



ATCO

WA Gas Distribution Licence (GDL8) Audit 2022

Reasonable Assurance Engagement Report

August 2022

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1. EXECUTIVE SUMMARY

1.1 Background

ATCO owns and operates the largest gas distribution network in Western Australia, delivering gas to approximately 750,000 end users and covering approximately 14,000 kilometres. The gas distribution network services Geraldton, Kalgoorlie, Albany, Bunbury, Busselton, Harvey, Pinjarra, Brunswick Junction, Capel and the wider Perth metropolitan area.

The Retail Gas Market is administered by the Australian Energy Market Operator (“AEMO”) and the Economic Regulation Authority (“ERA”) is responsible for approving amendments to the Gas Retail Market Scheme, including Market Rules. The Economic Regulation Authority (ERA) Western Australia granted ATCO a Gas Distribution Licence (GDL8) in July 2000, which they have held since. GDL8 provides ATCO with the legal right to distribute gas to customers.

ATCO is regulated by the ERA, who granted them with Gas Distribution Licence (GDL8), on 17 August 2007. During the period under consideration, the licence was amended on 1 January 2020 with the insertion of a new compendium of gas customer licence obligations and on 16 June 2021, where the licence was renewed for 21 years. On 25 November 2021, the licence was amended by substitution – Gas Licence Review 2020.

ATCO is required by Section 11ZA (1) of the Act to provide the ERA with a performance audit conducted by an independent expert acceptable to the ERA no less than once in every 24-month period (or such longer period as the ERA allows). For this purpose, RSM Australia Pty Ltd (“RSM”) was engaged by ATCO to undertake the Performance Audit that is aligned with the requirements of ASAE3100 - Compliance Engagements and consistent with the ERA 2019 Audit and Review Guidelines - Electricity and Gas Licenses (“ERA Guidelines”). This performance audit covered ATCO’s Gas Distribution Licence GDL8, for the 36-month period from 1 July 2019 to 30 June 2022 and examined a total of 52 obligations from the Compliance Manual.

An audit plan was developed and approved by the ERA using a risk-based approach to focus on high-risk areas in accordance with Risk Management Guidelines, AS ISO 31000:2018 and the ERA’s “Audit and Review Guidelines: Electricity and Gas Licenses (March 2019)” (“Audit Guidelines”). To assess the controls and performance against those standards, RSM applied various approaches including a combination of interviews/enquiries, examination of documents and detailed testing

1.2 Objective and Scope

The Performance Audit is defined as an examination of measures taken by ATCO to meet the performance criteria specified in the GDL8. As required by the ERA Guidelines, the scope of the Performance Audit considered:

- 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 (specifically, proper records which provide assurance that procedures are consistently followed, and controls are maintained).
- Integrity of reporting – the completeness and accuracy of the compliance and performance reports provided to the ERA; and
- Compliance with any individual licence conditions – the actual performance against the requirements imposed on ATCO by the ERA or specific matters raised by the ERA.

1. EXECUTIVE SUMMARY (CONT.)

1.3 ATCO's Responsibility

ATCO is responsible for:

- Implementing policies, procedure and controls, which are designed to ensure compliance with the conditions of the GDL8;
- Ensuring monitoring processes are in place to assess its compliance requirements and reporting on its level of compliance to ERA; and
- Implementing corrective actions for instances of non-compliance.

Assumptions made in considering the scope of our work included:

- The information received from ATCO is assumed by RSM to be complete, accurate and valid; and
- Information relevant to the audit of compliance with the GDL8 is communicated to RSM in a timely manner.

1.4 RSM Responsibility

Our audit was conducted as described in the Audit Plan and as agreed with the ERA. Our responsibility was to express a conclusion on ATCO's compliance with the conditions of the GDL8 based on our procedures and present the audit statement in line with the report format prescribed in Chapter 5 of the ERA Guidelines.

Our assurance engagement was conducted in accordance with the Australian Standard on Assurance Engagement ASAE3100 – Compliance Engagements. Our assurance procedures include such tests and procedures as we consider necessary in the circumstances. These procedures were undertaken to form a reasonable assurance conclusion as to whether, in all material aspects, the licence obligations are complied with, and control procedures were adequately designed and operated effectively based on the specified criteria.

1.5 General Observations

In considering ATCO's internal control procedures, structure and environment, its compliance culture and its information systems specifically relevant to those licence obligations subject to audit, we observed that ATCO has:

- Maintained and established its control framework through tailored policies and procedures including work instructions which are explicitly aligned to ensure ATCO and staff meet their Licence obligations.
- Maintained a mix of manual and automated controls surrounding the planning and execution of disconnection services. However, further improvements are required as described below in [Section 2.6](#).
- Established a complaint handling system through the Salesforce system, including details of required follow up actions and escalation and reference to the ombudsman. Further improvement of complaints handling controls are required to ensure compliance with the relevant obligations as described in [Section 2.6](#).

1. EXECUTIVE SUMMARY (CONT.)

1.6 Basis for Conclusion

We have completed our Performance Audit as required by the ERA Guidelines and present a summary of our findings below.

In conducting the audit, we identified five obligations for which we assessed ATCO as non-compliant requiring corrective action, rated level B 2. The identified issues and the previous year audit recommendations are summarised in **Section 1.7** and **Section 2.5** respectively. Further details are provided in **Section 4** of this report.

The findings below are considered to be material; therefore, we have provided a qualified reasonable assurance opinion in the attached Independent Assurance Report on page 19.

Section 3.2 contains a summary of ATCO's GDL8 obligations and our conclusions regarding the control and compliance ratings for each obligation, based on our assessment of ATCO's controls.

1.7 Findings

Section 2.5 contains details of recommendation on the actions ATCO should take into consideration in line with section 5.1.8 of the Guidelines.

Our testing of the obligations identified five (5) non-compliances in Obligations **227, 230, 230B, 255 and 255A** (noted in the table below) that require corrective actions.

There was also one self-reported finding on Obligation **254** where no further exceptions were identified through our substantive testing procedures and no further action is required as the existing controls are deemed to be adequate. Therefore, these self-reported non-compliances are rated as follows: Control Rating of "A" and Compliance Rating of "2" These are included in **Section 3.2** and **Section 4**.

The table below summarises our findings in relation to the licence compliance obligations during the period 1 July 2019 to 31 June 2022, identifying where ATCO had instances of non-compliance with the licence conditions and where control deficiencies were identified.

1.7.1 Non-compliance findings requiring corrective actions

Summary of Issues		
Obligation No.	Licence Obligation	Issue
227	Energy Coordination Act section 11M A retailer or a distributor must not arrange for disconnection or disconnect a customer's supply address in the circumstances specified.	Non-Compliant – B 2 ATCO has self-reported one breach to the ERA in 2019 where a disconnection was performed outside the specified timeframe. Sample based testing of 46 disconnections during the audit period did not identify any further exceptions where ATCO or its contractors had arranged for a disconnection outside the specified circumstances in clause 7.6. We have noted that ATCO is currently implementing a Field Mobility project to automate the disconnection timeframe requirements in the workforce management system, which is managed manually at the moment. This manual process resulting in a control risk. The targeted completion date for this project is December 2022 (See Section 2.5, 02/2019) Based on the above, we determined ATCO to be non-compliant with this obligation.

1. EXECUTIVE SUMMARY (CONT.)

1.7.1 Non-compliance (Cont.)

Summary of Issues		
Obligation No.	Licence Obligation	Issue
230	<p>Energy Coordination Act section 11M</p> <p>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 procedures, 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>Non-Compliance– B 2</p> <p>ATCO has twenty-five (25) self-reported breaches within the audit period where the reconnections were not performed within the required timeframe. We note that the majority of noted breaches (23 out of 25) occurred during 2018-2019 where ATCO trialled a gas inlet valve lock procedure as an alternate to performing gas disconnection and reconnection at the street, which would mitigate excavation and reduce reconnection response time to reconnections. Due to the trialling of this system, 23 reconnections exceeded their respective 2 business day time limit as the tasks were incorrectly categorised during the system trial and were instead performed within a 10 day response time.</p> <p>We conducted sample-based testing of 46 reconnections which resulted in four (4) instances where the reconnection was not performed within the time frame set. Out of four exceptions, two were self-reported to ERA and two exceptions were completed within three business days. In one of the noted instances, the Retailer's notification was received after 1PM which is the ATCO's cut-off time for scheduling reconnections (internal process). Whilst the requirement of 1PM cut-off time is communicated with the retailers that ATCO deal with, it is not noted in the retail market scheme rules set by AEMO which ATCO subscribes to.</p> <p>Based on the above, we determined ATCO to be non-compliant with this obligation.</p>
230B	<p>Energy Coordination Act section 11M</p> <p>Notwithstanding clause 8.2(5), if a distributor becomes aware that there has been an unauthorised utilisation of gas at the customer's supply address, the distributor must notify the retailer as soon as practicable and is not obliged to reconnect the supply address until the issue is resolved</p>	<p>Non-Compliance - B 2</p> <p>ATCO has one self-reported non-compliance within the audit period where the retailer was not advised, due to an internal miscommunication. Based on the information in the compliance report, the job was not correctly advised to the reconnection team by the field officer. No further self-reported non-compliances were identified in the 21/22 compliance report period</p> <p>Sample-based testing of 31 service orders related to illegal gas access revealed no further instances where ATCO had not notified suppliers as soon as practicable.</p> <p>Based on our audit procedures we have concluded that ATCO is not compliant with the obligation</p>
255	<p>Energy Coordination Act section 11M</p> <p>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>Non-Compliance - B 2</p> <p>ATCO has self-reported one breach in the 2022 reporting period, where the customer was not advised of the right to raise the complaint with the Energy & Water Ombudsman and the relevant contact details were not provided to the customer. We conducted sample-based testing of 45 complaints recorded within the audit period and identified two (2) additional instances where the customer was not advised of further escalation to the Ombudsmen option after having their complaint/claim for reimbursement rejected.</p> <p>Based on the above, we determined ATCO to be non-compliant with this obligation.</p>

1. EXECUTIVE SUMMARY (CONT.)

1.7.1 Non-compliance (Cont.)

Summary of Issues		
Obligation No.	Licence Obligation	Issue
255A	<p>Compendium clause 12.1(4) A retailer or distributor must, on receipt of a written complaint by a customer, acknowledge the complaint within 10 business days and respond to the complaint within 20 business days.</p>	<p>Non-Compliance - B 2</p> <p>ATCO has three self-reported breaches within the audit period where, a total of twenty-three (23) complaints were not responded to within the required timeframes (10 and 20 business days). The noted incidents were due to human error in the classification and communication of complaints or system changes, not a breakdown of controls. Our sample-based testing of 45 complaints recorded within the audit period did not identify any further exceptions where the customer did not receive a response from ATCO within 20 business days of receipt of the complaint.</p> <p>Based on discussions held and sample-based testing, we determine ATCO is non-compliant with this obligation.</p>

This is discussed in further detail in **Section 4** of this report.

2. AUDIT OBJECTIVE, SCOPE AND APPROACH

2.1 Objective

RSM was appointed by ATCO, and approved by the ERA, to fulfil the role of the Approved Independent Auditor, to provide a reasonable assurance audit of compliance with ATCO's Gas Distribution Licence ("GDL8").

2.2 Scope of Our Work

The ERA provides guidance on aspects of the Licence and ATCO's performance criteria, which is included in the scope of the Performance Audit in the ERA Gas Compliance Reporting Manual (June 2020) ("**ERA Reporting Manual**").

The Performance Audit applies the singular audit priority assessment approach to identify all applicable licence obligations. Each of the compliance requirements identified in the ERA Reporting Manual have been evaluated for applicability to ATCO and used as the basis for determining the performance criteria considered in the Performance Audit. The scope of the reasonable assurance engagement is defined by the requirements of the ERA Reporting Manual. It excludes assessments of systems and procedures that are not involved with ensuring compliance with the requirements of the GDL8 and any other disclosure obligations under the ERA Reporting Manual.

The audit period was from 1 July 2019 to 31 June 2022, covering the 36-month period which the ERA has established with ATCO to conduct Performance Audits. For details of the RSM team and time allocated to the audit, refer to **Appendix B – Work Schedule**.

The Audit Plan approved by the ERA for this Performance Audit sets out the compliance requirements that applied to ATCO's operations during the audit period. In addition, the Audit Plan also listed ATCO's GDL8 obligations included in the scope of the audit, along with the risk assessment and audit priority assigned to each obligation.

2.3 Overview of our Approach

Our approach for the Performance Audit involved the following activities which were undertaken during the period June to August 2022:

- Utilising the ERA Guidelines and the ERA Reporting Manual as a guide, we developed a risk assessment based on detailed system analysis and walkthrough including assessment of controls adequacy and effectiveness;
- Interviews with relevant ATCO key personnel to gain an understanding of internal controls and processes (see **Appendix A**);
- Reviewed relevant documentation and conducted walkthroughs of processes and controls to assess overall adequacy, compliance and effectiveness in accordance with GDL8 (see **Appendix A**);
- Sample tested, in accordance with ASA 530 Audit Sampling, relevant obligations based on assigned audit priority to determine whether transactions complied with the requirements of the obligation; and
- Reporting findings to ATCO for review and response.

2.4 Deviations from the Audit Plan

While performing an assessment on relevant supporting documentation as well as discussion with ATCO key personnel to evaluate compliance and understanding the activities undertaken to achieve compliance, one deviation from the audit plan occurred. ATCO received an extension from the ERA in relation to the submission of the draft report to the ERA from 31/08/2022 to 15/09/2022.

