

## 2019 – 2022 GDL8 PERFORMANCE AUDIT - POST AUDIT IMPLEMENTATION PLAN

Recommendation Reference	Non-compliance/ Controls improvement	Auditor's recommendation	Action proposed to be taken by the licensee	Responsible Person(s)	Target completion date
01/2022	<p><b>B2</b></p> <p><b>230 Distribution Licence clause 2.1 and Schedule 2 Compendium clauses 8.2(1) -(3)</b></p> <p><b>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.</b></p> <p><b>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.</b></p> <p><b>Where reconnection requires excavation, the distributor must reconnect the customer's supply address within 10 business days of receipt of the request to reconnect.</b></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</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>The R40 Schema project completed in November 2021 introduced unique service codes in NMIS and SAP to identify TAC LOCK activities, removing the risk of this activity being incorrectly treated as a disconnect/reconnect at main (10 business day response time).</p> <p>It should be noted that for disconnections completed prior to November 2021, where a TAC LOCK was applied under a disconnect at main job type a corresponding reinstate at main service request must be issued which carries a 10 business day timeframe.</p> <p>A manual process of reviewing the disconnection SAP reference will be required to determine how the reconnection should be treated.</p> <p>Where the reconnection request occurs after 1pm ATCO apply a 2 business day reconnection KPI from the commencement of the following business day. This arrangement is agreed with ATCO and the Retailers and ensures scheduling of reconnections aligns with full business days and operational availability.</p>	General Manager Network Operations	31/01/2023

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	<p>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 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</p>				

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	<p>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>				
02/2022	<p><b>B2</b>  <b>255 Trading Licence clause 2.1 and Schedule 2 Distribution Licence clause 2.1 and Schedule 2 Compendium clause 12.1(3)(b)</b>  <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 Freecall telephone number of the gas ombudsman.</b></p> <p>Discussions with the Customer Relations Team Leader and Manager Risk &amp; 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</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</p>	<p>Customer Relations Consultants to utilise standard footer to all customer emails re-advicing customers of right to escalate to senior employee.</p> <p>Customer Relations Team Leader to include standard footer advising Ombudsman's contact details to all final close out emails for escalated cases where customer has not confirmed satisfactory resolution.</p> <p>Refresher training last held November 2021, due November 2022</p>	GM BD & Customer Relations	30/11/2022

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	<p>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 &amp; 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 &amp; 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>procedures are created, or sooner if there is a long lead-time on the resolution of a new approach.</p>			
03/2022	<p><b>B2</b> <b>227 Distribution Licence cl 21.1 Trading Licence cl 23.1</b> <b>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.</b></p> <p>Discussions with the Manager Commercial Operations, Manager Network Control, Planning Manager and Manager Risk &amp; Compliance</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>Automating the current manual process of removing this activity from the Field Mobility Device preventing field staff from completing disconnections within the block out periods.</p> <p>Scoping of the project to be completed by December 2022 with project schedule currently aligned to December 2023 completion.</p>	General Manager Network Operations	31/12/2023

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	<p>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>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>			

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04/2022	<p><b>B2</b>  <b>230B Trading Licence clause 2.1 and Schedule 2 Distribution Licence clause 2.1 and Schedule 2 Compendium clause 12.1(4)</b>  <b>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.</b></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</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>	<p>Risk &amp; Compliance to continue the periodic Tool box reminder of process for reporting illegal tampering through to ATCO's Control Room who populate and distribute the communication template to relevant internal stakeholders.</p> <p>Control Room send out regular reminders to internal stakeholders reminding them of the importance of notifying retailers in a timely manner. A dedicated email template has been developed for this purpose and is used. This process will be added to the Control Room's formal work instructions by the end of the year.</p> <p>The Tool box reminder will now incorporate a reminder of process undertaken by Market Services for advising retailers of tampering and/or unauthorised gas usage. Manager Commercial Operations will further re-iterate this requirement to Market Services, as and when required.</p>	General Manager Network Operations	31/12/2022

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	<p>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>				
05/2022	<p><b>B2</b>  <b>255A Trading Licence clause 2.1 and Schedule 2</b>  <b>Distribution Licence clause 2.1 and Schedule 2</b>  <b>Compendium clause 12.1(4)</b>  <b>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.</b></p> <p>Discussions with the Customer Relations Team Leader and Manager Risk &amp; 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</p>	<p>We recommend that ATCO consider periodic trainings for relevant staff on handling and reporting complaints, with an emphasis of capturing the correct details within the system.</p>	<p>Annual complaints refresher training for all customer facing staff.</p> <p>New procedure in place for auto complaint case creation to minimise opportunity for human error.</p> <p>New Customer Relations mailbox procedure implemented to minimise human error, in addition to weekly checks performed.</p> <p>Weekly checks also implemented for complaints sent as service orders in NMIS only.</p> <p>Salesforce update now includes acknowledgement emails within case notes for visual confirmation acknowledgement email sent.</p>	GM BD & Customer Relations	Completed

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	<p>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 involved the Customer Relations Team's retrieval and classification of complaints.</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</p>				



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	<p>(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>				