

ERL 1 2021 post audit implementation plan

Declarations

Recommendation reference	Non-compliance / Controls improvement (Rating / Licence obligation reference number & licence obligation / Details of noncompliance or inadequacy of controls)	Auditor's Recommendation	Action proposed to be taken by licensee	Responsible person(s)	Target completion date
2/2021	<p>Rating: B / 2</p> <p>Legislative Obligation: Code of Conduct, clause 4.1 Obligation #145– A retailer must issue a bill no more than once a month and at least once every 3 months, except for the circumstances specified in subclause 4.1.</p> <p>Details:</p> <p>In its 2020/2021 Compliance Report, Synergy reported it issued a bill for a period greater than 3 months, on 9,016 occasions, due to Synergy's fault, error or omission.</p> <p>Following identification of the issue in 2021, Synergy instituted a Billing Acceleration Squad via which Synergy has committed to the following actions to prevent recurrence of the breach:</p> <ul style="list-style-type: none"> • Embedding key roles into the billing process review team; • Identification and remediation of training gaps for subject matter experts and agents; • Continued BPEM automation; and <p>Embedding reporting and analysis – including reporting to proactively identify the volume of unsent bills reaching greater than 90 days. This will provide operational teams and</p>	<p>Synergy to carry out proposed actions committed to in its 2020/2021 compliance report.</p>	<p>As per Synergy's 2020/2021 compliance report, actions as noted will be taken to rectify and prevent recurrence of the breach.</p>	<p>Manager Customer Success, Retail Business Unit</p>	<p>On-going</p>

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	managers visibility over any backlogs and completed billing activity with improved forecasting capability.				
6/2021	<p>Rating: B / 2</p> <p>Legislative Obligation: Code of Conduct, clause 5.6(5), obligation #196 – If a residential customer has been assessed as being in financial hardship, a retailer must retrospectively waive any late payment fee charged to this customer's last bill prior to the assessment being made.</p> <p>Details:</p> <p>It was noted that Synergy will waive a customer's late payment fee if the customer is assessed as being in financial hardship and when a dunning lock is placed on an account in SAP CRM, no further late payment fees will be charged. Should late payments fees already be on an account, the agent will manually waive the fees.</p> <p>Sample testing of residential customers in financial hardship during the audit period noted in one instance, the customer did not have their late payment fee waived by Synergy. It was noted by the Team Leader Financial Hardship that this was the result of agents not following the required documented process.</p>	<p>Synergy to consider the following:</p> <ul style="list-style-type: none"> • Conducting a root cause analysis of the cause of the error in the sample tested; and • Implementing system controls which automate the late payment fee waiver when a customer is flagged as being in financial hardship. 	<p>Synergy agrees to complete analysis to determine the root cause of the non-compliance.</p> <p>Synergy currently has system controls in place which automates the waiver of a late payment fee for customers in hardship, however these controls have limitations when the fee is on an invoice that is due to be issued.</p> <p>Synergy will review the current controls and investigate if any enhancements can be made to strengthen the control.</p> <p>In addition, Synergy will remind all agents of the documented process and the compliance requirements for clause 5.6(1) of the Code.</p>	Manager Customer Success, Retail Business Unit	30 November 2021

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7/2021	<p>Rating: B / 2</p> <p>Legislative Obligation: Code of Conduct, clause 6.10(2) Obligation #221 – A retailer must ensure that its hardship policy complies with the criteria specified in subclause 6.10(2).</p> <p>Details:</p> <p>It was noted Synergy's Operational Hardship teams will review the policy annually against the ERA Hardship Policy checklist as published on the ERA's website.</p> <p>Through audit review of Synergy's Financial Hardship Policy, it was noted while complaint in almost all respects, subclause 6.10(2)(c) requires the retailer to include a statement in its hardship policy that they will treat all customers sensitively and respectfully. Although this could be inferred by the tone of the document, the statement is not explicitly included in the Synergy Financial Hardship Policy. This was noted to be due to the Marketing team changing the wording in order to reflect customer friendly language.</p>	<p>Synergy to update the Financial Hardship Policy to include the information in subclause 6.10(2)(c) of the Code of Conduct.</p>	<p>Synergy will amend its on-line policy to better align with the Code clause 6.10(c) requirement.</p>	<p>Manager Customer Success, Retail Business Unit</p>	<p>30 September 2021</p> <p>COMPLETE: 30 September 2021</p>