2. AUDIT OBJECTIVE, SCOPE AND APPROACH (CONT.)

2.5 Review of Previous Audit Recommendations

This engagement has been conducted as a Performance Audit to assess ATCO's compliance against ERA Guidelines. We identified four obligations as non-compliant from the previous audit with the same rating in this current audit. Reviewing the recommendations provided and the actions taken, we have provided further recommendations to improve the internal controls. The below observations in respect of the previous audit and resultant actions have been considered as part of our audit priority assessment:

A. RESOLVED DURING CURRENT AUDIT PERIOD				
Recommendation Reference	Non-Compliance / Controls Improvement	Auditor's Recommendation	Date Resolved	Further Action Required / Details of further action required
01/2019	<p>A2</p> <p>1 Distribution Licence cl 4.1</p> <p>A licensee must pay the applicable fees in accordance with the Economic Regulation Authority (Licensing Funding) Regulations 2014 clauses 6 & 7.</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. Based on audit procedures performed it was deemed that was ATCO not compliant with this licence obligation.</p>	It was recommended that ATCO prioritise 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.	July 2019	<p>No further action is required. ATCO was permitted not to proceed with this recommendation as per ERA's approval on 29 Oct 2019.</p> <p>Also, we did not note any non-compliance exceptions through sample testing of all relevant invoices during the current audit period.</p>

2. AUDIT OBJECTIVE, SCOPE AND APPROACH (CONT.)

2.5 Review of Previous Audit Recommendations (Cont.)

B. RESOLVED DURING CURRENT AUDIT PERIOD				
Recommendation Reference	Non-Compliance / Controls Improvement	Auditor's Recommendation	Date Resolved	Further Action Required / Details of further action required
04/2019	<p>B2</p> <p>254 Trading Licence clause 2.1 and Schedule 2 Distribution Licence clause 2.1 and Schedule 2 Compendium clause 12.1(3)(a)</p> <p>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>The script and templates are contained within the Complaints Handling Process as well as being kept on the Call Centre Representative's desk. 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.</p> <p>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. Based on discussions held and sample-based testing, it was determined that ATCO was not compliant with this obligation</p>	<p>It was recommended 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>	Oct 2019	<p>No further action is required.</p> <p>ATCO were permitted not to proceed with this recommendation as per ERA's approval on 29 Oct 2019.</p> <p>ATCO have implemented an automated control with Salesforce in 2021 for adherence with this obligation. This is an automated email response when a complaint is received. noting that a customer may escalate their complaint to a senior employee should they be dissatisfied with the current handling of a complaint.</p>

2. AUDIT OBJECTIVE, SCOPE AND APPROACH (CONT.)

2.5 Review of Previous Audit Recommendations (Cont.)

C. RESOLVED DURING CURRENT AUDIT PERIOD				
Recommendation Reference	Non-Compliance / Controls Improvement	Auditor's Recommendation	Date Resolved	Further Action Required / Details of further action required
06/2019	<p>A2</p> <p>258 Trading Licence clause 2.1 and Schedule 2 Distribution Licence clause 2.1 and Schedule 2 Compendium clause 12.4</p> <p>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. Based on discussions held and sample-based testing, it was determined that ATCO was not compliant with this obligation.</p>	<p>It was recommended 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 action is required</p>	Oct 2019	No further action is required.

2. AUDIT OBJECTIVE, SCOPE AND APPROACH (CONT.)

2.5 Review of Previous Audit Recommendations (Cont.)

A. UNRESOLVED DURING CURRENT AUDIT PERIOD			
Recommendation Reference	Non-Compliance / Controls Improvement	Auditor's Recommendation	Further Action Required / Details of further action required
02/2019	<p>B 2</p> <p>227 Distribution Licence cl 21.1 Trading Licence cl 23.1</p> <p>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 Risk, Compliance and Internal Audit 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>	<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>	<p>Yes, further action is required as per Recommendation 03/2022 in Section 2.5.</p> <p>As per our discussions with ATCO's management, planning for the automation of disconnections as part of the workforce management system upgrade project (Field Mobility) is expected to be completed by the end of 2022. Expected implementation is by the end of 2023.</p> <p>Although, we did not note any exceptions through our sample testing of disconnections actioned during the audit period, there was one self-reported breach in 2019 where a customer was disconnected after 3pm.</p> <p>Therefore, we have deemed ATCO to be non-compliant with this obligation.</p>

2. AUDIT OBJECTIVE, SCOPE AND APPROACH (CONT.)

2.5 Review of Previous Audit Recommendations (Cont.)

B. UNRESOLVED DURING CURRENT AUDIT PERIOD			
Recommendation Reference	Non-Compliance / Controls Improvement	Auditor's Recommendation	Further Action Required / Details of further action required
03/2019	<p>B 2</p> <p>230 Distribution Licence clause 2.1 and Schedule 2 Compendium clauses 8.2(1)- (3).</p> <p>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 procedures, 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. However, review of datasheets for the audit period revealed ATCO self-reported 31 non-compliances during the audit period. 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>Yes, further action is required as per Recommendation 01/2022 in Section 2.5.</p> <p>ATCO has 25 self-reported breaches during the audit period. Also, sample-based testing of 46 reconnections in this audit resulted in the identification of four (4) instances where the reconnection was not performed within the 2 business day time frame set.</p>

2. AUDIT OBJECTIVE, SCOPE AND APPROACH (CONT.)

2.5 Review of Previous Audit Recommendations (Cont.)

C. UNRESOLVED DURING CURRENT AUDIT PERIOD			
Recommendation Reference	Non-Compliance / Controls Improvement	Auditor's Recommendation	Further Action Required / Details of further action required
05/2019	<p>B 2</p> <p>255 Trading Licence clause 2.1 and Schedule 2 Distribution Licence clause 2.1 and Schedule 2 Compendium clause 12.1(3)(b)</p> <p>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 Freecall 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. 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. Based on discussions held and sample-based testing, we determine ATCO was not compliant with this obligation.</p>	<p>It was recommended 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>Yes, further action is required as per Recommendation 02/2022 in Section 2.5.</p> <p>ATCO had implemented three changes in 2019:</p> <ul style="list-style-type: none"> ▪ Salesforce CRM system introduced in 2019 ▪ A Customer Relations Team Leader resource was added ▪ Refresher training provided in August 2019 <p>However, sample-based testing of 46 Salesforce records revealed two (2) non-compliance instances where the customers were not informed of the escalation to Ombudsman option after their complaints were rejected by ATCO.</p>

2. AUDIT OBJECTIVE, SCOPE AND APPROACH (CONT.)

2.6 Review of Current Audit Recommendations

A. UNRESOLVED DURING CURRENT AUDIT PERIOD			
Recommendation Reference	Non-Compliance / Controls Improvement	Auditor's Recommendation	Management Comments
01/2022	<p>B 2</p> <p>230 Distribution Licence clause 2.1 and Schedule 2 Compendum clauses 8.2(1)-(3)</p> <p>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 procedures, 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>Finding:</p> <p>Discussions with the Planning Manager and Manager Commercial Operations elaborated on the procedures in place to monitor and check SAP reports on a regular basis for reconnections and any rescheduling required. We noted that reconnection appointments are required to be scheduled for completion the following business day. If the customer requires the connection to be rescheduled, these details are recorded in Network Management Information System (NMIS) and fed into SAP with the rescheduled date. Jobs that are requested after 1PM will be scheduled for the next day.</p> <p>ATCO has two self-reported breaches within the audit period where twenty-five (25) reconnections were not performed within the required timeframe. We note that 23 of these instances occurred during 2018-2019, where ATCO trialled a gas inlet valve lock procedure as an alternate to performing gas disconnection and reconnection at the street, which would mitigate excavation and reduce reconnection response time to reconnections. Due to the trailing of this system, 23 reconnections exceeded their respective 2 business day time limit as the tasks were incorrectly categorised during the system trial and were instead</p>	<p>We recommend ATCO update their internal processes to ensure that reconnection requests that are nearing the identified deadline or received after the cut off time are prioritized and scheduled to be completed by the following business day to ensure ATCO complies with the AEMO's market rules for reconnections. This process could be through manual intervention or further updated via a technology solution.</p>	

	<p>performed within a 10 day response time, as assigned in the system.</p> <p>The remaining two (2) instances in the 2019/2020 period were determined as isolated instances, due to the complexity of a job and an internal miscommunication respectively.</p> <p>We conducted sample-based testing of 46 reconnections which resulted in four (4) instances where the reconnection was not performed within the time frame set. Out of four exceptions, two were self-reported to the ERA and two exceptions were completed within three business days. In one of the noted instances, the Retailer's notification was received after 1PM which is the ATCO's cut-off time for scheduling reconnections (internal process). Whilst the requirement of 1PM cut-off time is communicated with the retailers that ATCO deal with, it is not noted in the retail market scheme rules set by AEMO which ATCO subscribes to. We therefore highlight that the source of these exceptions is not a system control deficiency issue.</p> <p>Based on the above, we determined ATCO to be non-compliant with this obligation.</p>		
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2. AUDIT OBJECTIVE, SCOPE AND APPROACH (CONT.)

2.6 Review of Current Audit Recommendations (Cont.)

B. UNRESOLVED DURING CURRENT AUDIT PERIOD			
Recommendation Reference	Non-Compliance / Controls Improvement	Auditor's Recommendation	Management Comments
02/2022	<p>B 2</p> <p>255 Trading Licence clause 2.1 and Schedule 2 Distribution Licence clause 2.1 and Schedule 2 Compendium clause 12.1(3)(b)</p> <p>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 Freecall telephone number of the gas ombudsman.</p> <p>Finding:</p> <p>Discussions with the Customer Relations Team Leader and Manager Risk & Compliance revealed that ATCO have devised an escalation process consisting of four tiers to which in the instance where a customer is not satisfied with the response of the designated Customer Service Representative (CSR) and makes it apparent to ATCO (i.e. responds to their email or call), the complaint is then escalated to the next tier. This can then be escalated once more before the complaints team provides details to the Energy and Water Ombudsman. This complaints process is outlined within the Complaints Handling Procedures. ATCO utilises email templates and call scripting to refer the customer to the Complaints Handling Process, and the Energy & Water Ombudsman contact details.</p> <p>ATCO has self-reported one breach in the 2022 reporting period, where the customer was not advised of the right to raise the complaint with the Energy & Water Ombudsman and the relevant contact details was not provided to the customer.</p> <p>We conducted sample-based testing of 45 complaints recorded within the audit period and identified two (2) additional instances where the customer was not advised of further escalation to Ombudsmen option after having their complaint/claim for reimbursement rejected</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 review their internal policies and procedures to amend them to ensure that when a customer's complaint has been rejected, avenues for escalation internally or the ombudsman's contact details are provided to the customers when a complaint is rejected by ATCO. This procedure could be supported through the use of an automatic action or prompt when customer service team members are responding to client complaints</p> <p>Training on the requirements of the appropriate response to customer complaints, resolution and rejection should be scheduled once the new procedures are created, or sooner if there is a long lead-time on the resolution of a new approach.</p>	

2. AUDIT OBJECTIVE, SCOPE AND APPROACH (CONT.)

2.6 Review of Current Audit Recommendations (Cont.)

C. UNRESOLVED DURING CURRENT AUDIT PERIOD			
Recommendation Reference	Non-Compliance / Controls Improvement	Auditor's Recommendation	Management Comments
03/2022	<p>B 2</p> <p>227 Distribution Licence cl 21.1 Trading Licence cl 23.1</p> <p>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>Finding:</p> <p>Discussions with the Manager Commercial Operations, Manager Network Control, Planning Manager and Manager Risk & Compliance revealed that there are procedures and monitoring mechanisms in place to support compliance with this licence obligation to ensure that disconnections are not to be done after 3pm. Also, ATCO has their own internal control of 12pm to mitigate any issues that may occur through the disconnection process. Contractors on the field utilise Personal Mobility Devices, in which the Planning team enters and removes jobs from the devices. As a manual control, the planning team remove any jobs that may go over the internal control of 12pm. However, should a job be rescheduled and communicated with a customer, it may be done after the expected timeframe.</p> <p>ATCO has self-reported one breach to the ERA in 2019 where a disconnection was performed outside the specified timeframe. Sample based testing of 46 disconnections during the audit period 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>We have noted that ATCO is currently implementing a Field Mobility project to automate the disconnection timeframe requirements in the workforce management system, which is managed manually at the moment. The targeted completion date for this project is December 2022 (See Section 2.5, 02/2019)</p> <p>Based on the above, we determined ATCO to be non-compliant with this obligation</p>	<p>We have noted that ATCO is currently implementing a Field Mobility project to automate the disconnection timeframe requirements in the workforce management system, which is managed manually at the moment.</p> <p>We recommend ATCO to continue the current plan as scheduled and consider monitoring the mobility devices of contractors closely in the meantime to ensure jobs that may go past the 3pm time-limit are pulled from the devices and scheduled as priority for the following suitable business day. Adhering to the internal KPI of not performing disconnections after 12pm should be the benchmark for disconnections.</p>	

2. AUDIT OBJECTIVE, SCOPE AND APPROACH (CONT.)

2.6 Review of Current Audit Recommendations (Cont.)

D. UNRESOLVED DURING CURRENT AUDIT PERIOD			
Recommendation Reference	Non-Compliance / Controls Improvement	Auditor's Recommendation	Management Comments
04/2022	<p>B 2</p> <p>230B Trading Licence clause 2.1 and Schedule 2 Distribution Licence clause 2.1 and Schedule 2 Compendium clause 12.1(4)</p> <p>Notwithstanding clause 8.2(5), if a distributor becomes aware that there has been an unauthorised utilisation of gas at the customer's supply address, the distributor must notify the retailer as soon as practicable and is not obliged to reconnect the supply address until the issue is resolved</p> <p>Finding:</p> <p>Discussions with the Planning team established that illegal tampering or unauthorised gas usages are initially notified by Field Officers, the public or users. Upon notification, an inspector's order will be issued to the retailer to inform them of the tampering or unauthorised gas usage. We noted that illegal tampering is captured on the same reports as reconnections and have no delineating identifiers.</p> <p>ATCO has one self-reported non-compliance within the audit period where the retailer was not advised, due to an internal miscommunication. Based on the information in the compliance report, the job was not correctly advised to the reconnection team by the field officer. Field Officers report instances of illegal tampering to ATCO, where it is fed into NMIS and notifies the retailer via SAP. The initial report by the field officers and the subsequent capturing the report into SAP was the human error which resulted in the job not being captured in the system. In response to the non-compliance, ATCO has implemented a new communication template and rolled out to ensure the correct process is followed. No further self-reported non-compliances were identified in the 21/22 compliance report period</p> <p>Sample-based testing of 31 service orders related to illegal gas access revealed no further instances where ATCO had not notified suppliers as soon as practicable.</p> <p>Based on our audit procedures we have concluded that ATCO is not compliant with the obligation.</p>	<p>We recommend that ATCO introduce periodic training for the identification and communication of illegal tampering, and spot checks for staff. Additionally, ATCO management should consider introducing and maintaining a register specifically for illegal tampering instances to monitor the required notifications.</p>	

