

POST AUDIT IMPLEMENTATION PLAN

Recommendation reference	Non-compliance / Controls improvement	Auditor's recommendation	Action proposed to be taken by the licensee	Responsible person (s)	Target completion date
01/2019	<p>A2</p> <p>(1) A licensee must pay the applicable fees in accordance with the Regulations (Energy Coordination (Licensing Fees) Regulations Clause 4 & 5).</p> <p>Discussions with the Senior Manager Business Services, Risk & Compliance and Senior Risk and Quality Advisor revealed that there are procedures in place to pay applicable fees in accordance with the prescribed timeframe.</p> <p>Review of the ETF Remittance advice for licence fees paid during the audit period revealed that the invoice for the 2017 year from the ERA was dated 18 July 2017. The invoice was required to be paid by 31 July 2017, and was paid two days late.</p> <p>Based on audit procedures performed we deem ATCO not compliant with this licence obligation.</p>	<p>We recommend prioritising the ERA invoice if it arrives late and the payment of the invoice occurs prior to 31 July to ensure compliance with the licence obligation.</p>	<p>ATCO continues to proactively liaise with the ERA to support the timely receipt of the licensing invoice, and endeavours to make the licensing payment prior to 31 July if the invoice arrives late.</p> <p>No further action required.</p>	<p>Senior Manager Business Services, Risk & Compliance</p>	<p>N/A</p>

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02/2019	<p>B2</p> <p>(227) 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.</p> <p>Discussions with the Manager Commercial Operations and Senior Manager Business Services, Risk & Compliance revealed that there are procedures and reporting mechanisms in place to support compliance with this licence obligation.</p> <p>ATCO had 3 self-reported disconnection breaches outside the circumstances specified in clause 7.6 for the audit period. All breaches identified were in the remove regulator or street level disconnections. Internally, no non-compliant disconnections were identified for an Apply Meter Lock ("AML") disconnection outside the prescribed timeframe. During the audit period ATCO put into place an automated preventative control on its PDA devices that are utilised for AML service orders. This will lock the Contractor out from accepting the service order after 2.30pm. For its remove regulator and street level disconnections ATCO utilises a field mobility device. This device does not have an automatic lock out function built in; however, the ATCO planning team have daily monitoring and detective controls in place to prevent a disconnection occurring outside the prescribed timeframe. During the audit period ATCO internally brought forward the timeframe for disconnections for the above service order types to prior to 12pm, previously 2.30pm.</p> <p>Sample based testing of 45 disconnections during the audit period and review of minutes of meetings held with ATCO Contractors did not identify any exceptions where ATCO or its Contractors had arranged for a disconnection outside the specified circumstances in clause 7.6.</p> <p>Based on the above, we determined ATCO to be non-compliant with this obligation.</p>	As implemented on the PDA devices, a lockout function should be explored for implementation on the field mobility devices. Training of staff around the matter must be consistent and rigorous.	<p>In the past 12 months, ATCO has implemented additional control enhancements to minimise the risk of disconnections being performed outside of the permitted timeframes. ATCO has continued to closely monitor its compliance with this obligation and the additional controls have been effective in ensuring ATCO achieves full compliance.</p> <p>ATCO will assess the option of automating the controls as part of the next upgrade of its workforce management system, which is scheduled for completion by early 2022.</p>	Manager Network Control	March 2022

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03/2019	<p>B2</p> <p>(230) 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.</p> <p>Discussions with the Planning Manager revealed that there are procedures and reporting mechanisms in place to support compliance with this licence obligation. ATCO has improved its procedures in place in the current audit period to monitor and check SAP reports twice a day for reconnections and any rescheduling required. We note that reconnection appointments are required to be scheduled for completion the following business day. If the customer needs to reschedule, these details are recorded in the NMIS and fed into SAP with the rescheduled date.</p> <p>Sample based testing of 45 service orders during the audit period did not identify any instances of non-compliance with the licence obligation.</p> <p>However, review of datasheets for the audit period revealed ATCO self-reported 31 non-compliances during the audit period.</p> <p>Based on the above, we determined ATCO to be non-compliant with this obligation.</p>	<p>More attention given to the elimination of administrative errors, with perhaps the Planning Manager reviewing issued reconnections on a periodic basis. Improved communication with the field officers regarding their workflow status is also necessary to avoid reconnection jobs being missed.</p>	<p>During the reporting period, ATCO completed over 30,000 reconnection jobs. As part of ATCO's periodical review and monitoring of its compliance with its licensing obligations, ATCO identified and self-reported 31 reconnections as not meeting the reconnection response time assigned.</p> <p>Overall, ATCO's internal controls are effective in maintaining a high level of compliance with this obligation. ATCO continues to monitor compliance with this obligation and ensure ongoing employee awareness of the reconnection response time.</p> <p>No additional action required.</p>	<p>Manager Network Control</p>	<p>N/A</p>

