

POST-AUDIT IMPLEMENTATION PLAN – Wesfarmers Kleenheat Gas Pty Ltd – 4 December 2020

GTL10 2020 Performance Audit Report

Reference Number	Non-compliance	Auditor's Recommendation	Action proposed to be taken by Kleenheat	Responsible person(s)	Target completion date
1/2020	<p>Obligation 147 Compendium Clause 4.5(1) Unless the customer agrees otherwise, a retailer must include the minimum prescribed information in clauses 4.5(1)(a)-(cc) on the customer's bill.</p> <p><i>Note:</i> the summary wording of this obligation has not changed, but since the commencement of the amended Compendium on 1 January 2020, there have been some changes to the content of clauses 4.5(1)(a)-(cc)8 and the creation of an exception to complying with 4.5(1)(w) as set out in 4.5(4).</p>	<p>Background: In its 2018/19 and 2019/20 Annual Compliance reports to the ERA, Kleenheat self-reported 6,030 instances during the audit period where it failed to include bill particulars as required under clauses 4.5(1)(a)-(cc). Out of these instances, 319 instances occurred as a result of a system error affecting customers who have switched from a non-standard form contract to a standard form contract with an outstanding bill with subsequently issued collection notices. If the bill remains outstanding after 21 days, the standard form contract collection process is automatically initiated, and this issue has not yet been resolved.</p> <p>Recommendation: Kleenheat continue to investigate faults to the billing engine and to implement system updates to prevent instances of non-compliance.</p>	<p>Short term mitigation of the breach risk for Obligation 147, specifically when a customer switches plan from NSFC to SFC and has an invoice issued under NSFC conditions, will be managed with additional exception reporting. This is expected to be in place by 1st January 2021, along with additional training delivered to credit officers to amend the collection strategy. Long term consideration will be given to a system modification to automate this process as part of the continuous improvement program.</p>	Commercial Manager	January 2021

POST-AUDIT IMPLEMENTATION PLAN – Wesfarmers Kleenheat Gas Pty Ltd – 4 December 2020

GTL10 2020 Performance Audit Report

Reference Number	Non-compliance	Auditor's Recommendation	Action proposed to be taken by Kleenheat	Responsible person(s)	Target completion date
2/2020	<p>Obligation 165 Compendium Clause 4.14(2) If the customer's account is in credit at the time of account closure, the retailer must, subject to clause 4.14(3), at the time of the final bill ask the customer for instructions on where to transfer the amount of credit (based on clauses 4.14(2)(a) or (b)), and pay the credit in accordance with the customer's instructions within 12 business days or another time agreed with the customer.</p>	<p>Background: In its 2018/19 and 2019/20 Annual Compliance reports to the ERA, Kleenheat self-reported 2,899 instances during the audit period where it failed to obtain instructions from the customer on how to deal with a credit position on a final bill, and/or follow those instructions within the prescribed timeframe.</p> <p>Out of these instances, 724 occurred as a result of a systemic issue causing final bills not to be issued under the final bill template, as a response Kleenheat implemented a business improvement project (currently in the testing phase) in order to fix the issue, which has not yet been resolved.</p> <p>Recommendation: Kleenheat continue to investigate faults to the billing engine and to implement system updates to prevent instances of non-compliance.</p>	<p>Kleenheat identified 21 scenarios as to why the final bill did not generate correctly. To date 19 of those scenarios have been resolved with the final two due to be resolved by the end of November. The billing team will continue to monitor any issues associated with the generation of the final invoice by performing root cause analyses and will implement either process or system changes to cater for any outlying scenarios.</p>	Customer Service Operations Manager	<p>Completed: November 2020</p> <p>The original target completion date for this action was November 2020. The two unresolved billing scenarios were subsequently resolved in November 2020.</p>