2. AUDIT OBJECTIVE, SCOPE AND APPROACH (CONT.)

2.6 Review of Current Audit Recommendations (Cont.)

E. UNRESOLVED DURING CURRENT AUDIT PERIOD			
Recommendation Reference	Non-Compliance / Controls Improvement	Auditor's Recommendation	Management Comments
05/2022	<p>B 2</p> <p>255A Trading Licence clause 2.1 and Schedule 2 Distribution Licence clause 2.1 and Schedule 2 Compendium clause 12.1(4)</p> <p>A retailer or distributor must, on receipt of a written complaint by a customer, acknowledge the complaint within 10 business days and respond to the complaint within 20 business days.</p> <p>Finding:</p> <p>Discussions with the Customer Relations Team Leader and Manager Risk & Compliance revealed that complaints are attended to as soon as they are received by the team (within working hours).</p> <p>This is maintained through Salesforce, a Customer Relationship Management System (CRM), where an automated emails are sent once an email has been received. Should a customer call ATCO, they are sent to the call centre who will then open a complaint case in Salesforce and forward it to the Complaints handling team, who will follow up accordingly. A dashboard is developed for the active tracking of cases. The system also allows for internal notes to be maintained while the case is undergoing internal investigations.</p> <p>ATCO has three self-reported breaches within the audit period where, a total of twenty-three (23) complaints were not responded to within the required timeframes (10 and 20 business days). The noted incidents were due to human error in the classification and communication of complaints or system changes, not a breakdown of controls.</p> <p>In the 2021-2022 period two (2) complaints were due to an administrative error and internal miscommunication respectively. Both instances were the source of communication and administrative error, involving the Gas inspections Team and Market Services Team reporting complaints to Customer Relations from a customer and retailer respectively.</p> <p>In the 2020-2021 period, seventeen (17) of these were due to the Salesforce system upgrade, where the automated acknowledgement system function was temporarily deactivated. Two (2) additional instances in this period were complaints that were a miscommunication from retailers. In response to these breaches ATCO</p>	<p>We recommend that ATCO consider implementing awareness programs across the division on the handling and reporting of complaints, including intranet and email reminders.</p>	

	<p>have revised the complaints submission process, so that all complaints are submitted through Salesforce.</p> <p>In the 2019-2020 period, there were two (2) instances that were identified. The first instance involved a complaint referred to a contractor who took longer than 20 business days to respond, ATCO also did not adequately follow up with the contractor, resulting in the delay. The Salesforce (CRM) now actively prevents this issue with automated reminders and tracking for complaints. The second instance was the result of an investigation of a complaint taking longer than anticipated, however the customer was advised of the delays.</p> <p>Our sample-based testing of 45 complaints recorded within the audit period did not identify any further exceptions where the customer did not receive a response from ATCO within 20 business days of receipt of the complaint.</p> <p>Based on discussions held and sample-based testing, we determine ATCO is non-compliant with this obligation.</p>		
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3. PERFORMANCE SUMMARY

3.1 Compliance and Controls Rating Summary

When assessing ATCO's audit performance, RSM used the rating scale below which is defined in the ERA Guidelines. The rating scale considers a rating for ATCO's control procedures and control environment (controls rating) and ATCO's compliance with the conditions of its Licence (compliance rating).

Controls Adequacy 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 effect on customers or third parties
C	Inadequate controls – significant improvement required	3	Non-compliant – moderate effect on customers or third parties
D	No controls evident	4	Non-compliant – major effect on customers or third parties
N/P	Not performed – A controls rating was not required	N/R	Not rated – No activity took place during the audit period

The table below summarises the assessments made during the Performance Audit on ATCO's compliance and the adequacy of controls in place to manage ATCO's compliance with all the relevant GDL8 obligations. It is noted that GDL8 obligations that were assessed as 'Not Applicable' for the audit period have not been included in the table below.

Compliance Rating	Controls Rating					Total
	A	B	C	D	N/P	
1	38	1	-	-	-	39
2	1	5	-	-	-	6
3	-	-	-	-	-	0
4	-	-	-	-	-	-
N/R	-	-	-	-	7	7
Total	39	6	-	-	7	52

The table is consistent with the ratings in [Section 3.2](#) and [Section 4](#) of this report.

3. PERFORMANCE SUMMARY (CONT.)

3.2 Performance Summary Table

In accordance with the ERA Guidelines, when assessing ATCO's audit performance, for each Licence obligation, we rated ATCO's compliance with the conditions of its licence (compliance rating). If ATCO did not perform the activity during the audit period, the obligation was assessed as 'Not Rated' (N/R) with an explanation provided.

We also provided a rating for ATCO's control procedures and control environment (controls ratings) for obligations with an Audit Priority of 1,2,3,4 and 5, or those that was assessed to be non-compliant during the audit period.

The table below summarises the compliance rating and controls rating for each obligation. It is noted that Licence obligations that were assessed as 'Not Applicable' for the audit period have not been included in the Performance Summary Table below in accordance with the ERA Guidelines.

No.	Obligations Reference	Controls Adequacy					Audit Priority	Compliance Rating				
		A	B	C	D	NP		1	2	3	4	NR
8 Type 1 Reporting Obligations for all Licence Types												
25	Section 117	✓					Priority 2	✓				
28	Section 11Z	✓					Priority 2	✓				
92	Section 11M	✓					Priority 2	✓				
227	Section 11M		✓				Priority 2		✓ ¹			
9 Licence Compliance Requirements - Energy Coordination Act 1994												
1	Section 11Q(1-2)	✓					Priority 2	✓				
6	Section 11X(3)	✓					Priority 2	✓				
7	Section 11Y(1)(a)	✓					Priority 5	✓				
8	Section 11Y(1)(b)					✓	Priority 4					✓
9	Section 11Y(c)	✓					Priority 5	✓				
10	Section 11ZA(1)	✓					Priority 4	✓				
17	Section 11ZK(3)	✓					Priority 5	✓				
18	Section 11ZOC(1)(a)	✓					Priority 4	✓				
20	Section 11ZOV(1)	✓					Priority 4	✓				
21	Section 11ZOV(2)	✓					Priority 4	✓				
22	Section 11ZOZ(3)					✓	Priority 4					✓
23	Schedule 3, section 2(1)					✓	Priority 4					✓
24	Section 11ZQH(a)	✓					Priority 4	✓				
24A	Section 11ZQH(b)	✓					Priority 4	✓				
11 Licence Compliance Requirements - Energy Coordination (Gas Standards Act 1972)												
25	Section 11Z	✓					Priority 2	✓				
26	Section 11Z	✓					Priority 2	✓				
27	Section 11Z					✓	Priority 2					✓
28	Section 11Z	✓					Priority 2	✓				
13 Licence Compliance Requirements - Licence Conditions												
92	Section 11M	✓					Priority 2	✓				
93	Section 11M					✓	Priority 4					✓
94	Section 11M	✓					Priority 4	✓				
95	Section 11M	✓					Priority 5	✓				

¹SELF-REPORTED BY ATCO

3. PERFORMANCE SUMMARY (CONT.)

3.2 Performance Summary Table (Cont.)

No.	Obligations Reference	Controls Adequacy					Audit Priority	Compliance Rating				
		A	B	C	D	NP		1	2	3	4	NR
13 Licence Compliance Requirements - Licence Conditions												
96	Section 11M	✓					Priority 4	✓				
97	Section 11M	✓					Priority 5	✓				
98	Section 11M					✓	Priority 5					✓
99	Section 11M	✓					Priority 5	✓				
100	Section 11M	✓					Priority 4	✓				
101	Section 11M					✓	Priority 4					✓
102	Section 11M	✓					Priority 4	✓				
103	Section 11M	✓					Priority 4	✓				
104	Section 11M	✓					Priority 4	✓				
105	Section 11M	✓					Priority 4	✓				
15 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Compendium)												
Disconnection												
226	Section 11M	✓					Priority 4	✓				
227	Section 11M		✓				Priority 2		✓ ¹			
Reconnection												
230	Section 11M		✓				Priority 2		✓ ¹			
230A	Section 11M	✓					Priority 2	✓				
230B	Section 11M		✓				Priority 2		✓ ¹			
Information & Communication												
244	Section 11M	✓					Priority 4	✓				
245	Section 11M	✓					Priority 5	✓				
247	Section 11M	✓					Priority 4	✓				
249	Section 11M	✓					Priority 4	✓				
250	Section 11M	✓					Priority 4	✓				
Complaints & Dispute Resolution												
251	Section 11M		✓				Priority 4	✓				
252	Section 11M	✓					Priority 4	✓				
254	Section 11M	✓					Priority 2		✓ ¹			
255	Section 11M		✓				Priority 2		✓ ¹			
255A	Section 11M		✓				Priority 2		✓ ¹			
257	Section 11M	✓					Priority 4	✓				
258	Section 11M	✓					Priority 2	✓				
Complaints & Dispute Resolution												
281	Section 11M	✓					Priority 4	✓				
282	Section 11M	✓					Priority 4	✓				
283	Section 11M	✓					Priority 4	✓				

¹Self-reported by ATCO



ATCO

Independent Assurance Report – Gas Distribution Licence (GDL8) Audit

1 July 2019 to 30 June 2022

INDEPENDENT ASSURANCE REPORT – ATCO

To: Economic Regulation Authority (“ERA”) and Management of ATCO,

Independent Assurance Report on compliance with ATCO Gas Distribution Licence (GDL8)

We have conducted an audit on the systems, procedures and processes used by ATCO to evaluate the operating effectiveness of the of the controls identified to maintain compliance with ATCO Licence obligations for the period 1 July 2019 to 31 June 2022. Our audit has been conducted to form a reasonable assurance conclusion and this report has been prepared in accordance with the ERA Guidelines.

ATCO Responsibilities

Management of ATCO are responsible for designing, implementing and maintaining internal controls relevant to compliance with the ERA Gas Distribution Licence (GDL8) and ensure operating processes meet the requirements as per the ERA Guidelines.

Independence

We have complied with the relevant ethical requirements relating to assurance engagements, which include independence and other requirements founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality, and professional behaviour.

In accordance with Australian Standard on Quality Control 1, RSM maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Our Responsibilities

Our responsibility is to express a conclusion on compliance with the ERA Gas Distribution Licence, in all material respects. The audit has been conducted in accordance with *ASAE 3100 – Compliance Engagement* to provide reasonable assurance that ATCO has complied with all relevant obligations of their WA Gas Trading Licence in accordance with the ERA Guidelines. We accordingly include such tests and procedures we consider necessary in the circumstances.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Inherent Limitations

Because of the inherent limitations of any internal control structure, it is possible that fraud or errors may occur and not be detected. We have not audited the overall internal control structure and no opinion is expressed as to its effectiveness. An audit is not designed to detect all weaknesses in control procedures or all instances of non-compliance as it is not performed continuously throughout the period, and the tests performed are on a sample basis having regard to the nature and size of the entity.

Any projection of the evaluation of internal control procedures to future periods is subject to the risk that the procedures may become inadequate because of changes in conditions, or that the degree of compliance with them may deteriorate.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Use of Report

This reasonable assurance report has been prepared for ATCO and the ERA. We disclaim any assumption of responsibility for any reliance on this report to any other persons or users, or for any purpose other than that for which it was prepared.

We disclaim all liability to any party other than ATCO in respect of, or in consequence of, anything done, or omitted to be done, by any party in reliance, whether whole or partial, upon any information contained in this report. Any party, other than ATCO, who chooses to rely in any way on the contents of this report, does so at their own risk.

Conclusion

Based on the procedures performed and evidence obtained, in our opinion, except for the exceptions identified in **Section 4** of the report and any effects thereof, ATCO have complied, in all material respects, with the WA Gas Distribution Licence (GDL8) for the period 1 July 2019 to 31 June 2022.

Signed



PHILIPPA HOBSON
Director
RSM Australia Pty Ltd

Perth
31 August 2022

4. DETAILED FINDINGS

Each Licence obligation was assessed based on their Audit Priority which determined the audit objectives, the nature and extent of the audit procedures required (as outlined in the Audit Plan). Testing ranged from extensive substantive testing around the controls and activities of particular processes to confirming the existence of controls through to discussions with key personnel.

The table below details how ATCO addressed their Licence obligations where the following observations and recommendations are presented in sub-sections for each of the relevant Codes and Regulations as detailed below:

- **Section 4.1** - Licence Compliance Requirements - Type 1 Reporting Obligations for all Licence Types
- **Section 4.2** – Licence Compliance Requirements - Energy Coordination Act 1994
- **Section 4.3** - Licence Compliance Requirements - Gas Standards Act 1972
- **Section 4.4** – Licence Compliance Requirements - Licence Conditions
- **Section 4.5** - Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Compendium)

It is noted that Licence obligations that were assessed as 'Not Applicable' for the audit period have not been included in the detailed findings below in accordance with the ERA Guidelines.

Each section contains:

- **Assessment of compliance and control adequacy** – the conclusions from our audit procedures and our assessment of ATCO's compliance with the applicable obligations;
- **Findings** – our understanding of the process and any issues that have been identified during the audit; and
- **Recommendations** – recommendations for improvement or enhancement of the process or control.

