

Origin Energy's post-audit implementation plan

Reference	Non-compliance /controls improvement	Auditor's recommendation	Action proposed to be taken by Origin	Responsible person/team	Completion date
01/2019	<p>Rating: B2, C3</p> <p>Obligation(s): (120, 121, 114) <i>Code of Conduct clause 2.3(2), 2.3(3) and 2.3(4)</i></p> <p>Observation(s): It was identified that during the audit period, some customers were not provided all required information prior to providing their verifiable consent, and in one instance, a customer was provided the terms and conditions for the incorrect state prior to providing their verifiable consent.</p>	<p>We recommend Origin to update training modules, agent scripts and procedures to ensure that all required information, outlined in the Gas Marketing Code of Conduct, is provided to customers prior to obtaining verifiable consent of customers.</p>	<p>Origin is of the view that its current sales scripts and processes for agents to follow are sufficient to ensure that customers are provided with all required information prior to them giving their consent.</p> <p>Apart from one agent playing an incorrect recorded message, other instances of non-compliance identified appear to be isolated cases of the responsible agent in each case not following the entire script to ensure that all required information was provided. Origin also understands that audit testing revealed progressive improvement in the delivery of required information to customers over the audit period.</p> <p>Origin will review its sales training and relevant frontline agent scripts to ensure that information in Gas Marketing Code of Conduct which is required to be outlined to a customer prior to obtaining their verifiable consent is provided.</p> <p>Origin will include a report of this type 2 non-compliance in its next annual breach report.</p>	<p>Sales Delivery Manager, and Compliance & Quality Coordinator (Third Party Sales)</p>	<p>Completed</p>

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02/2019	<p>Rating: B2</p> <p>Obligation(s): (136) <i>Schedule 2 Compendium of Gas Customer Licence Obligations 4.1(a)</i></p> <p>Observation(s): The auditor observed that a customer may be invoiced more than once a month in the following scenarios:</p> <ul style="list-style-type: none"> • Amended bills • Final Bills <p>Separately, however, there were instances of customers being billed more than once a month attributed to Origin receiving multiple meter reads from ATCO within a month (including instances where the submission of meter reads was delayed). As Origin's automated billing process is based on the receipt of meter reads, multiple bills may be issued within a month.</p>	<p>We recommend Origin monitor customers that are billed more than once a month in conjunction with late bills to ensure customers are billed accordingly.</p>	<p>Origin is committed to ensuring that customers receive their bills in a timely manner and does not believe that it is in the best interests of customers to delay invoices to the following month where there has been a delay by ATCO providing timely meter data (which is not within Origin's control).</p> <p>Origin will include a report of this type 2 non-compliance in its next annual breach report, apart from which, Origin proposes not to take any further action.</p>	Group Manager, Customer Operations	N/A
Reference	Non-compliance /controls improvement	Auditor's recommendation	Action proposed to be taken by Origin	Responsible person/team	Completion date
03/2019	<p>Rating: B2</p> <p>Obligation(s): (137) <i>Australian Gas Association Code clause 4.2.1</i></p> <p>Observation(s): It was observed that in some circumstances, Origin billed customers outside of the prescribed billing timeframe. Customers were not being billed every three months during the audit period. These instances were a result of:</p> <ul style="list-style-type: none"> • Exceptions were related to an "implausible read check" that Origin performed as part of the billing process. It indicated that the read was not obtained timely from the previous billing period requiring a validation 	<p>We recommend Origin to clearly identify the SLAs with their third party and monitor exception reports on a regular basis to ensure bills are sent to customers at least every 105 days.</p>	<p>Origin devotes significant resources to minimising the number of late bills issued and has robust processes in place to monitor the timeliness and accuracy of billing. This includes following up with ATCO regarding delayed meter reads or to validate meter reads which exceed expected values.</p> <p>Origin has clear SLAs in place with its third-party operational teams to process exceptions, which are closely monitored through daily reporting and regular governance meetings. There are times, however, where the SLA's may be exceeded due to complex</p>	Group Manager, Customer Operations	N/A

