elevated for management in accordance with this requirement. As such assessment of compliance with the Dispute Resolution requirement cannot be made. <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Commercial Analyst - Director Legal & Commercial 	A	NR
57	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 7.1(3)	If the dispute is resolved, the disputing parties must prepare a written and signed record of the resolution and adhere to the resolution.	4	There have been no disputes during the audit period that have been elevated for management in accordance with this requirement. As such assessment of compliance with the Dispute Resolution requirement cannot be made. <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed 	A	NR

					<ul style="list-style-type: none"> - Commercial Analyst - Director Legal & Commercial 		
58	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 7.2(4)	A disputing party that refers a dispute to the Authority must give notice to the Authority of the nature of the dispute, including specified details	5	<p>There have been no disputes during the audit period that have been elevated for management in accordance with this requirement. As such assessment of compliance with the Dispute Resolution requirement cannot be made.</p> <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Commercial Analyst - Director Legal & Commercial 	A	NR
59	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code clause 7.3(2)	A disputing party must at all times conduct itself in a manner which is directed towards achieving the objectives in clause 7.3(1) of the Electricity Industry Customer Transfer Code	5	<p>There have been no disputes during the audit period that have been elevated for management in accordance with this requirement. As such assessment of compliance with the Dispute Resolution requirement cannot be made.</p> <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Commercial Analyst - Director Legal & Commercial 	A	NR
68	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code Annex 6 clause A6.2(a)	A network operator and a retailer must use reasonable endeavours to ensure that its information system on which electronic communications are made is operational 24 hours a day and 7 days a week.	5	The organisation has implemented computer systems are backed up and available. There were no instances during the audit period where the CTE Pty Ltd systems were unavailable for any time.	A	1

					<ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Commercial Analyst - Director Legal & Commercial 		
69*	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code Annex 6 clause A6.2(b)	A network operator and a retailer must establish a mechanism to generate an automated response message for each electronic communication (other than an automated response message) received at the electronic communication address.	5	<p>Correspondence between WP and CTE Pty Ltd is maintained in the Web Portal. Historical messages can be seen through the “view messages” function. Correspondence is tagged as either pending, completed or rejected, i.e. market transaction list</p> <p>In addition, the web portal enables the issue of email alerts to confirm transactions. Further correspondence is maintained in dropbox files.</p> <p>The 2004 version of the Customer Transfer Code Annex 6 A6.1 - Electronic Communications Protocol referred to email communication having automated response requirement. The revised (September 2016) Code deleted this requirement. As such this condition was only applicable until 20 September 2016. No recommendation is made as the obligation ceases to apply.</p> <ul style="list-style-type: none"> ▪ Web Portal ▪ Dropbox ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Commercial Analyst 	A	2

70*	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code Annex 6 clause A6.6	The originator of an electronic communication must identify itself in the communication.	5	<p>The web portal has an automated process to ensure this is undertaken. A review of automated response messages confirmed that the electronic communication identified the originator (i.e. dependent on CTE Pty Ltd user, as each has own login profile) and templates are used to submit requests through the web portal.</p> <p>Standard email signatures and letter templates used for communication.</p> <ul style="list-style-type: none"> ▪ Web Portal ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Commercial Analyst 	A	1
71*	Electricity Industry (Licence Conditions) Regulations r 5(2)	Electricity Industry Customer Transfer Code Annex 6 clause A6.7	The originator of an electronic communication must use reasonable endeavours to adopt a consistent data format for information over time, to facilitate any automated processing of the information by the addressee.	5	<p>The Web Portal is used as a primary means of communication between WP and CTE Pty Ltd. The system application allows automatic transfer of data.</p> <ul style="list-style-type: none"> ▪ Web Portal ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Commercial Analyst 	A	1

*Note: Applicable from 18 August 2015 to 31 October 2016. Obligation then removed from Electricity Compliance Reporting Manual due to the removal of Annex 6.