4. DETAILED FINDINGS (CONT.)

4.1 Type 1 Reporting Obligations for all Licence Types

No.	Obligation Reference	Obligation Description	Observations and Findings
8 Type 1 Reporting Obligations for all Licence Types			
25	Energy Coordination Act section 11Z	A licensee must comply with the applicable standards of the Gas Standards Act 1972.	<p>Discussions with the Manager Technical Compliance and Manager Risk & Compliance revealed that there were three Safety Cases and Safety Inspection plans (2019, 2022, 2021) which supported compliance with this licence obligation.</p> <p>Inspection Plans are annually audited, and the review of annual audit reports of the Safety Case (2019-2021) did not identify any non-compliance with the Safety Cases. High-risk findings of Inspection Plan audits were actioned by management. Furthermore, we reviewed the Acceptance Letters for all three years received from the Department of Mines, Industry Regulation and Safety (DMIRS) and confirmed they were accepted and therefore compliant.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation.</p>
		Priority 2	Control Adequacy: A Compliance Rating: 1

4. DETAILED FINDINGS (CONT.)

4.1 Type 1 Reporting Obligations for all Licence Types

No.	Obligation Reference	Obligation Description	Observations and Findings
8 Type 1 Reporting Obligations for all Licence Types			
26	Energy Coordination Act section 11Z Gas Standards Act 1972 Section 8(1)	A licensee shall not commence to supply gas to a consumer's gas installation unless that installation meets the requirements prescribed in respect of that installation.	<p>Discussions with the Manager Technical Compliance showed that Pressure Reduction Systems and OPS Operation Pressure Shutoff valves are in place to monitor the minimum heating value. This value was elaborated as between 46.0 – 52.0 in the Wobbe specification range. Pressure Reduction Systems and Operation Pressure Shutoff systems are monitored regularly and linked remotely to the asset management team. Should a breach of the defined parameters occur, an alarm will be raised automatically. Inspection reports of the gas composition are completed on a monthly basis and submitted to the Department of Mines, Industry Regulation and Safety (DMIRS).</p> <p>Sample based testing of eight monthly monitoring reports showed that the heating values were within the approved minimum heating value range. Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation.</p>
		Priority 2	Control Adequacy: A Compliance Rating: 1

4. DETAILED FINDINGS (CONT.)

4.1 Type 1 Reporting Obligations for all Licence Types

No.	Obligation Reference	Obligation Description	Observations and Findings
8 Type 1 Reporting Obligations for all Licence Types			
92	Energy Coordination Act section 11M	The licensee must continuously operate those parts of the distribution system required to meet its obligations to supply gas, except to the extent necessary for compliance with the Gas Standards (Gas Supply and System Safety) Regulations 2000.	<p>Discussions with Manager Risk & Compliance indicated that the Gas Distribution Safety Cases which ensure the safe distribution of gas and report, cover the continuity of operation and other aspects of technical compliance. The safety cases are audited on an annual basis.</p> <p>Inspection of the Safety Case and curtailment documents showed that the continuity of operations was appropriately documented. The Safety Case document was approved on the 1/12/2017) and the curtailment document was approved on the 14/05/2018. Both documents were still current during the audit period and further investigation of the Safety Case audit reports and Curtailment Document did not identify any exceptions.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation</p>
		Priority 2	Control Adequacy: A Compliance Rating: 1

4. DETAILED FINDINGS (CONT.)

4.1 Type 1 Reporting Obligations for all Licence Types

No.	Obligation Reference	Obligation Description	Observations and Findings
8 Type 1 Reporting Obligations for all Licence Types			
227	Energy Coordination Act section 11M	A retailer or a distributor must not arrange for disconnection or disconnect a customer's supply address in the circumstances specified.	<p>Non-Compliant</p> <p>Discussions with the Manager Commercial Operations, Manager Network Control, Planning Manager and Manager Risk & Compliance revealed that there are procedures and monitoring mechanisms in place to support compliance with this licence obligation to ensure that disconnections are not to be done after 3pm. Also, ATCO has their own internal control of 12pm to mitigate any issues that may occur through the disconnection process. Contractors on the field utilise Personal Mobility Devices, in which the Planning team enters and removes jobs from the devices. As a manual control, the planning team remove any jobs that may go over the internal control of 12pm. However, should a job be rescheduled and communicated with a customer, it may be done after the expected timeframe.</p> <p>ATCO has self-reported one breach to the ERA in 2019 where a disconnection was performed outside the specified timeframe. Sample based testing of 46 disconnections during the audit period 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>We have noted that ATCO is currently implementing a Field Mobility project to automate the disconnection timeframe requirements in the workforce management system, which is managed manually at the moment. The targeted completion date for this project is December 2023 (See Section 2.5, 02/2019)</p> <p>Based on the above, we determined ATCO to be non-compliant with this obligation.</p> <p>Recommendation 03/2022: We have noted that ATCO is currently implementing a Field Mobility project to automate the disconnection timeframe requirements in the workforce management system, which is managed manually at the moment.</p> <p>We recommend ATCO to continue the current plan as scheduled and consider monitoring the mobility devices of contractors closely in the meantime to ensure jobs that may go past the 3pm time-limit are pulled from the devices and scheduled as priority for the following suitable business day. Adhering to the internal KPI of not performing disconnections after 12pm should be the benchmark for disconnections.</p>
		Priority 2	Control Adequacy: B Compliance Rating: 2

4. DETAILED FINDINGS (CONT.)

4.2 Energy Coordination Act 1994

No.	Obligation Reference	Obligation Description	Observations and Findings
9. Licence Compliance Requirements - Energy Coordination Act 1994			
1	Energy Coordination Act section 11Q(1-2)	A licensee must pay the applicable fees in accordance with the Economic Regulation Authority (Licensing Funding) Regulations 2014 clauses 6 & 7.	<p>Discussions with Manager Risk & Compliance revealed that there are procedures in place to pay applicable fees in accordance with the prescribed timeframe.</p> <p>Review of three ETF Remittance advice for licence fees paid during the audit period revealed that the ATCO paid all invoice within the two weeks of receiving the invoice.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation</p>
		Priority 2	Control Adequacy: A Compliance Rating: 1
6	Energy Coordination Act section 11X(3)	A licensee must take reasonable steps to minimise the extent of the duration of any interruption, suspension or restriction of the supply of gas due to an accident, emergency, potential danger or other unavoidable cause	<p>Discussions with the Manager Network Control established that ATCO adhere to an established Emergency Response Management Plan which is supplemented by an escalation process map. These guide ATCO from the call centre to the Contractors to categorise and minimise the extent of the duration of any interruption due to emergency. A review of these documents was undertaken and concluded that the information included is adequate.</p> <p>Sample based testing of 13 emergency line calls determined that all were handled correctly in response to priority level administered. 3 voice samples of the interaction between the staff on the emergency line determined that in accordance with the incident reporting procedure that calls are handled adequately.</p>
		Priority 2	Control Adequacy: A Compliance Rating: 1

4. DETAILED FINDINGS (CONT.)

4.2 Energy Coordination Act 1994 (Cont.)

No.	Obligation Reference	Obligation Description	Observations and Findings
9. Licence Compliance Requirements - Energy Coordination Act 1994			
7	Energy Coordination Act section 11Y(1)(a)	A licensee must provide for an asset management system in respect of its assets within 5 business days from the commencement date, or from the completion of construction of the distribution system, whichever is later	<p>Discussions with the Manager, Risk & Compliance confirmed that ATCO uses SAP as their Asset Management System. SAP was introduced and its use commenced in 2017 and was verified in the last audit that ATCO was compliant with the obligation.</p> <p>Policies and procedures are in place to support the AMS, and these are comprehensively outlined in the Asset Management Plan. Review of the Asset Management Plan detailed the policies above mentioned is reviewed annually by management to ensure that the policies and procedures in place are still operating effectively.</p> <p>Based on our audit procedures, we have concluded that ATCO has adequate and effective controls in place to support compliance with this licence obligation</p>
		Priority 5	Control Adequacy: A Compliance Rating: 1
8	Energy Coordination Act section 11Y(1)(b)	A licensee must notify details of the asset management system and any substantial changes to it to the ERA within 10 business days	<p>Discussions with the Manager Risk & Compliance confirmed that ATCO has made no changes to the AMS within the audit period. Should there have been any changes, they would have been provided to the ERA within the stipulated period (within 10 days). The Master Obligation Register is where this is tracked.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation</p>
		Priority 4	Control Adequacy: N/P Compliance Rating: N/R

4. DETAILED FINDINGS (CONT.)

4.2 Energy Coordination Act 1994 (Cont.)

No.	Obligation Reference	Obligation Description	Observations and Findings
9. Licence Compliance Requirements - Energy Coordination Act 1994			
9	Energy Coordination Act section 11Y(1)(c)	A licensee must provide the ERA with a report by an independent expert acceptable to the ERA within 24 months of commencement and every 24 months thereafter (or longer if the ERA allows) as to the effectiveness of the asset management system.	<p>Discussions with the Manager Risk & Compliance confirmed last year's notes that ATCO have an exemption allowing them to perform the external audits every three years (36 months). They are aware that the auditor must be approved by the ERA. We observed that after each approval of a report, the ERA provides ATCO the next date to which the next performance audit/ asset management system audit is to be submitted. A review of the 2020 AMS report approval from the ERA highlighted that the AMS review audit is to be submitted in 2023. This is tracked through the Master Obligations Register.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation.</p>
		Priority 5	Control Adequacy: A Compliance Rating: 1
10	Energy Coordination Act section 11ZA(1)	A licensee must provide the ERA with a performance audit by an independent expert acceptable to the ERA within 24 months of commencement and every 24 months thereafter (or longer if the ERA allows).	<p>Discussions with the Manager, Risk & Compliance confirmed that ATCO has an exemption to the 24-month rule for audits performed by an independent expert. We observed that after each approval of a report, the ERA provides ATCO the next date to which the next performance audit/ asset management system audit is to be submitted. This is tracked through the Master Obligations Register to ensure that preparations for the audit are ready to commence. Review of the 2019 Performance Audit approval highlighted the 36-month timeframe for which ATCO is to submit the next performance audit report to the ERA.</p> <p>Based on our audit procedures and review of documentation we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation</p>
		Priority 4	Control Adequacy: A Compliance Rating: 1

4. DETAILED FINDINGS (CONT.)

4.2 Energy Coordination Act 1994 (Cont.)

No.	Obligation Reference	Obligation Description	Observations and Findings
9. Licence Compliance Requirements - Energy Coordination Act 1994			
17	Energy Coordination Act section 11ZK(3)	A licensee must pay the costs and expenses incurred in the taking of an interest or easement in respect of land held by a public authority.	<p>Discussions with the Land Management Coordinator and Manager Risk & Compliance revealed ATCO commenced one new easement of land within the audit period where ATCO purchased a lot from the State of WA for the pressure reduction station expansion. Contract Approval Forms (CAFs) were used in order to gain the necessary approvals and all signatures were recorded via DocuSign.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation.</p>
		Priority 5	Control Adequacy: A Compliance Rating: 1
18	Energy Coordination Act section 11ZOC(1)(a)	A licensee that transports gas through a distribution system must be a member of an approved retail market scheme if a scheme is in force.	<p>Discussions with the Manager Commercial Operations and Manager Risk & Compliance confirmed that ATCO was a member of the Australian Energy Market Operator (AEMO) as a retail market scheme. A Review of the AEMO's Current Registered Participants List was conducted and found that under the WA Retail Gas on AEMO's website; which contained the listing of members who make up the retail scheme; confirmed ATCO's inclusion. ATCO confirmed that it is a one-time application, unless a company is removed from the list, therefore there is no need to reapply.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation</p>
		Priority 4	Control Adequacy: A Compliance Rating: 1

4. DETAILED FINDINGS (CONT.)

4.2 Energy Coordination Act 1994 (Cont.)

No.	Obligation Reference	Obligation Description	Observations and Findings
9. Licence Compliance Requirements - Energy Coordination Act 1994			
20	Energy Coordination Act section 11ZOV(1)	A licensee must not engage in prohibited conduct relating to the operation of a retail market scheme	<p>Discussions with the Manager Commercial Operations and Manager Risk & Compliance established that ATCO has a code of conduct in place to minimise the risk of prohibited conduct occurring. A review of the Code of Conduct and ATCO's vision outlined in a "How we do business" document highlighted ATCO's values of Integrity, Agility, Caring and Collaboration. The integrity value covers the "do's" and "do not's" of staff operations in the regulatory environment.</p> <p>ATCO participates in regular meetings with AEMO and retailers which occur monthly or bi-monthly and are recorded in meeting minutes. Any breaches or non-compliances are reported in the meeting. Delays in meter readings due to COVID related issues in recent times, have resulted in these meetings occurring on a more frequent basis.</p> <p>The Manager Commercial Operations attends all the meetings, and depending on the issues, is joined by other relevant ATCO team members. Minutes are taken for all these meetings. Minutes for the past two quarters were observed to confirm attendance by ATCO representatives.</p> <p>Prohibited conduct is prevented through the planning system (NMIS). Through access controls for employees by role, illegitimate alterations within the system are mitigated. These access rights are reviewed once a quarter. A review of these access controls was conducted.</p> <p>Negative Assurance audit reports on Retail Market Procedures and the associated workpapers were reviewed and it was established that there were no instances where ATCO had participated or assisted another party to participate in prohibited conduct were found.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation</p>
		Priority 4	Control Adequacy: A Compliance Rating: 1
21	Energy Coordination Act section 11ZOV(2)	A licensee must not assist another party to engage in prohibited conduct relating to the operation of a retail market scheme	<p>Prohibited conduct is prevented through the planning system (NMIS). Through access controls for employees by role, illegitimate alterations within the system are mitigated. These access rights are reviewed once a quarter. A review of these access controls was conducted.</p> <p>Negative Assurance audit reports on Retail Market Procedures and the associated workpapers were reviewed and it was established that there were no instances where ATCO had participated or assisted another party to participate in prohibited conduct were found.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation</p>
		Priority 4	Control Adequacy: A Compliance Rating: 1