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04/2019	<p>B2</p> <p>(254) 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).</p> <p>Discussions with the Team Leader Customer Experience and Senior Risk and Quality Advisor revealed that ATCO utilise scripts and email templates for correspondence with complainants and all interactions are required to be documented within SAP. The call scripts and email templates contain the option for the customer to have their complaint heard by a senior employee in the event they are dissatisfied with ATCO's initial response. The script and template are contained within the Complaints Handling Process as well as being kept on the Call Centre Representative's desk.</p> <p>Sample based testing of 45 complaints recorded within the audit period revealed on one occasion, all interactions with the customer occurred via email were inspected and it was noted the ATCO representative did not advise the customer of the right to have their complaint heard by a senior employee. On 36 other occasions, call recordings could not be retrieved, and the file notes in SAP did not document whether the required disclosure was provided to demonstrate compliance with this obligation.</p> <p>Based on discussions held and sample based testing, we determine ATCO was not compliant with this obligation.</p>	<p>We recommend that ATCO perform a re-training of all staff who interact with customers who may make a complaint to emphasise the importance of capturing all information when conversations occur over the phone or face to face and direct them to the Complaints Handling process for email templates and call scripts.</p>	<p>ATCO is implementing a new customer relationship management (CRM) system with complaint management workflow, which will embed the use of call scripts and other disclosure templates, and also improve information capturing. ATCO is also reviewing its current resourcing for complaint management to enhance monitoring and quality assurance. Refresher training will also be provided to ensure ongoing employee awareness of this obligation.</p>	<p>Manager Customer Engagement</p>	<p>Jan 2020</p>

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05/2019	<p>B2</p> <p>(255) 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 Free call telephone number of the gas ombudsman.</p> <p>Discussions with the Team Leader Customer Experience and Senior Risk and Quality Advisor revealed that ATCO have implemented a four tiered approach to complaint handling where the next tier is required where the customer is not satisfied with the response received; initial contact with the customer, first escalation, second escalation and finally escalation to the Energy & Water Ombudsman. The complaints process is contained within the Complaints Handling Procedures. ATCO will endeavour to resolve all complaints internally. Furthermore, email templates refer the customer to the Complaints Handling Process, which contains the details of the Energy & Water Ombudsman.</p> <p>Sample based testing of 45 complaints recorded within the audit period revealed on two occasions, there was sufficient evidence to demonstrate non-compliance with this licence obligation due to insufficient detail contained within SAP notes. On both occasions, the customer was noted as dissatisfied, however the details of the Energy & Water Ombudsman were not provided.</p> <p>On these two occasions, call recordings could not be retrieved, and the file notes in SAP did not document whether the complaint was resolved at a level acceptable to the customer.</p> <p>Based on discussions held and sample based testing, we determine ATCO was not compliant with this obligation.</p>	<p>We recommend that ATCO perform a re-training of all staff who interact with customers who may make a complaint to emphasise the importance of capturing all information when conversations occur over the phone or face to face and also that capturing the level of satisfaction of the customer is crucial for meeting licence obligations.</p>	<p>ATCO is implementing a new customer relationship management (CRM) system with complaint management workflow, which will embed the use of call scripts and other disclosure templates, and also improve information capturing. ATCO is also reviewing its current resourcing for complaint management to enhance monitoring and quality assurance. Refresher training will also be provided to ensure ongoing employee awareness of this obligation.</p>	<p>Manager Customer Engagement</p>	<p>Jan 2020</p>

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06/2019	<p>B2</p> <p>(258) When a retailer, distributor or gas marketing agent receives a complaint that does not relate to its functions, it must advise the customer of the entity that it reasonably considers to be the appropriate entity to deal with the complaint (if known).</p> <p>Discussions with the Team Leader Customer Experience and Senior Risk and Quality Advisor revealed that staff are aware of their responsibilities. Review of the Complaints Handling Procedure revealed ATCO staff are required to direct customers to the appropriate entity where the complaint does not relate to ATCO.</p> <p>Sample based testing of 45 complaints recorded within the audit period revealed on one occasion, the Call Centre Representative was aware of the appropriate entity, however did not provide the details of the entity.</p> <p>Based on discussions held and sample based testing, we determine ATCO was not compliant with this obligation.</p>	<p>We recommend that ATCO perform a re-training of all staff who interact with customers who may make a complaint to emphasise the importance of providing the customer with the details of the external entity if the complaint does not relate to ATCO. In addition, to emphasise the importance of adhering to ATCO's Complaints Handling Procedure.</p>	<p>Refresher training will be provided to ensure ongoing employee awareness of this obligation.</p>	<p>Manager Customer Engagement</p>	<p>Nov 2019</p>