Section 11: Electricity Industry (Customer Contracts) Regulations – Licence Conditions and Obligations

REF 78-100 ALL NOT APPLICABLE AS CLEANTECH ENERGY PTY LTD DOES NOT HAVE ANY SMALL USE CUSTOMERS

SECTION 12: ELECTRICITY INDUSTRY ACT - LICENCE CONDITIONS AND OBLIGATIONS

101	Retail Licence condition 14.1	Electricity Industry Act section 13(1)	A licensee must, not less than once every 24 months, provide the Authority with a performance audit conducted by an independent expert acceptable to the Authority.	4	<p>The requirement for the audit is monitored by the Director Commercial & Legal. Additionally it is raised in email communications and correspondence with the Secretariat, as well as being tracked in a Compliance Schedule. This requirement was not rated as there were no completed audits during the period covered by this audit.</p> <ul style="list-style-type: none"> ▪ Compliance Task List (Excel Spreadsheet) ▪ ERA correspondence ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Director Commercial & Legal - Commercial Analyst 	A	NR
105	Retail Licence condition 4.1	Electricity Industry Act section 17 (1)	A licensee must pay to the Authority the prescribed licence fee within one month after the day of grant or renewal of the licence and within one month after each anniversary of that day during the term of the licence i.e. 19 September each year	4	<p>Licence fees were paid during the audit period as follows;</p> <ul style="list-style-type: none"> - ERA Invoice ERA100513 (Issued on 28 August 2015) and Paid 6/10/15 - ERA Invoice 100820 (issued on 8 August 2016) and Paid 10/8/16 - ERA Invoice 101230 (issued on 8 August 2017) and Paid 27/9/17 	B	2

					<ul style="list-style-type: none"> ▪ Invoice issued by the Authority ▪ Record of Payment in accounts system ▪ Compliance Task List ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Director Commercial & Legal - Commercial Analyst <p>RECOMMENDATION 5/2017</p> <p>REF 105 – NON-COMPLIANCE → During the audit period there were two instances where the licence fees have been paid outside the specified timeframe. Implementation of a compliance task list and employment of additional resources should adequately address this issue. The organisation is small and a standing agenda or similar business tool may be considered to ensure compliance in the future.</p>		
106	Retail Licence condition 5.1	Electricity Industry Act section 31 (3)	A licensee must take reasonable steps to minimise the extent or duration of any interruption, suspension or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause.	4	In general, the supply of electricity is managed by WPN and is essentially outside the control CTE Pty Ltd. As such assessment of compliance with this requirement cannot be made. <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed 	NP	NR

					- Director Commercial & Legal		
113	Retail Licence condition 5.1	Electricity Industry Act section 115(2)	A licensee that has, or is an associate of a person that has, access to services under an access agreement must not engage in conduct for the purpose of hindering or prohibiting access	4	<p>CTE Pty Ltd has an ETAC and establishes Electricity Supply Agreements (ESAs) with Customers. Requirements within these agreements provide adequate controls preventing the potential to engage in conduct for the purpose of hindering or prohibiting access. There have been no complaints or issues in this regard noted during the audit period.</p> <ul style="list-style-type: none"> ▪ ETAC ▪ ESA ▪ CTE Pty Ltd Personnel interviewed <p>- Director Commercial & Legal</p>	A	1
SECTION 13: ELECTRICITY LICENCES - LICENCE CONDITIONS AND OBLIGATIONS							
119	Retail Licence condition 12.1	Electricity Industry Act section 11	A licensee and any related body corporate must maintain accounting records that comply with the Australian Accounting Standards Board Standards or equivalent International Accounting Standards.	4	The CTE Pty Ltd is not a reporting entity and the financial reports have been prepared by in house expertise with exception of the 2017 report. Discussions with the Director Commercial & Legal confirm that the statements have been prepared in accordance with the AUASB standards. Two Directors of the organisation are Certified Practising Accountants. The 2017 Report followed on from the figures used in the in previous years.	B	2

					<p>Noted 2016-2017 financial statements refer to APES 315: Compilation of Financial Information and APES 110 Code of Ethics for Professional Accountants.</p> <ul style="list-style-type: none"> ▪ Annual Financial Statements 2015, 2016 & 2017 ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Director Commercial & Legal <p>RECOMMENDATION 2/2017</p> <p>119 – NON COMPLIANCE → Ensure Annual Reports specifically refer to compliance with AUASB and are certified accordingly.</p>		
121	Retail Licence condition 14.2	Electricity Industry Act section 11	A licensee must comply, and require its auditor to comply, with the Authority's standard audit guidelines dealing with the performance audit.	4	<p>Direct instructions from Licensee to Auditor to comply with the ERA guidelines.</p> <p>Copies of communications received from ERA relating to audit requirements sent by CTE Pty Ltd through to Auditor to convey requirements specifically the undertaking of audits in compliance with the Audit & Review Guidelines: Electricity, Gas and Water Licences.</p> <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Director Commercial & Legal 	A	1