4. DETAILED FINDINGS (CONT.)

4.2 Energy Coordination Act 1994 (Cont.)

No.	Obligation Reference	Obligation Description	Observations and Findings
9. Licence Compliance Requirements - Energy Coordination Act 1994			
22	Energy Coordination Act section 11ZOV(3)	A licensee, as a member of a retail scheme, must comply with a direction given to it by the ERA to amend the scheme, and to do so within a specified time.	<p>Discussions with Manager Commercial Operations, revealed that in February 2021 there was a request to change the scheme to introduce new activities into the market, upgrading market schema to 40.</p> <p>AEMO sought approval from the ERA for three proposals to amend the gas retail market scheme. An IT system upgrade was planned, where a review of the plan was executed by the ERA. The ERA approved the amendments and published the amendment date in the West Australian Government Gazette, the 29th of November 2021. However, as per the decision by the ERA, these implementations are non-binding and participants are not obligated to implement them.</p> <p>ATCO has a system upgrade scheduled with the IT team in relation to the amendments for the 29th of November 2022.</p> <p>In absence of activity pertaining to this obligation occurring, we are unable to provide a compliance rating.</p>
		Priority 4	Control Adequacy: N/P Compliance Rating: NR
23	Energy Coordination Act schedule 3, section 2(1)	A licensee, as the operator of a supply system, must notify the Minister if a state of emergency exists in relation to a supply system as soon as practicable after becoming aware of it.	<p>Discussions with the Manager Network Control has revealed there were no instances of a 'state of emergency' in the period. An analysis of process documents determined that there are adequate procedures and policies to meet the obligation should the event of an emergency arise.</p> <p>In the absence of activity within the audit period we are unable to rate the compliance of this licence obligation.</p>
		Priority 4	Control Adequacy: N/P Compliance Rating: NR

4. DETAILED FINDINGS (CONT.)

4.2 Energy Coordination Act 1994 (Cont.)

No.	Obligation Reference	Obligation Description	Observations and Findings
9. Licence Compliance Requirements - Energy Coordination Act 1994			
24	Energy Coordination Act section 11ZQH(a)	<p>The licensee must not supply gas to customers unless the licensee is a member of an approved gas industry ombudsman scheme.</p>	<p>Discussion with Customer Relation Team Leader indicated that ATCO is part of the Energy and Water Ombudsman as an approved industry ombudsman scheme. Review of three invoices from the audit period issued by the Gas Industry Ombudsman and paid by ATCO revealed that ATCO has been a member of the scheme for the duration.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation.</p>
		<p>Priority 4</p> <p>Control Adequacy: A</p> <p>Compliance Rating: 1</p>	
24A	Energy Coordination Act section 11ZQH(b)	<p>The licensee must not supply gas to customers unless the licensee is bound by, and compliant with, any decision or direction of the gas industry ombudsman.</p> <p><i>Note: This obligation was added as part of the ERA compliance reporting manual update as of June 2020.</i></p>	<p>Meetings with Manager Risk and Compliance and the Customer Relations Team Leader revealed that there was one instance where ATCO received a direction from the Ombudsman to repair the customers' reticulation system. Although ATCO contacted the client to action the Ombudsman direction, they were unable to do so as the customer rejected ATCO's request for repairing the reticulation system; and requested further work beyond the scope of direction. ATCO was unable to provide us evidence for the customers' rejection and further request as a personal phone was used to call the customer.</p> <p>Based on our audit procedures we have concluded that ATCO was compliant with this license obligation.</p>
		<p>Priority 4</p> <p>Control Adequacy: A</p> <p>Compliance Rating: 1</p>	

4. DETAILED FINDINGS (CONT.)

4.3 Gas Standards Act 1972

No.	Obligation Reference	Obligation Description	Observations and Findings
10 Licence Compliance Requirements - Gas Standards Act 1972			
25	Energy Coordination Act section 11Z	A licensee must comply with the applicable standards of the Gas Standards Act 1972.	<p>Discussions with the Manager Technical Compliance and Manager Risk & Compliance revealed that Safety Case (2019-2021) and safety inspection plans supported compliance with this licence obligation.</p> <p>Inspection Plans are annually audited, and the review of annual audit reports of the Safety Case (2019-2021) did not identify any non-compliance with the Safety Cases. High-risk findings of Inspection Plan audits were actioned by management. Furthermore, we reviewed the Acceptance Letter received from the Department of Mines, Industry Regulation and Safety (DMIRS) as the regulator, confirming its acceptance and therefore, compliance.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation.</p>
		Priority 2	Control Adequacy: A Compliance Rating: 1
26	Energy Coordination Act section 11Z	A licensee must not supply gas at less than the relevant approved minimum heating value	<p>Discussions with the Manager Technical Compliance showed that Pressure Reduction Systems and OPS Operation Pressure Shutoff valves are in place to monitor the minimum heating value. This value was elaborated as between 46.0 – 52.0 in the Wobbe specification range. Pressure Reduction Systems and Operation Pressure Shutoff systems are monitored regularly and linked remotely to the asset management team. Should a breach of the defined parameters occur, an alarm will be raised automatically. Inspection reports of the gas composition are completed on a monthly basis and submitted to the Department of Mines, Industry Regulation and Safety (DMIRS).</p> <p>Sample based testing of eight monthly monitoring reports showed that the heating values were within the approved minimum heating value range. Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation.</p>
		Priority 2	Control Adequacy: A Compliance Rating: 1

4. DETAILED FINDINGS (CONT.)

4.3 Gas Standards Act 1972 (Cont.)

No.	Obligation Reference	Obligation Description	Observations and Findings
10 Licence Compliance Requirements - Gas Standards Act 1972			
27	Energy Coordination Act section 11Z Gas Standards Act 1972 Section 9(1)	A licensee shall not cause or permit any alteration to be made in the specific gravity, flame, speed or other prescribed characteristic of gas supplied by him unless he has first applied for, and obtained, the written approval of the Minister	Discussions with Manager Technical Compliance highlighted that there had been no alterations to the characteristic of gas supplied by ATCO within the audit period. In the absence of activity within the audit period, we are unable to rate the compliance of this licence obligation.
		Priority 2	Control Adequacy: N/P Compliance Rating: N/R
28	Energy Coordination Act section 11Z Gas Standards Act 1972 Section 13(1)	A licensee shall not commence to supply gas to a customer's gas installation unless that installation meets the requirements prescribed in respect of that installation	<p>Discussions with the Manager Gas Inspection, Manager Technical Compliance and Manager Risk & Compliance revealed that ATCO has been exempt from this obligation by the DMIRS. We sighted the approval documents and its inclusion in the Inspection Policy. However, they are required to prepare inspection plan for inspecting 5% of the new connections.</p> <p>Sample based testing of eight quarterly inspection plans and 50 individual gas inspections within the audit period revealed that the inspection had been completed in accordance with the plan and all prescribed requirements had been met.</p> <p>We also noted that for 2020, ATCO received an exemption for this quota by the Director of Energy and Safety (DoES) due to lockdown and COVID complications. As part of these measures, G Class Inspection activities were temporarily suspended from the 17th of March 2020, in consultation with Building and Energy, to reduce the contact exposure risk between members of the public and ATCO personnel.</p> <p>Based on our audit procedures, and taking into account the exemption by the Director of Energy Safety, we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation</p>
		Priority 2	Control Adequacy: A Compliance Rating: 1

4. DETAILED FINDINGS (CONT.)

4.4 Licence Compliance Requirement - Licence Conditions

No.	Obligation Reference	Obligation Description	Observations and Findings
13 Licence Compliance Requirements – Licence Conditions			
92	Energy Coordination Act section 11M	A licensee must continuously operate those parts of the distribution system required to meet its obligations to supply gas, except to the extent necessary for compliance with the Gas Standards (Gas Supply and System Safety) Regulations 2000.	<p>Discussions with Manager Risk & Compliance indicated that the Gas Distribution Safety Cases which ensure the safe distribution of gas and report, cover the continuity of operation and other aspects of technical compliance. The safety cases are audited on an annually basis.</p> <p>Inspection of the Safety Case and Curtailment documents demonstrated that the continuity of operations was appropriately documented. The Safety Case document was approved on the 1/12/2017) and the curtailment document was approved on the 14/05/2018. Both documents were still current during the audit period and further investigation of the Safety Case audit reports and Curtailment Document did not identify any exceptions.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation</p>
		Priority 2	Control Adequacy: A Compliance Rating: 1
93	Energy Coordination Act section 11M	A licensee must give the ERA written notice where it proposes to permanently cease or substantially decrease its activities under the licence 6 months before the cessation or decrease or, if this is not practicable, as soon as possible.	<p>Discussions with the Manager Risk & Compliance established that throughout the audit period ATCO has not proposed to substantially decrease or permanently cease its activities.</p> <p>In the absence of activity within the audit period, we are unable to rate the compliance of this licence obligation.</p>
		Priority 4	Control Adequacy: N/P Compliance Rating: N/R

4. DETAILED FINDINGS (CONT.)

4.4 Licence Compliance Requirements – Licence Conditions

No.	Obligation Reference	Obligation Description	Observations and Findings
13 Licence Compliance Requirements – Licence Conditions			
94	Energy Coordination Act section 11M	A licensee must comply and require its expert to comply with the ERA's standard guidelines dealing with the asset management review.	<p>Discussions with the Manager Risk & Compliance confirmed that every 36 months ATCO seeks tender for an independent expert to review its Asset Management System. This process also verifies the expert's compliance ERA's standard guidelines.</p> <p>An inspection of a letter from the ERA approving the AMS review plan and a review of the 2020 Asset Management System Review Report issued by the independent expert concluded the independent expert's compliance with the ERA's standard guidelines with the Asset Management Review.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation.</p>
		Priority 4	Control Adequacy: A Compliance Rating: 1
95	Energy Coordination Act section 11M	A licensee's independent expert must be approved by the ERA prior to reviewing the effectiveness of the asset management system.	<p>Discussions with the Manager Risk & Compliance revealed that ATCO seeks the approval of the independent expert from the ERA before conducting the asset management system review. Planning for this to occur is tracked through the Master Obligation Register.</p> <p>Inspection of a letter from the ERA to ATCO confirmed the ERA's approval for the selected independent expert who subsequently conducted the AMS review in 2020.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation.</p>
		Priority 5	Control Adequacy: A Compliance Rating: 1

4. DETAILED FINDINGS (CONT.)

4.4 Licence Compliance Requirements – Licence Conditions

No.	Obligation Reference	Obligation Description	Observations and Findings
13 Licence Compliance Requirements – Licence Conditions			
96	Energy Coordination Act section 11M	A licensee must comply and require its expert to comply with the ERA's standard guidelines dealing with the performance audit.	<p>Discussions with Manager Risk & Compliance indicated that following a completion of tender to seek an independent auditor to conduct a performance audit, ATCO would seek approval from the ERA. This is managed through the Master Obligation Register.</p> <p>A review of the previous Performance Audit Report and Audit Plan issued by the independent auditor was conducted. We were able to confirm that compliance with the ERA's standard Guidelines was included.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation</p>
		Priority 4	Control Adequacy: A Compliance Rating: 1
97	Energy Coordination Act section 11M	A licensee's independent auditor must be approved by the ERA prior to the audit.	<p>Discussions with Manager Risk & Compliance confirmed that ATCO's independent auditors have to be approved by the ERA and the same auditor cannot be engaged for more than two consecutive years. Engaging independent auditors, obtaining required approvals and meeting the assurance report submission deadlines are tracked through a master obligation register which is utilised by ATCO to comply with various regulatory requirements.</p> <p>A review of 2022 approval of the performance auditor and the 2020 approval of the asset management auditor, we were able to confirm that independent auditors engaged by ATCO are approved by ERA prior to engagement. Additionally, we confirmed that the same auditor was not engaged for the previous review.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation</p>
		Priority 5	Control Adequacy: A Compliance Rating: 1

4. DETAILED FINDINGS (CONT.)

4.4 Licence Compliance Requirements – Licence Conditions

No.	Obligation Reference	Obligation Description	Observations and Findings
13 Licence Compliance Requirements – Licence Conditions			
98	Energy Coordination Act section 11M	A licensee may be subject to individual performance standards.	Discussions with the Manager Risk & Compliance confirmed that ATCO has not been subject to individual performance standards, neither has the ERA imposed such standards throughout the period. Further investigation of ATCO's correspondence with ERA only revealed that ATCO was able to submit Performance Audit Reports and Asset Management System Reviews every 36 months. In the absence of activity within the audit period we are unable to rate the compliance of this licence obligation.
		Priority 5	Control Adequacy: N/P Compliance Rating: N/R
99	Energy Coordination Act section 11M	Unless otherwise specified, all notices must be in writing and will be regarded as having been sent and received in accordance with defined parameters.	Discussions with the Manager Risk & Compliance confirmed that all notices provided by ATCO are in writing via email and the ERA responds in kind. A review of six emails pertaining to compliance reporting showed all notices and responses are done through email. Based on our audit procedures, we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation
		Priority 5	Control Adequacy: A Compliance Rating: 1

4. DETAILED FINDINGS (CONT.)

4.4 Licence Compliance Requirements – Licence Conditions

No.	Obligation Reference	Obligation Description	Observations and Findings
13 Licence Compliance Requirements – Licence Conditions			
100	Energy Coordination Act section 11M	A licensee and any related body corporate must maintain accounting records that comply with the Australian Accounting Standards Board or equivalent International Accounting Standards.	<p>Discussions with the Manager Risk & Compliance showed that adequate control mechanisms are in place to ensure accounting records are maintained as per the Australian Accounting Standards Board or equivalent International Accounting Standards.</p> <p>It was revealed that accounting is reported on internally, including to the head office in Canada. The CFO meets with the Designated Audit Directors (DADs). The finance department has their own process for management reporting.</p> <p>In order to establish the Finance team at ATCO have adequate oversight and are appropriately qualified in their positions and duties we considered the organisation chart and personnel holding positions within Finance. We also reviewed three annual audited reports (2019-2021) by PwC, and it was revealed that an unqualified opinion was issued for the three years, which included compliance with applicable accounting standards, and no issues were raised. Though we do note in the 2020 annual financial report there was an emphasis of matter noted. In relation to the usage of the report.</p> <p>Quarterly management reports were reviewed that confirmed there was appropriate oversight regarding preparation of the financial statements. ATCO prepares its financial statements through SAP.</p> <p>Based on our audit procedures, we have concluded that ATCO has adequate and effective controls in place to support compliance with this licence obligation.</p>
		Priority 4	Control Adequacy: A Compliance Rating: 1