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	<p>and confirmation with the distributor prior to billing the customer.</p> <ul style="list-style-type: none">• A service level agreement (SLA) is in place between Origin and a 3rd party operational team to process the exceptions. The exceptions had not been completed within the SLA.		<p>resolution requirements such as investigation by a meter data provider or a system fix.</p> <p>Origin will include a report of this type 2 non-compliance in its next annual breach report, apart from which, Origin proposes not to take any further action.</p>		
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04/2019	<p>Rating: B2</p> <p>Obligation(s): (175, 177, 180) <i>Schedule 2 Compendium of Gas Customer Licence Obligations 4.18 (6)</i></p> <p>Observation(s): It was observed that only final bill customers are given instructions on how to request refund or credited to customer's account. Origin's process is to credit the customer's account automatically when an overcharge is identified. When the overcharge occurs on a final bill Origin will ask the customer instructions (in the form of a credit refund letter) with the final bill on what the customer would like to do with the credit balance. Regardless of the amount of the overcharge Origin will credit the customers' accounts</p>	<p>We recommend Origin to ask customers for instructions for all overcharges over \$100, not just Final Bills.</p>	<p>Where a customer has an active account with Origin, we will continue to apply any overcharged amount to the customer's account per our current business process.</p> <p>However, where the overcharge credit is greater than \$100, we will update the accompanying amended bill cover letter to inform the customer they may alternatively request a refund for the overcharged amount and provide instructions for doing so.</p> <p>Origin will include a report of this type 2 non-compliance in its next annual breach report.</p>	<p>Group Manager, Customer Operations</p>	<p>31 Dec 2019</p>
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05/2019	<p>Rating: B2</p> <p>Obligation(s): (204, 211) <i>Schedule 2 Compendium of Gas Customer Licence Obligations 6.3 (1) & 6.8 Australian Gas Association Code clause 4.2.1</i></p> <p>Observation(s): It was noted that Origin does not advise customers who are experiencing financial hardship that they have the right to have their bills redirected at no charge to a third person. In situations where a customer requests this, Origin will comply, however the customer is not advised that they have this option.</p>	<p>We recommend Origin to update their customer agent scripts and financial hardship brochures to include the relevant information in regards to advising customers who are experiencing financial hardship that they have the right to have their bills redirected at no charge to a third person.</p>	<p>Origin will update its operational process (agent scripting) and the hardship information we send to customers on commencement of their enrolment in our Power on Program to ensure that hardship customers are informed of the option to redirect their bill to a third person at no charge.</p> <p>Origin will include a report of this type 2 non-compliance in its next annual breach report.</p>	<p>Credit Implementation and Assurance Manager</p>	<p>Completed</p>

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06/2019	<p>Rating: B2</p> <p>Obligation(s): (250, 215, 220 & 147) <i>Schedule 2 Compendium of Gas Customer Licence Obligations 4.5(1), 6.10(2),6.10(7), 10.11(2) Australian Gas Association Code clause 4.2.3.3</i></p> <p>Observation(s): Origin's bill and hardship policy states "Need an interpreter?" instead of "Interpreter Services."</p>	<p>We recommend Origin to update their bills, reminder notices, disconnection warnings and hardship policy to include the words "Interpreter Services".</p>	<p>Origin does not view this as a material breach of its obligations. Interpreter service contact details are provided in our hardship policy and on bills, reminder notices and disconnection warnings.</p> <p>Origin notes that the ERA recently released its final decision on Amendments to the Gas Marketing Code of Conduct, which removes the requirement to include the text 'interpreter services' next to the interpreter symbol.</p> <p>Origin will include a report of this type 2 non-compliance in its next annual breach report, apart from which, Origin proposes not to take any further action.</p>	<p>Group Manager, Customer Operations Group Manager, Credit & Collections</p>	N/A
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07/2019	<p>Rating: B2</p> <p>Obligation(s): (255) <i>Schedule 2 Compendium of Gas Customer Licence Obligations 12.1(3)(b)</i></p> <p>Observation(s): It was identified that management does not have a process in place to notifying customers of their right to refer their complaints to the Ombudsman if they are still unsatisfied with Origin's response, and providing Freecall and Freefax number of the Ombudsman to the customer.</p>	<p>We recommend Origin to update training modules and agent scripts to include the responsibility to notify customers of their right to refer their complaints to the Ombudsman if they are still unsatisfied with Origin's response, and providing Freecall and Freefax number of the Ombudsman to the customer. In addition include this information in the close out letter provided to customers.</p>	<p>Origin will review its training modules, agent scripts, and complaint resolution letters to ensure that we notify customers of their right to refer their complaint to the Ombudsman if they remain dissatisfied with our proposed resolution.</p> <p>Origin will include a report of this type 2 non-compliance in its next annual breach report.</p>	<p>Group Manager, Customer Services</p>	Completed