123	Retail Licence condition 15.1	Electricity Industry Act section 11	A licensee must report to the Authority, in the manner prescribed, if a licensee is under external administration or there is a significant change in the circumstances upon which the licence was granted which may affect a licensee's ability to meet its obligations.	4	<p>During the Audit Period CTE Pty Ltd was not under external administration and had not undergone any significant change in circumstances upon which the licence was granted, which may affect its ability to meet its licence obligations. As such there was no assessment with this requirement to report to the Authority was made.</p> <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Director Commercial & Legal - 	A	NR
124	Retail Licence condition 16.1	Electricity Industry Act section 11	A licensee must provide the Authority, in the manner prescribed, any information the Authority requires in connection with its functions under the Electricity Industry Act.	2	<p>During the Audit Period the Licensee has provided the Authority information it required in connection with its functions under the Electricity Industry Act.</p> <p>Every licensee is required to submit a compliance report to the Authority covering all of its type 1 and type 2 licence obligations for each financial year (1 July to 30 June inclusive) by 31 August immediately following the year that is the subject of the report. During the audit period the reports were submitted;</p> <ul style="list-style-type: none"> - 2016 Report on the 22 September - 2017 Report on the 30 August <ul style="list-style-type: none"> ▪ Compliance Task List 	B	2

					<ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Director Commercial & Legal <p>RECOMMENDATION 5/2017</p> <p>REF 124 – NON-COMPLIANCE → The 2016 Compliance Report was submitted after the specified date and has been noted in the 2017 Compliance Report. Changes improving the resources for the organisation by hiring additional personnel and the implementation of the Compliance Task List have addressed these issues.</p>		
125	Retail Licence condition 17.1 & 17.2	Electricity Industry Act section 11	A licensee must publish any information it is directed by the Authority to publish, within the timeframes specified	4	<p>The Authority has not directed any information to be published during the audit period, as such, assessment of compliance with this requirement cannot be made.</p> <ul style="list-style-type: none"> ▪ Review ERA Website ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Compliance Manager 	A	NR
126	Retail Licence condition 18.1	Electricity Industry Act section 11	Unless otherwise specified, all notices must be in writing.	4	<p>During the audit period notices received from the Authority have been in writing. Specific notices in relations to direction and communication are retained and have been reviewed as part of the audit.</p> <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed 	A	1

					- Director Commercial & Legal		
SECTION 15: ELECTRICITY INDUSTRY METERING CODE - LICENCE CONDITIONS AND OBLIGATIONS							
324	Retail Licence condition 5.1	Electricity Industry Metering Code clause 3.3B	A user who is aware of bi-directional flows at a metering point which was not previously subject to a bi-directional electricity flows or any changes in a customer's or user's circumstances in a metering point which will result in bi-directional electricity flows must notify the network operator within 2 business days.	4	<p>CTE Pty Ltd confirmed it does have customers with bi-directional flows at a metering point. It is understood that customers are required to have a retailer reference number (RRN) prior to the bi-directional flow meter installation. As such, processes have been established and a review of the web portal and billing information was undertaken to verify process. With regards to an existing customer who installs a bi-directional flow meter a miscellaneous service order is completed and a retailer reference number (RRN) provided. A meter reconfiguration service order is then raised, during the audit period there were two service orders for meter reconfiguration noted. The billing process provides and additional check on whether or not a bi-directional flow meter is installed.</p> <ul style="list-style-type: none"> ▪ Web Portal ▪ Billing checks ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Director commercial & Legal - Commercial Analyst 	A	1