4. DETAILED FINDINGS (CONT.)

4.4 Licence Compliance Requirements – Licence Conditions

No.	Obligation Reference	Obligation Description	Observations and Findings
13 Licence Compliance Requirements – Licence Conditions			
101	Energy Coordination Act section 11M	A licensee must report to the ERA if the licensee is under external administration or experiences a significant change in its corporate, financial or technical circumstances that may affect the licensee's ability to meet its obligations under this licence within 2 business days of the change occurring.	<p>Discussions with the Manager Risk & Compliance revealed that ATCO has not had experienced a significant change in its corporate, financial, or technical circumstances and had not been under external administration during the audit period.</p> <p>Given the absence of activity within the audit period we are unable to rate ATCO's compliance with this licence obligation.</p>
		Priority 4	Control Adequacy: N/P Compliance Rating: N/R
102	Energy Coordination Act section 11M	A licensee must provide to the ERA any information that the ERA may require in connection with its functions under the Energy Coordination Act 1994 in the time, manner and form specified by the ERA.	<p>Discussions with the Manager Risk & Compliance revealed that ATCO is required to submit the following reports to the ERA on a regular basis:</p> <ul style="list-style-type: none"> ▪ Asset management review ▪ Annual Compliance reports ▪ Annual Performance reports, and ▪ Performance audit report <p>Whilst the performance report and compliance reports are submitted annually, the asset management review report and performance audit report are submitted once every 36 months. This is tracked through the Master Obligation register. The Manager Risk and Compliance, ensures that the report format and conditions are compliant with the ERA's guidelines and submits the report to the ERA. Reports are reviewed internally prior to submission to the ERA.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation.</p>
		Priority 4	Control Adequacy: A Compliance Rating: 1

4. DETAILED FINDINGS (CONT.)

4.4 Licence Compliance Requirements – Licence Conditions

No.	Obligation Reference	Obligation Description	Observations and Findings
13 Licence Compliance Requirements – Licence Conditions			
103	Energy Coordination Act section 11M	A licensee must publish any information it is directed by the ERA to publish, within the timeframes specified.	<p>Discussions with the Manager Risk & Compliance revealed that ATCO has a 7-day timeframe for information to be published. This corresponded with a review of email trails for three performance reports between ATCO and the ERA, where the ERA specifically mentioned the 7-day time limit via date. The inspection of supporting evidence demonstrated ATCO's compliance with the specified 7 days' timeframe for publishing information within the audit period.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation.</p>
		Priority 4	Control Adequacy: A Compliance Rating: 1
104	Energy Coordination Act section 11M	Subject to clause 2.2, a licensee must provide reasonable information relating to the capacity of its distribution system at a specified location as requested by the holder of a trading licence in respect of the distribution system to enable the holder of the trading licence to perform the activities under its licence	<p>Discussions with the Manager Commercial Operations and the Manager Risk & Compliance showed that information exchange with trading licensee on pipelines not covered by the National Access Code (Kalgoorlie and Albany Gas Distribution Pipelines (GDS) has been implemented as if they were covered pipelines.</p> <p>The data exchange with the trading licensee automated through NMIS. This fact was confirmed through a sample-based review of three-meter Readings within the audit period.</p> <p>Based on our audit procedures we have concluded that ATCO has adequate and effective controls in place to support compliance with this licence obligation.</p>
		Priority 4	Control Adequacy: A Compliance Rating: 1

4. DETAILED FINDINGS (CONT.)

4.4 Licence Compliance Requirements – Licence Conditions

No.	Obligation Reference	Obligation Description	Observations and Findings
13 Licence Compliance Requirements – Licence Conditions			
105	Energy Coordination Act section 11M	A licensee must offer to connect residential premises located within the licence area to the distribution system if requested by a trader, subject to certain defined conditions.	<p>Discussions with the Planning Manager and Manager Risk & Compliance confirmed that once the established conditions of residential premises had been passed, offers to connect which are integrate into NMIS, are actioned automatically.</p> <p>The connection handbook detailed a well-established workflow for each instance of connection request.</p> <p>Based on our audit procedures we have concluded that ATCO has adequate and effective controls in place to support compliance with this licence obligation.</p>
		Priority 4	Control Adequacy: A Compliance Rating: 1

4. DETAILED FINDINGS (CONT.)

4.5 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Compendium)

No.	Obligation Reference	Obligation Description	Observations and Findings
12 Licence Compliance Requirements - Energy Coordination (Customer Contracts) Regulations 2004 (Cont.)			
Disconnection			
226	Energy Coordination Act section 11M	A distributor who disconnects or interrupts a customer's supply address for emergency reasons must provide a 24-hour emergency line and use its best endeavours to restore supply as soon as possible.	<p>Discussions with the Manager Network Control and Manager of Risk and Compliance revealed that rotational- roster system ensures the maintenance and staffing of a 24-hour emergency line at all times. Rosters are planned until 2026 for resource management. In this roster Auxiliary (Aux) staff are also rostered to cover members of the team when full time staff are unable to work.</p> <p>A review of 3 emergency line calls confirmed that all required information was communicated to the customer. We noted that ATCO maintained an internal escalation process and job categorisation where high priority jobs hold a stricter timeframe.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation.</p>
		Priority 4	Control Adequacy: A Compliance Rating: 1

4. DETAILED FINDINGS (CONT.)

4.4 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Compendium)

No.	Obligation Reference	Obligation Description	Observations and Findings
12 Licence Compliance Requirements - Energy Coordination (Customer Contracts) Regulations 2004 (Cont.)			
Disconnection			
227	Energy Coordination Act section 11M	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>Non-Compliant</p> <p>Discussions with the Manager Commercial Operations, Manager Network Control, Planning Manager and Manager Risk & Compliance revealed that there are procedures and monitoring mechanisms in place to support compliance with this licence obligation to ensure that disconnections are not be done after 3pm. Also, ATCO has their own internal control of 12pm to mitigate any issues that may occur through the disconnection process. Contractors on the field utilise Personal Mobility Devices, in which the Planning team enters and removes jobs from the devices. As a manual control, the planning team remove any jobs that may go over the internal control of 12pm. However, should a job be rescheduled and communicated with a customer, it may be done after the expected timeframe.</p> <p>ATCO has self-reported one breach to the ERA in 2019 where a disconnection was performed outside the specified timeframe. Sample based testing of 46 disconnections during the audit period 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>We have noted that ATCO is currently implementing a Field Mobility project to automate the disconnection timeframe requirements in the workforce management system, which is managed manually at the moment. The targeted completion date for this project is December 2023 (See Section 2.5, 02/2019)</p> <p>Based on the above, we determined ATCO to be non-compliant with this obligation.</p> <p>Recommendation 03/2022: We have noted that ATCO is currently implementing a Field Mobility project to automate the disconnection timeframe requirements in the workforce management system, which is managed manually at the moment.</p> <p>We recommend management continue the current plan as scheduled and consider monitoring the mobility devices of contractors closely in the meantime to ensure jobs that may go past the 3pm time-limit are pulled from the devices and scheduled as priority for the following suitable business day. Adhering to the internal KPI of not performing disconnections after 12pm should be the benchmark for disconnections</p>
		Priority 2	Control Adequacy: B Compliance Rating: 2

4. DETAILED FINDINGS (CONT.)

4.4 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Cont.)

No.	Obligation Reference	Obligation Description	Observations and Findings
15 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Compendium) (Cont.)			
Reconnection			
230	Energy Coordination Act section 11M	<p>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 procedures, 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.</p> <p>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.</p> <p>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>Non-Compliant</p> <p>Discussions with the Planning Manager and Manager Commercial Operations elaborated on the procedures in place to monitor and check SAP reports on a regular basis for reconnections and any rescheduling required. We noted that reconnection appointments are required to be scheduled for completion the following business day. If the customer requires the connection to be rescheduled, these details are recorded in Network Management Information System (NMIS) and fed into SAP with the rescheduled date. Jobs that are requested after 1PM will be scheduled for the next day.</p> <p>ATCO has two self-reported breaches within the audit period where twenty-five (25) reconnections were not performed within the required timeframe. We note that 23 of these instances occurred during 2018-2019, where ATCO trialed a gas inlet valve lock procedure as an alternate to performing gas disconnection and reconnection at the street, which would mitigate excavation and reduce reconnection response time to reconnections. Due to the trailing of this system, 23 reconnections exceeded their respective 2 business day time limit as the tasks were incorrectly categorised during the system trial and were instead performed within a 10 day response time, as assigned in the system.</p> <p>The remaining two (2) instances in the 2019/2020 period were determined as isolated instances, due to the complexity of a job and an internal miscommunication respectively.</p> <p>We conducted sample-based testing of 46 reconnections which resulted in four (4) instances where the reconnection was not performed within the time frame set. Out of four exceptions, two were self-reported to the ERA and two exceptions were completed within three business days. In one of the noted instances, the Retailer's notification was received after 1PM which is the ATCO's cut-off time for scheduling reconnections (internal process). Whilst the requirement of 1PM cut-off time is communicated with the retailers that ATCO deal with, it is not noted in the retail market scheme rules set by AEMO which ATCO subscribes to. We therefore highlight that the source of these exceptions is not a system control deficiency issue.</p> <p>Based on the above, we determined ATCO to be non-compliant with this obligation.</p> <p>Recommendation 01/2022: We recommend ATCO update their internal processes to ensure that reconnection requests that are nearing the identified deadline or received after the cut off time are prioritized and scheduled to be completed by the following business day to ensure ATCO complies with the AEMO's market rules for reconnections. This process could be through manual intervention or further updated via a technology solution.</p>
		Priority 2	Control Adequacy: B Compliance Rating: 2

4. DETAILED FINDINGS (CONT.)

4.4 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Cont.)

No.	Obligation Reference	Obligation Description	Observations and Findings
15 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Compendium) (Cont.)			
Reconnection			
230A	Energy Coordination Act section 11M	<p>If any of the circumstances described in clauses 8.2(3)(b)-(e) apply, the distributor must notify the retailer of the relevant circumstance within 2 business days of receipt of the reconnection request made under clause 8.2(1).</p>	<p>Discussions with the Planning Manager and Manager Commercial Operations elaborated on the procedures to notify retailers of reconnections circumstances. We noted that notifications are sent through SAP automatically to the retailer in instances where the reconnection is unable to be performed within the 2- or 10-day time limit.</p> <p>Sample based testing of 46 samples revealed no instances of non-compliance with the obligation in notifying retailers within the allotted timeframe.</p> <p>Based on the above, we determined ATCO to be compliant with this obligation.</p>
		Priority 2	Control Adequacy: A Compliance Rating: 1
230B	Energy Coordination Act section 11M	<p>Notwithstanding clause 8.2(5), if a distributor becomes aware that there has been an unauthorised utilisation of gas at the customer's supply address, the distributor must notify the retailer as soon as practicable and is not obliged to reconnect the supply address until the issue is resolved</p> <p>Note: this obligation was non-compliant and reported to ERA in FY20-21</p>	<p>Non-Compliant</p> <p>Discussions with the Planning team established that illegal tampering or unauthorised gas usages are initially notified by Field Officers, the public or users. Upon notification, an inspector's order will be issued to the retailer to inform them of the tampering or unauthorised gas usage. We noted that illegal tampering is captured on the same reports as reconnections and have no delineating identifiers.</p> <p>ATCO has one self-reported non-compliance within the audit period where the retailer was not advised, due to an internal miscommunication. Based on the information in the compliance report, the job was not correctly advised to the reconnection team by the field officer. Field Officers report instances of illegal tampering to ATCO, where it is fed into NMIS and notifies the retailer via SAP. The initial report by the field officers and the subsequent capturing the report into SAP was the human error which resulted in the job not being captured in the system. In response to the non-compliance, ATCO has implemented a new communication template and rolled out to ensure the correct process is followed. No further self-reported non-compliances were identified in the 21/22 compliance report period</p> <p>Sample-based testing of 31 service orders related to illegal gas access revealed no further instances where ATCO had not notified suppliers as soon as practicable.</p> <p>Based on our audit procedures we have concluded that ATCO is not compliant with the obligation.</p> <p>Recommendation 04/2022: We recommend that ATCO introduce periodic training for the identification and communication of illegal tampering, and spot checks for staff. Additionally, ATCO management should consider introducing and maintaining a register specifically for illegal tampering instances to monitor the required notifications.</p>
		Priority 2	Control Adequacy: B Compliance Rating: 2

4. DETAILED FINDINGS (CONT.)

4.4 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Cont.)

No.	Obligation Reference	Obligation Description	Observations and Findings
15 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Compendium) (Cont.)			
Information & Communication			
244	Energy Coordination Act section 11M	A distributor must give a customer on request, at no charge, or direct the customer to a person or class of persons who can provide, the information specified in clause 10.6(c)-(i).	<p>Discussions with the acting Customer Relations Team Leader, revealed that ATCO's training modules are available through SafeTrac, where there is theory-based training, in conjunction with the on-the-job training for all call centre employees.</p> <p>The process begins with a customer informing their gas retailer who will inform ATCO. If ATCO receives a phone call directly, they will be referred back to the retailer to ensure the process is followed through correctly.</p> <p>A review of the policies and procedures as well as two audio logs of the call centre handling retailer enquiries, referring back to 10.(6), demonstrated that the staff at ATCO's call centre were adequately trained and experienced to capture job information, customer information and establish planning for the requested job by the customer.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation.</p>
		Priority 4	Control Adequacy: A Compliance Rating: 1

4. DETAILED FINDINGS (CONT.)

4.4 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Cont.)

No.	Obligation Reference	Obligation Description	Observations and Findings
15 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Compendium) (Cont.)			
Information & Communication (Cont.)			
245	Energy Coordination Act section 11M	A retailer and distributor must, to the extent practicable, ensure that any written information that must be given to a customer by the retailer, distributor or gas marketing agent under the Gas Marketing Code and the Compendium is expressed in clear, simple and concise language and is in a format that makes it easy to understand.	Discussions with the Manager Risk & Compliance established that a quality check is conducted by the Communications Team to ensure information is written in a clear, simple and concise manner prior to being communicated with the customers. ATCO's requirements regarding the communication with customers are outlined on a guideline. Reviewing customers' communications evidence and information available on ATCO Website indicate that they were written in simple and concise manner. Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation.
		Priority 5	Control Adequacy: A Compliance Rating: 1
247	Energy Coordination Act section 11M	A distributor must advise a customer on request how the customer can obtain a copy of the Compendium; and make a copy of the Compendium available on the distributor's website.	Discussions with the Manager Risk & Compliance revealed that the compendium is readily available at no cost on ATCO Website under the Regulation menu. Employees in the Call Centre and Reception are adequately trained to handle customers' requests and provide them a copy of the Compendium. Additionally, on the job training and the training system, called Safetrac (https://www.safetrac.com.au/), contains modules that train the employee for such situations. Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation.
		Priority 4	Control Adequacy: A Compliance Rating: 1

4. DETAILED FINDINGS (CONT.)

4.4 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Cont.)

No.	Obligation Reference	Obligation Description	Observations and Findings
15 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Compendium) (Cont.)			
Information & Communication (Cont.)			
249	Energy Coordination Act section 11M	<p>A retailer and distributor must make available to a residential customer on request, at no charge, services that assist the residential customer in interpreting information provided by the retailer or distributor (including independent multi-lingual and TTY services, and large print copies).</p>	<p>Discussions with the Manager Risk & Compliance confirmed that ATCO provides TeleType (TTY) and multilingual services to customers at no cost. The contact details are provided on the invoice document and the Customer Service area of the website. This was confirmed through reviewing the invoice template and the Customer Service area of the website.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation.</p>
		<p>Priority: 4</p> <p>Control Adequacy: A</p> <p>Compliance: 1</p>	
250	Energy Coordination Act section 11M	<p>A retailer and, if appropriate, a distributor must include on a residential customer's bill and bill related information, reminder notice and disconnection warning the telephone numbers for:</p> <ul style="list-style-type: none"> its TTY services; independent multi-lingual services; and interpreter services with the National Interpreter Symbol 	<p>Discussions with the Manager Risk & Compliance revealed that ATCO's template for invoicing is an automated process and invoices, reminder notices and disconnection warnings are pre-filled with TTY and Interpreter Services information contact details consistently.</p> <p>A review of an invoice template used by ATCO confirmed that the TTY, multi-lingual and interpreter contact details are consistently listed on the top right corner of each invoice.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation.</p>
		<p>Priority 4</p> <p>Control Adequacy: A</p> <p>Compliance Rating: 1</p>	

4. DETAILED FINDINGS (CONT.)

4.4 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Cont.)

No.	Obligation Reference	Obligation Description	Observations and Findings
15 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Compendium) (Cont.)			
Complaints & Dispute Resolution			
251	Energy Coordination Act section 11M	A retailer and distributor must develop, maintain and implement an internal process for handling complaints and resolving disputes.	<p>Discussions with the Customer Relations Team Leader revealed that ATCO has an established internal process for complaints handling which is maintained and reviewed. This is outlined as a four-tiered approach, with the responsibilities for each tier outlined in detail and how this should reflect in their systems.</p> <p>A review of the Complaints Handling Procedure was conducted and confirmed the procedural document established internal process for handling complaints.</p> <p>Based on our audit procedures we have concluded that there are generally adequate controls in place to support compliance with this licence obligation. However, controls could be further improved as per the recommendation provided for Obligation 255 to comply with this requirement.</p>
		Priority 4	Control Adequacy: B Compliance Rating: 1

4. DETAILED FINDINGS (CONT.)

4.4 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Cont.)

No.	Obligation Reference	Obligation Description	Observation and Findings
15 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Compendium) (Cont.)			
Complaints & Dispute Resolution (Cont.)			
252	Energy Coordination Act section 11M	<p>The complaints handling process under clause 12.1(1) must comply with AS/NZS 10002:2014 and address, at the least, the criteria specified in subclauses 12.1(2)(b)-(c).</p> <p>The complaints handling process must be available at no cost to customers.</p>	<p>Discussions with the Customer Relations Team Leader revealed that an internal complaints handling process has been established and actively maintained. Review of the Complaints Handling Procedure manual noted a section which mentions it's development in accordance with AS/NZS 10002:2014. While not stated, the general governing principles of the standard are met within the manual. The procedure explicitly states the requirements of Compendium clause 12.1. The document was also reviewed by a Risk and Compliance Advisor.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation.</p>
		Priority 4	Control Adequacy: A Compliance Rating: 1

4. DETAILED FINDINGS (CONT.)

4.4 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Cont.)

No.	Obligation Reference	Obligation Description	Observation and Findings
15 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Compendium) (Cont.)			
Complaints & Dispute Resolution (Cont.)			
254	Compendium clause 12.1(3)(a)	<p>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><i>Note: this obligation was non-compliant and reported to ERA in FY20-21</i></p>	<p>Non-Compliant</p> <p>Discussions with the Customer Relations Team Leader and Manager Risk & Compliance revealed that ATCO predominantly utilises automated email responses when a complaint is received. This email notes that a customer may escalate their complaint to a senior employee should they be dissatisfied with the current handling of a complaint. Beyond this, there are also scripts and email templates for correspondence with complainants, which are all required to be documented in Salesforce, their Customer Relationship Management (CRM) system. The call scripts and email templates require for the customer to be informed that their complaint heard by a senior employee in the event they are dissatisfied with ATCO's handling of the complaint. Scripting and templated responses are contained within the Complaints Handling Process and can be accessed at any time by the Complaints team.</p> <p>ATCO has two self-reported non-compliance events within the audit period where a total of eighteen (18) instances occurred where the escalation advice was not provided to the customer.</p> <p>17 instances occurred in the 2020-2021 period, as the process of upgrading the CRM system resulted in 17 customers not receiving the standard disclosure of their right to escalate their complaint to a senior employee.</p> <p>In the 2019-2020 period, there was one (1) instance where ATCO did not correctly identify the customer's reinstatement issue as a complaint which resulted in the escalation advice not being provided at the time of response. However this was subsequently provided once correctly classified as a complaint.</p> <p>Additionally, sample-based testing of 45 complaints recorded within the audit period revealed all interactions with the customer are communicated through a templated email out as an initial response to the complaint, which contains a statement referring the customer to a senior employee should they not be satisfied with the current representative. As noted in 04/2019 in Section 2.5, ATCO have since implemented an automated control in place in 2021 for adherence with this obligation.</p> <p>Based on the above, we determined ATCO to be non-compliant with this obligation. However, no recommendation was provided for this obligation as the self-reported non-compliances were occurred as a result of Salesforce upgrading process, and no non-compliance instances were noted during our substantive testing procedures.</p>
		Priority 2	Control Adequacy: A Compliance Rating: 2

4. DETAILED FINDINGS (CONT.)

4.4 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Cont.)

No.	Obligation Reference	Obligation Description	Observation and Findings
15 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Compendium) (Cont.)			
Complaints & Dispute Resolution (Cont.)			
255	Compendium clause 12.1(3)(b)	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>Non-Compliant</p> <p>Discussions with the Customer Relations Team Leader and Manager Risk & Compliance revealed that ATCO have devised an escalation process consisting of four tiers to which in the instance where a customer is not satisfied with the response of the designated Customer Service Representative (CSR) and makes it apparent to ATCO (i.e. responds to their email or call), the complaint is then escalated to the next tier. This can then be escalated once more before the complaints team provides details to the Energy and Water Ombudsman. This complaints process is outlined within the Complaints Handling Procedures. ATCO utilises email templates and call scripting to refer the customer to the Complaints Handling Process, and the Energy & Water Ombudsman contact details.</p> <p>ATCO has self-reported one breach in the 2022 reporting period, where the customer was not advised of the right to raise the complaint with the Energy & Water Ombudsman and the relevant contact details was not provided to the customer. We conducted sample-based testing of 45 complaints recorded within the audit period and identified two (2) additional instances where the customer was not advised of further escalation to Ombudsmen option after having their complaint/claim for reimbursement rejected.</p> <p>Based on discussions held and sample-based testing, we determine ATCO was not compliant with this obligation</p> <p>Recommendation 02/2022: We recommend that ATCO review their internal policies and procedures to amend them to ensure that when a customer's complaint has been rejected, avenues for escalation internally or the ombudsman's contact details are provided to the customers when a complaint is rejected by ATCO. This procedure could be supported through the use of an automatic action or prompt when customer service team members are responding to client complaints</p> <p>Training on the requirements of the appropriate response to customer complaints, resolution and rejection should be scheduled once the new procedures are created, or sooner if there is a long lead-time on the resolution of a new approach.</p>
		Priority 2	Control Adequacy: B Compliance Rating: 2

4. DETAILED FINDINGS (CONT.)

4.4 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Cont.)

No.	Obligation Reference	Obligation Description	Observations and Findings
15 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Compendium) (Cont.)			
Complaints & Dispute Resolution (Cont.)			
255A	Compendium clause 12.1(4)	A retailer or distributor must, on receipt of a written complaint by a customer, acknowledge the complaint within 10 business days and respond to the complaint within 20 business days.	<p>Non-Compliant</p> <p>Discussions with the Customer Relations Team Leader and Manager Risk & Compliance revealed that complaints are attended to as soon as they are received by the team (within working hours).</p> <p>This is maintained through Salesforce, a Customer Relationship Management System (CRM), where an automated emails are sent once an email has been receipted. Should a customer call ATCO, they are sent to the call centre who will then open a complaint case in Salesforce and forward it to the Complaints handling team, who will follow up accordingly. A dashboard is developed for the active tracking of cases. The system also allows for internal notes to be maintained while the case is undergoing internal investigations.</p> <p>ATCO has three self-reported breaches within the audit period where, a total of twenty-three (23) complaints were not responded to within the required timeframes (10 and 20 business days). The noted incidents were due to human error in the classification and communication of complaints or system changes, not a breakdown of controls.</p> <p>In the 2021-2022 period two (2) complaints were due to an administrative error and internal miscommunication respectively. Both instances were the source of a communication and administrative error, involving the Gas inspections Team and Market Services Team reporting complaints to Customer Relations from a customer and retailer respectively.</p> <p>In the 2020-2021 period, seventeen (17) of these were due to the Salesforce system upgrade, where the automated acknowledgement system function was temporarily deactivated. Two (2) additional instances in this period were complaints that were a miscommunication from retailers. In response to these breaches ATCO have revised the complaints submission process, so that all complaints are submitted through Salesforce.</p> <p>In the 2019-2020 period, there were two (2) instances that were identified. The first instance involved a complaint referred to a contractor who took longer than 20 business days to respond, ATCO also did not adequately follow up with the contractor, resulting in the delay. The Salesforce (CRM) now actively prevents this issue with automated reminders and tracking for complaints. The second instance was the result of an investigation of a complaint taking longer than anticipated, however the customer was advised of the delays.</p> <p>Our sample-based testing of 45 complaints recorded within the audit period did not identify any further exceptions where the customer did not receive a response from ATCO within 20 business days of receipt of the complaint.</p> <p>Based on discussions held and sample-based testing, we determine ATCO is non-compliant with this obligation.</p> <p>Recommendation 05/2022: We recommend that ATCO consider implementing awareness programs across the divisions on the handling and reporting of complaints, including intranet and email reminders.</p>
		Priority 2	Control Adequacy: B Compliance Rating: 2

4. DETAILED FINDINGS (CONT.)

4.4 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Cont.)

No.	Obligation Reference	Obligation Description	Observations and Findings
15 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Compendium) (Cont.)			
Complaints & Dispute Resolution (Cont.)			
257	Compendium clause 12.3	A retailer, distributor and gas marketing agent must give a customer on request, at no charge, information that will assist the customer in utilising the respective complaints handling processes.	<p>Discussions with the Customer Relations Team Leader revealed that ATCO has an established internal process for complaints handling. Call Centre Representatives are made aware of their obligations to assist customers and provide information to customers in the process. Scripting provided by the Customer Relations Team Leader revealed that call centre staff are guided by scripts when ascertaining information from calls.</p> <p>A review of the Compliance Handling Procedure confirmed that the notion of providing information free of charge had been explicitly stated in the document. Further observation of 5 calls demonstrated that representatives understood the provision of information on request at no charge. A review of ATCO's website also confirmed that information to raise a complaint at no cost is visible and accessible.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation</p>
		Priority: 4	Control Adequacy: A Compliance Rating: 1

4. DETAILED FINDINGS (CONT.)

4.4 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Cont.)

No.	Obligation Reference	Obligation Description	Observations and Findings
15 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Compendium) (Cont.)			
Complaints & Dispute Resolution (Cont.)			
258	Compendium clause 12.4	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>Discussions with the Customer Relations Team Leader and Manager Risk & Compliance explained that staff are trained and knowledgeable of the Complaints Handling Procedure and is their responsibility handle complaints accordingly. The Complaints Handling Procedure was reviewed and illustrated that when a complaint does not relate to the functions of ATCO, staff are required to direct customers to the appropriate entity.</p> <p>Sample based testing of 45 complaints recorded within the audit period revealed no instances of non-compliance with this obligation.</p> <p>Based on the above, we determined ATCO to be compliant with this obligation.</p>
		Priority: 2	Control Adequacy: A Compliance Rating: 1

4. DETAILED FINDINGS (CONT.)

4.4 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Cont.)