339	Retail Licence condition 5.1	Electricity Industry Metering Code clause 3.11(3)	A Code participant who becomes aware of an outage or malfunction of a metering installation must advise the network operator as soon as practicable.	4	<p>WPN has primary responsibility for the management and monitoring of meters. Generally, customer queries or a review of billing data prior to issue will identify these anomalies. There were no outages or malfunctions identified during the audit period.</p> <p>However, the process for a customer query with regard to billing was reviewed during the audit and whilst it was well managed and due to the small size of the organisation well communicated, the initial contact by the customer could be better tracked where the contact is via telephone and not email. Discrepancies in data and as such potential outage or malfunction of meters can be identified through this avenue as customers may query accounts in relation to operational needs.</p> <ul style="list-style-type: none"> ▪ Review of communication with WPN ▪ Customer Accounts ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Director Commercial & Legal - Commercial Analyst <p>RECOMMENDATION 3/2017</p> <p>339 - CONTROLS IMPROVEMENT → Establish business process to ensure the initial contact made by a customer or contact made by CTE Pty Ltd to</p>	B	NR
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					customer or WPN is better tracked where the contact is made via telephone or verbal in nature. This will assist in ensuring compliance with clause 4.5(2) of the Metering Code.		
364	Retail Licence condition 5.1	Electricity Industry Metering Code clause 3.27	A person must not install a metering installation on a network unless the person is the network operator or a registered metering installation provider for the network operator doing the type of work authorised by its registration.	4	CTE Pty Ltd does not undertake the installation of meters. The licensee utilises WPN for meter installations. <ul style="list-style-type: none"> ▪ ETAC ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Director Commercial & Legal 	NP	NR
371	Retail Licence condition 5.1	Electricity Industry Metering Code clause 4.4(1)	If there is a discrepancy between energy data held in a metering installation and data held in the metering database, the affected Code participants and the network operator must liaise together to determine the most appropriate way to resolve a discrepancy.	5	During the audit period there have been no meter discrepancies identified and no corrected data provided. <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Commercial Analyst 	A	NR
372	Retail Licence condition 5.1	Electricity Industry Metering Code clause 4.5(1)	A Code participant must not knowingly permit the registry to be materially inaccurate.	5	This is primarily the responsibility of WPN. However, CTE Pty Ltd may identify errors through internal review systems, customer enquiries, etc. <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Commercial Analyst 	A	NR
373	Retail Licence condition 5.1	Electricity Industry	If a Code participant (other than a network operator) becomes aware of a change to or	4	Regular discussions are held with WP account manager. Any queries into	B	1

		Metering Code clause 4.5(2)	an inaccuracy in an item of standing data in the registry, then it must notify the network operator and provide details of the change or inaccuracy within the timeframes prescribed i.e. 2 business days		<p>discrepancies are followed up in a timely manner.</p> <p>Review of Web Portal confirmed the function to submit queries to WP and monitor their progress (timelines of actioning). As previously detailed establishing procedures around recording initial contact will allow continued compliance with this requirement. One instance where incorrect address was noted was acted upon the same day. Sighted communication.</p> <ul style="list-style-type: none"> ▪ Review of communication with WPN ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Commercial Analyst <p>REFER RECOMMENDATION 3/2017 & CONTROLS IMPROVEMENT REF 339</p>		
388	Retail Licence condition 5.1	Electricity Industry Metering Code clause 5.4(2)	A user must, when reasonably requested by a network operator, use reasonable endeavours to assist the network operator to comply with the network operator's obligation under clause 5.4(1).	5	<p>WPN is responsible for the reading of the meters and they are primarily read remotely. CTE Pty Ltd work with WP in identifying data discrepancies and meter faults. The ESA stipulates this requirement of the customer for access to meters (refer Section 7). Actual reads are flagged by validation codes. These are codes for data are supplied by the Network Operator. Normal billing practice is to only use actual data (i.e Code A). CTE has not been contacted by the Network Operator for assistance during the audit period.</p>	A	NR

					<ul style="list-style-type: none"> ▪ Requests from Network Operator ▪ Remote Reading of Meters ▪ ESA ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Director Commercial & Legal - Commercial Analyst 		
401	Retail Licence condition 5.1	Electricity Industry Metering Code clause 5.16	If a user collects or receives energy data from a metering installation then the user must provide the network operator with the energy data (in accordance with the communication rules) within the timeframes prescribed.	4	Not Applicable to audit scope as Western Power read all meters. CTE Pty Ltd does not collect energy data.	NP	NR
402	Retail Licence condition 5.1	Electricity Industry Metering Code clause 5.17(1)	A user must provide standing data and validated (and where necessary substituted or estimated) energy data to the user's customer, to which that information relates, where the user is required by an enactment or an agreement to do so for billing purposes or for the purpose of providing metering services to the customer.	4	There are no meters to collect information or data from for billing. (Meters are the Network Operators under the Meter Code). CTE Pty Ltd is obligated to supply meter data to the customer on request and at no charge. There have been no requests for either energy data or standing data during the audit period. CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Commercial Analyst 	A	NR
405	Retail Licence condition 5.1	Electricity Industry Metering Code clause 5.18	A user that collects or receives information regarding a change in the energisation status of a metering point must provide the network operator with the prescribed	4	CTE Pty Ltd does not collect or receive information regarding a change in the energisation status of a metering point. Western Power manages the status of metering points. As such assessment of	A	NR