No.	Obligation Reference	Obligation Description	Observations and Findings	
15 Licence Compliance Requirements - Compendium of Gas Customer Licence Obligations (Compendium) (Cont.)				
Record Keeping & Reporting				
281	Compendium clause 13.1	A retailer and a distributor must prepare a report in respect of each reporting year setting out the information specified by the ERA.	<p>Discussions with the Manager Risk & Compliance confirmed that ATCO has a Master Obligation spreadsheet in place to manage compliance with the obligation.</p> <p>Review of performance reports and datasheets submitted in the period revealed that information has been set out in accordance with the information specified by the ERA.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation.</p>	
		Priority 4	Control Adequacy: A	Compliance Rating: 1
282	Compendium clause 13.2	A report referred to in clause 13.1 must be provided to the ERA by the date, and in the manner and form, specified by the ERA.	<p>Discussion with the Manager Risk & Compliance revealed ATCO prepares a workplan, risk and compliance workplan, details out all the tasks and compliance commitments for the year. Also, review of the reports issued to the ERA in the audit period demonstrated that ATCO has complied with the information requests from the ERA in regard to preparing the required reports and datasheets in the correct date, manner and form.</p> <p>ATCO utilises report templates and datasheets accessible on the ERA website. Review of correspondence between ATCO and the ERA confirmed that the reports were compliant with the required formats and specifications.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation.</p>	
		Priority 4	Control Adequacy: A	Compliance Rating: 1
283	Compendium clause 13.3	A report referred to in clause 13.1 must be published by the date specified by the ERA.	<p>Discussion with the Manager Risk & Compliance and Senior Technical Manager revealed that reports are to be submitted within 7 days of the ERA's request. A review of correspondence between the two parties highlighted that this timeframe was adhered to. Reviewing the supporting evidence confirmed that ATCO submitted the report onto their website within 7 days of the deadline given and communicated to ERA once completed.</p> <p>Based on our audit procedures we have concluded that there are adequate and effective controls in place to support compliance with this licence obligation.</p>	
		Priority 4	Control Adequacy: A	Compliance Rating: 1

APPENDIX A - REFERENCES

ATCO Personnel participating in the Performance Audit

Title	Name
Manager Risk & Compliance	Fabian D'Mello
Manager Commercial Operations	Joe Sanches
Manager Gas Inspection	Jaga Namebeley
Manager Technical Compliance	Stuart Jobling
Risk & Compliance Advisor	Michael Beer
Land Management Coordinator	Chris Crowson
Manager Network Control	Ann Chong
Supervisor Control Room	Read Louw
Customer Relations Team Leader	James Pentecost
Planning Coordinator	Max Willmot
Manager Planning & Contact Centre	Shelene Richards
Senior Gas Distribution Inspector	David Dyer

APPENDIX A – REFERENCES (CONT.)

Key Documents Reviewed

Please note this list is not exhaustive:

- Approval of Auditor Letter
- ATCO Asset Management System (AMS) Review Plan
- AGA COM PR02-WI12 Curtailment
- Emergency Response Management Plan
- ATCO Gas Australia Gas Distribution System Safety Case
- ATCO Gas Australia Asset Management System Review Report prepared between 1 Jul 2019 to 30 June 2022.
- Audit Plan – Compliance Calendar for 1 Jul 2019 to 30 June 2022
- Acknowledgement letter- AMS for 1 Jul 2019 to 30 June 2022
- ATCO Management of Change
- Draft report to ERA AGA Asset Management System Review Report
- Approval of Review Plan – AMS Review ATCO Gas Pty Ltd for 1 Jul 2019 to 30 June 2022
- Asset Lifecycle Strategy – Asset Management Plan
- Springboard invoice Template change (The latest version)
- ATCO Gas Australia Financial report – 2019,2020,2021
- Organisational Chart – Finance
- Incident Escalation Process Map
- Call Centre Scripting Sheet
- Call Centre Quick Reference Guide
- Gas Supply System Emergency
- Gas Meter Box Location Handbook
- Site Inspection Leak Repairs list performed between 1 Jul 2019 to 30 June 2022
- Connection Process Handbook
- Identification and uniform policy
- Disconnection Process Map and/ or Handbook
- ATCO's Membership to a Retail Market Scheme and the associated documents
- Performance Report to ERA submitted between 1 Jul 2019 to 30 June 2022
- 2019, 2020, 2021 & 2022 (DRAFT) Gas Distribution Licence Performance Reporting Handbook
- Preparation and Submission of Annual Performance Report and Individual reporting standards
- 2019, 2020, 2021 & 2022 (DRAFT) Gas Distribution Licence Performance Reporting Datasheets
- ERA approval of auditor 2022 and 2020
- Complaints Handling Procedure
- Complaints Policy
- Complaints Framework
- Lodgement of Easements
- AGA ENG PR03 Acquisition of Land
- INS PL00001 Inspection Policy Statement & Plan
- AGA R&R PR25 Class G Installation Inspections
- ATCO Gas Australia Inspection Plan – Quarterly Reports between 1 Jul 2019 to 30 June 2022
- ATCO PL00005 AGA Gas Distribution System Safety Case
- AGA R&R PR04 Technical Compliance Audit Procedure
- ATCO Risk Register
- ATCO Master Obligation Register
- ATCO Compliance Reports between 1 Jul 2019 to 30 June 2022
- AA-HSE-PR20 Incident Reporting Investigation Procedure
- AGA-O&M-PR34 Fault Standard & SAP Priority Information
- AGA-O&M-WI33 Call Centre Work Instruction
- TCO PR0003 Notifiable Incident Reporting
- 08. Letter to licensee - 2020 asset management system review - ATCO Gas Australia Pty Ltd - GDL008
- 08. Notice - 2020 asset management system review - ATCO Gas Australia Pty Ltd - GDL008
- 10. 71-60660 - ATCO AMS Review Report - Second Draft Issued to AGA 3 Apr 2020
- AGA-S&P-PL01_Strategic_Asset_Management_Plan
- Approval of review plan - 2020 review - ATCO Gas Australia Pty Ltd - GDL008
- ATCO_letter_AMS_change_2017
- Final review plan - ATCO Gas Pty Ltd - GTL008_Rev2 – 2020

- Letter to licensee - 2020 asset management system review - ATCO Gas Australia Pty Ltd - GDL008
- Notice - 2020 asset management system review - ATCO Gas Australia Pty Ltd - GDL008
- TCO_PL00001_Emergency_Response_Management_Plan
- Signed letter to licensee - 2019 Performance Audit - GDL008 - ATCO Gas Australia Pty Ltd
- 01. Approval of auditor nomination - 2022 audit - GDL008 - ATCO Gas Australia Pty Ltd
- 35. Signed_letter_to_licensee_-_2019_Performance_Audit_-_GDL008_-_ATCO_Gas_Australia_Pty_Ltd (1) (1)
- Grant Thornton 2016 GLD Audit
- Signed letter to licensee - 2019 Performance Audit - GDL008 - ATCO Gas Australia Pty Ltd
- 17. CAF Contract_Approval_Form_EPPS_-_1_Wicks_St_Contract_of_Sale
- 17.FW_ RMS Audit - Land Purchase
- Application for Registration in the WA Retail Gas Market (2)
- WA Gas Retail Market Agreement v30 (2)
- Gas retail market in Western Australia
- 18. WAGRMA_Atco_(fully_signed)
- 20220401 NMIS Access for March 2022
- DRAFT GRCF Meeting 146 - Meeting Minutes - 28 October 2021
- Draft GRCF meeting minutes for 28 October meeting
- Draft GRCF meeting minutes for 29 March 2022 meeting
- GRCF Meeting 147 - Meeting Minutes - 29 March 2022
- GRCF Meeting 148 - Meeting Minutes - 21 June 2022
- RE GRCF agenda and meeting pack for Tuesday 21 June meeting - late paper for June meeting
- ATCO AEMO Audit Report 2022 FINAL
- Decision-on-gas-retail-market-scheme-Proposals-IN003-20W-IN002-15W-IN009-19W-and-IN010-20W---redacted-for-publishing
- Gg2021_088
- AGA-R&R-PL01 Emergency Response Management Plan
- AGA-R&R-PL01-FM04 Emergency and Operational Contacts
- ATCO WFMS L3 AS-IS Processes - Manage Faults & Emergencies v.02
- Control Room 100% KPI on attending emergency notifications
- eSafe Emergency Management Team Meetings called for priority 1 emergency notifications 2020-2022
- 2022-00265 - Mr Outman Maqdouf – ATCO
- Invoice INV-1223
- ATCO ombudsman
- PL00005 AGA Gas Distribution System Safety Case
- Inspection Plan Audits 2019, 2020, 2021
- Safety Case Audits 2019, 2020, 2021
- DES Approval 14 December 2021 ATCO Inspection Policy Statement and Plan Revision 7 B&E G2020-67070 (A41218865)
- DES Approval 17 July 2019 Inspection Plan Revision 6 ES G2018-5495 (A28135726)
- Action detail sheet. Inspection audit plan and Ex GDS SC audit.
- AGA-R&R-PL11 ATCO Inspection Policy Statement and Plan Rev 7
- HS30 Munster Gas Composition Feb 22
- Inspection Plan Quarterly Reports 2019, 2020,2021,2022
- RE ATCO Inspection Policy Statement Plan - Request for Suspension
- AGA-R&R-PL11 ATCO Inspection Policy Statement and Plan Rev 7
- AGA-R&R-PL11 ATCO Inspection Policy Statement and Plan Revision 6 (1)
- Class G Form_update for Rev 7 IPSP
- TCO PL00005 AGA Gas Distribution System Safety Case
- AGA-COM-PR02-WI12 Curtailment
- Approval of auditor - 2020 review - ATCO Gas Australia Pty Ltd - GDL008
- ATCO_Audit_Plan_Performance_Audit_2019_-_UPD_-_2 (2)
- Approval of audit plan - 2022 performance audit - GDL008 - ATCO Gas Australia
- Approval of auditor - 2020 review - ATCO Gas Australia Pty Ltd - GDL008
- Signed letter to licensee - 2019 Performance Audit - GDL008 - ATCO Gas Australia Pty Ltd
- RE Annual gas licence compliance and performance(2) reporting obligations - 201920 reporting year

- RE Annual gas licence compliance and performance reporting obligations - 2019/20 reporting year
- FW Acknowledgement - 2019 Annual Compliance Report - GDL8 - ATCO Gas Australia Pty Ltd
- ATCO Gas GDL8 2021 Compliance Report
- ATCO Gas Australia 2019 Compliance Report
- Acknowledgement - 2020 Annual Compliance Report - GDL8 - ATCO Gas Australia Pty Ltd
- ATCO Gas GDL8 2022 Compliance Report
- RE ATCO 2019 Performance report – signed
- AGALP Annual Financial report for the YE 31 Dec 2020
- AGALP Annual Financial report for the YE 31 Dec 2021_signed
- AGALP Annual FS 31 Dec 2019 Final Signed
- AGALP Financial Information for the YE 31 Dec 2020 – Signed
- AGALP Reg Annual FS 31 Dec 2019 signed
- Appendix D MOE DRAFT
- ATCO Organisational Structure
- Annual Compliance Reports 2019, 2020, 2021
- Annual Performance Reports 2019,2020, 2021
- ATCO_Annual_Performance_Report.msg 2018 - 2019 (1)
- ATCO_Annual_Performance_Report.msg 2018 – 2019
- FW__Annual_gas_licence_compliance_and_performance_reporting_obligations_-_2020_21_reporting_year (1)
- RE Annual gas licence compliance and performance reporting obligations - 2019 20 reporting year (1)
- ECA 17 Odorant Analysis and BV reports Apr 2020 - MeteringDataManagement - 05_05_2020 11 45 AM
- ECA 17 Odorant Analysis and BV reports Aug 19 - MeteringDataManagement - 06_09_2019 11 31 AM
- ECA 17 Odorant Analysis and BV reports November 2019 - MeteringDataManagement - 05_12_2019 12 49 PM
- AGA-A&C-MA01 Connection Process Handbook (2)
- AGA-R&R-PL01-WI03 After Hours Call Out Roster
- Control Room Roster TEAMS_2018-2026
- ATCO Fault Line 24 hours Coverage & Emergency Comms
- Weekly Control Room Bulletin 04.06.2022
- Clean-copy-amended-Gas-Compendium---November-2019---to-take-effect-from-1-Jan-2020
- Customer invoice example
- AGA-O&M-PR31 Complaints Handling Procedure
- AGA-O&M-PR31 Complaints Handling Procedure
- Publication of 2020-2021 Annual Performance Report to ATCO website
- ATCO Gas GDL8 2021 Compliance Report

APPENDIX B – WORK SCHEDULE

RSM Staff

RSM Staff who were involved in the Performance Audit include:

- Pippa Hobson, Engagement Partner
- Tim Pittaway, Engagement Quality Review Partner
- Akshi Singh, Manager
- Elnaz Vafaei, Assistant Manager
- Lara Smith, Consultant
- Shyam Kumar, Consultant

Resumes for the RSM staff were outlined in the proposal accepted by ATCO and the Auditors Approval Submission document presented to the ERA.

Timeframe and Work Schedule

The planning and risk assessment phases of the Performance Audit were completed in May and June 2022, after which the draft Audit Plan and risk assessment was presented to ATCO for comment prior to submission to the ERA for review and approval. The Final Audit Plan was approved by the ERA on 30 June 2022.

Fieldwork and detailed compliance testing were undertaken through face-to-face meetings with ATCO's staff and the use of an online sharefile and video conferencing tools during the months of July and August 2022. This enabled a draft report to be submitted to ATCO by the extended due date of 24 August 2022.

In summary, the time allocated per team member was as follows:

Task	RSM Personnel	Total Hours
Planning & Commencement 9 May- 24 June 2022	<ul style="list-style-type: none"> ▪ Pippa Hobson (Partner) ▪ Tim Pittaway (QA Partner) ▪ Akshi Singh (Manager) ▪ Elnaz Vafaei (Audit Senior) ▪ Lara Smith (Consultant) ▪ Shyam Kumar (Consultant) 	57
Walkthroughs & Fieldwork 1 July – 29 July 2022	<ul style="list-style-type: none"> ▪ Pippa Hobson (Partner) ▪ Tim Pittaway (QA Partner) ▪ Akshi Singh (Manager) ▪ Elnaz Vafaei (Audit Senior) ▪ Lara Smith (Consultant) ▪ Shyam Kumar (Consultant) 	223
Completion & Reporting 1 Aug- 19 Aug 2022	<ul style="list-style-type: none"> ▪ Pippa Hobson (Partner) ▪ Tim Pittaway (QA Partner) ▪ Akshi Singh (Manager) ▪ Elnaz Vafaei (Audit Senior) ▪ Lara Smith (Consultant) ▪ Shyam Kumar (Consultant) 	65

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