			information, including the stated attributes, within the timeframes prescribed.		compliance with this requirement cannot be made. <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed - Commercial Analyst 		
406	Retail Licence condition 5.1	Electricity Industry Metering Code clause 5.19(1)	A user must, when requested by the network operator acting in accordance with good electricity industry practice, use reasonable endeavours to collect information from customers, if any, that assists the network operator in meeting its obligations described in the Code and elsewhere, and provide that information to the network operator.	5	There have been no requests to collect information. As such assessment of compliance with this requirement cannot be made. <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed - Commercial Analyst 	A	NR
407	Retail Licence condition 5.1	Electricity Industry Metering Code clause 5.19(2)	A user must, to the extent that it is able, collect and maintain a record of the address, site and customer attributes, prescribed in relation to the site of each connection point, with which the user is associated.	5	A review of Web Portal noted that all site and customer attributes are captured via predetermined fields and drop down menus. <ul style="list-style-type: none"> ▪ Web portal ▪ CTE Pty Ltd Personnel interviewed - Commercial Analyst 	A	1
408	Retail Licence condition 5.1	Electricity Industry Metering Code clause 5.19(3)	Subject to subclauses 5.19(3A) and 5.19(6), the user must, within 1 business day after becoming aware of any change in an attribute described in subclause 5.19(2), notify the network operator of the change.	4	There have been no changes to site attributes i.e NMI of each connection point at the site. There has been no advice from users. The licensee uses Western Power's service request form for new customers. CTE Pty Ltd Management confirmed awareness with the 1 business day rule. <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed 	B	NR

					<p>- Commercial Analyst</p> <p>RECOMMENDATION 4/2017</p> <p>REF 408 CONTROLS IMPROVEMENT → Whilst this is NR during the audit period, to ensure ongoing compliance with the requirements the recommendations made in 339 regarding recording initial contact would capture any changes, as currently there would be no other measurable way of determining 1 business day rule has been met unless initial contact is recorded (Refer 339)</p>		
410	Retail Licence condition 5.1	Electricity Industry Metering Code clause 5.19(6)	The user must use reasonable endeavours to ensure that it does not notify the network operator of a change in an attribute described in subclause 5.19(2) that results from the provision of standing data by the network operator to the user.	5	<p>Director Commercial & Legal confirmed that there was no change to customer attribute information during the audit period, including arising from standing data provided by the Network Operator. As such assessment of compliance with this requirement cannot be made.</p> <ul style="list-style-type: none"> ▪ Review web portal ▪ CTE Pty Ltd Personnel interviewed <p>- Commercial Analyst</p>	A	NR
416	Retail Licence condition 5.1	Electricity Industry Metering Code clause 5.21(5)	A Code participant must not request a test or audit unless the Code participant is a user and the test or audit relates to a time or times at which the user was the current user or the Code participant is the IMO.	4	The licensee has not made requests for tests of the metering system during the audit period on behalf of a customer. As such assessment of compliance with this requirement is cannot be made.	A	NR

					<ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed - Commercial Analyst 		
417	Retail Licence condition 5.1	Electricity Industry Metering Code clause 5.21(6)	A Code participant must not make a test or audit request that is inconsistent with any access arrangement or agreement.	4	<p>Confirmed that during the audit period CTE Pty Ltd did not make any requests for audit or tests.. As such, assessment of compliance with regards to inconsistency with the access agreement cannot be made.</p> <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed - Commercial Analyst 	A	NR
435	Retail Licence condition 5.1	Electricity Industry Metering Code clause 5.27	Upon request, a current user must provide the network operator with customer attribute information that it reasonably believes are missing or incorrect within the timeframes prescribed.	4	<p>All compliance is performed via the Web Portal. Any requests received from WP would be actioned via Web Portal in a timely manner.</p> <p>Review of the Web Portal correspondence did not identify any requests for customer attribute information from WP during the audit period. As such assessment of compliance with this requirement cannot be made.</p> <ul style="list-style-type: none"> ▪ Review web portal ▪ CTE Pty Ltd Personnel interviewed - Commercial Analyst 	A	NR
448	Retail Licence condition 5.1	Electricity Industry	A user must, in relation to a network on which it has an access contract, comply with	4	Documentation, systems and external audit reports reviewed during the audit indicated compliance with this	A	1

		Metering Code clause 6.1(2)	the rules, procedures, agreements and criteria prescribed.		<p>requirement. In addition, the licensee uses the Web Portal to make all metering transactions and as such complies with WPN rules, procedures, agreements and criteria prescribed.</p> <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Director Commercial & Legal - Commercial Analyst 		
451	Retail Licence condition 5.1	Electricity Industry Metering Code clause 7.2(1)	Code participants must use reasonable endeavours to ensure that they can send and receive a notice by post, facsimile and electronic communication and must notify the network operator of a telephone number for voice communication in connection with the Code.	5	<p>WP has been notified of all communication details. Evidence of dialogue between the parties has been noted. CTE primarily use email but have verified ability for fax (utilising a 3rd party service to provide electronically) and postal communication which has been supplied to WP.</p> <ul style="list-style-type: none"> ▪ Review web portal ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Director Commercial & Legal - Commercial Analyst 	A	1
453	Retail Licence condition 5.1	Electricity Industry Metering Code clause 7.2(4)	A Code participant must notify its contact details to a network operator with whom it has entered into an access contract within 3 business days after the network operator's request.	4	<p>WPN has made no requests for contact details during the audit period. Change of address notifications were made in accordance with requirements.</p> <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Director Commercial & Legal 	A	NR

					- Commercial Analyst		
454	Retail Licence condition 5.1	Electricity Industry Metering Code clause 7.2(5)	A Code participant must notify any affected network operator of any change to the contact details it notified to the network operator at least 3 business days before the change takes effect.	4	<p>During the audit period the Licensee has changed address. Documentation sighted confirmed notification. Dual addresses were utilised for a period of time and Licensee fully moved by 13th July 2017 (notification occurred 27 February 2017).</p> <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed - Director Commercial & Legal 	A	1
455	Retail Licence condition 5.1	Electricity Industry Metering Code clause 7.5	A Code participant must not disclose, or permit the disclosure of, confidential information provided to it under or in connection with the Code and may only use or reproduce confidential information for the purpose for which it was disclosed or another purpose contemplated by the Code.	4	<p>There have been no instances of non compliance identified in relation to this requirement.</p> <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed - Director Commercial & Legal 	A	1
456	Retail Licence condition 5.1	Electricity Industry Metering Code clause 7.6(1)	A Code participant must disclose or permit the disclosure of confidential information that is required to be disclosed by the Code.	4	<p>There is no information required to be disclosed during the audit period.</p> <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed - Director Commercial & Legal 	A	NR
457	Retail Licence condition 5.1	Electricity Industry Metering Code clause 8.1(1)	Representatives of disputing parties must meet within 5 business days after a notice given by a disputing party to the other disputing parties and attempt to resolve the dispute under or in connection with the	5	<p>There have been no disputes during the audit period. As such assessment of compliance with this requirement cannot be made.</p>	A	NR

			Electricity Industry Metering Code by negotiations in good faith.		<ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Director Commercial & Legal 		
458	Retail Licence condition 5.1	Electricity Industry Metering Code clause 8.1(2)	If a dispute is not resolved within 10 business days after the dispute is referred to representative negotiations, the disputing parties must refer the dispute to a senior management officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.	5	<p>There have been no disputes during the audit period. As such assessment of compliance with this requirement cannot be made.</p> <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Director Commercial & Legal 	A	NR
459	Retail Licence condition 5.1	Electricity Industry Metering Code clause 8.1(3)	If the dispute is not resolved within 10 business days after the dispute is referred to senior management negotiations, the disputing parties must refer the dispute to the senior executive officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.	5	<p>There have been no disputes during the audit period. As such assessment of compliance with this requirement cannot be made.</p> <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Director Commercial & Legal 	A	NR
460	Retail Licence condition 5.1	Electricity Industry Metering Code clause 8.1(4)	If the dispute is resolved by representative negotiations, senior management negotiations or CEO negotiations, the disputing parties must prepare a written and signed record of the resolution and adhere to the resolution.	4	<p>There have been no disputes during the audit period. As such assessment of compliance with this requirement cannot be made.</p> <ul style="list-style-type: none"> ▪ CTE Pty Ltd Personnel interviewed <ul style="list-style-type: none"> - Director Commercial & Legal 	A	NR
461	Retail Licence condition 5.1	Electricity Industry Metering Code clause 8.3(2)	The disputing parties must at all times conduct themselves in a manner which is directed towards achieving the objective of dispute resolution with as little formality and technicality and with as much expedition as the requirements of Part 8 of the Code and	5	<p>There have been no disputes during the audit period. As such assessment of compliance with this requirement cannot be made.</p>	A	NR

			a proper hearing and determination of the dispute, permit.		<ul style="list-style-type: none">▪ CTE Pty Ltd Personnel interviewed<ul style="list-style-type: none">- Director Commercial & Legal		
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